



# South Downs Local Plan

Sustainability Appraisal Adoption Statement

July 2019

### Quality information

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# 1. Introduction

## Background

- 1.1 The South Downs National Park Authority has recently prepared the first Local Plan for the National Park. The Local Plan, which covers 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 contains planning policies designed to help deliver the statutory National Park purposes and duty, and has been prepared 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.
- 1.2 The South Downs Local Plan was submitted to the Government for examination by an appointed Planning Inspector in April 2018. Examination hearings were held in November and December 2018, subsequent to which the National Park Authority held a consultation on Main Modifications (to the submitted plan) for a six week period ending on 28<sup>th</sup> March 2019.
- 1.3 The Inspector published a report into the Local Plan's legal compliance and soundness on 18<sup>th</sup> June 2019 and concluded that the Plan is legally compliant and sound. The Local Plan is recommended for adoption at a Full Authority meeting on 2<sup>nd</sup> July 2019.
- 1.4 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making, led by consultants AECOM (from 2014 onwards; with the scoping stage of the SA having been led by the National Park Authority). SA is a mechanism for assessing and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view to achieving sustainable development.

## SA explained

- 1.5 SA assesses 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 towards sustainable development.
- 1.6 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 also include social and economic issues.

## This SA Adoption Statement

- 1.7 Regulation 16 of the SEA Regulations sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency.
- 1.8 In addition Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the final SA Report alongside the Adopted Local Plan.

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

1.9 In the context of the requirements of the SEA Regulations, this SA Adoption Statement for the South Downs Local Plan must explain:

- How environmental (and sustainability) considerations have been integrated into the Local Plan.
- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account.
- The measures that are to be taken to monitor the significant effects identified for the Local Plan.

1.10 In association with the above requirements, the SA Adoption Statement is structured as follows:

- **Chapter 2** of this SA Adoption Statement presents the narrative for plan making and the accompanying SA process to date. This incorporates a description of the elements required by the first three bullet points above
- **Chapter 3** describes how consultation responses have been taken into account through the Local Plan/SA process
- **Chapter 4** presents the monitoring programme for the SA.

## 2. How the SA process has informed and influenced the development of the Local Plan

### Overview of Local Plan development/SA since 2013

- 2.1 Preparation of the South Downs Local Plan began in 2013. The SA process has informed and influenced the Local Plan throughout its development. Reflecting this, six main SA documents have been prepared to accompany key points in plan development, all of which have supported consultation and decision making at the relevant stage.
- 2.2 **Figure 2.1** below summarises the key documents which have been prepared for the Local Plan and accompanying SA process to date.

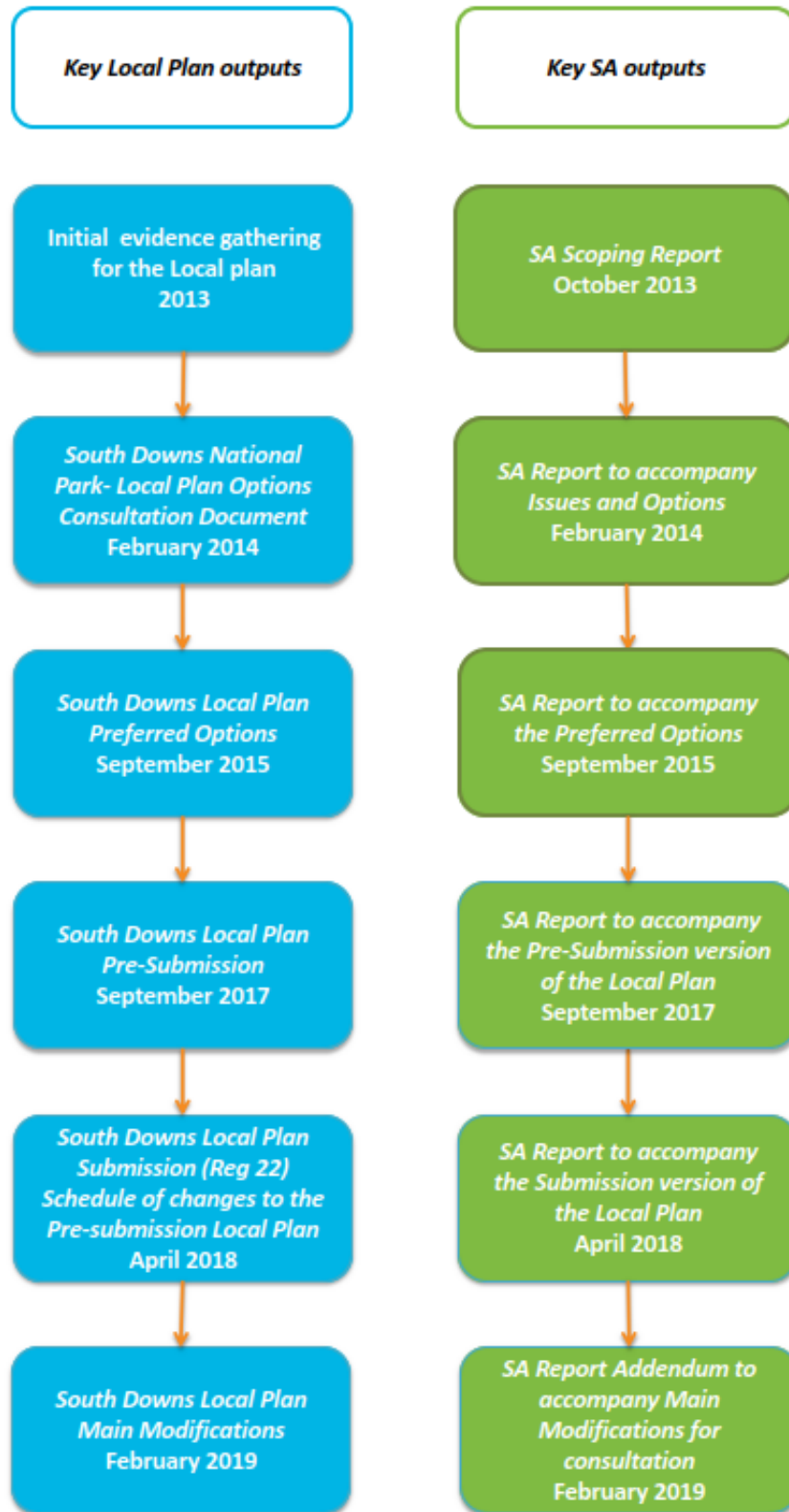


Figure 2.1: Key outputs of the South Downs Local Plan and accompanying SA process



## Appraisal of reasonable alternatives for the Local Plan

- 2.3 A key element of how the SA process has informed and influenced the development of the Local Plan is how the SA has informed the consideration of reasonable alternatives, including the preferred spatial strategy for the plan.
- 2.4 The following sections therefore describe how the SA process to date has informed the preferred strategy for the South Downs National Park and potential locations for proposed development. Specifically, these sections explain how the Local Plan's development policies and spatial strategy have been developed in terms of:
- SA of alternative policy approaches for the Local Plan;
  - SA of alternative development strategies for the Local Plan;
  - SA of alternative options for the Shoreham Cement Works site; and
  - SA of alternative approaches to delivering affordable housing through the Local Plan.

## Consideration of reasonable alternatives for policy approaches

- 2.5 The *Options Consultation Document* presented a discussion of 55 'issues' for focus at that stage in plan development. These issues were discussed under eight themes, including
- Landscape and Natural Resources
  - Historic Environment
  - Design
  - Settlement Strategy
  - Housing
  - Economy and Tourism
  - Community Facilities and Infrastructure
  - Transport and Accessibility
- 2.6 For each of the 55 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 Local Plan policies could take on various key planning issues.
- 2.7 The *Options Consultation Document* was accompanied by the Options SA Report (February 2014). 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 for the Local Plan. Through this approach the SA appraised reasonable alternatives for a range of potential policy approaches for the Local Plan.

## Consideration of reasonable alternatives for development strategies

### Appraisal of alternative spatial strategies

- 2.8 A key element of the Local Plan's development process 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.
- 2.9 A central element of the Options Consultation stage and the accompanying SA process was to inform the development of spatial options for the Local Plan to allow coherent development strategies to emerge.
- 2.10 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>2</sup>
- 2.11 These development strategy options were generated with the aim of testing different growth scenarios that emerged from the Strategic Housing Market Assessment (SHMA) and from land supply availability as set out in the Strategic Housing Land Availability Assessment (SHLAA), both of which were specifically commissioned to inform the Local Plan.
- 2.12 The development strategy options were based on the two following variables:
- Different levels of housing delivery ranging from 255 homes per annum to 450 homes per annum
  - Different distributions of development in the National Park (including: the five larger settlements in the National Park namely, Petersfield, Lewes, Midhurst, Liss and Petworth; smaller settlements; and strategic sites).
- 2.13 For each of the options considered, hypothetical housing numbers (in addition to existing permissions and windfall allowances) were presented by settlement (and in some cases including strategic sites) in order to allow the appraisal to take place. This was undertaken solely for the purposes of testing reasonable alternatives for the Local Plan, and the distributions were based upon apportioning housing in accordance with the various emerging strategies and noting provisional findings of the SHLAA.
- 2.14 The five development strategy options considered were as follows:

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<sup>2</sup> The Planning Inspectorate (2007). Local Development Frameworks: Lessons Learnt Examining Development Plan Documents

**Table 2.1 Settlements and hypothetical quantum of development allocated to each settlement (total over plan period) under each development strategy option**

| Settlement                             | Option 1:<br>Dispersed<br>High | Option 2:<br>Dispersed Medium +60% | Option 3:<br>Concentrated Medium | Option 4:<br>Dispersed Medium | Option 5:<br>Dispersed Medium -<br>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  |
| Meonstoke and Corhampton               | 44                             | 18                                 | 0                                | 11                            | 0  |

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

- 2.15 The findings of the appraisal of development strategy options were presented in the SA Reports accompanying consultation on the Preferred Options for the Local Plan (September 2015), the Pre-Submission Local Plan (September 2017) and the Submission version of the Local Plan (April 2018).

### Appraisal of alternative options for site allocations

- 2.16 The sites considered through the SA process are from the longer list of SHLAA sites considered for inclusion for the Local Plan.
- 2.17 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. This led to a number of sites being rejected, as they were considered unsuitable for development, due to landscape or other impacts, not available or not achievable.
- 2.18 In terms of the remaining sites considered to be 'reasonable alternatives' the SA process undertook an assessment of these sites. The site assessment was presented in the SA Reports accompanying Pre-Submission and Submission versions of the Local Plan.

### Reasons for choosing the preferred development strategy

- 2.19 The National Park Authority considered that, based upon landscape sensitivity assessment from the SHLAA published in December 2016, it was 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.
- 2.20 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.
- 2.21 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.
- 2.22 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 and sports and recreation facilities similarly assessed below standard in the key settlements with the exception of Petersfield, that is well served.

- 2.23 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 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.
- 2.24 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.
- 2.25 The Local Plan approach is the Dispersed Medium option. The proposed allocations included in the Local Plan will assist in delivering the evidence-based housing provision for the National Park 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. The Local Plan specifies a number of settlements that will accommodate approximate levels of housing. The distribution of this development 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 by way of 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 Local Plan evidence base document '*Sites and Settlements: Route Map for Housing Allocations*'.

## Consideration of reasonable alternatives for the Shoreham Cement Works

- 2.26 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.
- 2.27 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.

2.28 In light of the opportunities provided by the site, the SA process for the Local Plan has undertaken an appraisal of a number of strategic-level alternative options for the site. The purpose of the appraisal is to explore the likely sustainability implications and trade-offs that would be required if different approaches to development of the site are taken. In this context four options were considered for the site through the SA process, linked to different uses for the site relating to Land Use Classes<sup>3</sup>. These were 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

### Reasons for choosing the preferred approach for the Shoreham Cement Works

2.29 The National Park Authority 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 at the Shoreham Cement Works 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.

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

2.31 To help achieve this, the National Park Authority is preparing 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.

### Consideration of reasonable alternatives for delivering affordable housing

2.32 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.

2.33 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

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<sup>3</sup> The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. Class A broadly aligns with shops, eating and drinking establishments and professional services, Class B relates to business, industrial or storage/distribution activities, C1 class relate to hotels and hostels, C3 dwelling houses, and Class D relate to non-residential uses such as leisure or services. A description of the Use Classes can be accessed as follows: [https://www.planningportal.co.uk/info/200130/common\\_projects/9/change\\_of\\_use](https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use)

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.

- 2.34 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 were keen to consider a policy which would deliver an increased level of affordable housing on smaller sites. This was 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
- 2.35 In light of these elements, the SA process considered two options, with a view to exploring the sustainability implications of different approaches to affordable housing delivery in the National Park.
- 2.36 These were 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.

### Reasons for choosing the preferred approach for affordable housing

- 2.37 The Local Plan's approach to affordable housing mirrors that of Option 2 above. The approach will 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 approach 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. It 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.



## Development of planning policies for the Local Plan

### Appraisal of Local Plan planning policies

- 2.38 At various stages of plan making, the SA process has appraised and informed emerging plan policies.
- 2.39 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.
- 2.40 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 (September 2015). At this stage, the SA Report set out a number of recommendations designed to enhance the sustainability performance of the Local Plan policies.
- 2.41 The policies and site allocations in the Local Plan were then revisited in, 2017 and appraised through the SA process. The findings of the appraisal were presented in the SA Report to accompany the Pre-Submission version of the Local Plan (September 2017).
- 2.42 Following Pre-Submission consultation, a number of changes were made to the Local Plan. The updated plan policies were appraised and presented in the SA Report accompanying the Submission version of the Local Plan (April 2018).
- 2.43 The SA Report Addendum (April 2019) then presented an appraisal of the Main Modifications undertaken to the Local Plan following examination.

### 3. Consultation responses and how they have been taken into account

- 3.1 Regulation 16 of the SEA Regulations requires that the SA Adoption Statement includes a description of how the opinions expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account.
- 3.2 As discussed in **Chapter 2** (and as visualised in **Figure 2.1**), at each stage of the Local Plan's development, an SA Report was published alongside the Local Plan for consultation.
- 3.3 Consultation included with:
- the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England);
  - other stakeholders; and
  - the general public.

#### Responses received at Regulation 18 and 19 consultation and at Submission

- 3.4 The responses received prior, and subsequent, to publication of the Local Plan were presented in the Local Plan Consultation Statement<sup>4</sup>. This included: a description of the key consultation processes undertaken for the Local Plan; a summary of the main issues raised by responses; and how they had been addressed.
- 3.5 The Consultation Statement can be accessed at the following location:  
[www.southdowns.gov.uk/coredocumentlibrary](http://www.southdowns.gov.uk/coredocumentlibrary)<sup>5</sup>

#### Responses received at the Main Modifications stage

- 3.6 The National Park Authority has also prepared a summary of the representations made during the six week consultation on the Main Modifications undertaken in February/March 2019, and responses.
- 3.7 A summary of the representations made at the Main Modifications stage is presented in the *South Downs Local Plan Main Modifications Report* (April 2019), which can be accessed at the following link:  
<https://www.southdowns.gov.uk/wp-content/uploads/2019/04/Main-Modifications-Report-FINAL-PUBLISHED.pdf>

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<sup>4</sup> South Downs National Park Authority: South Downs Local Plan Submission Consultation Statement (April 2018); South Downs Local Plan Submission Consultation Statement Addendum (June 2018); and South Downs Local Plan Revised Appendix 4 of the Submission Consultation Statement (Aug 2018)

<sup>5</sup> The relevant documents on this link to access are as follows: Consultation Statement (ref SDLP 03); Submission Consultation Statement ADDENDUM (ref SDLP 03.3); and the Revised Appendix 4 of the Submission Consultation Statement (ref SDLP 03.4).

## 4. Monitoring

### Measures decided concerning monitoring

- 4.1 The SEA Regulations require that: *"The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action."*
- 4.2 The Regulations also state that the SA Adoption Statement should set out *"...the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme."*
- 4.3 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. This will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many of the indicators of progress chosen for the SA require data that is already being routinely collected at a local level by the National Park Authority and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.
- 4.4 **Table 4.1** therefore outlines a monitoring programme for measuring the Local Plan's implementation in relation to the areas where the SA has identified significant effects or where significant opportunities for an improvement in sustainability performance may 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.

**Table 4.1: SA monitoring programme for the South Downs Local Plan**

| Area to be monitored  | Indicator   | Data source                         | Frequency of monitoring |
|---|---|-------------------------------------|-------------------------|
| 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                  |

| Area to be monitored   | Indicator   | Data source                         | Frequency of monitoring |
|--|---|-------------------------------------|-------------------------|
| 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                  |
| 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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