



# Local Plan Review

## Integrated Impact Assessment Scoping Report

October 2024

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## 1. Introduction

### *Background*

- 1.1 The South Downs Local Plan (2014-2033) was adopted in July 2019. The South Downs National Park Authority (SDNPA) has made the decision to start a review in line with Government policy and as an opportunity to deliver more through planning on its corporate priorities of addressing **Nature Recovery, Climate Action, and creating a National Park for All**.
- 1.2 The Local Plan is a planning document that sets out the overall vision and objectives for the National Park and provides a spatial strategy and policies that will guide how these will be achieved. The overall aim of the Local Plan is to ensure that any new development will deliver sustainable development and help to achieve the National Park purposes (the statutory purposes and duty for national parks are specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995) as follows:

#### **The National Park purposes are:**

To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.

To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The National Park Authority 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 245 of the Levelling Up and Regeneration Act 2023 also requires all relevant authorities, including statutory undertakers and other public bodies, to seek to further these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires The Sandford Principle to be applied, and the first purpose of the National Park will be given priority.

- 1.3 Local Plans includes strategic, development management and allocation policies. [The National Planning Policy Framework 2023](#) (NPPF) provides the framework within which Local Plans are produced. The work on the Local Plan Review is taking place at a time of much change with planning reforms and this integrated impact assessment is a useful tool to gather early information and feedback from statutory and key consultees.
- 1.4 As part of the Local Plan Review, the SDNPA will be looking at development need across the National Park and for individual settlements. Development sites will be sought to help meet this need through our Land Availability Assessment (LAA). Government policy set out in the National Planning Policy Framework (NPPF) and the Planning Practice Guidance [PPG Natural Environment](#) makes clear that the scale and extent of development in National Parks should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality.



## *Change in Government and the Levelling Up and Regeneration Act 2023*

- 1.5 The Levelling-up and Regeneration Bill was given Royal Assent on Thursday 26 October 2023 and is now an Act of Parliament (law). The Act brings forward a range of changes to the planning system such as replacement of SA/SEA and EIA with a system of environmental outcomes reports and changes to the Development Plan regime. The Act introduces National Development Management Policies as statutory policy which, together with the development plan, forms the policy standard against which planning applications must be determined. Development Plans will cover locally specific matters with issues that apply in most areas to be covered by new National Development Management Policies. In the event of conflict, it is the national policy when enacted which would take primacy over local policies. Section 245 of the Act is important for National Parks. It places a new duty which means that relevant bodies (including SDNPA, Planning Inspectorate, adjacent local authorities, and statutory undertakers) will need to 'seek to further' the purposes of National Parks. This came into force on 26<sup>th</sup> December 2023.
- 1.6 Following a General Election on 4<sup>th</sup> July 2024, the new Government will be considering planning and changes to the planning system and has recently published a revised National Planning Policy Framework for consultation. Following the Levelling up and Regeneration Act, secondary legislation and guidance is still expected.
- 1.7 As noted above - further details on Environmental Outcome Reports are awaited. A [government consultation exercise](#) in March 2023 (undertaken by the previous government) sought views on how this new framework could work as a replacement to the existing environmental assessment regimes that have been transposed into domestic law from the Environmental Assessment of Plans and Programmes Directive and the Environmental Impact Assessment Directive. This will be kept under review through the Local Plan Review process. The work on the Local Plan Review is taking place at a time of much change with planning reforms and new Environmental Outcome Reports. The SDNPA are at the initial stages of the LPR process, and this scoping report is a useful tool to gather early information and feedback from statutory and key consultees.

## *The Integrated Assessment Process*

- 1.8 The SDNPA is required to ensure that sustainable development is promoted throughout a plan's preparation. To assist in this process the SDNPA must prepare a report assessing the sustainability of plans it prepares through undertaking a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA). The previous version of the Scoping Report (November 2023) related to the SA process. However, this next version of the Scoping Report, has been updated to support an Integrated Impact Assessment (IIA). The purpose of this is to promote sustainable development, health, and equality issues through better integration of social, environmental and economic considerations into the preparation of the LPR.
- 1.9 The IIA will consider the requirements and scope of:
  - Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).
  - Equalities Impact Assessment (EqIA).
  - Health Impact Assessment (HIA).

The IIA will not include a Habitats Regulation Assessment (HRA), but it will take account of the HRA findings. To be effective, the appraisal process must be fully integrated into the plan making process and applied at each stage of document production. It will also be used to monitor the effectiveness of the plan during its implementation.

- 1.10 To undertake the IIA process the following five stages should be completed:

*Stage A* - Setting the context and objectives, establishing the baseline, and deciding the scope.

*Stage B* - Developing and refining alternatives and assessing effects.

*Stage C* – Preparing the IIA report.

*Stage D* – Seeking representations on the IIA report; and

*Stage E* – Post adoption reporting and monitoring.

### *Why Undertake an Integrated Impact Assessment?*

- 1.11 There are several reasons for undertaking an IIA during the development of local planning documents. It is usual practice to combine the processes of SEA and SA, as they share a few similarities. Whilst there are formalised approaches for both SA and SEA, only through the SEA is there a legal obligation to perform certain activities. An EqlA is required to be undertaken for plans, policies, and strategies by the Equality Act 2010. Although there is no statutory requirement to undertake HIA, its requirements have been considered to add value and depth to the assessment process. A HIA will be undertaken as part of the whole IIA process of the Local Plan. This will include creating a clear assessment matrix for the HIA to assess proposed policies in the Local Plan. A separate EqlA screening will be undertaken for the LPR and included within the final IIA/SA. The IIA will aid in development of the LPR by supporting plan preparation by challenging and testing iterations of the Local Plan, so that a more robust final document is produced. It will identify the potentially negative and positive effects of the LPR policies and provide an opportunity to mitigate potentially adverse effects and enhance positive effects to achieve economic, social, and environmental benefits. The IIA also allows stakeholders to make more informed comments and responses to the LPR during consultation, because the IA gives a full picture of the likely significant effects.

- 1.12 It is a requirement that the SEA/SA Scoping Report is sent to the three statutory Consultation Bodies with environmental responsibilities. These and other stakeholders were consulted in 2023. A further consultation exercise on the IIA will be undertaken in August/September 2024. Please see section 6 below for details on the consultation exercise on the SA Scoping Report. Further information will be added to this section following the consultation on the IIA.

### *The South Downs National Park*

- 1.13 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.
- 1.14 The South Downs National Park Authority (SDNPA) became the Local Planning Authority on 01 April 2011. National Park Authorities are independent authorities operating within the local government framework.

- 1.15 The Corporate Plan 2020 – 2025 for the South Downs National Park Authority shows how the organisation sets its own priorities and delivers the outcomes in the Partnership Management Plan. The Corporate Plan is used in parallel with the Partnership Management Plan, which sets out the over-arching management of the South Downs National Park. Using the Corporate Plan, priorities are set out annually over five years (see link for [Year 3 Action 2022-2023](#)) to deliver the outcomes of the Partnership Management Plan. These priorities form an important overarching vision and commitment for the National Park and for the Local Plan review.
- 1.16 The high-level targets set out in the Corporate Plan are - Nature Recovery (supporting action to rebuild biodiversity), Climate Action (supporting action to reduce emissions and increase resilience and A National Park for All (supporting action to increase the value of the National Park to under-served groups). Under each of these high-level targets are clear and measurable detailed targets. These are:

#### **Nature Recovery**

- *To secure an additional 13,000ha, or 33% of land managed for nature by 2030 from a baseline of 25%.*
- *Maintain, enhance and/or restore existing key sites, habitats and species.*

#### **Climate Change**

- *South Downs National Park Authority to reduce its carbon footprint by 150 tons per annum in line with the 2030 net zero target.*
- *5% reduction per annum in the overall carbon footprint of the South Downs National Park from the baseline reported in 2019.*

#### **A National Park for All**

- *Increase diversity of visitors to, and those engaging with, the South Downs National Park.*
  - *'Your National Park' campaign reaches 20,000 people by 2025.*
  - *Impact measure for direct engagement.*
- 1.17 The SDNPA Partnership Management Plan 2020-2025 sets out the overarching five-year strategy for the management of the South Downs National Park. The Plan is the single most important policy document for the National Park. It consists of a vision, three linked strategic themes and 10 outcomes which set where we would like to get to by 2050. The themes and outcomes work together and have equal importance. This is the link to [The Partnership Management Plan](#).

#### **The South Downs Local Plan**

- 1.18 The South Downs Local Plan covers the entire National Park and was adopted in July 2019. The adopted local plan can be read here: [South Downs Local Plan 2019](#).
- 1.19 It is a legal requirement and stated in paragraph 33 of the NPPF that local plans should be reviewed and updated as necessary every five years.
- 1.20 The Local Plan is currently at the beginning of the review process. The SDNPA propose to retain the landscape led approach, ecosystem services and the development strategy of a medium level of development dispersed across the

National Park. However, there is a need to review development needs and provision numbers both at a park-wide level and for individual settlements. In addition, the Plan needs to ensure it delivers on corporate priorities relating to Nature Recovery, Climate Action and a National Park for All. Of the options tested through the SA, it was determined that a 'dispersed medium' development strategy would do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park. The 'medium level of development' is as set out in the Adopted Local Plan Spatial Strategy. Further details can be found in the adopted Local Plan.

- 1.21 The timeline for the Local Plan Review is set out in the revised Local Development Scheme (8<sup>th</sup> edition), which was approved by the Authority in December 2022. Details are set out in the [Committee Report](#).
- 1.22 It has been agreed that the Shoreham Cement Works Area Action Plan will now be integrated within the Local Plan Review. The Issues and Options Sustainability Appraisal for the Shoreham Cement Works site can be read [here](#).

## 2. The IIA Report

### *Methodology and key stages*

- 2.1 This section sets out the methodology of the IIA and the various stages and process of undertaking the work. It also outlines the approach to the IIA and how the approach will incorporate the scopes required by different types of assessment.
- 2.2 The process and tasks of the IIA are detailed below:
- Review plans, programmes and policies that are appropriate to the scope of a IIA of Local Plan.
  - Compare compatibility of the objectives of appropriate plans, programmes and policies.
  - Identify IIA issues for the South Downs National Park.
  - Identify available and appropriate baseline data.
  - Identify gaps in baseline data with respect to the most important sustainability issues.
  - Identify sustainability objectives.
  - Identify key issues.
  - Appraise emerging LPR policies and site-specific allocations.;
  - Record appraisal results and how they have or have not influenced policy and site allocations.
  - Establish a monitoring regime for the indicators identified and carry out monitoring.

- 2.3 One of the first stages is to prepare and consult on a IIA Scoping Report.

### *Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)*

- 2.4 SEA is a process which ensures environmental impact is considered at formation of plans stage. The SA considers a broader scope of impacts, looking at the economy and local communities/wider society as well as the environment.

### *Equality Impact Assessment (EqIA)*

- 2.5 EqIA is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010. It is being used as part of the IIA to add value and depth to the assessment process.
- 2.6 For this exercise, the IIA needs to consider in its scope, the likely effects on discriminatory practices; the potential to alter the opportunities of certain groups of people; and/or effect on relationships between different groups of people.
- 2.7 To understand which groups of people (or individuals), may suffer discrimination, the Equality Act sets out a series of “protected characteristics”:
- age

- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

2.8 The first part of the process is screening. This involves the assessment of impacts of the LPR against the protected characteristics outlined above. If no negative effects are identified during screening no further assessment is required. If there are effects that cannot easily be mitigated, a full EqIA should be undertaken.

#### *Health Impact Assessment (HIA)*

2.9 There is no statutory requirement to undertake HIA as part of the plan making process. It is included to ensure a wider definition of potential impacts is considered. The key aim is to ensure that plans and policies minimise negative and maximise positive health impacts.

2.10 Public Health England produced Health Impact Assessment in spatial planning - A guide for local authority public health and planning teams (2020). This can be located [here](#).

2.11 This document states that HIA is a tool used to identify the health impacts of a plan or project and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities.

2.12 Paragraph 2.11 states – ‘an HIA is most effective when it is undertaken prospectively and concurrently to inform and shape a plan, policy or development project during options appraisal and design (that is before decisions are made and submitted as part of a planning application). The intention to use an HIA should be determined early in the planning process. Depending on the scale of the plan or project, it may be appropriate to integrate or align an HIA with a sustainability appraisal (SA) / strategic environmental assessment (SEA) for plan-making or EIA and other assessments required as part of local information requirements for planning applications.

2.13 The document sets out the methodology stages:

- Screening: Determine whether an HIA is needed and justified subject to anticipation of health impacts on population groups.
- Scoping: Identify the potential health impacts and target population groups to assess.
- Assessing: Assess the significance of health impacts, qualify and quantify potential costs and benefits, how health varies in different circumstances, across different populations and any alternatives.

- Reporting: Engage all relevant stakeholders and recommend preventative and mitigation actions to deliver the greatest possible health gain.
  - Monitoring and evaluating: Include indicators and mechanisms and set out processes and resources for the local authority and/or with the planning applicant to undertake and act on results of regular monitoring.
- 2.14 There are several good examples where HIAs have been successfully integrated into SEA/SA. One of these is [Rother Local Plan SA Interim Report](#). The Council has integrated into the SA report the important process of assessing proposed policy against a set of health and wellbeing criteria. The integration is mutually beneficial as the SA process has identified where there are health and wellbeing issues, which have then been further elaborated and explored through a distinct set of Health Impact Assessment criteria. This included embedding summary tables for HIA after each policy. Further details on how a HIA is incorporated into the Local Plan for the South Downs National Park will be set out in the IIA.

### *The IIA Scoping Report*

- 2.15 The approaches outlined above in relation to SA/SEA, EqIA and HIA use similar assessment steps. In general, this includes: screening (i.e. deciding if the assessment is needed); setting the baseline context; identifying where there are impacts on defined relevant topics areas (e.g. flora and fauna, the determinants of health, or the impact on certain groups of people in society); understanding impacts of that which is being assessed and making recommendations for mitigation and enhancements, where necessary. The requirements of EqIA and HIA have been integrated with the SA/SEA process to create the IIA. Further details will be set out in the IIA but will include a clear assessment matrix for the HIA to test proposed policies in the Local Plan.
- 2.16 The structure of the IIA has been developed in accordance with government guidance for undertaking SA in compliance with the SEA Directive. A key aim of the scoping procedure is to help ensure the IIA process is proportionate and relevant to the plan being assessed. To ensure the assessment takes in the scope of EqIA and HIA, equality and health issues/characteristics will be considered at the appropriate points in the assessment, alongside other sustainable development objectives, impacts and considerations.
- 2.17 This IIA sets the context and objectives, establishes the baseline, and decides the scope. It:
- a) Identifies other relevant policies, plans and programmes and sustainability objectives.
  - b) Collects baseline information.
  - c) Identifies sustainability issues and problems.
  - d) Develops the sustainability appraisal framework; and
  - e) Consults the consultation bodies on the scope of the IIA.
- 2.18 The IIA process has five stages, and each stage comprises several subsidiary tasks, some of which should be implemented alongside each other. Stage A explains the process used in this IIA and is presented in the Table below (Table 1):

Table 1: Work Requirements of the IIA

Stage A:	Setting the context and objectives, establishing the baseline and deciding on the scope.	
	Sub-Stage	Tasks
A1	Identify links to other relevant plans, programmes and sustainability objectives.	Defines how the plan is affected by outside factors and suggest ideas for how any constraints can be addressed.
A2	Collect baseline/ environmental data.	Provision of an evidence base for sustainability issues, effects prediction and monitoring.
A3	Identify sustainability issues / problems.	Used to focus the IIA and streamline the subsequent phases, including baseline information analysis, setting of the Sustainability Appraisal Framework, prediction of effects and monitoring.
A4	Developing the SA framework.	A process to enable the sustainability of plan to be appraised.
A5	Consulting on the scope of the SA.	Carried out with statutory bodies and other relevant organisations with social, environmental, health, equality or economic responsibilities to ensure the appraisal covers the key sustainability issues.

- 2.19 It is a requirement that an SA/SEA Scoping Report is sent to the three statutory Consultation Bodies with environmental responsibilities. As referred to above, this exercise was carried out in 2023. However, a further consultation exercise on the IIA was undertaken in August/September 2024. Please see section 6 below for details on the consultation exercise.

#### *The SA Framework*

- 2.20 The SA Framework is a vital tool to enable the sustainability effects of the Local Plan to be assessed. The Framework consists of the Sustainability Objectives that have been developed from the associated Key Sustainability Issues emerging from consideration of the baseline data (Stages A2 and A3). The detailed Framework is set out in section 5.



### 3. Review of Relevant Plans, Programmes and Sustainability Objectives

#### *Introduction*

- 3.1 The SEA Directive and Government guidance require that relevant international, national, regional, and local plans, policies and programmes are reviewed during the Scoping phase of the SA process. This review should identify existing sustainability objectives and ways in which the SDNP plans and policies can contribute to the achievement of sustainable development. The LPR and the IIA will be influenced by many different plans, programmes and strategies.

#### *Initial Identification of Sustainability Objectives*

- 3.2 This section considers the sustainability objectives (SO) set out in SA to the adopted South Downs Local Plan. The SA and other relevant documents can be found on the website here: [Sustainability Appraisal for the adopted Local Plan](#).
- 3.3 The SA Framework for the adopted Local Plan and the appraisal findings within the SA Report were presented under 12 'SA themes', reflecting the range of information being considered through the process. These are:
- Landscape.
  - Climate Change and Adaptation.
  - Biodiversity.
  - Cultural Heritage.
  - Cultural Activity.
  - Health and Wellbeing.
  - Vitality of Communities.
  - Accessibility.
  - Sustainable Transport.
  - Housing.
  - Climate Change Mitigation; and
  - Local Economy.
- 3.4 The SA for the South Downs Local Plan provides a valuable starting point in identifying relevant sustainability objectives for the LPR. The direct relevance of several of the objectives to the LPR varies and therefore they will be adapted, excluded or subsumed within others to form the new set against which the LPR is tested. In addition, this is now a Scoping Report for an IIA so it has a wider scope than the previous Local Plan and will include issues relating to health and equalities.
- 3.5 Table 2 below sets out the SA Framework for the adopted South Downs Local Plan.

Table 2: SA Framework for the adopted South Downs Local Plan

Number	SA Theme	Adopted Local Plan SA objective	Adopted Local Plan SA sub- objective
1	Landscape	To conserve and enhance landscape character.	1.1: Provide resilience to the landscape character in response to climate change.
			1.2 Extend the area of dark night skies and the assessed tranquillity of the National Park.
			Are the policies in the local plan supporting this objective?
			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.
			2.2: Promote the uptake of sustainable drainage systems.
			2.3: The achievement of integrated coastal zone management
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.
			3.2: Conserve, enhance, restore, expand and reconnect areas of priority habitat ('Bigger, better, more and joined').
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.
			4.2: Help the HE adapt to changing conditions arising from CC (warmer, wetter, infestations etc.).
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.

Number	SA Theme	Adopted Local Plan SA objective	Adopted Local Plan SA sub- objective
6	Health and Wellbeing	To improve the health and well-being of the population and reduce inequalities in health and well-being.	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.
			6.2: Use environmental and building standards to ensure that places promote health and wellbeing.
			6.3: To contribute to a reduction in all aspects of rural crime through effective enforcement in partnership with other enforcement agencies.
7	Vitality of Communities	To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	7.1: Supporting communities where children grow up and go to school.
			7.2: Supporting and empowering local communities to shape their own community (recognising the value of community and neighbourhood planning).
			7.3: Support schemes aimed at extending involvement of all members of society in the SDNP.
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).
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.	9.1: Provide sustainable access to services.
			9.2: Work with other partners to develop a high quality, safe access network and better links between bus and trains and cycling opportunities.
			9.3: Minimising the impact of vehicle infrastructure on landscape and communities.
			9.4: A sustainable transport infrastructure for 2020 and beyond.

Number	SA Theme	Adopted Local Plan SA objective	Adopted Local Plan SA sub- objective
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.	10.1: Support rural communities by providing affordable housing for local people which meets the needs of communities now and in the future.
			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 & duty.
			10.3: To make suitable provision for transit and permanent traveller sites based upon projected need.
			10.4: Make appropriate provision for the accommodation needs of older generations.
11	Climate Change mitigation	To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures.	11.1: Promote appropriate retrofitting and upgrading of the existing housing stock and other buildings informed by the sense of place.
			11.2: Supporting communities with the right low carbon / renewable infrastructure in the right place.
			11.3: Extension of tree planting, where appropriate both for carbon storage opportunities and to provide wood fuel sources.
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.	12.1: Encourage development of appropriate infrastructure throughout the area to encourage small business, communities & tourism in the Park.
			12.2: Encourage local industry and maintenance of a living cultural skills base that forms part of heritage now and into the future.
			12.3: Recognise and support core sectors of the South Downs economy such as food production, tourism and land management.
			12.4: Promote agri-environmental businesses and diversification that focuses on ecosystem services and enhancement of the local supply chain.

Number	SA Theme	Adopted Local Plan SA objective	Adopted Local Plan SA sub- objective
			12.5: Market towns to provide services to the rural hinterland.

## Relevant Plans and Programmes

- 3.6 A plan will be influenced in various ways by other plans or programmes and by external objectives such as those laid down in policies or legislation.
- 3.7 The statutory purposes and duty for national parks are specified in the National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995. As part of national legislation, they sit above all plans, programmes and policies in the South Downs National Park.
- 3.8 Table 3 below - illustrates the key plans, programmes or policies (PPPs) that are under consideration as part of the IIA process and are likely to influence the review of the Local Plan. A full list (with web-links) can be found in **Appendix A**. Table 3 presents the PPPs around broad range of themes. The Vision and Circular on English National Parks and the Broads (2010) and the National Planning Policy Framework (NPPF) 2023 are relevant to all the key themes and are therefore inserted within each section.
- 3.9 New PPPs will emerge during working on the LPR and the table and Appendix A will be updated in future SA reports to reflect consideration of these inputs.

Table 3 – Key Relevant Plans and Programmes (RPP)

Broad Themes	Most relevant PPP (full list in Appendix A)
<i>Landscape</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	The Natural Environment and Rural Communities Act 2006
	Countryside and Rights of Way Act DEFRA 2000
	DEFRA 25 Year Environment Plan 2018
	Environment Act (2021)
	South Downs Local Plan 2011-2034 (adopted 2019)
	South Downs National Park Partnership Management Plan 2020 - 2025
	South Downs Landscape Character Assessment (LCA) 2020 Technical Papers
	Tranquillity Study 2017
<i>Biodiversity and Nature Recovery</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Strategic Environmental Assessment - SEA (Directive 2001/42/EC)
	Natural Capital Investment Strategy for Sussex 2019 - 2024 by Sussex Local Nature Partnership December 2019
	The Environment Act 2021
	UK Biodiversity Action Plan 1995-2012
	Biodiversity Net Gain: planning updates

	The Levelling Up and Regeneration Bill
	The Environmental Improvement Plan (EIP) 2023
	South Downs Habitats Regulations Assessment 2018 of the South Downs Local Plan
	County Local Nature Recovery Strategies
<i>Historic environment, Heritage Assets and Cultural Heritage</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Planning (Listed Buildings & Conservation Areas) Act 1990
	Conservation Area Appraisals
<i>Climate Change</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	The Paris Agreement 2016
	The Climate Change Act 2008
	Climate Change Act 2008 (2050 Target Amendment) Order 2019
	UK Renewable Energy Strategy 2009
	The 2030 Agenda for Sustainable Development and the SDGs Transforming our World
	Small World Consulting baseline emissions & target scenario for SDNP
	SDNPA Climate Change Strategy & Action Plan
	Strategic Flood Risk 2015 and 2017
	South Downs Climate Change Strategy and Action Plan.
	Shoreline Management Plans (SMP 11 South Foreland to Beachy Head, SMP 12 Beachy Head to Selsey Bill and SMP 13 Selsey Bill to Hurst Spit)
	National Coastal Erosion Risk Map
	Flood Risk Management Plans
	SE River Basin Management Plan Update 2022
	People and Nature Network – Evidence and Action Report SDNPA
	Catchment Management Plans (Adur & Ouse, Arun & Western Streams, Cuckmere & Pevensey Levels, East Hampshire, Test & Itchen, Wey)
<i>Community, Health &amp; Wellbeing</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Open space, sports and recreation evidence study 2017

	The Health and Wellbeing Strategy 2021
	The NHS Long Term Plan 2019
	Public Health England Strategy 2020 - 2025
<i>Economy &amp; Employment</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	South Downs Tourism Strategy 2015 – 2020
	Coastal West Sussex and Greater Brighton Local Strategic Statement – Delivering Sustainable Growth 2015-31
	SDNPA 2018 Economic Profile and SDNPA 2020 updated Economic Profile
	Retail evidence study 2016
<i>Equality</i>	Human Rights Act 1998
	Equality Act 2010
	Equalities and Human Rights Commission Our Strategic Plan consultation 2025 – 2028
	Government Equalities Office: Public Sector Equality Duty: guidance for public authorities
	Guidance Housing for older and disabled people 2019
	Local Authority Equality and Inclusion Policies and Plans
<i>Housing</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Housing and Planning Act 2016
	Local Plans prepared by local authorities adjoining the National Parks and
	Made Neighbourhood Plans within the National Park
	Affordable Housing Supplementary Planning Document (SPD).
<i>Protection &amp; Sustainable Use of Resources</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Natural England's Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach & associated documents
	West Sussex Joint Minerals Plan (2018, Partial Review 2021)
	Hampshire Minerals and Waste Plan (2013)
	Waste and Minerals Local Plan for East Sussex



	West Sussex Waste Local Plan 2014
<i>Transport</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	Local Roads Transport assessment 2016
	Roads in the South Downs 2015
	West Sussex Transport Plan 2022
	Hampshire County Council Local Transport Plan 2011-2031
	East Sussex Local Transport Plan 3 (2011 to 2026)
	SDNPA Cycling and Walking Strategy 2017-2024
<i>Design</i>	Vision and Circular on English National Parks and the Broads (2010)
	NPPF 2023
	National Model Design Code
	The Levelling Up and Regeneration Act

## 4. Baseline Data Collection and Key Sustainability Issues

### *Introduction*

- 4.1 The second task in Stage A of the process involves researching the environmental, economic and social conditions in the National Park. It is important to identify the current state of the environment to judge the impact and effectiveness of the plan during implementation. This is achieved by collecting baseline data that will provide a starting point for predicting and monitoring social, economic and environmental effects and identifying sustainability issues within the area. A practical approach has been taken to gathering baseline data. Every effort has been made to provide an accurate baseline review. Production of the baseline has been effective at providing an understanding of current issues, and there is generally enough information available to enable an informed and detailed appraisal.
- 4.2 There is a wealth of research and study information available about the National Park. The key facts and trends are outlined in the Corporate Plan, the adopted Local Plan, background evidence, strategies and reports. Detailed monitoring data on the performance of current local planning policies can be found in the [Authority Monitoring Reports](#) (AMR) produced by the National Park Authority.
- 4.3 This report focuses on baseline and trend information directly relevant to the Local Plan Review. This is a starting point for judging how different policies are likely to influence the condition of the National Park and contribute to the delivery of sustainable development.
- 4.4 The SEA Directive also requires consideration of the likely evolution of the area without implementation of the plan or programme. This is called the future baseline and will be set out within this chapter.
- 4.5 The collection of baseline information is grouped by topic. Each topic follows a similar structure, starting with a brief overview of policy context, a list of the key and relevant South Downs Local Plan policies within the adopted plan and then a summary of key baseline information.
- 4.6 Following this are the key sustainability issues and likely evolution without the Local Plan Review. Finally gaps in the current evidence base are identified along with sources of potential further information. The following topics will form the headings for this section under which all baseline evidence will sit:
  - Landscape
  - Biodiversity and Nature Recovery
  - Historic Environment, Heritage Assets and Cultural Heritage
  - Climate Change
  - Community, Health & Wellbeing
  - Economy and Employment Housing
  - Equality (a new topic - this is not listed as a specific topic within the adopted Local Plan SA)
  - Transport

- Protection & Sustainable Use of Resources
- Design (a new topic),

## Landscape

### Policy Context

- 4.7 [The English National Parks Vision and Circular 2010](#) states that in their role as Local Planning Authorities, National Park Authorities are expected to follow and promote with partners and stakeholders the principles of the European Landscape Convention in all decisions and discussions concerning planning, management, and protection.
- 4.8 The National Planning Policy Framework ([NPPF 2023](#)) sets out the following:
- Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks. (Paragraph 176).
  - Planning policies and decisions should contribute to and enhance the natural and local environment by:
    - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).
    - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland (sections from paragraph 174).
  - Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
    - a) mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
    - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
    - b) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (paragraph 185).
- 4.9 At the local level, the South Downs Local Plan (SDLP) uses the European Landscape Convention (ELC) 2004 definition of landscape as: ‘an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’. The Local Plan states (paragraph 5.7): ‘landscape character is what make an area unique, resulting from the action and interaction of natural and/or human factors.

Landscape character is the combination of distinct, recognisable and consistent pattern of elements and features including, for example, the landform, historic landscape or 'time depth', and a variety of perceptual and aesthetic qualities.'

4.10 All the policies within the SDLP refer to and/or encompass landscape and landscape impact. The following policies within the South Downs Local Plan directly and specifically relate to landscape character:

- SD4: Landscape Character
- SD5 Landscaped-led approach to design
- SD6: Safeguarding Views
- SD7: Relative tranquillity
- SD8: Dark Night Skies

*Current Evidence and Local Guidance Documents:*

South Downs Landscape Character Assessment (LCA) 2020

Dark Skies TAN 2020

South Downs Local Plan 2019 and background papers

SDNPA Tranquillity Study 2017

Viewshed Characterisation Study 2015

South Downs Integrated Landscape Character Assessment (SDILCA) 2011

Sussex Historic Landscape Characterisation 2010

Made Neighbourhood Plans (various dates)

4.11 The South Downs contains a rich and complex landscape character, with significant local variation and contrast. Landscapes are more than just attractive scenery – they tell a vivid story of how, for centuries, the natural environment and human settlements have influenced each other. Landscapes are not static, and they can be greatly affected by changes in land use.

4.12 In some cases, the nature of this change has the potential to adversely affect the landscape and its associated special qualities. Landscape character is:

- Distinct, recognisable and consistent pattern of elements in the landscape
- What makes one landscape different from another (rather than better or worse)

An understanding of the character of the landscape is central to delivering the National Park's purposes and duty. It is important that the landscape is properly factored into decision making.

4.13 The first LCA for the National Park area was produced in 2005 – it was a detailed technical report with maps and annexes. It is described as an 'Integrated' LCA as it included Historic Landscape Character data as part of the assessment.

4.14 The LCA was updated slightly in 2011 to include areas of landscape that had been added when the National Park was formally designated in 2009. It retained the same

broad structure and classification of landscape types and areas. The 2020 update is more comprehensive, it has been developed as an on-line resource to make it more accessible and useable. There have been minor changes to the classification of landscape types and areas – with some areas now being covered in more detail. The descriptions within the 2020 update include more detail on specific characteristics and sensitivities. They also include a summary of the Ecosystem Services that are delivered within each landscape area and information of Nature Recovery for each landscape area.

- 4.15 The landscape of the South Downs as seen today is the product of an interaction between natural and human processes. The landscape bears the imprint of successive periods of human inhabitation and land use.
- 4.16 The physical and human influences, have in combination created the unique and distinctive character of the South Downs. The South Downs National Park can be divided into landscape character types and landscape character areas.
- 4.17 The [South Downs Landscape Character Assessment 2020](#) states that the South Downs is dominated by a spine of Chalk that stretches from Winchester in the west to the cliffs of Beachy Head in the east. To the north of the Chalk the older sandy rocks of the Lower Greensand and soft shales of the Wealden Clays are exposed. The Chalk is separated from the Lower Greensand by a belt of low-lying ground marked by the Gault and a 'terrace' of Upper Greensand that lies at the foot of the Chalk scarp. To the south of the chalk the younger Tertiary rocks overlie the Chalk.
- 4.18 The landscape has been divided into 19 landscape character types. Each of these landscape character types has a distinct and relatively homogenous character with similar physical and cultural attributes, including geology, landform, land cover and historic evolution. The landscape types are further subdivided into landscape character areas. The character areas are discrete geographic areas that possess the common characteristics described for the landscape type. Each character area has a distinct and recognisable local identity.
- 4.19 Each of the landscape character types contain many sensitive physical and aesthetic/perceptual features that are vulnerable to change. These are set out in the document.
- 4.20 [The Sussex Historic Landscape Characterisation Study 2010](#) provides an understanding of the historical and cultural origins of today's landscape and the processes of land use change that have shaped it. At the site-specific scale, it should be used as a first stage in researching a specific site, providing a historic landscape character context.
- 4.21 Tranquility is a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality of the landscape and is influenced by things that people can both see and hear in the landscape around them. [The 2017 Tranquility Study](#) involved an assessment of both positive and negative tranquility factors which were then scored and mapped.

#### *Monitoring*

- 4.22 The AMR for 2021 – [The South Downs National Park Authority's Monitoring Report 2021](#) states that through using satellite data, the Authority is able to monitor

changes in land-cover across the National Park, and assess this at a Landscape Character Type (LCT) level. It can also assess the level of significance of those changes in terms of their impact upon Landscape Character.

- 4.23 There are notable or significant changes within LCTs that are predominantly farmland. As an example, we see 'significant' change within the Greensand Terrace or the Scarp Footslopes. This is generally the result of an increase in the overall area under cultivation or cropping. The overall area of grassland has also decreased. There are also minor changes in the percentage woodland cover, which suggested an increase in coniferous woodland planting and a small decrease in deciduous woodland cover. The overall urban/developed component of the National Park has seen a very minor increase, which would be expected as part the normal process of planning and development.
- 4.24 The South Downs is a relatively narrow protected landscape and expanding urban areas on the boundaries of the National Park are increasingly eroding its isolated quality.
- 4.25 The South Downs is accessible to a large surrounding population, with 10 million people within an hour's drive (refer to [Integrated Landscape Character Assessment 2005](#)).
- 4.26 There is consequent demand for infrastructure and facilities, increasing recreational car traffic within the National Park. This results in changes to existing recreation sites, and cumulative effects on the special qualities of remoteness and rural landscape that people come to enjoy.
- 4.27 Incremental, small-scale change with gradual erosion of local rural character is a key concern. Conversion of former farm buildings remains an issue, and a recent increase in small holdings and alternative farm enterprises has led to subdivision and clutter. There has also been a notable decrease in grazing, and, in some areas, lack of management and 'set aside' is creating an agricultural landscape that is at odds with the managed character.

*What other evidence will we be collecting?*

- 4.28 There is already significant baseline information, and this will form part of the background evidence for the Local Plan Review. In addition, landscape impact assessments will be undertaken as part of the site allocation work.

## *Biodiversity and Nature Recovery*

### *Policy Context*

- 4.29 Under [The Environment Act 2021](#) all planning permissions granted in England (with a few exemptions) will have to deliver at least 10% biodiversity net gain (BNG). At the time of writing, this is expected to become mandatory during 2024, following the provision of secondary legislation and guidance. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years (see [Biodiversity Metric calculator](#)).
- 4.30 Biodiversity is at the heart of the vision for English National Parks set out in the Vision and Circular (2010), which states – 'Wildlife flourishes and habitats are maintained, restored and expanded and linked effectively to other ecological networks. Woodland cover has increased, and all woodlands are sustainably managed, with the right trees in

the right places. Landscapes and habitats are managed to create resilience and enable adaptation’.

4.31 The NPPF 2023 states the following:

- Establishes the need to plan for biodiversity at a landscape scale across local authority boundaries, identifying the local ecological network and promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species population, linked to national and local targets.
- States that the conservation of wildlife and cultural heritage are important considerations in all (protected) areas and should be given great weight in National Parks and the Broads (Para 176).
- States that planning permission should be refused if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for. Development should also be refused if it results in the loss or deterioration of irreplaceable habitats (para 180) unless the need for and benefits of the development in that location clearly outweigh the loss.

4.32 At the local level, the following policies within the South Downs Local Plan directly relate to biodiversity:

- SD2: Ecosystem Services
- SD9: Biodiversity and Geodiversity
- SD10: International Sites
- SD11: Trees, Woodland and hedgerows

4.33 The purpose of the policies is to set out a positive strategy to ensure the conservation and enhancement of biodiversity across the National Park; set specific requirements relating to SAC / SPA areas and ensure the management of existing trees, woodland and hedgerows.

*Current Evidence and Local Guidance Documents:*

Biodiversity Net Gain Technical Advice Note 2022 SDNPA

South Downs Wildlife Delivery Plan 2021

The Environment Act 2021

Habitats Regulations Assessments Technical Advice Note SDNPA 2021

People and Nature Network Plan Evidence and Action Report 2020

South Downs Landscape Character Assessment 2020

Climate Change Act 2008 (2050 Target Amendment) Order 2019

Natural Capital Investment Strategy for Sussex 2019-2024

South Downs Local Plan 2019 and background papers



DEFRA 25 Year Environment Plan 2018

South Downs National Park Authority Local Plan 2014-2033 (April 2018) Habitats Regulations Assessment

Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network (Sir John Lawton, 2010) [Making Space for Nature: A Review of England's Wildlife Sites and Ecological Network](#)

Natural England – biodiversity opportunity areas and designated sites

Made Neighbourhood Plans (various dates)

Ecosystem Services Technical Advice Note (SDNPA)

South Downs Landscape Character Assessment 2020

County Local Nature Recovery Strategies (currently under preparation by the relevant Responsible Authorities).

- 4.34 Intensive agriculture has had an impact on many farmland species. Within the UK, populations of [Grey Partridge](#) have plummeted by 94% over the past 40 years and 97% of the [wild flower meadows](#) have disappeared since the 1930s. However, in In 2021/22 49%, of the National Park is managed through [agri-environment schemes](#).
- 4.35 A new nature-friendly farming initiative in the South Downs National Park is sowing the seeds for significant wildlife recovery in the coming years. The South Downs National Park Authority [Farming In Protected Landscapes \(FiPL\) programme](#) has supported 71 separate projects to help kick-start nature recovery, climate action and sustainability, as well as improving landscape, heritage and access. Highlights include:
- Over 3,600 metres of new hedgerows have been created.
  - Almost 10 hectares of woodland is being enhanced to make it more attractive to wildlife.
  - A total of 38 projects are helping to store carbon to reduce the greenhouse effect.
  - Four ponds have been restored and two new ponds have been created.
  - Some 228 metres of flint walling has been restored.
  - Six projects will improve soil quality, while a further six will help to reduce flood risk.
  - Management will be improved at 2,300 hectares of land at Sites of Special Scientific Interest (SSSI), while a further 600 hectares of land outside SSSIs will be enhanced to support biodiversity.
  - Over 4,300 hectares of land is now being managed with regenerative farming techniques, which focus on rejuvenating depleted topsoil to improve its biodiversity and carbon-capturing powers, while also producing high-quality food.
  - Over 40 projects will help the public have a better understanding of farming and landscape.



- 4.36 There are many sites of international nature conservation importance in or nearby to the National Park. These are protected under European Directives (Special Areas of Conservation (SAC) and Special Protection Areas (SPA)) or Global Agreements (Ramsar sites). There are 13 SACs designated in the National Park, two of which are also designated as SPAs for their international importance for birds: the Arun Valley SPA and the Wealden Heaths. The Arun Valley is also designated as a Ramsar site as a wetland of global importance for its wintering waterfowl, breeding waders, rare wetland invertebrates and scarce plants. All SACs and SPAs in the National Park are also designated as Sites of Special Scientific Interest, a national nature conservation designation – references found in [Biodiversity Background Paper](#).
- 4.37 There are three types of national nature conservation designation in the National Park: National Nature Reserves (NNR), Sites of Special Scientific Importance (SSSI) and Marine Conservation Zone (MCZ). There are nine National Nature Reserves within the National Park, which are sites of national importance for their biodiversity value. Examples include Castle Hill NNR near Brighton, an outstanding area of chalk downland, and Kingley Vale NBNR, one of Europe's finest yew forests. All these are also designated as SSSIs. References found in [Biodiversity Background Paper](#).
- 4.38 In total there are 86 SSSIs, covering 6% of the National Park, and 10 of which are designated for their geological importance. Beachy Head is the only Marine Conservation Zone (MCZ) within the National Park. Just over 7% of the total area of the MCZ falls within the National Park (reference Biodiversity Background Paper).
- 4.39 There are three main types of local nature conservation sites in the National Park: Local Wildlife Sites (which include Sites of Importance for Nature Conservation (SINCs)) and Sites of Nature Conservation Importance (SNCIs)), Local Nature Reserves (LNRs) and Regional Important Geological Sites (RIGS). There are 874 LWS across the National Park. This figure will change as LWS sites are regularly reviewed and some are de-designated or new ones identified. There are also 25 Local Nature Reserves and 50 RIGS. (reference Biodiversity Background Paper).
- 4.40 The South Downs National Park is one of the most wooded national parks in the country. The trees and woodlands of the National Park are important features of the landscape character and the character of the towns and villages within the National Park and provide important ecosystem services such as air purification and carbon storage. Areas of woodland which have been in continuous existence since 1600AD or before may be designated as Ancient Woodland. The continual and relatively undisturbed nature of ancient woodland means that they have often developed irreplaceable complex ecosystems and are home to rare and endangered species. In all 23% of the National Park is covered by woodland, half of which (approximately 17,000ha) is designated as ancient woodland. (reference Biodiversity Background Paper).
- 4.41 The National Park supports a wealth of wildlife including iconic species such as burnt orchid, round-headed rampion, otter, skylark, barn owl and brown trout. It is also home to less well-known species such as the barbastelle bat and sundew (a carnivorous plant). Many of the species found in the National Park are rare and localised, for example, the greater mouse-eared bat.
- 4.42 The National Park contains numerous biodiversity assets which are not designated, but which form an important element of the total natural capital of the National Park. These assets form vital parts of the network of habitats of the National Park and form

part of the green infrastructure of the National Park. In 2008, a wide consultation was held in Southeast England to develop a landscape-scale approach to conservation by identifying 'Biodiversity Opportunity Areas' (BOAs). Nearly half (46%) of the National Park is covered by BOAs. (reference Biodiversity Background Paper).

- 4.43 Recreational use of internationally designated nature conservation sites has the potential to prevent appropriate management or exacerbate existing management difficulties, cause damage through erosion and fragmentation, cause nutrient enrichment because of dog fouling, and cause disturbance to sensitive species such as ground-nesting birds and wintering wildfowl.
- 4.44 Biodiversity Net Gain (BNG) is an approach to development and associated land management that aims to leave biodiversity in a measurably better state than before. The Government made it a mandatory requirement for all development to achieve a 10% net gain for biodiversity through the Environment Act.
- 4.45 [The South Downs Landscape Character Assessment 2020](#) (updated January 2023) provides nature recovery information within each of the landscape character types. Each of the types have nature recover ambitions. Examples include:
- Chalk downland should be managed with regular grazing (Type A Open Downland)
  - Increase positive woodland management for biodiversity benefits & reduce management neglect –the greatest threat to ancient woodland (Type B Wooded estate Downland).
  - Expand the areas of chalk grassland where possible and establish habitat connectivity for chalk grassland across this large landscape character type. (Type C Clay Plateau)
  - Create open areas within woodlands to encourage chalk grassland habitat particularly on archaeological sites (Type D Downland Mosaic)
  - Restore Calcareous grassland on the valley sides to contribute to biodiversity and to improve water quality (over arable). (Type E chalk Valley Systems)

#### *Monitoring*

- 4.46 The [2022-2023 AMR](#) (published December 2023) includes an indicator on the number of applications achieving Biodiversity Net Gain (BNG) & not achieving Biodiversity Net Gain (indicator SDLP14: Number of applications achieving Biodiversity Net Gain & not achieving Biodiversity Net Gain).
- 4.47 Applications generally considered to be likely within scope for the future BNG mandatory requirements were reviewed. This excluded applications which were, for example, householder applications, small scale self-build, works only to existing structures (e.g. replacement windows), change of use applications of existing buildings, temporary development under 2 years, development that would impact less than 25 square meters of habitat, Tree Preservation Orders (TPOs), discharge of conditions or amendments to proposals already permitted
- 4.48 Of these, over 63% of planning applications included biodiversity measures either directly linked to achieving biodiversity net gain or as general biodiversity enhancements but were not measured using the BNG Metric. Examples of

enhancements most typically provided were wildflower planting, green roofs, tree and hedgerow planting and enhancements, and rain gardens. It is noted that there were several references to species-specific measures such as bird and bat boxes contributing to BNG. Whilst these are important biodiversity enhancements, these are not within the scope of BNG as defined in the BNG Metric. Twelve planning applications included measurements of BNG using the Metric. The 12 applications that used a BNG Metric delivered a net total of 23.71 habitat Biodiversity Units (BU), 9.85 hedgerow biodiversity units and 0.35 watercourse units. Further details are in the AMR.

- 4.49 A further indicator monitored within the AMR 2023 is – Indicator SDLP15: Schemes granted permission for biodiversity offsetting. Biodiversity offsetting is an approach which, circumstance, may be considered appropriate when certain requirements for biodiversity cannot be achieved on the site of development proposals. A green finance market for nature-based solutions is emerging across England for securing biodiversity offsets. Most notably due to relatively recent requirements for nutrient neutrality to address the Habitats Regulations, and legislative requirements under the Environment Act for mandatory Biodiversity Net Gain from 2024. SDNPA has been a lead player in this market through its ReNature Credit scheme. Several sites have been secured for BNG and/or Nutrient offsetting in the National Park. At the time of writing the AMR, the offsetting sites that currently have capacity with credits available are Gawthorpe Estate and Whitewool Farm for Nutrients and Iford Estate for BNG.
- 4.50 There were 43 applications for a total loss of 158 trees. Of these losses, 25 applications had conditions to replace lost trees. 21 of these applications replaced all trees that were removed as part of the application and only 4 applications had conditions to replace some of the trees. Of the 25 applications a total of 80 trees were to be planted to replace those lost, meaning approximately 51% of lost trees were conditioned to be replaced. This is a percentage decrease from 60% in the previous year. Lack of space for viable replacements on site will account for some of the applications that did not include replacement of all TPO trees.
- 4.51 In 2019 SDNPA developed a baseline and a means to measure ‘Urban Greening’ within the larger the National Park. As a time series of data, it provides a way of assessing trends in the component of Green Infrastructure that exists within the urban areas. This can help the LPA to understand how effective the policies are in terms of encouraging the provision of Green Infrastructure or the impact of Biodiversity Net Gain. Given the Local Plan was not adopted until 2019, the influence of policies is still hard to assess. Most urban settlements are seeing small gains in terms of their urban greenness.

*What other evidence will we be collecting?*

- 4.52 There is already significant baseline information, and these will form the background evidence for the LPR. Additional work will be undertaken on BNG, and wider biodiversity matters as part of the site assessment process as set out in the LAA assessment criteria. An HRA will be undertaken for the LPR.

Policy Context

4.53 The NPPF 2023:

- recognises that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

4.54 The following policies within the South Downs Local Plan directly relate to archaeological and cultural heritage.

- SD12: Historic Environment
- SD14: Climate Change, Mitigation and Adaptation of Historic Buildings
- SD15: Conservation Areas
- SD16: Archaeology

4.55 The purpose of the policies is to set out a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets.

*Current Evidence and Local Guidance Documents:*

South Downs Local Plan 2019 and background documents

Conservation area appraisal and management plans (21 have been updated for CAs within the National Park to date). Others will be updated on a rolling programme. Existing versions of CAs may be held by the relevant local planning authority. The SDNPA appraisals can be found here: [Conservation Area Appraisals](#)

Historic Environment Records for East and West Sussex and Hampshire

Registered Parks and Gardens included on the National Heritage List

Listed Buildings – Heritage List

Made Neighbourhood Plans (various dates)

4.56 The National Park has a rich and varied cultural heritage ranging from historic settlements and buildings to archaeological sites of all periods. It is critical that the historic environment is regarded as a positive and irreplaceable asset, valuable not only in cultural and economic terms, but as a frame and reference point for the creation of attractive places for current and future generations to enjoy. The term cultural heritage, which is part of Purpose 1 of the National Park, includes physical features such as archaeological sites and finds, historic buildings, fields and settlements, and more hidden evidence of how people used to live such as folk traditions, customs and work by creative people. The historic environment is part of cultural heritage.

4.57 The South Downs is particularly rich in prehistoric remains. Although it is difficult to assess whether their density per hectare exceeds those expected in other landscapes in south east England, there is no doubt that the signs of many previous civilisations are

extremely prominent, on the open chalk in particular. Archaeological investigations have been carried out in the National Park for over 100 years, yet much probably remains to be discovered, especially in the more densely wooded areas between the River Arun and the A3. (reference [State of the National Park Report 2012](#)).

- 4.58 Historic landscape characterisation identifies the elements in the landscape that have survived and influenced the current landscape. Historic Landscape Characterisation work is carried out on a county basis; therefore the National Park is included in the Sussex and Hampshire studies of Historic Landscape Characterisation reports and maps.
- 4.59 The topography of the landscape has a direct relationship to the settlement pattern in the National Park owing to its effect on the varying fertility of soils and subsequently the availability of resources, and its effect on the accessibility and viability of the land for cultivation. The scarp slope of the chalk ridge, as an example, has no record of cultivation, enclosure or settlement, although its strong relationship with the settlement pattern is in relation to the so called 'underhill villages' which are located on the springline between the chalk and the clay at the foot of the slope. There is often an 'underhill lane' connecting the line of settlements. These settlements are often linear in form. This settlement pattern is repeated along the length of the scarp slope from Eastbourne to Selborne.
- 4.60 In terms of designated sites, this includes 152 Grade I, 221 Grade II\* and 4,798 Grade II Listed Building entries 616 Scheduled Ancient Monuments, 166 Conservation Areas, 30 Registered Parks and Gardens, and 2 Registered Battlefields. (reference [State of the National Park Report 2012](#)).
- 4.61 Historic England undertakes an annual audit of the historic environment and produces a 'Heritage at Risk' Register. Many of these are located within the National Park.
- 4.62 The National Park is a place of inspiration for composers, writers, musicians, poets and artists – there are so many that only the most significant are mentioned here (reference [State of the National Park Report 2012](#)):
- Edward Elgar found fresh inspiration after the darkness of World War I and wrote the Cello concerto whilst living near Fittleworth.
  - The words to 'Jerusalem' are from one of the poems of William Blake, allegedly inspired by the view of the South Downs from Lavant.
  - Turner spent many summers at Petworth House where the Earl had a special studio built for him, to capture the best of the light.
  - The most important author associated with the National Park is Jane Austen, several of whose major works were written when she lived at Chawton.

### *Monitoring*

- 4.63 The 2023 AMR has monitored the percentage of Listed Buildings at risk. 1.16% (69 buildings) of all buildings, are now recorded as being at risk. The redundant Railway Goods Shed at Singleton Station was added to the at-risk register during the monitoring year. It is hoped that the building will be repaired and reused as part of the Centurion Way project to transform the previous railway line into a long distance multi-mode link. The percentage of buildings being at risk remains very low by national standards, probably reflecting high property values within the National Park.

Consequently, buildings and structures of limited or no economic value are expected to become ever more prominent among those listed buildings identified as at risk.

- 4.64 The 2023 AMR includes indicator SDLP22: Conservation Area Appraisals and Management Plans written. There is no specific target for updating Conservation Area Appraisals and Management Plans (CAAMP), however, the Authority does have a rolling programme for updating them. A total of 22 CAAMPs are adopted by the Authority. In the 2022/23 monitoring year, the Nepcote (within Findon, West Sussex) conservation area was designated with the CAAMP formally adopted at Planning Committee in March 2023. As of October 2023, the Lewes CAAMP was adopted at Planning Committee.

*What other evidence will we be collecting?*

- 4.65 There is already significant baseline information, and this will form part of the evidence base for the LPR. Cultural and heritage matters will be considered as part of the site assessment process.

## Climate Change

### Policy Context

- 4.66 [The Paris Agreement 2015](#) (UN Climate Change Conference), is a legally binding international treaty on climate change. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to pre-industrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by mid-century.
- 4.67 [The Climate Change Act 2008](#) sets legally binding targets to reduce carbon dioxide emissions in the UK by at least 80% by 2050, from 1990 levels.
- 4.68 [The Energy Paper – Powering our Net Zero Future 2020](#) presents a vision of how the UK will make the transition to clean energy by 2050.
- 4.69 [The Planning and Energy Act 2011](#) enables local planning authorities in England and Wales to set requirements for energy use and energy efficiency in local plans.
- 4.70 The NPPF 2023:
- The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
  - Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.



4.71 The following policies within the South Downs Local Plan directly relate to climate change and flooding:

- SD2: Ecosystem Services
- SD48: Climate Change and the Sustainable Use of resources
- SD49: Flood Risk Management
- SD50: Sustainable Drainage Systems
- SD51: Renewable Energy

4.72 Their purpose is to embed a holistic approach to managing natural resources into the Local Plan, encourage high standards of sustainable building design and reduce vulnerability to flood risk and the impacts of flooding.

#### *Current Evidence and Local Guidance Documents*

A greenhouse gas emissions assessment and target recommendations for the South Downs National Park 2022

Small-scale Renewable Energy TAN 2022

SE River Basin Management Plan updated 2022 Sustainable construction SPD 2020

People and Nature Network Evidence and Action Plan SDNPA 2020

Climate Change Strategy and Action Plan 2020

South Downs Local Plan 2019 and background papers

Water Cycle Study 2015 Scoping and Outline Report 2015

Level 1 Update and Level 2 Strategic Flood Risk Assessment 2017

Flood Risk and the Sequential Test for Site Allocations Background Paper 2017

The South Downs Climate Change Climate Change Adaptation Plan 2016

Renewable and Low Carbon Energy Study (2013)

Catchment Management Plans (Adur & Ouse, Arun & Western Streams, Cuckmere & Pevensey Levels, East Hampshire, Test & Itchen, Wey) 2009

Made Neighbourhood Plans (various dates)

4.73 Climate change will result in a range of direct and indirect effects on both the natural and human environment including flooding, increased soil erosion related to both sea level rise and current and projected wetter winters. This may impact on soil condition with increased erosion and nutrient loss. Drier summers will exacerbate the predicted supply/demand deficit for water supply.

4.74 UK air temperatures continue to rise with the strongest average monthly temperature increases being in the Southeast along with the Midlands and East Anglia. The analysis suggests that the Southeast will experience hotter, drier summers and warmer wetter winters with more extreme weather events.

4.75 Global sea level has risen over the 20<sup>th</sup> century and will continue to rise over the coming centuries. UK tide gauge records show substantial year-to-year changes in

coastal water levels (typically several centimetres) (source [Met Office](#)). Sea level will continue to rise to 2300 under all climate change projections. The global average sea level ranges at 2300, relative to a 1981-2000 baseline period, are: - 0.6–2.2m (low emissions scenario, RCP 2.5) – 0.9–2.6m (medium–low emissions scenario, RCP 4.5) – 1.7–4.5m (high emissions scenario, RCP 8.5) The UK land surface is tilting, with Scotland rising and southern England sinking, such that greater rates of sea level rise will be experienced in the south of England (source [Environment Agency](#)).

- 4.76 Mitigating against and adapting to climate change is an international and national priority. The Vision and Circular for English National Parks states that national parks should lead the way in adapting to and mitigating climate change. Development should therefore minimise the National Park’s vulnerability to climate change through reducing and mitigating the factors which are causing it and become more resilient by being able to adapt to its effects.
- 4.77 The [South Downs National Park Climate Change Adaptation Plan 2016](#) states that the South Downs is particularly vulnerable to the impacts of present and future climate change. It sets out a range of responses to the risks and opportunities from climate change, including flood and coastal erosion management, building ecological resilience to the impacts of climate change and effective water management.
- 4.78 The design and construction of new development with improved environmental performance is a critical part of delivering sustainable development. Even without climate change, there is still an imperative to promote development which meets the highest possible environmental design standards which minimises the use of finite resources.
- 4.79 The National Park’s extensive chalk geology makes groundwater flooding a key issue with several areas at risk.
- 4.80 A [Strategic Flood Risk Assessment](#) (SFRA) was undertaken for the Local Plan. Areas at risk of surface water flooding typically follow the main water courses and dry valleys in chalk downland areas. The SFRA also identifies that groundwater influence on fluvial flooding is a problem along the Findon Valley and Rivers Itchen, Meon, Lavant, as well as some of the smaller tributaries.
- 4.81 Generation of electricity from renewable sources is increasing in the Southeast. In 2021, the region generated 2843 GWh of electricity; equivalent to 7% of England’s total renewable energy generation (source [Government statistics found here](#)). The [Rampion Offshore Wind Farm](#) project, visible from the Adur Valley has an installed capacity of 400 megawatts (MW) and will generate almost 1,400 Gigawatt hours (GWh) of power each year. This is equivalent to the amount of electricity used annually by almost 350,000 British homes, or around half the homes in Sussex.
- 4.82 Climate change is already adversely affecting human health through:
- direct impacts – including health impacts of rising temperatures and extreme weather events
  - indirect impacts via ecosystems – such as impacts on global food supplies and changes in vector-borne disease transmission
  - indirect impacts via socioeconomic systems – including increased poverty, migration, and intensification of existing inequalities, through loss of livelihoods (e.g., due to crop failure) and reductions in habitable land (e.g., due to flooding or extreme temperatures).



- 4.83 These impacts are not evenly distributed, and significant inequalities exist. [The third UK climate risk change assessment](#), an independent report by the Climate Change Committee, outlines some of the major health impacts of climate change facing the UK. These include increases in the frequency of extreme weather events, rising temperatures, flooding, vector borne disease as the climate becomes most hospitable to animal-borne infectious diseases, food security and safety, poor air quality and disruption to water supplies. Some of these risks will also have an impact on the delivery of health and social care services in the UK.

#### *Monitoring*

- 4.84 The 2022 AMR (previous AMR reports can be found [here](#)) states that there were there were 54 permissions wholly within Flood Zone 2 and 3. No permissions were determined contrary to the advice of the Environment Agency (EA).
- 4.85 With reference to indicator SDLP64: Number of full planning permissions for renewable energy development, a total of A total of 13 full permissions were granted for renewable energy development in the reporting year. The great majority of domestic scale renewable energy installations can be carried out without the need for planning permission and so are not covered by this indicator. New housing or commercial developments, where renewable energy infrastructure forms only a minor element of the wider scheme, are also not listed. There were 11 permissions for solar photo-voltaic (PV) panels, including 6 permissions for small scale ground mounted solar arrays to serve domestic properties and a rural business (vineyard). One permission was granted (retrospectively) for a ground source heat pump in Ovington, Hampshire to serve a Grade II listed building. The proposal was considered to have a low impact and support the sustainability and energy efficiency of the listed building. Following a public inquiry, permission was granted in March 2023 for the A3 Bursledon Interchange. The redevelopment provides a new electric vehicle (EV) charging station with flexible commercial space and new tourist accommodation. The scheme is proposed to be off grid with combined heat and power, using agricultural waste (biogas) and solar power. Biogas (compressed liquefied gas-methane) created from agricultural waste and sourced from Hampshire farms will be delivered to the site.

#### *What other evidence will we be collecting?*

- 4.86 There is already significant baseline information, and this will form part of the evidence base for the LPR. In addition, a water cycle study update will be commissioned for the LPR and FRAs will be undertaken as part of the site allocation work. It is noted that numerous policy changes have taken place since the production of the previous flood risk evidence-based documents. To ensure that the evidence base is robust and up to date, Level 1 and 2 SFRA's will need to take into account the latest Climate Change Allowances Flood risk assessments, guidance on Flood Risk and Coastal Change (last updated 25 August 2022) and guidance on Preparing Strategic Flood Risk Assessments (last updated 31 March 2022). Level 2 SFRA's will be required for any sites proposed within FZ2 and 3. The Environment Agency will be providing updates to the national flood and coastal erosion risk information in 2025 (NaFRA2). We would also expect to see an updated Sequential Test and Exception Tests as appropriate. Further evidence on sustainable construction will be produced and renewable energy study is to be undertaken.

Policy Context

4.87 The NPPF 2023:

- Planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change (paragraph 98).
- Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. This includes the social objective of supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being (paragraph 8).

4.88 There are multiple strategies and policies that can be linked to this broad theme of health and wellbeing, however, the following policies within the South Downs Local Plan most directly relate to the topic:

- SD2: Ecosystems Services
- SD20: Walking, Cycling and Equestrian Routes.
- SD21: Public Realm, Highway Design and Public Art.
- SD43: New and Existing Community Facilities.
- SD45: Green Infrastructure.
- SD46: Provision and protection of open space, sport and recreational facilities and burial grounds / cemeteries.
- SD47: Local Green Spaces.

4.89 The purpose of the policies is to set out how development proposals will be expected to deliver infrastructure as well as the provision or protection of community facilities.

*Current Evidence and Local Guidance Documents:*

Census data 2011 and census 2021 first results

Healthy lives, healthy people: East Sussex Health and Wellbeing Board Strategy 2022

WSSC Public Health & Sustainability Framework 2021

Health and Well-being Strategy 2020-2025

People and Nature Network Plan Evidence and Action Report 2020

South Downs Local Plan 2019 and background papers

The South Downs National Park Open Space, Sports and Recreation – Background paper 2017

The Access Network and Accessible Natural Green Space Study 2013.

Public Rights of Way network maps

Made Neighbourhood Plans (various dates)

- 4.90 The population of the South Downs is predominantly rural with an average population density of 67 people per square kilometre compared to a southeast average of 440 people per square kilometre (reference State of the Nation Report 2012).
- 4.91 Most of the South Downs is privately owned and farmed. It is heavily populated compared to other National Parks with 117,000 residents ([Partnership Management Plan 2020 – 2025](#)).
- 4.92 The population of the South Downs National Park is growing, although at a slower rate than that of the comparator areas. It increased by 9,152 or 8.4% between 2002 and 2016. It is expected to increase by 7.95% or 9,150 people by 2033 ([Economic Profile of the South Downs National Park 2018](#)).
- 4.93 As is the case in most areas in the UK, the population in the South Downs National Park is ageing. Although there has been growth in the 16-24 and 45-64 age bands between 2002 and 2016, this has not been sufficient to offset decline in the 0-15 and 25-44 age groups and the growth in the over 65s. The biggest growth of 3.1% has been in the 65-74 age band (Ref: Economic Profile of the South Downs National Park 2018). The 65+ age group has continued to increase at the fastest rate and now makes up 25.35% of the population in the National Park while 25 to 44 year olds have shown the greatest decline (reference [Economic Profile update 2020](#)).
- 4.94 The dispersed nature of settlements and facilities is highly characteristic of the area but combined with limited public transport infrastructure places a high dependence upon cars and can leave people isolated.
- 4.95 The future of the National Park, like its past, is interdependent with the communities that surround it. More than 2.2 million people – including those in Chichester, Winchester, Worthing, Brighton & Hove, Eastbourne and Alton – live on its doorstep, and London is just over an hour away (reference Partnership Management Plan 2020 – 2025). Being able to access the National Park for enjoyment and recreation is therefore important to many people. Enjoyment of the outdoors brings many health and well-being benefits. However, those communities where health is poorest often do not have areas of accessible greenspace close to where they live to gain those benefits.
- 4.96 [Mapping of the indices of multiple deprivation](#) of health shows that urban areas adjacent to the National Park and within the market towns include pockets of poverty and poor health.

- 4.97 Inequalities exist in both physical and educational access to the countryside and cultural facilities between different social groups and there are some locations, particularly in urban areas, where the population has limited access to open space.
- 4.98 In 2013, the South Downs National Park Authority carried out a study to better understand how well the green open access areas of the National Park serve people living in and around it, and the potential pressures on this resource – the study can be found here: [The Access Network and Accessible Natural Green Space Study](#).
- 4.99 Although the SDNPA is not a sport and recreational facilities provider, it works with the twelve local authorities who are responsible for the delivery of sports and recreation facilities within their district, borough or city, both in and outside of the SDNP. [The South Downs National Park Open Space, Sports and Recreation Background paper 2017](#) reviewed the open space standards in operation throughout the National Park. The role of indoor spaces, community centres and village halls (for example) are very important for indoor recreational activities, and these provide an important benefit for mental and physical health and community cohesion.
- 4.100 An Open Space Audit with Parishes is to be undertaken as part of the LPR work. This will be a collaborative approach between SDNPA and parish councils. Information will be sought on what open space exists within a parish, what condition it is in and any other issues (such as is it accessible etc).
- 4.101 Policy SD47 in the adopted Local Plan designates Local Green Spaces, which have been promoted to the National Park Authority as demonstrably special to the local community. Many are also allocated within made neighbourhood plans.
- 4.102 Health and Well-Being sits within a broader work stream to connect individuals, families, groups and communities to the South Downs National Park. The Health and Well-Being strategy identifies the issues, presents evidence to support them and sets out how the SDNPA working with partners will address them. It is considered National Park is an under-utilised and under recognised asset for improving the mental and physical health and general well-being for those who live in and around it. The Health and Well-Being system is complex - currently in the South Downs National Park there are 4 Authorities with a public health remit, each with a statutory Health and Well-being Board. There are 6 Clinical Commissioning Group areas, 15 Clinical Commissioning Groups and 4 Sustainable Transformation Plans. Each have differing priorities.
- 4.103 The key issues for the National Park are set out in the [Health & Well Being Strategy](#) include: Access to accessible natural green space: we know there are deficits in the South Downs National Park (SDNP) despite being a largely rural area, lack of access to facilities and services in local towns and villages, the demographic profile of those who are more likely to access the National Park means that those who currently use the Park do not include underrepresented groups in or around the Park, addressing poor awareness of the existence of the South Downs National Park particularly in certain demographic groups, lack of knowledge of what there is to do and see in the South Downs National Park, Addressing barriers to access which are multiple and include: awareness and cultural and socio-economic issues and severance and connectivity are issues, with major roads preventing many communities from easily getting access to the National Park. There is also a lack of access to transport and lack of public transport into and around the National Park, accessibility and infrastructure for people

with a range of disabilities is also an issue and climate change and impacts on health are well established.

4.104 Other key issues with regards to health and wellbeing include:

- maintain and improve access to nature and to play and recreation increasing physical activity and providing health and wellbeing benefits such as positive mental health and including helping and reducing long term illnesses.
- maintain and improve social cohesion and reduce social isolation and loneliness.
- food security, access to healthy food, and growing spaces. The health benefits of food growing needs to be recognised not only increasing healthier eating but the benefits to physical and mental health and wellbeing.
- lifetime and adaptable homes that meet the needs of the ageing population.
- maximising opportunities for healthy design principles.
- active travel.
- healthy lifestyles and mental health.
- creation of environments and links to services and facilities which enable increased physical activity including those living with dementia and long-term illness and disability.

#### *Monitoring*

4.105 The 2023 AMR states that there were There were 37no. applications determined in the monitoring year which were either within, partly within, or shared a boundary with a Local Green Space (LGS). In the monitoring period, there were 16no. applications determined which were either partly within, or shared a boundary with, an LGS. Of these, 13no. applications related to either householder applications or listed building consents (including non-material amendments and discharge of conditions) for properties which were outside, but whose curtilages were either adjacent to, or were partly within a, LGS. These were all considered to have had very minimal impacts on the LGS designations. In the monitoring year, there were 21no. applications determined within a LGS designation, these included full permissions, nonmaterial amendments, discharges of conditions, and variations to conditions etc.

4.106 The AMR 2023 also measures Indicator SDLP29: Developments granted planning permission for community, culture, leisure and recreation facilities. In the monitoring year, there were 9no. permissions in relation to the net gain and/or net loss of sports related community facilities. Of these, 8no. resulted in a net gain of approx. 15,523sqm, whilst 1no. resulted in the net loss of 216sqm of floorspace.. In the monitoring year, there were 9no. permissions for the net gain and/or net loss of floorspace in relation to a farm shop, a place of worship, public houses (PH), nursery schools, and village halls. The only loss was 30sqm from the whole and partial loss of the outbuilding and car park respectively at the Whistle Stop PH (Liss). This was to facilitate the delivery of a new dwellinghouse. There were 3no. permissions which related to the net gain in floorspace for cultural facilities. There were 6no. permissions

in relation to the net gain and/or net loss of “other” leisure or recreation related development.

*What other evidence will we be collecting?*

4.107 There is already significant baseline information, and this will be used as background evidence for the LPR. An open space audit undertaken with parish councils will be completed as part of the LPR work. In addition, a Settlement Facilities study will be undertaken, and a Town Centre/Retail audit completed. A Health & Wellbeing background paper to the LPR will be prepared.

### *Economy and Employment*

Policy Context

4.108 The NPPF 2023:

- Identifies the economy as one of the three dimensions to sustainable development.
- Requires planning authorities to plan proactively to meet the development needs of business.

4.109 The South Downs Local Plan directly relates to employment and land use:

- SD25: Development Strategy
- SD23: Sustainable Tourism
- SD34: Sustaining the Local Economy
- SD35: Employment Land
- SD39 Agriculture and Forestry
- SD40 Farm and Forestry Diversification
- SD41 Conversion of Redundant Agriculture or Forestry Buildings

4.110 The purpose of the policies is to promote and protect local businesses without compromising the purposes of the National Park.

*Current Evidence and Local Guidance Documents*

Viticulture Technical Advice Note April 2021

SDNPA Economic Data Update 2020

SDNPA Climate Change Adaption Plan 2020

Planning Position Statement 2020

SDNPA Partnership Management Plan (2020 – 2025)

South Downs Local Plan 2019 and background papers

Economic Profile of the South Downs National Park (2018)

Coast to Capital LEP Strategic Economic Plan 2018-2030

A Strategic Economic Plan for the Enterprise M3 (LEP) Area 2018 – 2030

Visitor Survey 2018 Final report

SDNPA Housing and Economic Development Needs Assessment (2023)

SDNPA Retail Evidence Study 2016

SDNPA Employment Land Review 2015 and 2017 update

SDNPA Tourism Strategy 2015

The Southeast LEP Strategic Economic Plan 2014

The Local Plans/City Plan and Economic Strategies for: Adur & Worthing, Brighton & Hove, Arun, Horsham, Mid Sussex, Wealden, Lewes & Eastbourne, East Hampshire, Winchester and Chichester local planning authorities (various dates).

Made Neighbourhood Plans (various dates)

- 4.111 Following on from the State of the Park Report, the Local Plan identifies three key sectors or clusters of economic activity, namely farming, forestry and tourism. These sectors are all rooted in the National Park purposes and are linked to ecosystem services, particularly provisioning and cultural services. This Local Plan supports the expansion of these existing business sectors where to do so is compatible with the landscape and special qualities.
- 4.112 The South Downs National Park has seen growth in its business population of 18.7% in the last five years to over 8,000 businesses. The business population has grown more than that of Enterprise M3 but not as much as that of the other comparator LEPs: Solent LEP, Southeast LEP and Coast to Capital or the Southeast Region as a whole. The two largest sectors in the National Park are the Professional, Scientific & Technical sector which makes up nearly 21% of businesses, followed by Construction with nearly 11% of businesses. Agriculture, Forestry & Fishing is the third largest sector accounting for nearly 9% of businesses. (reference Economic Profile of the South Downs National Park 2018).
- 4.113 There were 9,440 jobs in the visitor economy in 2018. This accounts for 17% of total employment, highlighting how significant the visitor economy is to the South Downs National Park. Visitor economy employment is also higher than the visitor economy share of the business population in the South Downs National Park of 10.5%. Food & Drink makes up over half of visitor economy employment with 53% or 5,045 jobs. Accommodation is the second largest visitor economy sector with 14% or 1,330 jobs in 2018 while Museums, Heritage & Gardens is in third place with 12% or 1,150 jobs. (reference Economic Profile update 2020).
- 4.114 Manufacturing makes up 5% of the South Downs National Park's businesses with a total of 380 enterprises out of 8,135 in 2019 according to ONS. There were 4,335 people employed in Manufacturing in the South Downs National Park in 2018, 8% of employment. Architectural & Engineering Activities together with Civil Engineering provide a further 1,750 jobs or 29% of total Manufacturing & Engineering employment when both sectors are taken together. The largest sub sector is Manufacture of Motor Vehicles, which is helped by the presence of Rolls Royce in Chichester district. Although high technology manufacturing accounts for only 5% of manufacturing employment, 58% of South Downs manufacturing jobs are in the medium to high technology bracket. (Reference Economic Profile update 2020).



- 4.115 Many areas of the SDNP suffer from poor broadband access and this is a constraint to competitiveness and at home working and a key issue to be addressed.
- 4.116 Business creation and survival rates are generally good in the National Park, although lower than in the comparator geographies. The South Downs National Park business population has not shown the same growth rates as the other areas. The reasons for slower rates of business growth in rural areas commonly include the lack of premises for expansion and planning constraints, poorer infrastructure including ICT, difficulty in attracting skills. (Reference Economic Profile update 2020).
- 4.117 Many businesses in the South Downs National Park are micro businesses with fewer than 10 employees. In 2019, 7,350 firms or 90% were in this category while 665 or 8% were categorised as small with 10 to 49 employees. However, South Downs National Park has lower percentages of medium and, particularly, large companies, probably due to restrictions on employment space. This may also account in part for the lower growth rates in the National Park, with fewer large companies to support supply chains. (Reference Economic Profile update 2020).
- 4.118 There is a similar distribution by turnover size band with many businesses in the South Downs National Park and the comparator areas falling into two smallest size brackets i.e. the less than £100k and the £100k to £500k turnover brackets. However, South Downs National Park has the highest percentage in the second largest £0.5m to £1m bracket and the lowest percentage in the largest turnover size band of more than £1m per annum. (Reference Economic Profile update 2020).
- 4.119 A balance needs to be struck between not encouraging environmentally deleterious economic growth and supporting local communities that require well paid employment if they are to afford to live in the area.
- 4.120 [Local Economy Indicators](#) state that the GVA per capita of the South Downs National Park is broadly similar to the Southeast and well above many parts of the UK. The unemployment rate is well below the national average. The average rural house price is over £400,000, whilst in the towns it is over £270,000. There are, therefore, high levels of both in and out commuting for work. Whilst this set of information is now out of date due to the new census figures – the [Economic Data 2020](#) document provides some recent information. The business population of the South Downs National Park comprised 8,135 registered enterprises in 2019, a growth of just 120 enterprises or 1.5% since 2016. The rate of growth has slowed considerably.
- 4.121 The Employment Land Review (ELR) [Employment Land Review](#) and the HEDNA [Housing and Economic Needs Assessment](#) are the main evidence based studies supporting the Local Plan policies on employment. The scoping report refers to the newly published 2023 HEDNA. The purpose of the policies in the Local Plan are to promote and protect local businesses without compromising the purposes of the National Park. Strategic Policy SD34: Sustaining the Local Economy is consistent with the spatial strategy of a medium level of development dispersed across the National Park.
- 4.122 Food and beverages form an important economic sector. Vineyards and wineries are an expanding part of this sector, with the soils and weather patterns on the south facing dip slopes being ideal for grape production.
- 4.123 [Viticulture Technical Advice Note \(TAN\)](#) reported there are currently 51 vineyards, of which 11 include wineries, covering 436 ha of land in the SDNP. These vineyards and



wineries employ 358 people including seasonal labour, attract approximately 33,000 visitors a year and contribute directly approximately £24.5 million to the local economy; this contribution increases to £54 million if impacts on the wider economy are included. The scale of cool climate viticulture in the SDNP has the potential to increase dramatically with the study identifying 39,700ha of land in SDNP (34% of existing farmland) as being suitable for viticulture.

- 4.124 Agriculture and forestry/woodland management (henceforward referred to as 'forestry') are the two largest land uses in the National Park. The way they are carried out is therefore fundamental to delivering the first purpose of the National Park- the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the area. Supporting farming and forestry businesses also helps the National Park to meet its socioeconomic duty. While farming and forestry themselves may only employ a small proportion of the National Park's total population, these jobs are of greater significance in remoter areas of the National Park. Reference [Agriculture and Forestry Background Paper 2017](#).
- 4.125 The South Downs National Park is the largest rural resource for recreation and tourism in the Southeast of England, thus tourism plays a significant role in its local economy. The last overarching estimate showed that the National Park has approximately 46 million visitor days per year, making it the most popular Protected Landscape in the country which generates an income of nearly £5 billion and supports some 12,000 jobs. The South Downs National Park is found within just a few miles of several major conurbations and close to numerous major national transport gateways and is accessible to over 10 million people regionally – reference [Tourism Strategy 2015](#).
- 4.126 Popular and accessible though it is, the National Park also has fragile habitats and sensitive areas, a small number of hotspots currently attract a very disproportionate number of its visitors, and the vast majority arrive by car.
- 4.127 The [South Downs Visitor Survey 2021](#) has shown that one in four people who visited the National Park were local to the area (within a 10-mile radius), while just over a third visited for the day but lived further away. Around a fifth of people spoken to were staying overnight, either inside or outside the National Park boundary. There have been minor variations as to where people visited the Park from, in comparison to the previous survey period (2018, pre-COVID-19).
- 4.128 The most notable variation was the lower proportion of international respondents in 2021 which is not a surprising finding given the pandemic restrictions and uncertainty. There has also been a positive increase in the proportion of first-time visitors to the National Park since 2018 (+10%). The average length of overnight stays has fallen since 2018, from an average of 4.7 nights to 3.9 nights in the most recent survey period. The average spend per person per night has however increased (+£11.71 on average per night) when compared to 2018. Eight in ten respondents had either used a petrol/diesel private vehicle (77%) or, a private electric vehicle (4%) to visit the National Park. This result has remained relatively consistent compared to 2018.
- 4.129 The purpose of Policy SD23: Sustainable Tourism is to foster the responsible and sustainable delivery of tourism and recreation development in accordance with the Sustainable Tourism Strategy. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of the National Park.

- 4.130 While the National Park Authority will support growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or causing physical erosion.

#### *Monitoring*

- 4.131 The 2023 AMR states a net total of 9,401sqm of new employment floorspace was completed during the monitoring year. The amount of completed floorspace decreased in 2022/23 compared to the previous year, both the gross and net figures. The gross figure of 10,752sqm compared to 12,201sqm in 2021/22. The net figure of 9,401sqm was lower than the 10,507sqm completed in 2021/22. Floorspace lost in 2022/23 was 1,351sqm, compared with 1,694sqm in 2021/22.
- 4.132 There is extant planning permission for 89,468 sqm of gross new employment floorspace and permitted losses of 37,754 sqm. This results in a net permitted employment floorspace in the National Park of 51,714 sqm.
- 4.133 A total of 28 planning applications for visitor accommodation were determined between 01 April 2022 and 31 March 2023. The number of rentable units permitted is slightly higher than last year (2021/22), with the majority for self-catering accommodation units. This is due to the 60no. Eco-Lodges (Class C1) allowed on appeal on land north of the A3 Junction at The Causeway, Petersfield. There were 4no. permissions for campsites granted in 2022/23. The permitted 86 self-contained units are the equivalent of 188 beds, with the majority (104 beds) permitted on appeal at land north of the A3 Junction at The Causeway in Petersfield. This was the most substantial scheme permitted in 2022/23 and includes the proposed delivery of 60 eco-lodges (44x 2-bed units and 16x 1-bed units), alongside retail, renewable energy and transport infrastructure. Other than this application, all other permissions across the National Park included smaller-scale new-build, or existing building conversions and extensions, for self-contained visitor accommodation units. There was a loss of 3no. rooms in 2022/23. The Authority only determined one application in 2022/23 which involved hostel-type visitor accommodation.

#### *What other evidence will we be collecting?*

- 4.134 There is already significant baseline information, and this will be used as background evidence for the LPR. It is recognised that much of this was written pre the Covid-19 pandemic which started in 2020. Therefore, further updates will be completed for the LPR such as the site based Employment Land Review and the town centre audit. A Housing and Economic Development Needs Assessment (HEDNA) has now been completed and a tourism strategy update. Any new documents completed by other agencies and local authorities will also be used..

### *Equality*

#### *Policy Context*

- 4.135 The NPPF states (in paragraph 96) that planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings. However, there is little specific reference to equality, inequality, deprivation and inclusion.
- 4.136 Direct planning policies Matters relating to equality are not outlined in the adopted Local Plan. However, the following policies include diversity, accessibility and inclusion within the wording:

- Strategic Policy SD19: Transport and Accessibility
- Strategic Policy SD20: Walking, Cycling and Equestrian Routes
- Strategic Policy SD27: Mix of Homes
- Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries.
- Strategic Policy SD33: Gypsies, Travellers and Travelling show people.
- Development Management Policy SD43: New and Existing Community Facilities

*Current Evidence and Local Guidance Documents*

South Downs National Park Partnership Management Plan 2020 - 2025

People and Nature Network (PANN) – Evidence and Action Report

SDNPA Corporate Plan 2020–2025

Current economic indicators for the local economy of the South Downs National Park  
September 2011

Strategic review of Health and Well-being 2020-2025

West Sussex County Council's corporate plan for 2021-2025.

East Sussex County Council: Equality, Diversity and Inclusion (EDI) Action Plan (2024-25)

Hampshire County Council Inclusion Strategy 2021 – 2024

Brighton & Hove City Council Equality & Inclusion Policy Statement and Strategy

The Local Plans/City Plan and Economic Strategies for: Adur & Worthing, Brighton & Hove, Arun, Horsham, Mid Sussex, Wealden, Lewes & Eastbourne, East Hampshire, Winchester and Chichester local planning authorities (various dates).

4.137 The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It is against the law to discriminate against anyone because of:

- age
- gender reassignment
- being married or in a civil partnership
- being pregnant or on maternity leave
- disability
- race including colour, nationality, ethnic or national origin
- religion or belief
- sex
- sexual orientation

4.138 The demographic profile of those who are more likely to access the National Park means that those who currently use the National Park do not include

underrepresented groups in or around the National Park. Addressing poor awareness of the existence of the South Downs National Park particularly in certain demographic groups – young people, people living in urban areas and those from Black and Minority Ethnic (BAME) groups is a key aim of the Health and Well-being Strategy. Addressing barriers to access which are multiple and include: awareness and cultural and socio-economic issues are important. These can affect confidence in, or ability to access and use, the SDNP for some groups or individuals.

- 4.139 The population is mainly characterised by prosperous people living in rural and semi-rural locations with only a few areas characterised by groups associated with low incomes and unemployment and concentrated in the main urban centres. The South Downs is amongst the least deprived areas in England, with no areas falling within the 20% most deprived in England. Where deprivation does exist, it is generally concentrated in urban areas with large social housing estates outside of, or on the edge of the Park boundary.
- 4.140 While the Park is represented by mostly affluent people in desirable locations, there are a few areas characterised by groups associated with lower incomes and unemployment. Where these pockets exist, they are to be found in or around the main market towns. Lastly, the Park does not appear to be a particularly multicultural area, however, this is generally the case in most rural areas in the Southeast (source: [Local Economy Economic Indicators](#))
- 4.141 The population of the South Downs National Park is growing, although at a slower rate than that of the comparator areas. It increased by 9,152 or 8.4% between 2002 and 2016. It is expected to increase by 7.95% or 9,150 people by 2033. The population is ageing with a greater decline in the 0 to 15 and the 25 to 44 age bands and greater growth in the over 65s than the comparator areas. The South Downs National Park has low levels of deprivation, apart from on the measures on barriers to housing and living environment where the lack of affordable housing means it has quite high negative scores. It is in the bottom quintile nationally on barriers to housing due to the low affordability of homes to rent and buy. ([Economic Profile](#)).
- 4.142 The [Partnership Management Plan](#) states that the visitor profile of the National Park shows that certain groups are currently under-represented. In particular:
- Young people (16–24) – Staying visitors are much more likely to be from older age groups (>55 years).
  - People from Black, Asian and Minority Ethnic (BAME) communities. The visitors are overwhelmingly white, with only 1% from BAME communities (compared to 14.8% in the populations surrounding the National Park).
  - People with disabilities – 26% of people polled cited ‘Health issues prevent me’ as a key reason for not visiting.
  - People from areas of social deprivation – 16% of people surveyed said they ‘can’t afford to go/it is too expensive’ as a main reason for not visiting. There are people struggling in the most apparently affluent areas.
- 4.143 With over 3300km of public paths, this National Park has one of the most extensive Rights of Way networks in the country. The 2018 visitor survey showed 73% of visitors came to enjoy a walk, yet many people who live close by are not experiencing it. There is a shortage of ‘family friendly’ paths suitable for inexperienced cyclists and vulnerable

users. Connectivity from market towns and transport hubs can be an issue, and major highway corridors – across the A27 to the coastal fringe, and across the M3 to Winchester – present significant barriers to access. The Authority Strategy for Cycling and Walking sets out an ambitious agenda to improve accessibility for all by creating a network of traffic free routes that are easily reached by communities within and near to the National Park, and which are well connected to public transport.

- 4.144 The South Downs is under huge pressure from car use. The 2018 Visitor Survey estimates that 77% of visits were made by car, creating carbon emissions, air pollution, noise and congestion. Improving public transport into and around the boundary is therefore vital. The retention and expansion of rural transport services is a key issue for the National Park. A transport network that works for both residents and visitors is a critical factor in supporting communities and enabling outstanding visitor experiences, yet rural bus services have reduced in the last five years through cuts in the budgets of Passenger Transport Authorities. This is having an impact on young people's ability to access education and employment and is increasing isolation among elderly or disabled rural residents without access to a car.

#### *Monitoring*

- 4.145 The 2022/2023 AMR has limited monitoring focus on issues of equality, diversity and inclusion. However, it does monitor Strategic Policy SD33: Gypsies and Travellers and Travelling Show people. The Court of Appeal in October 2022 ruled that the planning policy definition of gypsies and travellers discriminates against disabled and elderly members of the traveller community. Across the National Park, Local Authorities are currently updating their need assessments and the implications of any changes will be considered as and when this work is complete. The AMR details the latest position on outstanding need for Gypsies and Travellers for each Gypsies and Travellers Accommodation Assessment (GTAA) covering the National Park.

#### *What other evidence will we be collecting*

- 4.146 Further work will be required to monitor the impact of planning policies and the impact on equalities, diversity and inclusion. This will be started in the SA and continued into the next AMR.

### *Housing*

#### *Policy Context*

- 4.147 The NPPF 2023:

- Sets a strategy to significantly boost housing supply. For the most part, this is focused on meeting the objectively assessed housing needs for the area. However, it also makes very clear that where specific policies indicate development should be restricted, then this requirement to meet the full need does not apply (footnote 7 to paragraph 11, which specifies that National Parks are one such area).
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site.

- In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this.

4.148 The Government recognises that National Parks are not suitable locations for unrestricted housing and states that development needs do not need to be met in protected landscapes. Consistent with government policy, the expectation is that new housing in the SDNP will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

4.149 The following policies within the South Downs Local Plan directly relate to communities and housing:

- SD25: Development Strategy
- SD26: Supply of homes
- SD27: Mix of homes
- SD28: Affordable homes
- SD29: Rural Exception sites
- SD30: Development Management Policy Replacement Dwellings
- SD31: Development Management policy Extensions to Existing Dwellings and Provision of Annexes and Outbuildings
- SD32: Development Management Policy New Agricultural and Forestry Workers' Dwellings
- SD42: Infrastructure

4.150 The purpose of the policies is to identify towns and villages that can accommodate growth, establish the levels of housing expected to be delivered in each one, delivery of affordable housing and the provision of smaller homes. In addition, they ensure that development takes place alongside the protection and provision of infrastructure.

#### *Current evidence base*

South Downs Local Plan 2019 and background papers

Whole Plan and Affordable Housing Viability Report, 2017

Housing and Economic Development Needs Assessment (HEDNA) – 2023

Strategic Housing Land Availability Assessment 2016

Authority Monitoring Reports (2020-2021, 2021-2022 and 2022-2023)

Made Neighbourhood Plans (various dates)

Local Authority Housing Needs Assessments (across the National Park -various dates)



- 4.151 The adopted Local Plan 2019 states the provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to conserve and enhance the villages and market towns as thriving centres for residents, visitors and businesses, whilst conserving and enhancing the landscape of the National Park. Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise by providing homes for local workers. However, the provision of housing should not be at the expense of a nationally protected landscape.
- 4.152 Through the Local Plan the SDNPA made provision for approximately 4,750 additional homes in the period to 2033. The 2023 [HEDNA](#) states that across all tenures, the data shows a dwelling profile skewed towards larger properties when compared with regional and national data – particularly for market housing. The proportion of households with dependent children in SDNP is low with around 25% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally). Given the nature of the area and the needs identified, many units should be houses rather than flats – particularly for homes with 2- or 3-bedrooms. There is potentially a demand for bungalows, although realistically significant delivery of this type of accommodation is unlikely. It is however possible that delivery of some bungalows might be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into family use.
- 4.153 House prices in the SDNP 2015 averaged £365,000. In 2016 the overall median house price across the SDNP was £415,000. Analysis undertaken by Lloyds Bank 2016 (Lloyds Bank National Parks Review), identified that house prices in the 12 National Parks surveyed were, on average, £118,711 (49%) above the average for their surrounding county. The 2023 HEDNA states that data from the Land Registry for the year to September 2022 shows estimated lower quartile property prices by dwelling type. The data shows that entry-level costs to buy are estimated to start from about £193,000 for a second-hand flat and rising to over £600,000 for a detached home. The HEDNA also considers estimates of property prices by the number of bedrooms in a home. suggests a lower quartile price of about £170,000 for a 1-bedroom home, rising to £550,000 for homes with 4-bedrooms.
- 4.154 The HEDNA states that following on from the assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability. Around a third of households have incomes below £30,000 with a further quarter in the range of £30,000 to £50,000. Overall, the average (mean) income is estimated to be around £58,700, with a median income of £50,300; the lower quartile income of all households is estimated to be £29,200.
- 4.155 The National Park Authority supports the principle of rural exception sites, which provide 100 per cent affordable housing delivery on sites which may not be suitable for market housing. Local Plan Policy SD29 sets out the basis for this type of development which is particularly relevant to a National Park. The affordability of housing is a major barrier to sustainable communities in the National Park. There were 3780 households on housing waiting lists in 2010 which represents 7 per cent of all households in the National Park. The numbers on waiting lists in almost all the authorities within the National Park have increased over the last three years. (Reference State of the National Park Report 2012).

- 4.156 House prices in national parks continue to rise, with the average price up 7% (£29,609) in the last year, compared to a 2% rise for the average property in England and Wales. The South Downs has seen price rises, with properties up by 10%. With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of affordable homes, it can be difficult for people working in the National Park to afford to live within it. Young people and young families, in particular, struggle to find low-cost housing which creates a significant local housing need.

#### *Monitoring*

- 4.157 The 2023 AMR states that a net total of 205 new homes were completed during the reporting year in the South Downs National Park. This comprised 239 gross dwelling completions and 34 losses of dwellings. The output for 2022/23 was below the annualised provision figure from the Local Plan. However, the level of completions has picked up from the previous two years when the impact on construction progress of the Covid-19 pandemic and multiple lockdowns was clearly seen. This gradual return to pre-pandemic levels reflects national trends in the construction industry.
- 4.158 The SDNPA has a robust five-year land supply of housing principally due to several large sites coming forward for development at the same time. The supply translates to 6.92 years against the annualised local plan provision figure of 250 dwellings per annum, or 6.58 years against the provision figure plus 5% buffer and taking into account the previous year undersupply (272 dwellings per annum).

#### *What other evidence will we be collecting?*

- 4.159 There is already significant baseline information, and this will provide essential background evidence for the SDNPA. However, further work has been undertaken with the 2023 HEDNA and Land Availability Assessment including a call for sites. A Travellers Assessment will also be undertaken.

### *Transport*

#### *Policy Context*

- 4.160 The NPPF 2023:

- States that local plans should support a pattern of development which, when reasonable to do so, facilitates the use of sustainable modes of transport. Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (paragraphs 104, 105 and 106). It requires local planning authorities to work with neighbouring authorities and transport providers to develop strategies for infrastructure provision.
- Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails (paragraph 100). Paragraph 110 sets out transport issues to be addressed in the selection and design of new development sites.

- 4.161 The following policies within the South Downs Local Plan directly relate to transport and travel:



- Policy SD19: Transport and Accessibility
- Policy SD20: Walking, Cycling and Equestrian Routes
- Policy SD21: Public Realm, Highway Design and Public Art
- Policy SD22: Parking Provision

4.162 Alongside Policy SD25: Development Strategy, the purpose of the policies is to direct development towards the most sustainable locations in transport terms, safeguard and enhance non-motorised routes and provide guidance on design and parking.

#### *Current Evidence and Local Guidance Documents*

South Downs Local Plan 2019 and background papers

South Downs Local Plan Transport Paper 2017

Local Plan Transport Assessment (2016)

WSCC, 2016. West Sussex Walking and Cycling Strategy 2016 – 2026

Roads in the South Downs (2015)

South Downs Transport Study Phase 1 (2013)

West Sussex Transport Plan 2011-2026

East Sussex Local Transport Plan 3 (2011 to 2026)

Hampshire County Council Local Transport Plan 2011-2031

West Sussex Rights of Way Improvement Plan

Made Neighbourhood Plans (various dates)

4.163 Residents, business and visitors to the National Park have a high dependence on cars. This increasing dependence is a reflection of poor public transport infrastructure and the dispersed, rural nature of the communities. For many visitors and residents, it is the highway network that frames the experience of the National Park. Of some 46 million visitor days in 2012, 84% arrived by car. Roads, streets and lanes, their intersections and immediate surroundings, provide the most significant component of their travelling landscape (reference [Roads in the South Downs 2015](#)).

4.164 Travel accounts for 36% of the [South Downs National Park] residents' GHG (Green House Gas) footprint. [The Greenhouse Gas Emissions Study](#) concluded that South Downs National Park residents have a higher greenhouse gas footprint for vehicle fuel than the UK National Average. High visitor dependence upon cars makes car parking an issue particularly for popular destinations and for mass participation events such as long-distance runs / cycle rides. However, there is a rise in the ownership and use of electric vehicles.

4.165 There are many commuting movements each day. Of the estimated 219,244 commuting movements analysed, approximately 57% are within the wider South Downs area of the twelve local authority districts and 43% are outside it. Internally, the most popular destinations are Brighton and Hove, Worthing, Chichester, Mid Sussex and Lewes. The most popular external destinations are Crawley, Westminster, Portsmouth, Waverley and Havant ([source Economic Profile of the South Downs](#)).

Similar capacity issues are affecting coastway services primarily driven by housing development and associated population increases.

- 4.166 The National Park overlaps with four Local Transport Authority areas – Hampshire, West Sussex, Brighton & Hove and East Sussex – each with their own Local Transport Plan. The SDNP is transacted by several strategic highway routes including the A27 (east/west) and A3M / A3, A24, A23 and A26 with north-south routes concentrated within the principal chalk valleys. Pressures for road improvements, often with major cuttings and/or tunnels in the Downs, have been an issue in the eastern downs. This has led to reduced perceptions of tranquillity in open downland landscapes, especially adjacent to urban conurbations.
- 4.167 A detailed [Access Network and Accessible Natural Greenspace Study 2014](#) was carried out. This reviewed connectivity between the Rights of Way network, publicly accessible green space, centres of population and areas of deprivation. The study found that many towns along the southern and western border of the National Park were short of green space. In addition, the National Park is an important area for provision of green space for the whole urban coastal belt, but that connectivity needs to be increased.
- 4.168 The document [Roads in the South Downs 2015](#) was commissioned by the SDNPA in close collaboration with the local highway authorities. It contains guidance on locally appropriate highway design for the area. It combines an approach based on careful analysis of appropriate design speeds for traffic with an emphasis on distinctive place-making, village entrances and an integration of roads and streetscapes with their surrounding buildings, features and landscape elements.
- 4.169 In addition to car travel, there several sustainable travel options within the National Park. There are several bus and rail networks, some of which are well used by people visiting the SDNP (for example - Brighton & Hove bus routes 12/12a/12x/13x which serve Brighton - Eastbourne). There are longer-distance walking and cycling routes that connect external communities to the SDNP (e.g. National Cycle Network Route 2 (Dover, Kent to Dawlish, Devon), Avenue Verte (London to Paris via Newhaven and Dieppe), The South Downs Way and Regional Cycle Route 90 (Brighton to Firle, connecting into National Highways recently delivered shared-use path from Firle to Polegate). Local Plan policy, SD19: Transport and Accessibility, seeks to minimise the traffic impacts of new development and facilitate improvements to public transport. Policy, SD20: Walking, Cycling and Equestrian Routes, is focussed on the protection and enhancement of the ProW network and the safeguarding of land for new routes.
- 4.170 [Active Travel England](#) is responsible for making walking, wheeling and cycling the preferred choice for everyone to get around. The objective is for 50% of trips in England's towns and cities to be walked, wheeled or cycled by 2030. Wheeling includes all trips made by wheelchair, with pushchairs and those by scooter, rollerblades and similar forms of wheeled mobility).
- 4.171 Effective planning policies on transport routes and the public realm are essential to fulfilling the National Park purposes and duty. Firstly, transport policies will facilitate developments that make it easier for people to travel to and around the National Park by sustainable means. Secondly, transport policies can help support the National Park Authority's duty to communities, by focussing growth in the most sustainable locations, so it best meets the needs of residents and businesses while protecting the special qualities. Thirdly, most visitors experience the National Park's special qualities mainly

whilst travelling. Therefore, the public realm (such as roads, pavements, public rights of way and open access land) needs to be conserved and enhanced, to improve people's experience of it.

### *Monitoring*

- 4.172 The 2023 AMR states that a positive outcome would be to see an increase in these routes, in a way that protects the landscape of the National Park. A related target is to increase the proportion of journeys made within the National Park by non-motorised means.
- 4.173 UK Government statistics show Public Transport passenger journeys were down 68% in the year ending 2021. Where people counters have been installed on new NMU paths, evidence has shown continued increasing use by walkers, cyclists and where relevant equestrians. However, this data is location based and not available for the National Park as a whole.

### *What other evidence will we be collecting?*

- 4.174 A proportionate Transport Assessment will be undertaken to inform the LPR. This will complement the local transport plans of the three counties plus Brighton & Hove. Detailed highway assessments will be undertaken as part of the site assessment work.

## *Protection & Sustainable Use of Resources*

### *Policy Context*

- 4.175 The NPPF 2023:
- Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
  - Paragraph 174 states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 4.176 The following policies within the South Downs Local Plan directly relate to water, air, soil and geology:
- SD2: Ecosystem services
  - SD9: Biodiversity and Geodiversity
  - SD17: Protection of the Water Environment
  - SD18: The Open Coast
  - SD54: Pollution and Air Quality
  - SD55: Contaminated Land

- 4.177 The purpose of the policies is to protect groundwater and surface water assets, set out a positive strategy for the conservation and enhancement of geodiversity and manage the impact of pollutants.

*Current Evidence and Local Guidance Documents*

Natural England's Advice Note regarding Water Neutrality within the Sussex North Water Supply Zone: February 2022

JBA Consulting Water Neutrality Reports for Crawley, Chichester & Horsham local authorities 2022

Natural England's Position Statement for Applications within the Sussex North Water Supply zone September 2021 – Interim Approach

Provisional Agricultural Land Classification (ALC) Natural England 2020 South Downs Local Plan 2019 and background papers

Water Cycle Study and SFRA Level 1 (2015)

[Soils data Cranfield University](#)

Sussex Geodiversity Partnership – Regionally Important Geological and Geomorphological sites entry

Local Authority Air Quality Management Plans (various dates)

Made Neighbourhood Plans (various dates)

County Council (Hampshire, West Sussex, East Sussex) Mineral Plans (various dates)

- 4.178 The National Park contains a diverse range of groundwater and surface water features. Groundwater is the water which is held underground in the soil or in pores and crevices in rock. Groundwater features include aquifers and sources such as headwaters and springs. Surface water features include rivers, lakes, winterbournes, estuaries and open coastline. Water plays an important role in the special qualities of the National Park and offers essential supporting, provisioning and cultural ecosystem services.
- 4.179 Groundwater is a key part of the water cycle: it provides an important source for rivers, sustaining flows in dry periods, and thus supporting wildlife habitats. Two aquifers, one chalk and one greensand, supply people inside and outside of the National Park with high-quality drinking water. Both aquifers are under stress. The future demands of development from inside and outside of the National Park from water abstraction poses a risk. The quality of ground water is easily polluted directly and indirectly. It is therefore better to prevent or reduce the amount of contamination at source rather than treat it afterwards.
- 4.180 There are eleven main rivers flowing through the National Park and numerous other important watercourses and other surface water features. These do not function in isolation and have complex and dynamic interactions with the landscape.
- 4.181 The National Park has 17.5km of largely undeveloped open coastline incorporating the whole of the Sussex Heritage Coast, the iconic coastline between Eastbourne and Seaford where the South Downs meets the sea. Heritage coasts have four purposes, three of which align with National Park purposes and duty. The additional purpose is to

maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures.

- 4.182 Pressure from new development and rising household demand is increasing the need for water across the southeast. This is having an impact on the water resources from the South Downs National Park. Unsustainable abstraction still diminishes some of the most iconic catchments and important habitats in the country, such as chalk streams, which are a globally important habitat ([source water abstraction plan government information](#)). The [Building Regulations \(2010\) Part G](#) was amended in 2015 to require that all new dwellings must ensure that potential water consumption must not exceed 125 litres/person/day, or 110 litres/person/day where required under planning conditions. The Governments Environmental Improvement Plan contains a commitment to consider a new standard for new homes in England of 105 litres per person per day (l/p/d) and 100 l/p/d where there is a clear local need, such as in areas of serious water stress.
- 4.183 Part of the South Downs National Park (and surrounding area) falls within the Sussex North Water Resource (Supply) Zone. This includes parts of the Chichester, Horsham and Arun areas of the SDNP. The authorities within the Sussex North Water Resource Zone have jointly developed a Water Neutrality Mitigation Strategy, setting out a strategy to achieve water neutrality via measures within their remit, including through the local planning system. The objective of the Strategy is to enable the Local Plans to proceed towards adoption. As part of the strategy, the authorities are developing a water offsetting scheme to help progress stalled development. A Water Neutrality Project Manager was employed in January 2023 to lead this.
- 4.184 This area is served by groundwater abstraction near Pulborough. This has the potential to impact upon the Arun Valley, a Special Area Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The hydrology (water quantity and its movement) of the area is essential to maintaining the habitat upon which the designation features/species rely on.
- 4.185 In September 2021, the Authority received advice from [Natural England](#). Natural England state that it cannot be concluded that the existing abstraction within the Sussex North Water Supply Zone is not having an impact on the Arun Valley sites. It advises that developments within this zone must not add to this impact.
- 4.186 The impact of groundwater abstraction within the Sussex North Water Supply Zone has been of concern to Natural England since 2019. Natural England believes that the ongoing abstraction is having a detrimental impact on a number of designated sites including Amberley Wild Brooks SSSI and Pulborough Brooks SSSI. These form part of Arun Valley SPA, Arun Valley SAC and Arun Valley Ramsar site.
- 4.187 In addition to existing pressures, Natural England is also concerned that the Sussex North Water Supply Zone is likely to be subject to significant future development pressures. These will necessitate increased abstraction within the region and are likely to further exacerbate any existing impacts on the Habitats Sites.
- 4.188 Development proposals that would lead to a material increase in water demand will need to demonstrate 'water neutrality'. This means that there would be no increase in water consumption, demonstrated by a combination of water efficiency, water recycling and offsetting measures. This refers to all water supply zones within the National Park boundary.

- 4.189 The natural environment of the National Park provides many regulating ecosystem services, for example, vegetation cover helps to remove vehicle emissions from the air. In general, air quality in the National Park is good. However, there are concerns about the levels of nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes Town Centre for nitrogen dioxide, mainly due to traffic emissions. Ground level concentrations of ozone have also frequently exceeded the UK air quality standards at Lodsworth where Chichester District Council measure this pollutant.
- 4.190 Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. The biodiversity and underlying geodiversity of the National Park directly provide or underpin many ecosystem services that people depend on. Together, these include the filtering and storage of water for clean water supplies, water management and flood alleviation, and the provision of soils in which we grow our food and other produce, such as timber. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality (adopted Local Plan).
- 4.191 The thin sandy soils in the majority of the Western Weald provide very poor agricultural land for farming and new enterprise and instead there is a large amount of heathland and woodland. However, there are areas of Grade 3 and Grade 2 agricultural land; the most fertile soils being found in the north and alongside the River Rother in Hampshire. The majority of the Dip Slope is Grade 3 agricultural land (farming and new enterprise. However, there are pockets of Grade 2, some of the most fertile soils in the National Park. In terms of farming & new enterprise, the Coastal plain and the adjacent Dip Slope to the north, include some of the most fertile soils in the National Park, which has led to a larger proportion than elsewhere of intensively farmed Grade 2 agricultural land. Highly fertile soils cover the river flood plains and significant areas have been drained and converted to intensive agriculture (adopted Local Plan).

#### *Monitoring*

- 4.192 The ecological status of water bodies is assessed by the Environment Agency (EA) to report on progress of actions towards the Water Framework Directive (WFD).
- 4.193 There are five classes of Ecological status: High, Good, Moderate, Poor and Bad. To meet the directive a water body should be in good or high status. Ecological status is measured by numeric sampling of indicator species, including fish, invertebrates and plants. In 2020/21, the quality of groundwater in the South Downs National Park that was deemed 'good' was 31.8% (100km out of 314km of rivers, canals and surface water). This compares with 22% in 2019/20 (70km of 314km rated 'good'). There has been no reporting in the 2022 AMR as no new data in monitoring year.
- 4.194 There are two AQMAs within the National Park: one in the town of Lewes and one in the town of Midhurst. The main pollutant of concern under the Local Air Quality Management regime is nitrogen dioxide (NO<sub>2</sub>) and the key local source is road traffic. Elevated concentrations of NO<sub>2</sub> can occur in roads in and around town centres. This is the case for the two AQMAs identified within the National Park.



- 4.195 Chichester District Council (CDC) published their latest air quality status report in July 2021. This showed that for NO<sub>2</sub> at Rumbolds Hill, Midhurst the level of exceedance was 34µg/m<sup>3</sup>. The national standard for NO<sub>2</sub> is 40µg/m<sup>3</sup>. At the time the AQMA was declared in January 2020 the nitrogen dioxide was 42µg/m<sup>3</sup>.
- 4.196 The latest report on air quality in Lewes District, including the Lewes Town Centre AQMA, is yet to be published. The latest available data is from the June 2020 report. This indicated a NO<sub>2</sub> level at the Lewes Town Centre AQMA of 42µg/m<sup>3</sup> compared to 53µg/m<sup>3</sup> when the AQMA was first declared in June 2005.

*What other evidence will we be collecting?*

- 4.197 There is already significant baseline information, and this will form part of the background evidence for the LPR. However, a Water Cycle Study and HRA will be completed.

## Design

### Policy Context

#### 4.198 The NPPF 2023

- States in paragraph 126 that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.

- 4.199 [The National Model Design Code](#) provides detailed guidance on the production of design codes, guides and policies to promote successful design. [The National Design Guide](#) illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice.

#### 4.200 The following policies within the South Downs Local Plan directly relate to design:

- Strategic Policy SD5: Design
- Development Management Policy SD11: Trees, Woodland and Hedgerows
- Development Management Policy SD21: Public Realm, Highway Design and Public Art
- Strategic Policy SD45: Green Infrastructure

### *Current Evidence and Local Guidance Documents*

Design Guide SPD 2022

South Downs Local Plan 2019 and background papers

Sustainable Construction SPD 2020

The South Downs Landscape Character Assessment 2020

South Downs Green Infrastructure Framework draft 2016

Made Neighbourhood Plans (various dates)

Conservation area appraisals (various dates)

Development briefs and masterplans produced by local authorities (various dates)

Village Design Statements (various dates)

- 4.201 The unique character of the many diverse places within the National Park must always be the starting point for good design.
- 4.202 Preservation and enhancement of the National Park's built heritage is critically important to the Authority and will always be a prime consideration in the design of any development that might affect it. This means that the design of any new development in the National Park will be expected to demonstrate that it is responding to existing local character and identity, and that the heritage, local history and culture of the area are being valued.
- 4.203 The Authority sees the connected themes of conserving and enhancing biodiversity; enhancing and linking green infrastructure; and bringing people closer to nature as a significant design priority for all types of new development.
- 4.204 The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Local Plan Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The purpose of Policy SD5 is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park. Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future.
- 4.205 Green Infrastructure (GI) is a multifunctional network of natural and semi natural features, urban and rural, which can deliver a wide range of environmental and quality of life benefits for local communities. It is a vital tool for the delivery of ecosystem services benefits, for resilience to climate change, and for health and wellbeing. The National Park as a whole is a nationally significant GI asset through its role as the green heart of the Southeast, and its GI network is recognised to extend beyond its boundaries. Improvements to existing or provision of new infrastructure should be an integral part of the design of development proposals and should be landscape led and should be multifunctional. Opportunities should be identified and taken for improving and creating new connections between habitats.
- 4.206 The Authority will seek the highest quality design for development proposals in line with the first purpose of the National Park. This includes truly outstanding or innovative design and contemporary design which reinforce local distinctiveness, taking reference and visual cues from the landscape and local settlement identity and character. The Authority will encourage the use of locally sourced materials to support local character and distinctiveness. Development should maximise sustainable technologies. The sourcing and performance of materials, and construction methods, should maximise energy and resource efficiency.

### *Monitoring*

- 4.207 The 2023 AMR includes Indicator SDLP7: Number of Village Design Statements adopted. There are communities across the National Park at different stages of VDS



preparation and it is anticipated that more VDS to be presented for adoption in the coming year (2023/24), however this will be dependent on the current planning reforms and the status of Supplementary Planning Documents. In the year 2022/23 The following VDS were adopted:

- Clapham VDS (November 2022)
- Easebourne Parish Design Statement (February 2023)

4.208 The 2021-2022 AMR also includes Indicator SDLP8: Quality of design on new developments. A post construction design review was carried out and the results are summarised for this indicator. Nine sites that have been built out were reviewed on the quality of the completed dwellings. The post construction design review assessed each site against a range of design principles which are layout, heritage (conservation areas if applicable), scale, public realm, parking and services, green and blue infrastructure, residential amenity, boundaries, materials, architectural detail, energy and sustainable construction, and accessibility. The review found that of the nine sites, two were assessed as Mediocre, five as Fair and two as Good. The key outcome is to use the findings of the review to inform future planning decision making.

*What other evidence will we be collecting?*

4.209 There is already significant baseline information. However, work undertaken as part of the LPR will have an influence on design matters.

## 5. The Integrated Assessment Framework

### *Introduction*

- 5.1 This section will set out the sustainability objectives (known as the IIA/SA Framework). It will amalgamate the sustainability issues identified in the previous section and the objectives set out in the IIA SA to the South Downs Local Plan.
- 5.2 The SEA Directive also requires consideration not only of the current state of the environment but also 'the likely evolution thereof without implementation of the plan or programme'. This means that the SA/SEA must consider the future baseline situation should the implementation of the policies within the Local Plan Review not take place.
- 5.3 This section identifies some of the principal sustainability challenges and opportunities in the area which are potentially relevant to the National Park and the Local Plan review. For the IIA, objectives are specific aims that the LPR should strive to achieve.
- 5.4 The IIA/SA Framework is a vital tool to enable the sustainability effects of SDNPA plans, policies and programmes to be assessed. The Framework consists of SDNPA Sustainability Objectives. These have been developed from consideration of the key sustainability issues emerging from the baseline data and the objectives set out in the adopted Local Plan SA.
- 5.5 Table 4 below lists the key sustainability issues that have emerged from the baseline analysis in Section 4, together with characterisation of the future baseline based upon current evidence and trends.

Table 4 Key Sustainability Issues and Consequences for Future Baseline of the South Downs National Park

Key Sustainability Issues	Evidence and Trends	Consequences for Future Baseline
<b>Landscape</b>	<b>Landscape</b>	<b>Landscape</b>
Degradation of landscape character.	Increasing specialisation of agriculture, increase in the areas of cultivation or cropping, changing lifestyles and changing forms of land ownership. Incremental, small-scale change with gradual erosion of local rural character is a key concern. Conversion of former farm buildings remains an issue, and a recent increase in small holdings and alternative farm enterprises has led to subdivision and clutter. There has also been a notable decrease in grazing, and, in some areas, lack of management and 'set aside' is creating an agricultural landscape that is at odds with the managed character.	Continued loss and degradation of landscape character.
Increased urbanisation and loss of local distinctiveness, character and integrity of the historic built environment and its setting.	Local distinctiveness being eroded by incremental change, small-scale developments, extensions and conversions unsympathetic to settlement form and local vernacular styles. The percentage of listed buildings at risk remains low.	Pressures for provision of housing, particularly affordable housing within the SDNP have the potential to adversely affect the landscape character and the overspill of existing villages and market towns into surrounding rural areas. Further unsympathetic developments will lead to the greater erosion or loss of the character and local distinctiveness of the SDNP settlements and landscape.

Tranquillity and Dark Night Skies.	Loss of landscape character and tranquillity through poorly sited noisy developments and/or excessive and poorly designed lighting. The South Downs is accessible to a large surrounding population, with 10 million people within an hour's drive. There is consequent demand for infrastructure and facilities, increasing recreational car traffic within the National Park. This results in changes to existing recreation sites, and cumulative effects on the special qualities of remoteness and 'wilderness' that people come to enjoy.	Continued loss of landscape character and tranquillity and reduction in dark sky zone and increased light pollution. Increase in traffic within the National Park and increase in noise and air pollution.
Landscapes can provide support for species needing to move or respond to climate change.	Some habitats and species are more sensitive to climatic change than others. Species composition can change, for example favouring grasses and more drought tolerant species. Small sites have less resilience and isolated fragments of habitat are more likely to be lost. Through increasing the resilience of the National Park's natural environment to change, 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.	Ecological connectivity is an important function of the landscapes. Without it, species are unable to move and adapt to environmental change. Increased habitat fragmentation will mean that landscapes will lack the adaptive capacity to deal with major threats, such as a shift in climatic conditions.
<b>Key Sustainability Issues</b>	<b>Evidence and Trends</b>	<b>Consequences for Future Baseline</b>
<b>Biodiversity and Nature Recovery</b>	<b>Biodiversity and Nature Recovery</b>	<b>Biodiversity and Nature Recovery</b>
Potential conflicts between differing priorities e.g. access and biodiversity.	Recreational use of internationally designated nature conservation sites has the potential to prevent appropriate management or exacerbate existing management difficulties, cause damage through erosion and fragmentation, cause nutrient enrichment because of dog fouling, and cause disturbance to sensitive species such as ground-nesting birds and wintering wildfowl.	Pressures for increased provision of access and recreational opportunities and increased development within and on the edge of the SDNP have the potential to adversely affect the richness and diversity of the Park's wildlife and habitats.

<p>Climate change threats to biodiversity.</p>	<p>The Climate Change Adaption Plan sets out the main vulnerabilities to climate change impacts relating to the key natural and cultural assets of the National Park. These have been based around the projections presented within the UK Climate Impact Projections (2009). There are significant impacts on species, habitats and the natural assets of the South Downs. In some cases, the speed of change may be greater than the ability of species or habitats to fully adapt or shift. Though evidence is being accrued, it is not understood what the full ecological impacts of climate change. In the longer term there are challenges in deciding which species and habitats it is realistic to conserve and enhance, and which need to be supported to adapt or shift their range – or face loss.</p> <p>Key issues include a) changes in species composition and declines in diversity due to changes in climatic conditions and vulnerability of some species to temperature change, b) impacts on species may include changes in distribution and abundance, and the timing of seasonal events and habitat use. Therefore, there are likely to be changes in the composition of plant and animal communities, c) habitats are also likely to change, for example higher growth rates in forests, d) decrease in the overall ecological connectivity of the wider landscape, c) loss of condition of designated sites or priority habitats may occur.</p> <p>A key threat is also coastal squeeze – which is from the rise in sea level – and the loss of inter-tidal habitat.</p>	<p>Risk assessments and the Climate Change action plan will need to be kept under review as climate change impacts that have been considered may occur over a shorter timescale than originally projected. Over the longer-term other risks may materialise that were not considered or planned for. Therefore, a continual management and understanding of the baseline situation is constant and essential. Actions include:</p> <p>Increase habitat connectivity and the permeability of the landscape to wildlife. Undertake adaptive management and ensure that areas of valuable habitat are bigger, better managed and joined up. Increase the quality and habitat diversity of wildlife sites. Improve the quality of existing 'core' wildlife sites (such as Sites of Special Scientific Interest (SSSIs)) to enable populations of target species to grow and expand their range.</p>
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Long-term, sustainable land management for biodiversity, ecosystem services and ecological networks.	Many wildlife habitats are small and fragmented. Lack of long-term, sustainable land management for biodiversity, ecosystem services. Loss of ecological networks (trees, woodland and hedgerows).	The failure to address habitat fragmentation and management issues will result in further deterioration in site conditions and loss of biodiversity through insufficient capacity to support vulnerable species. Loss of ecological networks will impact on the ability to support habitats and species and ecological linkages.
Biodiversity Net Gain.	Biodiversity Net Gain (BNG) is an approach to development and associated land management that aims to leave biodiversity in a measurably better state than before. The Government made it a mandatory requirement for all development to achieve a 10% net gain for biodiversity through the Environment Act.	The number of development schemes that leave biodiversity in a measurably better state than before increases in number and significance.
<b>Key Sustainability Issues</b>	<b>Evidence and Trends</b>	<b>Consequences for Future Baseline</b>
<b>Historic environment, Heritage Assets and Cultural Heritage</b>	<b>Historic environment, Heritage Assets and Cultural Heritage</b>	<b>Historic environment, Heritage Assets and Cultural Heritage</b>
Damage to archaeological sites and historic features and historic landscapes and designated parkland.	Two flint mines within the National Park are listed as 'Heritage at Risk'. 33 of the Heritage at Risk sites in the National Park are Bronze Age in date and 30 of these are sites with one or more barrows. Parts of the Chichester Entrenchments, the Caburn hillfort, two field systems and a settlement are on the Heritage at Risk register. The Heritage at Risk register includes one stretch of Roman road, a temple site and a villa/farmstead in the National Park. There is only one Saxon site on the Heritage at Risk register. This is a cemetery site. While the Heritage At Risk register does not include any medieval archaeological site it does include six medieval buildings, four of which are churches.	Lack of detailed knowledge and management may lead to further degradation and loss of archaeological features and other heritage assets.

Heritage asset at risk including Conservation Areas and listed buildings.	Using the Buildings at Risk (BaR) Survey, there are 5,861 listed buildings. Of these 69 are now recorded as being at risk, which gives a percentage of 1.17%. The percentage of buildings being at risk remains very low by national standards, probably reflecting high property values within the National Park.	Buildings and structures of limited or no economic value are expected to become ever more prominent among those listed buildings identified as at risk. Failure to address heritage assets at risk will result in an increase in number and/or a lack of imaginative solutions to those that remain on the at risk register.
Climate change affecting the Historic Environment.	Energy efficiency assessment of the existing building stock is complicated by the fact that standard calculating methods underestimate the thermal performance of traditionally built buildings. Protection of heritage assets is important when upgrading the energy performance of these buildings. Historic assets such as barrows, hill forts and buried archaeology are sensitive to rainfall, erosion and encroachment by vegetation. If current and projected trends continue these features may be adversely affected.	Effective assessment and targeting of energy efficiency programmes will be needed to ensure heritage assets are protected when improving the efficiency of buildings.
<b>Key Sustainability Issues</b>	<b>Evidence and Trends</b>	<b>Consequences for Future Baseline</b>
<b>Climate Change</b>	<b>Climate Change</b>	<b>Climate Change</b>
Flood risk, increased soil erosion and adaptation related to both sea level rise and current and projected wetter winters. Increased cycles of drought and flooding are projected. Increase in extreme rainfall events and flooding.	Observed sea level rise between 1970 and 2000 has been around 50mm and now averages 3mm per year. The southeast has seen a notable increase in risk on the UK wildfire index. Some chalk grassland species are more sensitive to drought and heat stress than others. Species composition can change, with conditions favouring some grasses. The cost of damage to UK properties through flooding has reached around £1.3 billion per annum. More extreme rainfall events, such as in 2007, 2009 and 2012, have caused significant disruption and damage.	If this trend continues the effectiveness of coastal defences may be reduced, increasing the risk of coastal flooding. Sea level rise may affect the natural functioning of tidal rivers and estuaries. The trend towards hotter, drier summers may see an increased fire risk on lowland heath. There may be increased risk of flooding of properties and agricultural land in river valleys and low-lying areas.

<p>Increased heat and the impacts on health and wellbeing. Flooding and the impact on health.</p>	<p>Environmental impacts, driven by climate change, are likely to have significant impacts on society, health and well-being. Extremes or increases in summer temperatures can lead to increased mortality and morbidity in elderly or vulnerable groups of the population. Flooding events increasingly affect the lives of many communities. Along with the risks to life and property there are also impacts upon health and wellbeing, social cohesion and disruption to essential services. Higher temperatures and weaker air circulation leads to increased low level ozone formation and poorer air quality.</p>	<p>Without adaptation strategies and actions, the impact of climate change on health and well-being will increase especially among vulnerable members of the population. Action includes:</p> <p>Work with partners and recreation interest groups to manage and promote recreational access and to provide a greater variety of recreational activities. Promote green corridors, high quality green spaces and street trees within the urban environment to improve capacity for regulating air quality, providing shade and helping to manage the 'urban heat island' effect at a local level. Develop design codes that result in more sustainable building and schemes, with the best design, layout and materials to make them resilient to climate change.</p>
<p>Opportunities to develop low carbon and renewable energy within the NP consistent with SDNPA purposes.</p>	<p>Generation of electricity from renewable sources is increasing in the South East. In 2013, the region generated 5,550 GWh of electricity from renewable sources; equivalent to 14.3% of total energy consumption in the region, and the second highest of any region in England. Of this, 3,336 GWh were from wind, 965 GWh were from landfill gas, and 814 GWh were from other sources of bioenergy. There is considerable opportunity for increasing the number of homes heated through wood fuel. The Forestry Commission suggest that there is around 328km<sup>2</sup> of woodland cover across the South Downs.</p>	<p>Any development in respect of renewables cannot be allowed to compromise the nationally important landscape character which National Park status is designated to conserve and enhance. The challenge for the SDNPA is to determine the right technology in the right place.</p>



Key Sustainability Issues	Evidence and Trends	Consequences for Future Baseline
Community, Health & Wellbeing	Community, Health & and Wellbeing	Community, Health & and Wellbeing
Demographic and needs of the local population.	As is the case in most areas in the UK, the population in the South Downs National Park is ageing. Although there has been growth in the 16-24 and 45-64 age bands between 2002 and 2016, this has not been sufficient to offset decline in the 0-15 and 25-44 age groups and the growth in the over 65s. The biggest growth of 3.1% has been in the 65-74 age band (Ref: Economic Profile of the South Downs National Park 2018). The 65+ age group has continued to increase at the fastest rate and now makes up 25.35% of the population in the National Park while 25 to 44 year olds have shown the greatest decline (reference Economic Profile update 2020).	Facilities for youth become increasingly difficult to sustain because of out-migration of families that cannot afford to live in SDNP and the lack of employment opportunities in rural areas. Given the high proportion of larger houses and the associated high prices of housing, access to affordable housing is a key issue facing many local communities. Young people and young families find it difficult to get low-cost housing and therefore to continue living in the area. Fewer working residents living in the park results in increased traffic movements. Specific housing for older residents may be required.
Loss or reduction in availability of some community assets and services.	The potential for town centre floorspace development is highly constrained, with all main town centres containing significant numbers of listed buildings and an already tightly packed street scene. There are few areas of derelict land of any significant size, nor are there opportunities for larger-scale redevelopment. It is important that all residents within the National Park have access to a range of essential services and facilities, where possible, and the smaller village centres have a vital role to play. There may also be pressure on neighbouring authorities to provide accessible and relevant services. There is a wide range of community infrastructure facilities that are vital in maintaining the sustainability of both larger settlements and rural communities. Community infrastructure facilities enable essential public services to be provided as locally as possible.	The continued loss of community facilities undermines the communities themselves and the degree of social interaction as well as detracting from the sense of place that these facilities provide. This results in communities accessing services and facilities outside the community / National Park increasing pressure on rural roads etc.

Urban areas adjacent to the park include pockets of poverty and poor health.	Mapping the indices of multiple deprivation (IMD) demonstrates that in terms of general deprivation, overall, this is low across the SDNP, but there are areas of higher deprivation around Brighton and Hove and Worthing, as well as pockets at Petworth and, notably, a large rural area of Lewes District.	Some social and cultural groups of people groups visit National Parks less than others. This is also evident regarding gender and disability. Without effective Local Plan and Partnership Management Plan policies to address this, SDNPA would be failing in its responsibility to promote understanding and enjoyment to all sectors of society. Health and wellbeing will deteriorate without a suitable partnership strategy.
<p>Incidences of rural crime in the South Downs National Park encompassing:</p> <p>Wildlife Crime – Poaching, hare coursing</p> <p>Anti-Social Behaviour – fly tipping, littering, illegal use of private land.</p> <p>Farm crime – metal theft, fuel theft, equipment theft and sheep worrying</p>	Rural crime highlighted as a common issue in community led plans across the National Park. High numbers of people focused on some areas of the SDNP has led to recurring problems for some landowners and communities. These include injuries to sheep and disturbance to ground nesting birds by uncontrolled dogs, inconsiderate car parking, fly tipping and gates being left open.	Increased costs for landowners. Cost of removing fly-tipping, negative impact on the special qualities of the National Park, impact on visitors / tourism.
<b>Key Sustainability Issues</b>	<b>Evidence and Trends</b>	<b>Consequences for Future Baseline</b>
<b>Employment and Economy</b>	<b>Employment and Economy</b>	<b>Employment and Economy</b>
Economy – disconnected from the landscape/local area (out-commuting to jobs in surrounding towns/cities).	Approximately 14,000 residents commute out to other destinations in the southeast, including London. The population is dominated by the "Countryside category" i.e. well-off individuals living in rural or semi-rural location, mostly living in detached housing, working in agriculture or a professional capacity and often working from home.	Pattern of out-commuting does not foster strong locally based rural economy further undermining communities and local services. It can also create differences in the salary levels of those that live within the SDNPA but work outside of the National Park and those that are local workers, living within the Park. Increased trend of home working may however support daytime activities in some villages.

Many areas of the SDNP suffer from poor broadband access and/or 'dead zones' with no signal. This is a constraint to competitiveness in the online marketplace.	The 2012 State of the Park report recorded that there were very few places within the National Park with broadband speeds higher than 8Mb per second. The national BDUK programme is addressing much of this with the roll out of superfast broadband (24Mbps). Programmes are aimed at achieving 95% coverage. Modelling work commissioned by SDNPA, and other information, shows that areas of SDNP will be in the last 5% not covered by the national programme.	Any shortfall in achieving comprehensive (100%) superfast broadband coverage will constrain business growth in the National Park and the competitiveness of existing businesses. There is a visual and landscape impact of new telecommunication masts within the Park.
Global market-driven forces influence agriculture within the National Park. This has resulted in increased intensity of agricultural activities.	Land used for agriculture and forestry covers most of the National Park and is the most important provider of its ecosystem services. These range from the provisioning of food, biomass and other materials such as timber to the regulation of water and soil quality. It provides habitats for many of the National Park's most distinctive species, and the cultural benefits arising from the protection of beautiful and centuries old landscapes that attract visitors.	Changing agriculture has affected the landscape and features of the South Downs in the past and will continue to do so in the future; recognition of this underpins the need for an ecosystem services approach that should include a realistic valuation of food production (strategic and social importance, not just farm-gate prices).

<p>The tourism sector is largely leisure driven, and there are frequent shortages of all types of accommodation at weekends throughout the year and during the week in summer. There is strong demand for high-quality accommodation and clear prospects for future growth in the demand for all types of visitor accommodation. The National Park has sensitive habitats and landscapes, and a rich and varied historic environment. There is a need to ensure visitors enjoy the National Park without compromising its special qualities. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of the National Park.</p>	<p>The South Downs National Park is the largest rural resource for recreation and tourism in the Southeast of England, thus tourism plays a significant role in its local economy. The last overarching estimate showed that the National Park has approximately 46 million visitor days per year, making it the most popular Protected Landscape in the country which generates an income of nearly £5 billion and supports some 12,000 jobs. The South Downs National Park is found within just a few miles of several major conurbations. The National Park also has fragile habitats and sensitive areas, a small number of hotspots currently attract a very disproportionate number of its visitors, and the vast majority arrive by car.</p>	<p>Consideration of development proposals for visitor accommodation, visitor attractions and recreation facilities that minimised travel and does not detract from the local area is important and without this – the impact on visitors to the Park could be negative. The tourism offer should be a year-round visitor economy and without this, the season will continue to have peaks and troughs – to the detriment of the tourism sector.</p>
<b>Key Sustainability Issues</b>	<b>Evidence and Trends</b>	<b>Consequences for Future Baseline</b>
<b>Equality and Inclusion</b>	<b>Equality and Inclusion</b>	<b>Equality and Inclusion</b>
<p>Inequalities exist in both physical and educational access to the countryside and cultural facilities between different race, ethnicity and social groups and between genders and those with disabilities.</p>	<p>Although 10% of the population nationally is from a BME background, only 1% of visits to National Park are from a BME community (Campaign for National Parks).</p>	<p>Some social and cultural groups of people groups visit National Parks less than others. This is also evident regarding gender and disability. Without effective Local Plan and Partnership Management Plan policies to address this, SDNPA would be failing in its responsibility to promote understanding and enjoyment to all sectors of society.</p>

<p>The South Downs is under huge pressure from car use. Accessibility for disabled people and those without cars (especially the young and elderly) across the National Park is becoming increasingly difficult.</p>	<p>The South Downs is under huge pressure from car use. The 2018 Visitor Survey estimates that 77% of visits were made by car. Improving public transport into and around the boundary is therefore vital. The retention and expansion of rural transport services is a key issue for the National Park. Rural bus services have reduced in the last five years through cuts in the budgets of Passenger Transport Authorities. This is having an impact on young people's ability to access education and employment and is increasing isolation among elderly or disabled rural residents without access to a car.</p>	<p>Certain groups in society are not able to access the opportunities within the park such as towns, services, education and employment as suitable and accessible and affordable public transport is either not available or is infrequent.</p>
<p>Need to provide housing and facilities for an aging population</p>	<p>The population in the South Downs National Park is ageing. Although there has been growth in the 16-24 and 45-64 age bands between 2002 and 2016, this has not been sufficient to offset decline in the 0-15 and 25-44 age groups and the growth in the over 65s. The biggest growth of 3.1% has been in the 65-74 age band (Ref: Economic Profile of the South Downs National Park 2018). The 65+ age group has continued to increase at the fastest rate and now makes up 25.35% of the population in the National Park while 25 to 44 year olds have shown the greatest decline (reference Economic Profile update 2020).</p>	<p>Specific housing for older residents may be required.</p>

Key Sustainability Issues	Evidence and Trends	Consequences for Future Baseline
Housing	Housing	Housing
Need for affordable homes.	<p>The analysis within the 2023 HEDNA identifies a notable need for affordable housing, and provision of new affordable housing is an important and pressing issue in the area.</p> <p>There has been a notable increase (+22% or around 5,500 people) in the number of older people in the National Park (those aged 65 and over). The proportion of households with dependent children in SDNP is low with around 25% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally). Given the nature of the area and the needs identified, many units should be houses rather than flats – particularly for homes with 2- or 3-bedrooms. There is potentially a demand for bungalows, although realistically significant delivery of this type of accommodation is unlikely. It is however possible that delivery of some bungalows might be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into family use.</p>	Provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. Population will continue to age; loss of facilities will continue with a lack of younger population to fill local jobs. Increased development pressure on areas outside the National Park.

Housing to meet local needs.	<p>The residents of the National Park play a pivotal role in sustaining its vibrant communities and shaping its unique landscapes. There is real pride in our towns and villages, and many people dedicate time and resources to enhancing community life, conserving what is important to their local area and planning for the needs of future generations. Together we want to help our communities to become more sustainable and resilient and to provide environments that improve health and wellbeing, where residents have better access to housing, jobs, facilities, infrastructure and the services they need. Generally, house prices are higher in the National Park than surrounding urban areas, which tends to prevent those on low incomes from accessing housing. A high proportion of larger dwellings exacerbates this situation and can lead to unbalanced communities with young people and families unable to live in the National Park.</p>	<p>Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise. However, the provision of housing should not be at the expense of a nationally protected landscape.</p>
Under provision of transit and permanent traveller sites.	<p>Accommodation needs assessments Are currently being updated but are likely to result in additional need for gypsy and traveller pitches and travelling showman plots. The 2022 'call for sites' for the Land Availability Assessment included such sites, but few were submitted. Further site identification work will need to be carried out, including discussions with adjoining authorities, to identify suitable sites to meet the unmet need.</p>	<p>Increase in illegal encampments; increase in planning applications for pitches / sites; potentially an increase in planning appeals related to the former.</p>

Low capacity for settlements to accommodate new housing. Resistance from community. Locations for new housing often unsustainable.	Sites are allocated within the adopted local plan and neighbourhood plans. The AMR showed the output for 2022/23 was below the annualised provision figure from the Local Plan. However, the level of completions has picked up from the previous two years when the impact on construction progress of the Covid-19 pandemic and multiple lockdowns was clearly seen. This gradual return to pre-pandemic levels reflects national trends in the construction industry. The SDNPA has a robust five-year land supply of housing principally due to several large sites coming forward for development at the same time. The supply translates to 6.92 years against the annualised local plan provision figure of 250 dwellings per annum, or 6.58 years against the provision figure plus 5% buffer and taking into account the previous year undersupply (272 dwellings per annum).	It should be noted there is an issue with Sussex North Water Resource Zone that impacts on potential developability of some sites in the housing trajectory due to water neutrality.
Key Sustainability Issues	Evidence and Trends	Consequences for Future Baseline
Transport	Transport	Transport
Poor public transport infrastructure within the SDNP. High dependence on cars by residents in / around SDNP with associated peak time congestion and parking.	Many areas in the SDNP have poor public transport accessibility, reflecting a lack of bus service provision both within, and connecting to, the area. The poor public transport infrastructure is reflected in high dependence upon cars with 85% of residents owning one car and an estimated 63% of the working population travelling to work by car representing 7.76 million two-way journeys annually. Subsidised bus services have been cut in all four Local Transport Authority areas within SDNP.	Increasing dependence upon cars is not consistent with the low carbon economy that the SDNPA is seeking to develop. Poor public transport infrastructure combined with increasing numbers of visitors to the National Park will exacerbate problems of congestion on roads and adversely affect tranquillity. Lack of access to public transport results in social exclusion leaving vulnerable groups in rural areas without access to services that are readily available to residents with cars or those living in urban areas.



<p>High visitor dependence upon cars makes car parking an issue particularly for popular destinations and for mass participation events such as long-distance runs /cycle rides.</p>	<p>Data suggests an average of 39 million visitor days spent in the South Downs, 84% of which are reliant upon cars.</p>	<p>Continued growth in car usage by communities in and around the park, combined with increased volume of traffic associated with visitors will exacerbate existing problems of congestion and car parking in the SDNP undermining the NP purposes. It will impact negatively on landscape protection and nature recovery, air pollution and noise. Issues are likely to be:</p> <p>Managing access points to reduce negative impacts at hotspots; planning access points and interchanges to boost visits by sustainable means; and planning rights of way improvements in relation to access by sustainable means of travel. Consideration of charging points for electric cars.</p>
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Key Sustainability Issues	Evidence and Trends	Consequences for Future Baseline
Protection & Sustainable Use of Resources	Protection & Sustainable Use of Resources	Protection & Sustainable Use of Resources
Water demand for both domestic and agricultural use exceeds supply, with resulting over-abstraction from aquifers / rivers affecting quality of water sources.	Parts of the region are under serious water stress. Abstraction, from both the Chalk and Lower Greensand aquifers across the National Park, already exceed the available natural resource (Environment Agency, 2012).	The government target is to reduce per capita consumption to 130 litres / day whereas current pcc for the SDNP resource zones is 170 litres / day. The Building Regulations (2010) Part G was amended in 2015 to require that all new dwellings must ensure that potential water consumption must not exceed 125 litres/person/day, or 110 litres/person/day where required under planning conditions (HM Government, 2015b). The Governments Environmental Improvement Plan contains a commitment to consider a new standard for new homes in England of 105 litres per person per day (l/p/d) and 100 l/p/d where there is a clear local need, such as in areas of serious water stress. Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Southern Water want to help customers reduce how much water they use to 100 litres per person, per day by 2040. By 2025, Southeast Water are targeting the annual amount of water used by each of our customers to reduce from 143.1 litres a day in 2019/20 to 131.5 litres a day. During 2022/23, customers each used an average of 150.3 litres of water a day For Thames Water - in 2021-22, the three-year rolling average pcc performance was 147.5 litres per person per day (against a target of 142.6). Increasing population growth in the coastal towns will place existing chalk aquifers under further pressure and without reduction in per capita consumption in the longer term.

Maintenance of clean water supply in face of increasing demand given drier summers.	Clean water is essential for life. The chalk aquifers and river catchments of the South Downs provide drinking water, and we rely on the supply for commercial and domestic uses.	Water shortages during dry periods will result in more frequent incidence of hosepipe bans and water usage restrictions.
All development proposals within the Sussex North Water Resource (Supply) Zone that consume mains water that would lead to a material increase in water demand will need to demonstrate 'water neutrality.	Within the Sussex North zone – for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development. The existing water supply in the Sussex North water supply zone cannot be ruled out as contributing to the declines in wildlife within internationally protected sites in the Arun Valley, Sussex. The SDNPA lies within water company areas of “serious water stress” as outlined in the Government document Water stressed areas – 2021 classification.	Increasing pressure on abstraction will increase the vulnerability of surface water bodies and aquifers to further deterioration in ecological status without adequate management measures to address these issues. The developing strategy will include guidelines for water consumption requirements for new development within Sussex North water supply zone. It is Intended that these will be transposed into Policies and accompanying tools within each Local Plan within the Sussex North water supply zone. The document Water stressed areas – 2021 classification - should also be used as an evidence base for determining water consumption standards, especially for the areas within the National Park boundary that fall outside of the Sussex North Water Supply Zone.
Increased impact on soil condition with increased erosion and nutrient loss.	Soil degradation in England is currently estimated at between £250 and £350 Million per annum. Increased cycles of drought and flooding are projected. Since 1990, southern England has experienced an increase in soil moisture deficit, with a corresponding increase in water abstraction for irrigation. In spring 2011 the region experienced much drier than average conditions, causing problems for farmers.	If these trends continue, we may see a decline in yields or loss of crops due to drought. There may be an impact on soil condition with increased erosion and nutrient loss/run-off on some steeper slopes. Higher rainfall is likely to result in increased soil erosion.

## *Development of SA Framework*

- 5.6 The IIA/SA Framework is a key output of the Scoping Report as it establishes a set of objectives to measure the sustainability of environmental, economic and social effects of Local Plan policies which can be described, analysed and compared.
- 5.7 The proposed framework for assessing the Local Plan Review policies comprises the ten sustainability objectives and decision-making criteria listed below.
- 5.8 The sustainability objectives represent a mix of national and local outcomes relevant to the National Park and are based on the objectives used previously to assess the 2019 Local Plan. They have been re-assessed considering the updated national policy context, baseline information and sustainability issues set out in this Scoping Report. Where necessary they have been amended and re-ordered to create an up-to-date set of objectives to reflect any changes over the last 5 years.
- 5.9 Table 5 is a 'stepping stone' to the information set out in Table 6. The reason for setting out two separate tables is to break up the information so it can be easily read. If the tables were combined, it would mean 6 separate columns, and this would not sit clearly within the document.
- 5.10 Table 5 sets out the thematic topics of the SEA Directive with the proposed sustainability objectives (and sub objectives) for the Local Plan Review. It also includes the key sustainability issues that have emerged through the previous stages of this scoping report. This includes information on health and equalities.
- 5.11 Following on from Table 5, Table 6 repeats the proposed sustainability objectives and sub objectives for the Local Plan Review (for ease of reference so the reader does not have to keep referring to Table 5) but it also includes the decision aiding questions.
- 5.12 The decision aiding questions are helpful during the assessment and will provide more direction and focus to the specific issues for each sustainability issue. They are used to check if policies are addressing the sustainability objectives. The questions will explain the focus of each sustainability objective more precisely. It should be noted that the criteria/questions are not meant as an exhaustive list.
- 5.13 Please note that all sustainability objectives and sub objectives are inter-related and there are clear cross references and relationships between each and all of them. They do not exist and cannot be assessed in isolation. However, for the purposes of the Scoping Report and the Sustainability Appraisal, they are set out in Tables 5 and 6 as separate objectives.
- 5.14 Section 17 of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) states 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'. The impact of the Local Plan review on the sustainability objectives varies. For some IIA/SA objectives, the LPR will be the most important instrument to achieve the targets; for other objectives, the Local Plan's contribution is limited. A monitoring framework will be included in the LPR and a section on monitoring will be included within the IIA. At the stage of developing the IIA, indicators will be included within the monitoring information. These will assist with measuring the impacts of each of the sustainability objectives.

Table 5 Development of IIA/SA Framework for Local Plan Review

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Landscape	<p>Degradation of landscape character.</p> <p>Loss of landscape character and perceptual qualities such as tranquillity through poorly sited noisy developments and/or excessive and poorly designed lighting.</p> <p>Landscapes need to provide functionality and support for species needing to move or respond to climate change.</p>	Landscape	To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.	<p>1.1: Retain functionality and provide resilience to the landscape character in response to climate change.</p> <p>1.2 Conserve and enhance the perceptual qualities of the South Downs National Park including the dark night sky reserve and the of the National Park.</p> <p>1.3 To contribute to the tranquil setting of the South Downs National Park.</p> <p>1.3 Conserve and enhance views to and from and within the National Park.</p>
Biodiversity and Nature Recovery	<p>Habitats are small and fragmented. Limited long-term land management for biodiversity, ecosystem services.</p> <p>Potential conflicts between differing priorities e.g. access and biodiversity.</p> <p>Water demand for both domestic and agri. Use exceeds supply with resulting over abstraction from aquifers / rivers.</p>	<p>Biodiversity</p> <p>Fauna</p> <p>Flora</p>	To conserve and enhance the region's biodiversity and contribution to nature recovery.	<p>2.1 Maintain a functioning ecological network and conserve, enhance, restore, expand and reconnect areas of priority habitat.</p> <p>2.2 New development should contribute to nature recovery through biodiversity net gain and other delivery mechanisms.</p>
Historic and Cultural Heritage	<p>'Heritage at risk – listed buildings, ancient monuments in particular.</p> <p>Climate change affecting the Historic Environment.</p> <p>Limited access to and understanding of the historic environment.</p>	Cultural heritage, including architectural and archaeological heritage	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.	<p>3.1 To conserve the character of historic landscapes and the character of settlements and buildings and their setting.</p> <p>3.2 Improve access and understanding of local and cultural heritage.</p> <p>3.3 To enhance the distinctiveness and diversity of the local built environment and community spaces.</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Climate Change	<p>Performance of the energy efficiency of the existing housing and future build housing stock and of the industrial premises.</p> <p>Opportunities to develop low carbon and renewable energy within the NP consistent with SDNPA purposes.</p> <p>Flood risk, increased soil erosion and adaptation related to both sea level rise and current and projected wetter winters.</p> <p>Increased cycles of drought and flooding are projected.</p>	<p>Population</p> <p>Human health</p> <p>Climatic factors</p>	To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures.	<p>4.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>4.2 Maximise the use of low carbon and renewable energy within new developments and proposals.</p> <p>4.3 To minimise the impacts of climate change on the National Park's communities and habitats.</p> <p>4.4 To address extreme weather conditions through mitigation and adaption measures such as sustainable design, providing shade, rainwater harvesting and reduced energy consumption.</p> <p>4.5 Maximise the use of nature-based solutions such as natural flood management.</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Protection and Sustainable Use of Resources	<p>Maintenance of clean water supply in face of increasing demand given drier summers.</p> <p>Development pressure versus water neutrality in parts of the NP.</p> <p>Protection of the quality of surface and ground water.</p> <p>The future demands of development from inside and outside of the National Park from water abstraction poses a risk.</p> <p>The quality of ground water is easily polluted directly and indirectly.</p> <p>In general, air quality in the National Park is good. However, there are concerns about the levels of nitrogen dioxide emissions in certain areas.</p>	<p>Soil</p> <p>Water</p> <p>Air</p>	To protect and ensure the sustainable use of resources to preserve the environment and reduce pollution and to conserve resources for future generations.	<p>5.1 Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies.</p> <p>5.2 To address food shortages through mitigation and adaption measures such as safeguarding soil health for food production and soil health for carbon sequestration.</p> <p>5.3 To reduce land contamination and safeguard soil quality and quantity.</p> <p>5.4 To ensure air quality continues to improve and noise and light pollution are reduced.</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Employment and Economy	<p>The Park has fragile habitats and sensitive areas, a small number of hotspots currently attract a very disproportionate number of its visitors, and the vast majority arrive by car.</p> <p>Many areas of the SDNP suffer from poor broadband access and this is a constraint to competitiveness in the online marketplace.</p> <p>Mass out-commuting to jobs in surrounding towns/cities.</p> <p>There are a few areas in or around the main market towns with lower incomes and greater unemployment.</p> <p>Global market-driven forces influence agriculture within the National Park. This has resulted in increased intensity of agricultural activities.</p>	<p>Population</p> <p>Human health</p> <p>Cultural Heritage</p> <p>Landscape</p> <p>Material Assets</p>	To promote and support the local economy through sustainable economic growth, particularly in the key business sectors of farming, forestry and tourism.	<p>6.1 To encourage the provision of diverse employment opportunities within the tourism industry.</p> <p>6.2 To support local services and community facilities as part of the tourism offer.</p> <p>6.3 To further the understanding of the special qualities of the National Park by local people and visitors.</p> <p>6.4 To allow opportunities for all social groups to experience and enjoy the National Park, while ensuring that visitor pressure does not harm the sensitive habitats of the area.</p> <p>6.5: Encourage the development of appropriate infrastructure, especially high speed broadband, throughout the area to support small businesses.</p> <p>6.6: Encourage local businesses and maintain a living cultural skills base that forms part of the cultural heritage of the area now and into the future.</p> <p>6.7: Promote and support key sectors of the South Downs economy namely farming, forestry and tourism.</p> <p>6.8 Promote agri environmental and diversification schemes that focus on ecosystem services and enhancement of the local supply chain.</p>



IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Equalities and Inclusion	<p>Inequalities exist in both physical and educational access to the countryside and cultural facilities between different social groups.</p> <p>There are inequalities in relation to the experiencing the health benefits, both physical and mental, of increased physical activity and access to nature.</p> <p>Poor public transport infrastructure within the SDNP that is accessible and timely.</p> <p>Aging population and requirement for housing for this resident group.</p>	Population Human health	Promote equality of opportunity and the elimination of discrimination	<p>7.1 Ensure equality of opportunity and equal access to facilities/infrastructure for all.</p> <p>7.2 Ensure that the needs of different areas are equally addressed.</p> <p>7.3 Priority should be given to redressing the inequalities of access to green open space and to the natural environment.</p> <p>7.4 Provide a sustainable mix of housing that meets the needs of young and older people.</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Communities, Health & Wellbeing	<p>Urban areas adjacent to the National Park and within the market towns and coastal areas include pockets of poverty and poor health.</p> <p>Incidences of rural crime in the South Downs National Park.</p> <p>Population structure of the SDNP increasingly dominated by those aged 65 and over.</p> <p>Rural areas hit harder by closure of pubs, village shops and other community hubs resulting in a loss of community structure and impacts to social isolation, particularly for vulnerable groups including older and younger ages.</p> <p>Poor public transport infrastructure within the SDNP. Data suggests an average of 39 million visitor days spent in the South Downs, 84% of which are reliant upon cars.</p> <p>Inequalities exist in both physical and educational access to the countryside and cultural facilities between different social groups.</p> <p>There are inequalities in relation to the experiencing the health benefits, both physical and mental, of increased physical activity and access to nature and the benefits of healthy food and opportunities for food growing.</p>	Population Human health	Contribute towards improving the holistic health and well-being of the population and surrounding area. To create and sustain vibrant communities within the National Park and help towards improving accessibility to all services and facilities.	<p>8.1 Optimise the benefits that the natural environment offers to contribute to the holistic health and well-being of local communities within and surrounding the National Park.</p> <p>8.2 Use environmental and building standards to ensure that places promote health and wellbeing.</p> <p>8.3 Improve the well-being of local communities by providing a safe environment through the design and layout of development.</p> <p>8.4 Achieve healthy living opportunities by supporting access to open spaces, public rights of way, walking and cycling opportunities and outdoor leisure activities.</p> <p>8.5 Support mixed communities where children can play freely, and social isolation is the exception.</p> <p>8.6 Encourage the establishment of appropriate services and facilities in development schemes, based upon local plan evidence.</p> <p>8.7 Support the health and wellbeing needs of an aging population through access to services and facilities and appropriate design</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Transport	<p>High dependence on cars by residents in / around SDNP with associated peak time congestion and parking.</p> <p>High visitor dependence upon cars makes car parking an issue particularly for popular destinations and for mass participation events such as long-distance runs / cycle rides.</p>	<p>Population</p> <p>Human health</p> <p>Air</p>	Create the opportunities to support and facilitate an efficient transport network 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 and safeguarding existing and proposed access routes.</p> <p>9.2: Work with partners to develop a high quality, safe access network and improved links between bus and trains and cycling opportunities.</p> <p>9.3: Minimising the impact of vehicle infrastructure on the landscape and communities.</p> <p>9.4: Providing electric charging points across the National Park.</p>
Housing	<p>Need for new affordable housing stock.</p> <p>Need for accommodation for rural workers.</p> <p>Aging population and requirement for housing for this resident group.</p> <p>Low capacity for settlements to accommodate new housing. Resistance from community.</p> <p>Locations for new housing often unsustainable.</p>	<p>Population.</p> <p>Human health</p> <p>Material Assets</p>	To ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.	<p>10.1: Provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of different groups in the community.</p> <p>10.2 Ensure that housing development makes good use of existing land and buildings.</p> <p>10.3 Ensures that development incorporates energy and sustainability measures.</p>

IIA Topic	Summary of Key Sustainability Issues identified within the IIA Scoping Report	Corresponding SEA topic	Proposed sustainability objectives	Proposed sub objectives
Design Standards	<p>Increased urbanisation and loss of local distinctiveness, character and integrity of the built environment and its setting.</p> <p>Design of any new development in the National Park needs to demonstrate that it is responding to existing local character and identity, and that the heritage, local history and culture of the area are being valued.</p> <p>The design and layout of proposals should be consistent with local landscape character.</p> <p>Improvements to existing or provision of new infrastructure should be an integral part of the design of development proposals, and should be landscape led, and should be multifunctional.</p>	<p>Cultural heritage, including architectural and archaeological heritage</p> <p>Landscape</p>	<p>Value, protect and enhance the character of settlements, neighbourhoods and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness.</p>	<p>11.1 To promote landscape led design in development across the National Park.</p> <p>11.2 To promote high quality places, spaces and buildings.</p> <p>11.3 To make best and efficient use of previously developed land and existing buildings, implement sustainable design and construction practices.</p> <p>11.4 To promote multifunctional green and blue infrastructure.</p>

Table 6 Sustainability Objectives for the Local Plan Review

	Proposed sustainability objectives	Proposed sub objectives	Questions
1	To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.	<p>1.1: Retain functionality and provide resilience to the landscape character in response to climate change.</p> <p>1.2 Conserve and enhance the perceptual qualities of the South Downs National Park including the dark night sky reserve and the tranquil setting of the National Park.</p> <p>1.3 Conserve and enhance views to and from and within the National Park.</p>	<p>Will it conserve and enhance the landscape character of the South Downs National Park?</p> <p>Will it encourage appropriate management of designated landscapes?</p> <p>Will it protect and retain trees, woodlands and hedgerows?</p> <p>Will it conserve and enhance areas of tranquillity?</p> <p>Will it allow naturally functioning/natural processes?</p> <p>Does it consider views to and out of National Park, from close by and longer distance?</p> <p>Will it conserve and enhance the Sussex Heritage Coast?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
2	To conserve and enhance the region's biodiversity and contribution to nature recovery.	<p>2.1 Maintain a functioning ecological network and conserve, enhance, restore, expand and reconnect areas of priority habitat.</p> <p>2.2 New development should contribute to nature recovery through biodiversity net gain and other delivery mechanisms.</p>	<p>What level of BNG will be achieved?</p> <p>Will it provide opportunities to make bigger, better and more joined up nature sites?</p> <p>Will it avoid, mitigate and in the last resort compensate for identified adverse impacts to the interest features on sites designated for nature conservation?</p> <p>Will it protect and enhance existing local sites of nature conservation importance or create new areas of nature conservation value?</p> <p>Will it protect ancient woodland and ancient and veteran trees?</p> <p>Will it allow biodiversity to adapt to the effects of climate change, including enhancement of ecological networks / corridors?</p> <p>Will it protect the range of biodiversity, including rare and vulnerable species where they occur?</p>
3	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.	<p>3.1 To conserve the character of historic landscapes and the character of settlements and buildings and their setting.</p> <p>3.2 Improve access and understanding of local and cultural heritage.</p> <p>3.3 To enhance the distinctiveness and diversity of the local built environment and community spaces.</p>	<p>Will it protect, maintain and enhance listed buildings, conservation areas, archaeological sites, historic landscapes and the setting of these assets?</p> <p>Will it provide for increased access to and enjoyment of the historic environment?</p> <p>Will it encourage local cultural traditions?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
4	To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures.	<p>4.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>4.2: Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies.</p> <p>4.3 Maximise the use of low carbon and renewable energy within new developments and proposals.</p> <p>4.4 To minimise the impacts of climate change on the National Park's communities and habitats.</p> <p>4.5 To address food shortages and extreme weather conditions through mitigation and adaption measures such as sustainable design, providing shade, rainwater harvesting and reduced energy consumption, safeguarding soil health for food production and soil health for carbon sequestration.</p> <p>4.6 Maximise the use of nature-based solutions such as natural flood management.</p>	<p>Will it promote the value and benefits of natural resources and the use of sustainable materials?</p> <p>Will it encourage the use of energy efficiency and enable small-scale renewable energy schemes?</p> <p>Will it help in adapting to climate change?</p> <p>Will it reduce the risk from coastal, fluvial and surface water flooding?</p>
5	Protection & Sustainable Use of Resources.	<p>5.1 Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies.</p> <p>5.2 To address food shortages through mitigation and adaption measures such as safeguarding soil health for food production and soil health for carbon sequestration.</p> <p>5.3 To reduce land contamination and safeguard soil quality and quantity.</p> <p>5.4 To ensure air quality continues to improve and noise and light pollution are reduced.</p>	<p>Will it encourage water conservation and the sustainable use of water?</p> <p>Will it protect the quality of air and water and reduce greenhouse gas emissions?</p> <p>Will it ensure the sustainable use of soils and safeguard the best and most versatile agricultural land?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
6	Employment and Economy.	<p>6.1 To encourage the provision of diverse employment opportunities within the tourism industry.</p> <p>6.2 To support local services and community facilities as part of the tourism offer.</p> <p>6.3 To further the understanding of the special qualities of the National Park by local people and visitors.</p> <p>6.4 To allow opportunities for all social groups to experience and enjoy the National Park, while ensuring that visitor pressure does not harm the sensitive habitats of the area.</p> <p>6.5: Encourage the development of appropriate infrastructure, especially high-speed broadband, throughout the area to support small businesses.</p> <p>6.6: Encourage local businesses and maintain a living cultural skills base that forms part of the cultural heritage of the area now and into the future.</p> <p>6.7: Promote and support key sectors of the South Downs economy namely farming, forestry and tourism.</p> <p>6.8 Promote agri-environmental and diversification schemes that focus on ecosystem services and enhancement of the local supply chain.</p>	<p>Will it further the understanding of the special qualities of the National Park by local people and visitors?</p> <p>Will it allow opportunities for all social groups to experience and enjoy the National Park, while ensuring that visitor pressure does not harm the sensitive habitats of the area?</p> <p>Will it encourage sustainable tourism?</p> <p>Will it help support business development in sustainable locations?</p> <p>Will it encourage provision of diverse employment opportunities?</p> <p>Will it help to ensure diverse and vibrant town/village centres?</p> <p>Will it strengthen the farming, forestry and woodland management economies while benefitting the landscape of the National Park?</p> <p>Will it enable farm diversification appropriate to the character of the area?</p>



	Proposed sustainability objectives	Proposed sub objectives	Questions
7	Promote equality of opportunity and the elimination of discrimination	<p>7.1 Ensure equality of opportunity and equal access to facilities/infrastructure for all.</p> <p>7.2 Ensure that the needs of different areas are equally addressed.</p> <p>7.3 Priority should be given to redressing the inequalities of access to green open space and to the natural environment.</p> <p>7.4 Provide a sustainable mix of housing that meets the needs of young and older people.</p>	<p>Will it foster good relations between different people?</p> <p>Ensure equality of opportunity and equal access to facilities/infrastructure for all?</p> <p>Ensure no discrimination based on 'protected characteristics', as defined in the Equality Act 2010?</p> <p>Ensure that the needs of different areas, are equally addressed?</p> <p>Encourage active and connected, strong and cohesive community?</p> <p>Promote frequent and accessible transport?</p> <p>Ensure housing needs are met, especially those for the elderly?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
8	Contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities.	<p>8.1 Optimise the benefits that the natural environment offers to contribute to the holistic health and well-being of local communities within and surrounding the National Park.</p> <p>8.2 Use environmental and building standards to ensure that places promote health and wellbeing.</p> <p>8.3 Improve the well-being of local communities by providing a safe environment through the design and layout of development.</p> <p>8.4 Achieve healthy living opportunities by supporting access to open spaces, public rights of way, walking and cycling opportunities and outdoor leisure activities.</p> <p>8.5 Support mixed communities where children can play freely, and social isolation is the exception.</p> <p>8.6 Encourage the establishment of appropriate services and facilities in development schemes, based upon local plan evidence</p> <p>8.7 Support the health and wellbeing needs of an aging population through access to services and facilities and appropriate design</p>	<p>Will it provide, help, create and sustain healthy and sustainable communities?</p> <p>Will it increase the opportunities to enjoy healthy and active lifestyles which increase physical activity and connectivity?</p> <p>Will it discourage crime?</p> <p>Will it support local services, community facilities and community enterprises for all of the population?</p> <p>Will it focus development in settlements with adequate infrastructure and access and where a range of services and employment reduce the need to travel by car?</p> <p>Will it help to maintain, connect, improve or increase green infrastructure for the benefit of all sections of the local communities?</p> <p>Will it improve safe access for all to the countryside and encourage walking, cycling and other healthy outdoor activities?</p> <p>Will it maintain and improve safe access to the countryside and to nature and encourage walking, cycling and other healthy outdoor activities?</p> <p>Will it support healthy eating and lifestyles through increasing food growing opportunities and access to healthy food choices?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
9	Create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car.	<p>9.1: Provide sustainable access to services and safeguarding existing and proposed access routes.</p> <p>9.2: Work with partners to develop a high quality, safe access network and improved links between bus and trains and cycling opportunities.</p> <p>9.3: Minimising the impact of vehicle infrastructure on the landscape and communities.</p> <p>9.4: Providing electric charging points across the National Park.</p>	<p>Will it ensure transport infrastructure (roads/ rail/buses/ cycleways/footpaths) serves the needs of local businesses and communities?</p> <p>Will it locate development in areas with good access to the main road network with either existing or improved public transport and walking and cycling links??</p> <p>Will it improve the provision and use of sustainable transport?</p> <p>Will it enable increases in active travel – walking and cycling for all ages and abilities?</p> <p>Will it help reduce any environmental impacts of transport infrastructure, including impacts on the quality of life of residents and the character of settlements?</p>
10	To ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.	<p>10.1: Provide a sustainable mix of affordability, size and type of housing that is of good design and sustainable materials and provides for the needs of different groups in the community.</p> <p>10.2 Ensure that housing development makes good use of existing land and buildings.</p> <p>10.3 Ensures that development incorporates energy and sustainability measures</p>	<p>Will it support delivery of an appropriate level and mix of housing for local communities?</p> <p>Will it increase the amount of low cost or affordable housing for those in housing need?</p> <p>Will it support special accommodation needs, including those who are elderly or disabled, active commoners, gypsies, travelling show people and others?</p> <p>Will it ensure an appropriate level of utilities infrastructure, while limiting any adverse environmental impacts?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
11	Value, protect and enhance the character of settlements, neighbourhoods and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs.	<p>11.1 To promote landscape led design in development across the National Park.</p> <p>11.2 To promote high quality places, spaces and buildings.</p> <p>11.3 To make best and efficient use of previously developed land and existing buildings, implement sustainable design and construction practices.</p> <p>11.4 To promote multifunctional green and blue infrastructure</p>	<p>Will it maintain the local character and settlement pattern of villages and towns within the National Park?</p> <p>Will it enhance and contribute to local building traditions?</p> <p>Will it ensure high design standards?</p> <p>Will it create new opportunities for green infrastructure?</p> <p>Will it contribute to the creation of a sense of place, which is well-designed, safe, inclusive, accessible for all and reduces social isolation?</p> <p>Will it support the needs of vulnerable groups such as the creation of dementia friendly environments?</p>

## 6. Consultation Exercise

- 6.1 It is a statutory requirement that the Scoping Report is sent to the three environmental consultation bodies (Environment Agency, Natural England and Historic England). In addition, relevant local stakeholders were invited to make representations. A consultation exercise is important to ensure the scope of the IIA is suitably identified, the methodology for the proposed sustainability appraisal is comprehensive, the objectives are suitable, and the baseline data is appropriate and sufficient.
- 6.2 Consultation with the environmental bodies and the local stakeholders took place between April and September 2023 for the first version of the Scoping Report. A further updated IIA scoping report was sent out for consultation in August 2024.
- 6.3 Some of key issues raised during the first consultation exercise include the following.
- A request from the Environment Agency to update references and documents within the report. Reference was also made to greater clarification around the topic of water (surface & ground water, flooding, climate change).
  - Matters relating to water were also raised by Horsham District Council.
  - Natural England referenced multifunctional green infrastructure and requested this was highlighted in the report and the sustainability objectives.
  - East Sussex County Council highways requested that information is inserted regarding electric cars.
  - East Sussex County Council Public Health teams submitted a wide range of comments relating to expanding the existing information to include more detail on health and wellbeing, a request that the full scope of health and wellbeing are adequately covered in the report and changes to the sustainability framework and objectives.
- 6.4 A selection of the responses include:
- Further reference documents and strategies have been added to Appendix A and within the main document.
  - The report was amended to create a new topic of Protecting and Sustainable use of Resources.
  - Information was inserted into the report which explains that all objectives and sub objectives are inter-related.
  - A sub-objective on multifunctional green infrastructure was included.
  - Soil, air, and minerals have been separated out to create a new sustainability objective.
  - A title of one of the sections was amended to Community, Health & Wellbeing and further text was added to this section to take on board points from the SDNPA Health & Wellbeing Strategy.

- 6.5 Following the first consultation exercise, the baseline and objectives were updated as appropriate.
- 6.6 Further responses were received in September 2024. Key comments were received from East Sussex Public Health team. This resulted in a new sub objective and several new questions. These were added to Tables 5 and 6. Comments from Southern Water, Arun District Council and Natural England resulted in additions to Appendix A.
- 6.7 This version is the updated Scoping Report, which takes on board all the comments submitted during the first and second consultation period.
- 6.8 A summary of some of the comments received during the first and second consultation period is attached as **Appendix B**.

## 7. Next Steps

- 7.1 The next stage in developing the draft IIA/SA will include an assessment of the sustainability objectives against the objectives of the Local Plan Review to check compatibility. The sustainability objectives will be used to test a range of reasonable alternatives. These will be set out in the draft IIA/SA and the final version.
- 7.2 Regulations require the assessment of the effects of a plan or programme over short, medium, and long terms. Further work will be undertaken on growth scenarios and spatial strategies. In addition, a EqlA screening of the Local Plan review will be undertaken. A clear assessment matrix for the HIA to test proposed policies in the Local Plan will be produced.
- 7.3 During the production of the Local Plan review, new relevant documents and policies will emerge, as well as local documents being progressed to subsequent stages. New and updated documents will be reviewed at each stage for their relevance to the Local Plan and the Sustainability Appraisal.
- 7.4 Several versions of the IIA Sustainability Appraisal will be produced to assess and inform the Local Plan Review throughout its production.

# APPENDIX A



Key Themes	Document Name and Web link	Summary
<i>Landscape and Environment</i>	<a href="#">Vision and Circular on English National Parks and the Broads (2010)</a>	Provides guidance to national park authorities on how to achieve their purposes and duty. The purpose of this circular, which applies only in England, is to provide updated policy guidance on the English National Parks and the Broads “the Park”). The current Local Plan already meets the requirements of the policy but will be checked as the review Local Plan is produced.
	<a href="#">The Natural Environment and Rural Communities Act 2006</a>	The act created Natural England and the Commission for Rural Communities, and, amongst other measures, it extended the biodiversity duty set out in the Countryside and Rights of Way (CROW) Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity
	<a href="#">Countryside and Rights of Way Act 2000</a>	The Countryside and Rights of Way Act 2000 (CROW Act) normally gives a public right of access to land mapped as ‘open country’ (mountain, moor, heath and down) or registered common land. These areas are known as ‘open access land’.
	<a href="#">DEFRA 25 Year Environment Plan 2018</a>	A plan to improve the UK’s air and water quality and protect threatened plants, trees and wildlife species. It establishes an extensive set of targets and objectives.
	<a href="#">South Downs Local Plan 2011-2034 (adopted 2019)</a>	The South Downs Local Plan is the first Local Plan to cover the whole of the South Downs National Park. It sets out strategic and non-strategic policies (including site allocation policies) which form part of the statutory development plan for the area. It is a landscape led plan that reflects the national parks’ statutory purposes and duty, and which seeks to capture the principles of ‘ecosystem services’
	<a href="#">South Downs National Park Partnership Management Plan 2020–2025</a>	The South Downs Local Plan builds on the framework of the South Downs National Park Partnership Management Plan (PMP). The PMP sets out the overarching five-year strategy for the management of the South Downs National Park. It is a plan that sets out to shape the future of your South Downs National Park.

Key Themes	Document Name and Web link	Summary
	<a href="#">The Corporate Plan for the South Downs National Park Authority 2022-2023</a>	The Corporate Plan for the South Downs National Park Authority shows how the organisation sets its own priorities and delivers the outcomes in the Partnership Management Plan. The latest Corporate Plan 2022-23 is used in parallel with the Partnership Management Plan, which sets out the over-arching management of the South Downs National Park. Using the Corporate Plan, priorities are set out annually over five years to deliver the outcomes of the Partnership Management Plan. This version sets out priorities for Year 3
	<a href="#">South Downs National Park: View Characterisation and Analysis – The ‘Viewshed’ 2015</a>	South Downs National Park Authority commissioned LUC in 2014 to prepare a View Characterisation and Analysis Study comprising a mapping and analysis of views to, from and within the National Park. The existing South Downs Integrated Landscape Character Assessment (SDILCA 2011) is the foundation of the evidence base for landscape for the SDNP. This study will sit alongside the SDILCA to provide evidence on views, as well as providing a visual ‘way into’ understanding the SDILCA.
	<a href="#">South Downs Landscape Character Assessment (LCA) 2020 Technical Papers</a>	This report updates the Integrated Landscape Character Assessment (ILCA) for the South Downs National Park, which was first written in 2005 (before the National Park had been confirmed) and updated in 2011 to incorporate areas within the then newly designated National Park. The aim of this update is to provide a more practical tool in a more accessible and interactive form, which can be used to inform and guide positive landscape change, supporting a ‘landscape led’ approach to planning and design within the National Park
	<a href="#">Tranquillity Study 2017</a>	‘Tranquil and unspoilt places’ are one of seven special qualities of the National Park. They are the key characteristics that help make this place special. The tranquillity mapping project is intended as evidence work for adopted Local Plan
	<a href="#">Dark Skies Technical Advice Note 2021</a>	The Dark Skies Technical Advice Note (TAN) was first approved for publication in April 2018. The new document was updated in May 2021. The TAN sets out the South Downs National Park Authority’s (SDNPA) approach to lighting design and the protection and enhancement of dark skies.

Key Themes	Document Name and Web link	Summary
	<a href="#">SDNPA Historic Landscape Characterisation for Hampshire 2017</a>	HISTORIC LANDSCAPE CHARACTERISATION (HLC) is an archaeological method used to define and map the historic and archaeological dimension of the present-day landscape. This report accompanies the Historic Landscape Characterisation GIS dataset for the Hampshire area of the South Downs National Park
	<a href="#">SDNPA Viewshed Study 2015</a>	The Viewshed Study Report of the South Downs National Park takes 120 of the most widely known views and landmarks in the National Park and maps them using computer modelling to a 35 kilometre distance. These plots of views are called Zone of Theoretical Visibility (ZTVs). These are used to help assess and understand the impact of visible change in the views.
<b><i>Biodiversity and Nature Recovery</i></b>	<a href="#">Strategic Environmental Assessment-- SEA (Directive 2001/42/EC)</a>	The Protocol on Strategic Environmental Assessment augments the Espoo Convention by ensuring that individual Parties integrate environmental assessment into their plans and programmes at the earliest stages, and thus help in laying down the groundwork for sustainable development. This Directive is met through Sustainability Appraisals
	<a href="#">Natural Capital Investment Strategy for Sussex 2019-- 2024 by Sussex Local Nature Partnership</a>	In October 2019, Sussex Local Nature Partnership produced a comprehensive 'Natural Capital Investment Strategy' to guide its approach to directing investment in nature, across the terrestrial, coastal and marine environments, for the next 5 year period and beyond.
	<a href="#">The Environment Act 2021</a>	The Environment Act operates as the UK's new framework of environmental protection. Given that the UK has left the EU, new laws that relate to nature protection, water quality, clean air, as well as additional environmental protections. The Environment Act allows the UK to enshrine some environmental protection into law. It offers new powers to set new binding targets, including for air quality, water, biodiversity, and waste reduction
	<a href="#">UK Biodiversity Action Plan 1992-- 2012</a>	The UK Biodiversity Action Plan (UK BAP) was published in 1994 and was the UK Government's response to the Convention on Biological Diversity (CBD), which the UK signed up to in 1992 in Rio de Janeiro. The CBD called for the development and enforcement of national strategies and associated action plans to identify, conserve and protect existing biological diversity, and to enhance it wherever possible.

Key Themes	Document Name and Web link	Summary
	<a href="#">Levelling Up and Regeneration Act 2023</a>	<p>The Levelling-up and Regeneration Act 2023 (LURA) is a law that was passed by Parliament and received Royal Assent on October 26, 2023. The Act includes a number of measures that aim to:</p> <ul style="list-style-type: none"> <li>Speed up the planning system.</li> <li>Hold developers to account.</li> <li>Cut bureaucracy.</li> <li>Encourage more councils to plan for new homes.</li> <li>Reduce geographical disparities.</li> <li>Introduce a new Infrastructure Levy.</li> <li>Create a new form of devolved local government: The Act creates a new form of devolved local government called a County Combined Authority</li> </ul>
	<a href="#">South Downs Habitats Regulations Assessment 2018 of the South Downs Local Plan</a>	The objective of the assessment is to identify any aspects of the Local Plan that would cause an adverse effect on the integrity of International Sites, also known as Natura 2000 sites or European sites (Special Areas of Conservation / Special Protection Areas) and Ramsar sites, either in isolation or in combination with other plans and projects; and, to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified
	<a href="#">Mapping Hampshire Ecological Network 2020</a>	The Hampshire Biodiversity Information Centre (HBIC) was contracted by Natural England in 2015 to produce a detailed Ecological Network Map for Hampshire on behalf of the Local Nature Partnership (LNP).
	<a href="#">SDNPA People and Nature Network 2020</a>	Formally called the Green Infrastructure Framework, the People And Nature Network (PANN), will help the South Downs National Park Authority and its partners ensure nature is able to function effectively so that all action is coordinated and contributes to a strategic approach. This document called the People and Nature Network (PANN) sets out how a wide range of partners can work together to plan positively for nature and natural services within and surrounding the protected landscapes of the southeast.

Key Themes	Document Name and Web link	Summary
	<a href="#">Natural England Green Infrastructure Framework Guidance 2022</a> <a href="#">Natural England Action Plan 2022-2023</a>	The Green Infrastructure (GI) Framework is a commitment in the Government's 25 Year Environment Plan. It supports the greening of our towns and cities and connections with the surrounding landscape. Natural England is central to delivering the Framework. The GI Framework will be fully available in autumn 2022. Additional elements will include the core GI Standards, from which local authorities can set their own local standards, for example on accessible natural green space or urban greening.
	<a href="#">Natural Capital and Ecosystem Assessment Programme</a>	Natural Capital and Ecosystem Assessment (NCEA) is a science innovation and transformation programme, which spans across land and water environments. It has been set up to collect data on the extent, condition and change over time of England's ecosystems and natural capital, and the benefits to society.
	<a href="#">Biodiversity Metric 4.0</a>	Biodiversity Metric 4.0 is a biodiversity accounting tool that can be used for the purposes of calculating biodiversity net gain. This page includes published information about Biodiversity Metric 4.0, an update to the previously published biodiversity metric 3.1 (April 2022).  Biodiversity Metric 4.0 can be used or specified by any development project, consenting body or landowner that needs to calculate biodiversity losses and gains for terrestrial and/or intertidal habitats
	Biodiversity Areas/Designated sites	Various internet searches will provide information on protected and designated nature conservation sites. <a href="#">Natural Capital Investment Strategy for Sussex 2019-- 2024 by Sussex Local Nature Partnership</a>
	<a href="#">Biodiversity Net Gain Technical Advice Note (TAN)</a>	This technical advice note supports South Downs Local Plan Policy SD9: Biodiversity and Geodiversity. It provides interim guidance on how Biodiversity Net Gain is to be achieved in the South Downs National Park now in accordance with existing South Downs Local Plan Policy. It also provides guidance on how Biodiversity Net Gain is expected to make a meaningful contribution to nature recovery
	<a href="#">People and Nature Network Plan Evidence and Action Report 2020</a>	The People and Nature Network (PANN) aims to deliver benefits not only to the environment but also to the development of better places to live, work and invest.

Key Themes	Document Name and Web link	Summary
	<a href="#">Habitats Regulations Technical Advice Note 2021</a>	This Technical Advice Note (TAN) has been produced to provide guidance on how to undertake Habitats Regulations Assessment for development proposals in the South Downs National Park.
	<a href="#">Ecosystems Services Technical Advice Notes</a>	These technical advice notes support South Downs Local Plan Policy SD2: Ecosystem Services. They explain what ecosystem services are, and how they apply to development proposals.
	<a href="#">Seaford to Eastbourne Nature Recovery Project</a>	Around 12,000 hectares of land from Seaford to Eastbourne, in East Sussex, will benefit from government funding for nature recovery work.  The focus of the project, led by Natural England, will be across several locations, including the Cuckmere River, Seven Sisters cliffs and chalk reefs in the Beachy Head Marine Conservation Zones.
<i>Historic environment, Heritage Assets and Cultural Heritage</i>	<a href="#">Planning (Listed Buildings and Conservation Areas) Act 1990</a>	The Planning (Listed Buildings and Conservation Areas) Act is a UK Act of Parliament introduced in 1990 that changed laws relating to the granting of planning permission for building works, with a particular focus on listed buildings and conservation areas. It created special controls for the demolition, alteration or extension of buildings, objects or structures of architectural or historic interest, as well as conservation areas.
	<a href="#">Conservation Area Appraisals</a>	A Conservation Area Appraisal is an objective analysis of the elements which together define the area's special architectural or historic interest. These elements will be largely physical, both man-made and natural, but will also include more ephemeral considerations, such as spaces, views, uses, and sounds.  The appraisal seeks to describe and map these elements to inform everyone involved in the planning process. Appraisals also consider those elements and issues which currently are neutral or detrimental to the special character of the conservation area.  The normal lifespan for an appraisal is 10 years, after which they should be reviewed.
	<a href="#">National Planning Policy Framework NPPF 2023</a>	The National Planning Policy Framework was revised in September 2023 sets out the government's planning policies for England and how these are expected to be applied. The planning practice guidance to support the framework is published online.

Key Themes	Document Name and Web link	Summary
	<a href="#">Archaeology on the Edge 2019</a>	Heritage Coasts were established to protect and conserve the best stretches of undeveloped coast in England. The Sussex Heritage Coast was the first to be defined. The report outlined heritage assets at risk by anticipated timescales for coastal erosion impact specified as short term (0-20 years); medium term (0-50 years); and long term (50-100 years), and whether a heritage asset would be lost wholly or in part using estimated percentages against anticipated erosion rates.
	<a href="#">Historic England-- Energy Efficiency and Historic Buildings 2018</a> <a href="#">Historic England-- Energy Efficiency and Traditional Homes 2020</a>	<p>This guidance is for anyone who wishes to improve energy efficiency in an historic building. There are many reasons to do this. Improving energy efficiency will lower carbon emissions and fuel bills and often increase comfort.</p> <p>This advice note considers energy efficiency improvements to those traditional homes which are described as heritage assets within the planning system. It outlines a 'whole building' approach that can help in meeting the combined objectives of increasing energy efficiency and sustaining significance in heritage assets</p>
	<a href="#">South Downs Beachy Head to the River Ouse Aerial Investigation and Mapping report 2013</a>	This survey involved the interpretation, transcription and recording of all archaeological features seen on aerial photographs for part of the South Downs within East Sussex. The project area included the coast from Peacehaven to the western edge of Eastbourne, areas of downland and parts of the Ouse and Cuckmere river valleys. This report explores some of the key themes identified during the project.
	<a href="#">South Downs Worthing to the Weald Area Investigation and Mapping Report 2008</a>	This National Mapping Programme survey involved the interpretation, transcription and recording of all archaeological features seen on aerial photographs within this traditionally well researched landscape. It forms part of a programme of work by English Heritage designed to characterise the historic environment of the proposed South Downs National Park. The survey area includes the downland to the north of Worthing with a contextual area that encompasses part of the coastal plain, the Weald and the River Adur valley

Key Themes	Document Name and Web link	Summary
	<a href="#">The High Woods from Above National Mapping Programme 2016</a>	The 'High Woods' area of West Sussex and eastern Hampshire is remarkable in terms of the range, extent and time depth of the archaeological earthworks preserved in the woodland. A key part of the project was an airborne laser scanning survey, commonly known as lidar, which provided a highly accurate 3D model of archaeological features surviving as earthworks or structures in open land and woodland. Analysis and mapping from the lidar data and aerial photographs provided an interpretation of a complex and extensive archaeological landscape suitable for use by local communities, researchers and managers of the historic environment.
	<a href="#">Hampshire South Downs National Mapping Programme 2011</a>	The project consisted of an analytical survey of all archaeological features visible on aerial photographs within the Hampshire portion of the South Downs National Park and forms part of English Heritage's National Mapping Programme (NMP).
	<a href="#">West Sussex, East Sussex and Hampshire Historic Environment records</a>	<p>For each County-- Historic Environment Records (HER) are sets of data linked to a geographical information system (GIS). It can be used to assist in the analysis of the landscape and, when combined with the Historic Landscape Characterisation, looks at the archaeological evidence as well as historic use to determine how the landscape has changed.</p> <p>The HER contains a summary of known historic assets. Using GIS, the record can be viewed with additional layers of information, such as conservation areas and historic town characterisation. It also holds several electronic reports of archaeological investigations, usually carried out as part of the planning process, a summary of which is recorded in the HER</p>
<i>Climate Change and Flooding</i>	<a href="#">The Paris Agreement 2016</a>	The Paris Agreement is a legally binding international treaty on climate change. Its goal is to limit global warming to well below 2, preferably to 1.5 degrees Celsius, compared to preindustrial levels. To achieve this long-term temperature goal, countries aim to reach global peaking of greenhouse gas emissions as soon as possible to achieve a climate neutral world by mid-century.



Key Themes	Document Name and Web link	Summary
	<a href="#">The Climate Change Act 2008</a>	This introduced a statutory target of reducing greenhouse gas emissions. Initially a target was set of reducing carbon emissions by 80 per cent below 1990 levels by 2050 with an interim target of 34% by 2020. In June 2019 legislation was passed requiring the UK to bring all greenhouse gas emissions to net zero by 2050 and in 2021, the government committed to reducing emissions by 78% by 2035 compared to 1990 levels.
	<a href="#">UK Renewable Energy Strategy 2009</a>	The UK Renewable Energy Strategy 2009 is a white paper outlining how the UK will meet its legally-binding target to ensure 15% of energy comes from renewable energy sources by 2020.
	<a href="#">Sustainability and Climate Change Strategy for Education and Children's Service 2022</a>	DofE has an important role to play in all aspects of sustainability. While the policies set out here are focussed on the environmental aspect of sustainability, this is done with consideration for how those policies will interact with the social and economic aspects of sustainability.  It brings together short, medium and longer-term actions that will enable us to make progress towards achieving our 4 strategic aims and overarching vision. It is a strategy to 2030.
	<a href="#">The 2030 Agenda for Sustainable Development and the SDGs</a>	This agenda, including its 17 Sustainable Development Goals (SDGs) and 169 targets, was adopted on 25 September 2015 by Heads of State and Government at a special UN summit. The Agenda is a commitment to eradicate poverty and achieve sustainable development by 2030 world-wide, ensuring that no one is left behind. The adoption of the 2030 Agenda was a landmark achievement, providing for a shared global vision towards sustainable development for all.
	<a href="#">National biodiversity climate change vulnerability model</a>	The National Biodiversity Climate Change Vulnerability Model (NBCCVM) aims to provide a spatially explicit assessment of the relative vulnerability of priority habitats based on established climate change adaptation principles; suite of map-based-GIS outputs at a variety of scales which can be used (in conjunction with other relevant spatial data) to target action to build biodiversity resilience and a flexible, GIS based, decision support tool that allows the user to incorporate locally specific datasets and select how adaptation principles are combined to reflect local circumstances and priorities.

Key Themes	Document Name and Web link	Summary
	<a href="#">The Flood and Water Management Act 2010</a>	<p>The Flood and Water Management Act (FWMA) aims to improve both flood risk management and the way water resources are managed (HM Government, 2010).</p> <p>Schedule 3 of the Act has not been enacted in England, but this is expected to be implemented in 2024. The enactment of schedule 3 will have the following implications for the planning process:</p> <ul style="list-style-type: none"> <li>• Designation of local authorities as SuDS Approval Bodies (SAB) which have a duty to adopt new drainage systems.</li> <li>• Developers must ensure that drainage systems are built as per the approved drainage plan that complied with mandatory national standards as outlined in the NPPF and the PPG.</li> <li>• The cessation of the automatic right for new developments to connect to the existing sewer system.</li> </ul>
	<a href="#">SDNPA Climate Change Strategy &amp; Action Plan</a>	The Strategy and Plan confirms the Authority's commitment to address the climate and nature emergency by committing to the South Downs National Park Authority becoming a 'Net-Zero' Organisation by 2030, agreeing an action plan which includes a commitment to working with our constituent Local Authorities and other partners, and committing to working towards the South Downs National Park becoming 'Net-Zero with Nature' by 2040
	<a href="#">Strategic Flood Risk 2015 and 2017</a>	This report has been produced for the purpose of reporting the results of a combined Level 1 update and Level 2 Strategic Flood Risk Assessment (SFRA) for the South Downs National Park. This study has been commissioned by the South Downs National Park Authority (SDNPA) as part of the evidence base for three local planning documents which are currently under preparation including the now adopted South Downs Local Plan
	<a href="#">Small Scale Renewable Energy Technical Advice Note (TAN)</a>	The Small Scale Renewable Energy Technical Advice Note (TAN) was approved for publication by Planning Committee on 10 February 2022.

Key Themes	Document Name and Web link	Summary
	<a href="#">Sustainable Construction Supplementary Planning Document 2020</a>	The SPD provides further guidance to support the implementation of the South Downs Local Plan policies, in particular Policy SD2: Ecosystem Services, Policy SD3 Major Development, Policy SD22: Parking Provision (where it relates to electric vehicle charging), Policy SD48 Climate Change and Sustainable Use of Resources.
		<p>In March 2020, the South Downs National Park Authority adopted a new Climate Change Strategy and Action Plan. The Strategy and Plan confirms the Authority's commitment to address the climate and nature emergency by:</p> <ul style="list-style-type: none"> <li>• Committing to the South Downs National Park Authority becoming a 'Net-Zero' Organisation by 2030</li> <li>• Agreeing an action plan which includes a commitment to working with our constituent Local Authorities and other partners, in particular communities and landowners to deliver actions that respond effectively to the climate and nature emergency</li> <li>• Committing to working towards the South Downs National Park becoming 'Net-Zero with Nature' by 2040</li> </ul>
	Local Flood Risk Management Strategies <a href="#">Hampshire</a> , <a href="#">West Sussex</a> , <a href="#">East Sussex</a> , <a href="#">Brighton &amp; Hove</a>	Lead local flood authorities in England must develop local strategies for flood and coastal erosion risk management. These must be consistent with the national flood and coastal erosion risk management (FCERM) strategy, take account of the current policy and reflect the aspirations and priorities of other partners with responsibilities for FCERM along with wider local interests in linked environmental or social outcomes.
	<a href="#">Natural Flood Management Measures-- A practical guide for farmers and landowners of the Solent and South Downs-- 2020</a>	In the UK our flood risk management systems include large-scale, hard engineered flood defences in and around major urban areas, small-scale engineered solutions for rural communities and farmland, and coastal sea defences. More recently, there has been a move to show how a naturalistic approach to management of water in the wider countryside can contribute to the UK's flood risk management system. This is known as Natural Flood Management (NFM) and Working with Natural Processes (WwNP). NFM uses natural methods to reduce the downstream maximum water height of a flood (the flood peak) or to delay the arrival of the flood peak downstream.

Key Themes	Document Name and Web link	Summary
	<a href="#">Renewable and Low Carbon Energy Study 2013</a>	In January 2012 the SDNPA commissioned a Low Carbon and Renewal Energy Study to support policy development for both the Management Plan and the Local Plan. This was a two part study: a Phase 1 Scoping Study that reviewed existing policy; the available data and any key gaps in that data; characterised the key energy issues and identified topics for more detailed investigation in Phase 2.
	<a href="#">A greenhouse gas emissions and target scenario for the South Downs National Park 2022</a>	This report is designed to provide a robust and consistent evidence basis for climate action, matched to the unique characteristics and circumstances of each protected landscape, as we enter an era in which climate mitigation and sustainable land management become ever more central to all our lives, our work and to all policy decisions. It contains a consumption-based assessment of the greenhouse gas emissions attributable to residents and visitors, including travel to and from the landscape and a set of Paris aligned target recommendations for transitioning to a low-carbon economy.
	<a href="#">Shoreline Management Plans</a>	There several Shoreline Management Plans affecting the SDNPA area. These are: <a href="#">South Foreland to Beachy Head</a> <a href="#">Beachy Head to Selsey Bill</a> <a href="#">Selsey Bill to Hurst Spit</a>
	<a href="#">National Coastal Erosion Risk Map</a>	The coastal erosion map provides detail on the predicted erosion rates for the Short term (up to 2025), Medium term (up to 2055) and Long term (up to 2105).
	<a href="#">Flood Risk Management Plans</a> <a href="#">South East River Basin</a> <a href="#">Thames River Basin</a>	Flood risk management plans (FRMPs) set out how organisations, stakeholders and communities will work together to manage flood risk in England.
	<a href="#">Water Resource Management Plans</a>	Water Resource Management Plans which assess pressures on future water supplies. WRMPs are an essential evidence source for ascertaining water availability within the context of climate change

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	<a href="#">The UK Climate Change Risk Assessment (2022)</a>	The UK Climate Change Risk Assessment (2022) outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today.
	<a href="#">The UK Climate Projections (UKCP18)</a> <a href="#">What will Climate Change look like in your area?</a>	The UK Climate Projections (UKCP18) UK Climate Projections (UKCP) - Met Office provide a set of tools and data which cover all climate risks and impacts and provide authoritative advice on what to prepare for. A BBC and Met Office tool What will climate change look like in your area? - BBC News provides a postcode lookup to access UKCP18 projections for local places
	<a href="#">Living better with a changing climate</a>	The Environment Agency (EA) report, Living better with a changing climate, Living better with a changing climate (publishing.service.gov.uk) sets out the evidence on observed changes and expected future climate change impacts that we manage for the country (too much and too little water).
	<a href="#">Spatial Planning for climate resilience 2023</a>	The Climate Change Committee (CCC) commissioned the Centre for Sustainable Energy and the Town and Country Planning Association to conduct research into the barriers and opportunities to delivering climate mitigation and adaptation through the spatial planning system at the local authority level in England. The research examined the English planning system and the National Planning Policy Framework (NPPF) and draws this together with a survey of planning practitioners, local plan case studies and stakeholder roundtables.
	<a href="#">Independent Assessment of UK Climate Risk (2021)</a>	The Climate Change Committee's (CCC) Independent Assessment of UK Climate Risk (2021) sets out the priority risks and opportunities for the UK

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	<a href="#">Abstraction Licensing Strategies</a>	<p>The Environment Agency controls how much water is taken with a permitting system. The Environment Agency regulate existing licences and grant new ones. To do this they use: the catchment abstraction management strategy (CAMS) process abstraction licensing strategies. The publication 'managing water abstraction' sets out the approach and regulatory framework within which we will manage water resources.</p> <p>You need a water abstraction licence from the Environment Agency to remove more than 20 cubic metres of water a day from a watercourse or underground water reserve in England</p>
	<a href="#">SE River Management Plan</a>	The Southeast river basin district (RBD) river basin management plan describes the challenges that threaten the water environment and how these challenges can be managed.
<b>Community and the Economy</b>	<a href="#">South Downs Tourism Strategy 2015 - 2020</a>	<p>The National Park has approximately 46 million visitor days per year, making it the most popular Protected Landscape in the country which generates an income of nearly £5 billion and supports some 12,000 jobs. The strategy establishes 7 sustainable tourism objectives which address the following:</p> <ul style="list-style-type: none"> <li>• the visitor experience and offer.</li> <li>• visitor pressures.</li> <li>• sustainable practice by tourism providers.</li> <li>• visitors means of access to the National Park and fostering custodianship;</li> <li>• visitors contribution to the local economy</li> </ul>
	<a href="#">Equestrian Development Technical Advice Note (TAN) consultation draft</a> Sept 2022	This advice has been produced to guide horse owners, equestrian businesses and their agents when applying for planning permission for equestrian development. The TAN provides the information that is needed for equestrian development proposals; highlights relevant policies in the South Downs Local Plan and provides advice and guidance on what is needed to obtain planning permission

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	<a href="#">Camping and Glamping Technical Advice Note 2021</a>	<p>The Camping and Glamping Technical Advice Note (TAN) has been produced to guide applicants and agents when applying for planning permission for camping and glamping tourist accommodation.</p> <p>The guidance covers pitch up camping, glamping style yurts and domes, eco pods, 'luxury' style canvas tents and treehouses.</p>
	<a href="#">Coastal West Sussex and Greater Brighton Local Strategic Statement - Delivering Sustainable Growth 2015-31</a>	The Local Strategic Statement for Coastal West Sussex and Greater Brighton (LSS), is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. The reflect the local planning authorities' clear aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area.
	<a href="#">SDNPA 2018 Economic Profile and SDNPA 2020 updated Economic Profile</a>	The 2020 report contains an update of the key data in the South Downs Economic Profile 2018. The South Downs National Park (SDNP) has a relatively large and diverse business population comprising a range of industry sectors, in addition to the land-based industries and the visitor economy.
	<a href="#">Open space, sports and recreation evidence study 2017</a>	This paper outlines the basis upon which the open space, sports and recreation facilities standards of Policy SD46 in the Pre-Submission South Downs Local Plan have been formulated. It explains the context behind why the policy and standards are necessary to ensure that the Purposes and Duty of the National Park are met, briefly summarises national policy, and summarises the key evidence base studies which have fed into the policy.
	<a href="#">Retail evidence study 2016</a>	The purpose of the study is to inform the emerging town centre and retail policies of the South Downs Local Plan which will set out a broad development strategy over the period to 2032. This is the first local plan to be produced by the SDNPA since their National Park designation in 2011
	<a href="#">The State of the National Park 2012</a>	The first State of the National Park Report for the South Downs National Park. This report is structured around the special qualities, setting out the facts and figures that set out what condition they are in.

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	<a href="#">The South Downs National Park Data Update. A comparison of the economy of the South Downs National Park with the National Parks in England</a> Supplementary paper August 2020	The South Downs National Park Economic Profile 2018 and the South Downs National Park Economic Data Update 2020 analyse the economy of the South Downs National Park using as comparators the four Local Enterprise Partnerships whose boundaries it crosses and the Southeast region. A further question has arisen since the publication of the Economic Data Update 2020 as to what extent this economy differs from other rural economies. The South Downs National Park in contrast with other wilder, more remote National Parks such as Northumberland National Park, is not altogether rural and contains some major towns and is adjacent to significant urban centres as well as the M3 and A23 growth corridors. Therefore, some differences might be expected. This paper draws some initial conclusions in response to this question by comparing South Downs National Park's business make up with that of the other National Parks in England.
	<a href="#">Covid 19 Economic Recovery Strategy 2020</a>	Research showed that the Covid-19 pandemic is already having severe, adverse economic effects in the South Downs National Park and the Strategy sets out how the SDNPA will work with partners to mitigate the impact.
	<a href="#">Health Impact Assessments</a>	Health Impact Assessment (HIA) is a tool to identify and optimise the health and wellbeing impacts of planning. This guide supports the use of HIA in the process of plan making (when developing policies in local plans) and planning applications (designing proposals for development projects).
	<a href="#">East Sussex Public Health and Planning Memorandum of Understanding 2022</a>	This Memorandum of Understanding (MOU) sets out how the Public Health Team within East Sussex County Council (ESCC) and Local Planning Authorities (LPAs) will work together to deliver the County Council's statutory public health responsibilities and LPAs duties to deliver relevant elements of the National Planning Policy Framework through the planning system. This MOU includes all LPAs within East Sussex which are Eastbourne Borough Council, East Sussex County Council, Hastings Borough Council, Lewes District Council, Rother District Council, South Downs National Park Authority and Wealden District Council.
	<a href="#">Active Design</a>	Active Design aims to create places and spaces which encourage people to move more, with more opportunities for everyone to increase their activity levels and lead healthier lives (Sport England).



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	<a href="#">Public Health England Strategy 2020 - 2025</a>	This strategy outlines the foremost priorities which PHE will focus on for the next five years to both protect people and help people to live longer in good health.
	<a href="#">East Sussex Joint Assessment Needs</a>	The Joint Strategic Needs Assessment (JSNA) is a resource containing a wide range of local and national information to inform plans and decisions to improve people's health and wellbeing and reduce health inequalities
	<a href="#">West Sussex Joint Health and Wellbeing Strategy</a> 2019 - 2024	This document sets out the vision of the Health and Wellbeing Board, its goals and the ways in which it will work to improve the health and wellbeing for all residents in West Sussex.
	<a href="#">Joint Strategic Needs Assessment</a>	The Public Health and Social Research Unit is responsible for the Joint Strategic Needs Assessment (JSNA): the evidence base that underpins strategic Public Health decision-making in West Sussex by West Sussex County Council and its partners.
	<a href="#">Improving Lives Together</a>	Sussex Health & Care Strategy - building on the Health and Wellbeing Strategies in place across Brighton and Hove, East Sussex and West Sussex that focus on the priorities across our local populations.
	<a href="#">Open Access Land</a>	Mapping for Open Access Land (under The Countryside and Rights of Way Act 2000)
	<a href="#">Green Infrastructure Mapping</a>	The England Green Infrastructure Mapping Database is designed to provide technical evidence on the Green Infrastructure of England – Natural England
	<a href="#">Green Infrastructure Framework</a>	Introduction to the Green Infrastructure Framework

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	<a href="#">Accessible Green Spaces</a>	Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their Implementation (ENRR526) Natural England
	<a href="#">People and Nature Survey</a>	The People and Nature Survey for England gathers evidence and trend data about people's access, understanding and enjoyment of nature, and how it contributes to wellbeing.
	<a href="#">Viticulture Technical Advice Note 2021</a>	The growing of grapes for wine, known as viticulture, and the processing of grapes to make wine is expanding rapidly in the South Downs National Park (SDNP) as it is in many other parts of the United Kingdom. The purpose of the TAN is to explain how to make successful planning applications for new viticulture, wine making and other related development that deliver multiple benefits for the National Park. The TAN is primarily written for existing and prospective vineyard owners, estate managers, planning agents, Members and planning case officers both at the South Downs National Park Authority (SDNPA) and local authorities.
	<a href="#">Sussex Heritage Coast Strategy and Action Plan</a>	The Sussex Heritage Coast stretches from Eastbourne, along the iconic chalk cliffs of Beachy Head and the Seven Sisters, past Cuckmere Haven and on to Splash Point at Seaford. The Heritage Coast group have published a joint strategy and action plan setting out how the area will be managed for wildlife, landscape, tourism, recreation, heritage and the local community from 2016-20.

Key Themes	Document Name and Web link	Summary
<i>Equalities and Inclusion</i>	<a href="#">Equalities Act 2010</a>	<p>The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.</p> <p>The public sector Equality Duty came into force across Great Britain on 5 April 2011. It means that public bodies have to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees.</p> <p>It also requires that public bodies have due regard to the need to:</p> <ul style="list-style-type: none"> <li>eliminate discrimination</li> <li>advance equality of opportunity</li> <li>foster good relations between different people when carrying out their activities</li> </ul>
	<a href="#">West Sussex County Council Equality and Inclusion Policy</a>	The West Sussex Diversity and Inclusion policy statement sets out the County Council's commitment to deliver fair and inclusive services for all West Sussex communities.
	<a href="#">WSCC Council Plan</a>	<p>The plan sets out the priorities for the council and the outcomes we want to achieve for people who live and work in West Sussex. The focus is on four priorities, all of which are underpinned by a cross-cutting theme of protecting the environment:</p> <ul style="list-style-type: none"> <li>Keeping people safe from vulnerable situations.</li> <li>A sustainable and prosperous economy.</li> <li>Helping people and communities to fulfil their potential.</li> <li>Making the best use of resources</li> </ul>

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	<a href="#">East Sussex County Council Equality, Diversity and Inclusion Commitment</a>	East Sussex County Council recognises the diverse needs and strengths of our communities and is committed to promoting equality, recognising the benefits of diversity and ensuring inclusion in service delivery and employment. The County challenges discrimination and encourages respect, understanding and dignity for everyone living in, working in and visiting East Sussex. The County will do this through our direct practice in service delivery, in our recruitment and employment practices, and through our influence in the community, strategic planning and policy formation in employment and service delivery.
	<a href="#">ESCC Action Plan</a>	East Sussex County Council: Equality, Diversity and Inclusion (EDI) Action Plan (2024-25)  The first years of the action plan focused on increasing council-wide consistency, updating and aligning corporate statements, policies and objectives, and refreshing the governance and oversight of EDI. With these foundations renewed, many actions are now established as 'business as usual' and are listed below. These actions will continue to be supported and maintained through ongoing EDI officer support.
	<a href="#">Brighton &amp; Hove City Council Equality and Inclusion Strategy</a>	This strategy sets out the City's equality objective and areas of focus and action. It guides the work of all staff and elected members in the council as it delivers public services. By defining the priorities for the coming years, the City Council will enable a consistent corporate focus on achieving greater equality and inclusion in our city.
	<a href="#">Hampshire County Council Inclusion Strategy</a>	The residents: 2021 to 2025 sets out the Council's firm commitment to the people of the county, and the priorities, which include advancing social equality in Hampshire by tackling health and social inequalities, narrowing educational attainment gaps, and creating opportunity for all residents; enabling communities to be more resilient and connected, alongside promoting the development of communities that support and uphold equity, diversity and sustainability. The new, dedicated Inclusion Strategy for 2021-2024 is the blueprint for how HCC collectively realise these priorities for all of Hampshire's residents.

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	<a href="#">South Downs National Park commitment to Equality</a>	<p>The South Downs National Park Authority (SDNPA) will put equity at the centre of all the work, challenging and removing discrimination and barriers to participation wherever they may occur, creating a National Park where everyone can find opportunity and belonging.</p> <p>As an employer, SDNPA will reflect the nation we serve, and our values of collaboration, innovation and respect will be at the heart of our inclusive culture.</p> <p>As a planning authority, SDNPA will be accessible to all and ensure developments and policies are fully informed by the communities we support.</p>
	<a href="#">RTPI Strategic Priorities Equality, Diversity and Inclusion</a>	A diverse and inclusive profession is central to the future of planning. To be an effective and sustainable profession, we must be genuinely representative of the society in which we work. This includes recognising and addressing the need for broader visibility of diversity at all levels of the profession, from entry to the most senior.
	<a href="#">Equality, diversity, inclusion and Equity Strategy Town and County Planning Association</a>	Equality, diversity, inclusion and equity are critically important for the Association. Through the work today, the Association advocates for greater diversity and inclusion in the way that places are created. The TCPA seek to empower people to have real influence over decisions about their environments and to secure social justice within and between communities.
	<a href="#">EqIA Guide - TCPA</a>	Planning has a key role to play in achieving greater social and economic inclusion, promoting equality, and reducing poverty. Planning policies and decisions impact different people differently. There are multiple groups in society who are both underrepresented in engagement with planning processes and often at most risk of being disproportionately negatively affected by planning outcomes. In the process of developing planning policy, it is vital that local planning authorities assess the potential impacts of draft policies on different groups at an early stage, and adjust policies accordingly over time.
<i>Housing</i>	<a href="#">Housing and Planning Act 2016</a>	The Housing and Planning Act which received Royal Assent on 12 May 2016 applies to England. It contains a wide range of measures to expand homeownership, reform housing management and the planning process, and increase housing supply to tackle the housing crisis.

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	Local Authorities Local Plans within the National Park	<a href="#">Adur Local Plan</a> <a href="#">Arun Local Plan</a> <a href="#">Horsham District Planning Framework</a> <a href="#">Brighton &amp; Hove City Plan Part 1 Brighton &amp; Hove City Plan Part 2.</a> <a href="#">Lewes District Local Plan</a> <a href="#">Eastbourne Core Strategy</a> <a href="#">Mid Sussex District Plan 2014-2031</a> <a href="#">East Hampshire Local Plan</a> <a href="#">Adopted Chichester Local Plan: Key Policies 2014-2029.</a> <a href="#">Worthing Local Plan,</a> <a href="#">Winchester Local Plan</a> <a href="#">Wealden Local Plan.</a>
	<a href="#">Made Neighbourhood Plans</a>	Twyford, East Meon, Petersfield, Liss, Rogate, Milland, Lynchmere, Fernhurst, Kirdford, Wisborough Green, Petworth, Fittleworth, Bury, Lavant, Aldingbourne, Walberton, Arundel, Amberley, Angmering, Patching, Ferring, Clapham, Hurstpierpoint and Sayers common, Hassocks, Ditching, Plumpton, Hamsey, Ringmer, Lewes, Newhaven, Upper Beeding, Bramber.
	<a href="#">Extensions and Replacement Dwellings TAN 2023</a>	This Technical Advice Note (TAN) has been produced to guide applicants and decision-makers in interpreting relevant policies in the South Downs Local Plan. It relates to proposals for domestic extensions, outbuildings and annexes, and to proposals for replacement dwellings.

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	<a href="#">Affordable Housing SPD</a>	The SPD provides further guidance to support the implementation of South Downs Local Plan policies, in particular Policy SD28: Affordable Homes and Policy SD29: Rural Exception Sites. The SPD covers a number of detailed matters including local connections; financial contributions in lieu of on-site provision; and vacant building credit
<i>Air, Soils, Minerals and Water</i>	<a href="#">Natural England's Position Statement for Applications within the Sussex North Water Supply Zone September 2021 – Interim Approach &amp; associated documents</a>	<p>Concerns have been raised that groundwater abstraction within the Sussex North Water Supply Zone may be harming biodiversity within internationally designated sites. In October 2021, Natural England issued a Position Statement. The statement sets out that it cannot be concluded that the existing abstraction within the zone is not having an adverse impact on the Arun Valley sites and advises that development within the zone must not add to this impact.</p> <p>Water supplied by Southern Water within the zone area is sourced from abstraction points that are hydrologically linked to the Arun Valley, which includes these internationally designated sites:</p> <ul style="list-style-type: none"> <li>a Special Protection Area (SPA)</li> <li>a Special Area of Conservation (SAC)</li> <li>a Ramsar site.</li> </ul> <p>In October 2021, Natural England issued a Position Statement. The statement sets out that it cannot be concluded that the existing abstraction within the zone is not having an adverse impact on the Arun Valley sites and advises that development within the zone must not add to this impact</p>
	<a href="#">West Sussex Joint Minerals Plan (2018, Partial Review 2021)</a>	Joint Minerals Local Plan is the strategy for minerals supply in West Sussex until 2033. WSCC has worked in partnership with the South Downs National Park Authority to produce the West Sussex Joint Minerals Local Plan. It was formally adopted by both authorities in July 2018. Following a Soft Sand Review of the plan, formal revisions were adopted in March 2021.

Key Themes	Document Name and Web link	Summary
	<a href="#">West Sussex Waste Local Plan 2014</a>	<p>Produced in partnership with the South Downs National Park Authority. The plan covers the period to 2031 and is the most up-to-date statement of land use planning policy for waste. The plan provides the basis for making consistent decisions about planning applications for waste management facilities. The aspiration to become a zero waste to landfill county is a key element of the plan. The aim is to ensure that communities, environment and economy of West Sussex are protected. The plan sets out four key areas which will help shape the future of waste management waste in West Sussex:</p> <p>A vision and strategic objectives for sustainable waste management</p> <p>Nine policies to achieve the strategic objectives for the management of different waste types (Policies 1-9)</p> <p>13 development management policies to ensure no unacceptable harm to the environment, economy or communities of West Sussex (Policies 11-23)</p> <p>Six site allocations to help us meet the need for new facilities (Policy 10).</p>
	<a href="#">Hampshire Minerals and Waste Plan (2013)</a>	The Hampshire Authorities (Hampshire County Council, Portsmouth City Council, Southampton City Council, New Forest National Park Authority and the South Downs National Park Authority), are responsible for ensuring sufficient extraction and supply of minerals up to 2030. The Hampshire Authorities adopted the Hampshire Minerals and Waste Plan (HMWP) in 2013. The Plan is now subject to a Partial Review
	<a href="#">Waste and Minerals Local Plan for East Sussex</a>	The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. On the 13 May 2022, East Sussex County Council, the South Downs National Park Authority, and Brighton & Hove City Council submitted the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan - Revised Policies to the Secretary of State so that it may be the subject of a Public Examination
	<a href="#">West Sussex Minerals and Waste Safeguarding Advice 2020</a>	This document provides guidance on how the safeguarding of minerals resources and infrastructure associated with minerals supply (e.g. wharves, railheads, processing plants) and waste management will take place in West Sussex. It explains how the safeguarding policies in the West Sussex Joint Minerals Local Plan 2018 (JMLP) and the West Sussex Waste Local Plan 2014 (WLP) will be implemented in practice.



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	<a href="#">Southeast River Basin District Management Plan</a>	<p>This document sets out the:</p> <ul style="list-style-type: none"> <li>• current state of the water environment</li> <li>• pressures affecting the water environment</li> <li>• environmental objectives for protecting and improving the waters</li> <li>• programme of measures, actions needed to achieve the objectives progress since the 2009 plan</li> </ul> <p>It also informs decisions on land-use planning because water and land resources are closely linked.</p>
	<a href="#">Catchment Flood Management Plans</a>	Test and Itchen, East Hampshire, Arun and Western streams, Ouse and Adur, Cuckmere and Pevensey
	<a href="#">Draft Regional Plan</a>	Water Resources Southeast (WRSE) is an alliance of the six water companies that supply drinking water across South East England. The plan is one of five regional plans, being developed to meet the country's future water needs. In 2020, the Environment Agency published the first National Framework for Water Resources to transform how water supplies are planned. It requires water companies and other large water users to collaborate across boundaries and, through regional water groups, develop plans that consider their region's water needs. These plans should then fit together to provide a joined up national solution
	<a href="#">Agricultural Land classification</a>	Provisional Agricultural Land Classification Grade. Agricultural land classified into five grades. Grade one is best quality and grade five is poorest quality. Several consistent criteria used for assessment which include climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness) for England only.
	<a href="#">Chief Officer's report air pollution 2022</a>	This report is about air pollution and its solutions in England, but it is also an international problem. The first chapters of this report lay out the health problems of air pollution, but most of the report is about achievable solutions. Air pollution is everybody's problem, but it has improved and will continue improving.

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	<a href="#">Clean Air Strategy 2019</a>	This strategy sets out the Government's plans for dealing with all sources of air pollution, making the air healthier to breathe, protecting nature and boosting the economy.
	<a href="#">Air Pollutions Information Service</a>	Air pollution is one of the major environmental issues in the UK, with impacts occurring at local, regional and global scales. Much is known about the impacts on natural heritage features, with major steps already being taken in the development of abatement strategies both at national and international levels. It is clear, however, that there are still major gaps in the scientific understanding. This site provides a searchable database and information on pollutants and their impacts on habitats and species.
	<a href="#">Sussex Air Quality</a>	Sussex-air is a partnership, set up in 2000, comprised of officers from all the Local Authorities in Sussex. The aim of the partnership is to assist partners in complying with their statutory Local Air Quality Management (LAQM) duties and to contribute to improving air quality and health in Sussex.
<b>Infrastructure</b>	<a href="#">Local Roads Transport assessment 2016</a>	The purpose of this was to assess the traffic impact that proposed levels of Local Plan development could have on settlements within the South Downs National Park (SDNP) boundary.
	<a href="#">Roads in the South Downs 2015</a>	This guide aims by raising awareness of best practice for rural road design and management for highway authorities, the National Park Authority and all the communities within the area. It is intended to influence decision-making, training and investment as well as to raise awareness of opportunities and challenges in reconciling traffic movement with the inherent qualities and purposes of the National Park.
	<a href="#">West Sussex Transport Plan 2022</a>	Details of the strategy for future investment in the highways and transport infrastructure for 2022-2036.
	<a href="#">SDNPA Cycling and Walking Strategy 2017-2024</a>	This is the first Cycling and Walking Strategy for the South Downs National Park Authority (SDNPA). It sets out the aim and direction for the future of cycling and walking activities and supports infrastructure coming forward in the National Park.

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	<a href="#">East Sussex Local Transport Plan 3 (2011 to 2026)</a>	<p>Local Transport Plan 3 (LTP3) sets out how the County Council plans to improve transport and maintain the roads between 2011 and 2026. It includes the plans for regeneration and development in priority areas such as:</p> <p>Bexhill and Hastings</p> <p>Eastbourne and South Wealden</p> <p>Newhaven</p> <p>LTP3 also contains plans for transport in:</p> <p>Uckfield</p> <p>Lewes, the south coast towns and the South Downs</p> <p>Battle, Rye and rural Rother</p> <p>North Wealden and North Lewes districts</p>
	<a href="#">Emerging ESCC Local Transport Plan 4</a>	<p>New guidance is due to be published, requiring all Local Transport Authorities to update their Local Transport Plans and demonstrate alignment and contribution to net zero carbon - tailpipe and embodied emissions (through construction). The fourth East Sussex Local Transport Plan will replace the third Local Transport Plan and will run from 2023 - 2050. This will set out how ESCC plan to improve transport, deliver better access to jobs and services, including education, and create safer, healthier, more sustainable and inclusive communities.</p>
	<a href="#">ESCC Bus Improvement Plan</a>	<p>ESCC's mission as a local transport authority and as bus operators, is to ensure that East Sussex residents and visitors enjoy the highest possible quality bus services that provide:</p> <p>a frequent and comprehensive choice</p> <p>reduce congestion</p> <p>make a positive contribution to better air quality and decarbonisation.</p>

Key Themes	Document Name and Web link	Summary
	<a href="#">ESCC Cycling and Walking Infrastructure Plan</a>	The East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) sets out proposed cycling and walking networks and measures within specific areas of the County. The LCWIP focusses on areas of the County where there are the greatest opportunities to increase levels of cycling and walking. There is an emphasis on delivering infrastructure improvements which supports people who do not cycle or walk.
	<a href="#">Rights of Way Improvement Plan</a>	The ROWIP sets out ESCC's plans to improve our public rights of way network and access to the countryside.
	<a href="#">Hampshire County Council Local Transport Plan 2011-2031</a>	Hampshire County Council has a statutory requirement to have a Local Transport Plan (LTP) which sets out its vision for future transport and travel infrastructure. The current Local Transport Plan (LTP3) was developed in 2011 but is no longer relevant to today's challenges and opportunities. The Council is currently developing a <a href="#">new Local Transport Plan (LTP4)</a> .
	<a href="#">South Downs Way Management Plan 2015 - 2020</a>	This plan has been produced to guide the South Downs Way Trail partnership in its management of this National Trail. It will set out the direction of travel and highlight the key areas of delivery over the next 5 years. It is designed to give more bespoke and focused information than that contained in broader policy documentation such as the South Downs Partnership Management Plan. This plan is intended for all those whose work impacts or contributes to the delivery of this first class long distance trail. The South Downs Way Management Plan 2022 – 2030 is in development.
	<a href="#">Parking SPD</a>	The SPD provides further guidance to support the implementation of South Downs Local Plan policy SD22 Parking Provision.
	<a href="#">Decarbonising Transport</a> <a href="#">Transport Decarbonisation Plan</a>	Government's commitment to decarbonising all forms of transport.
	<a href="#">Road Investment Strategy</a>	Government's five year strategy for investment in and management of the strategic road network from April 2020 to March 2025.

Key Themes	Document Name and Web link	Summary
	<a href="#">strategic investment plan</a>	Strategic Investment Plan (SIP) for south east England. This plan provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions from now to 2050.
	<a href="#">Future Mobility</a>	Future mobility strategy sets out a people- and place-based approach to future mobility – ensuring that the benefits of innovation and investment are maximised in each part of the south east. It builds on the challenges and opportunities identified in our thirty-year transport strategy, providing a framework for local authorities and other key partners to help them understand where, when and how to invest in new transport technology, systems and services.
<i>Design</i>	<a href="#">National Model Design Code</a>	The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government’s priorities and provides a common overarching framework for design. As the requirements relating to design codes and guidance are finalised, we will ensure we do what is required.
	<a href="#">Levelling-up and Regeneration Act 2023</a>	The Levelling Up and Regeneration Bill has officially become law. The Bill, which is now the Levelling Up and Regeneration Act, received Royal Assent on 26 October, making it an Act of Parliament.
	<a href="#">Design Guide Supplementary Planning Document</a> updated 2022	The SPD provides further guidance to support the implementation of South Downs Local Plan policy SD5 (Design) and other design-related Local Plan policies.

# APPENDIX B

Consultation exercise 2023		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
East Hampshire DC	Some of the themes utilise the 2021 AMR, whereas other use the 2022 AMR.	Para 4.99 (previous para number - now 4.104) has been amended to refer to the 2022 AMR. Most of the references are for AMR 2022. Where the AMR 2021 is used (para 4.22) the text states this.
	Reference is made to different sources of economic data, much of which seems to originate prior to covid and changes to the economy.	The report has been updated to make reference to Covid-19 and that evidence gathering for the LPR will take into account key changes post Covid.
	Reference is made to the number of homes in the SDNP in 2001 and affordability ratio's and quotes the State of the National Park Report 2012 as the data source. This seems dated given the published HEDNA (Sept 2017).	The report has been updated to take into account the information within the 2023 HEDNA.
West Sussex CC Planning Policy	Our only comment would be that there does not appear to be mention of the West Sussex Waste Local Plan, which was produced in partnership with the SDNPA.	Reference is made in Table 3 and Appendix A.
Historic England	We are content that the scoping report for South Downs local plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	No change
Environment Agency	We suggest that the relevant Shoreline Management Plan and Flood Risk Management Plan should be included in Table 3 Page 14 or the relevant section of Appendix A.	These have been added to Table 3 and Appendix A.
	Level 2 SFRAs will be required for any sites proposed within FZ2 and 3. We would also expect to see an updated Sequential Test and Exception Tests as appropriate.	The report has been updated to include parts of the comments from the EA.

Consultation exercise 2023		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
	We would expect to see protection of the quality of surface and ground water included in the SA Framework (Table 5) and Sustainability Objectives and Indicators (Table 6) (not just related to climate change).	Considering these and other comments on water - the Scoping Report is amended to create a new topic of Protecting and Sustainable use of Resources. This includes matters relating to water, but flooding remains under the topic heading of Climate Change.
Horsham DC	The authorities within the Sussex North Water Resource Zone have jointly developed a Water Neutrality Mitigation Strategy, setting out their approach to helping resolve water neutrality issues within their remit, including through the local planning system. As part of the strategy, the authorities are developing a water offsetting scheme to help progress stalled development.	This information was added to the report.
Portsmouth Water	Can you confirm whether the report relates just to Sussex North Water Supply Zone or whether it relates to all Water Supply Zones within the SDNP boundary? This section needs to clarify this.	Further information was added to the report to state that this relates to all water supply zones.
Arun DC	The document clearly identifies the changes and the challenges going forward appropriately. There are no other comments to be made at this time from Arun.	No change
Wealden DC	I can confirm that officers from WDC have reviewed the information sent to us and we have no specific comments on the content of the report.	No change
Natural England	Whilst we broadly support the scope of the SA/SEA. We would welcome further consultation throughout the process of the local plan review.	No change



Consultation exercise 2023		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
	We welcome the inclusion of Natural England's documents on the Green Infrastructure Framework Guidance 2022, the Natural England Action Plan 2022-23 and our Position Statement for Applications within the Sussex North Water Supply Zone from October 2021. We advise that the Biodiversity Metric calculator is included in the list, the latest version of which was published on 28 March 2023.	Information regarding Biodiversity Metric 4.0 has been added to Appendix A.
	From our review of the Baseline Data Collection, we advise that this appears to be appropriate and largely sufficient. However, we advise that the section on Water, Air and Soils should include additional commentary on the evidence and local guidance documents in relation to soils and soil quality as well as minerals.	Reference to the Natural England classification on agricultural land has been inserted into Appendix A. Further information, taken from the adopted Local Plan has been added to the report.
	SO1 Landscape - we fully support the consideration of the protection, maintenance and enhancement of the special qualities of the South Downs National Park as part of the appraisal of impacts on landscape character. The objective could be strengthened by the inclusion of an additional sub-objective which recognises the significance of the interrelationship between landscape setting and the historic and future built environment.	A new paragraph has been inserted explains that all objectives and sub objectives are inter-related but for the scoping report - are separated. This is so the reader is aware and reminded that there are clear connections between all of them.
East Sussex CC Highways	The information is focussed on car travel and highway improvements. It is suggested that references are made in these sections to:- <ul style="list-style-type: none"> <li>• bus and rail networks</li> <li>• longer-distance walking and cycling routes that connect external communities to the SDNP</li> </ul>	References to bus and rail networks and long-distance paths have been added.
East Sussex CC Public Health	It is good to see that Health and Wellbeing is set out as a Sustainability Objective and theme for the SA Framework/SA Report. However, more can be added to communicate and prioritise health and wellbeing with this approach, and to reflect health and wellbeing as a key and consistent sustainability objective.	The Scoping Report includes further new paragraphs which summarises parts of the SDNPA wellbeing strategy.

Consultation exercise 2023		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
	Table 3 and Appendix A should include health and wellbeing as a Key Theme and include key documents such as the SDNPA Health and it should also refer to health and wellbeing considerations across climate change, design, and housing documents as well.	Table 3 has been amended to include more relevant documents.
	Baseline Data Collection and Key Sustainability Issues: Community and Wellbeing - this section should be titled 'Community Health and Wellbeing' and reflect and broaden the full scope of health and wellbeing issues across the SDNPA.	Some amendments have been made to the Scoping Report. The title of this section has been changed to Community, Health & Wellbeing as it is important that community is highlighted in a holistic way and not just about health.
East Sussex CC Culture & Tourism	The emphasis in the document is on outdoor spaces. The SDNPA should consider acknowledging the role of indoor spaces; community centres, village halls etc as they are crucial for indoor recreational activities, most cultural activities require an indoor space and arts engagement has the same benefits as sports activities for mental and physical health and community cohesion, as well as at times a link to the tourism offer with traditional cultural activities attracting visitors.	Further information has been added to the report.
East Sussex CC Research	There is a resource available, produced by the Office for National Statistics, which may be of use: National Park residents, England and Wales.	This will be accessed and referred to - where relevant.

Consultation Exercise 2024		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
Environment Agency	It is worth noting that we will be publishing updates to national flood and coastal erosion risk information in 2025 (NaFRA2) – further information about the project and projected timescales can be found on the gov.uk website.	Para 4.86 has been updated to include information about the 2025 updates from the EA.
Southern Water	We have also set out (in our response) some information pertaining to the impacts of climate change, water scarcity and surface water/foul water flooding. This information has been used in other water cycle studies and we hope it is useful to you.	The report has been updated (refer to para 4.182, Table 4, Appendix A)
Arun District Council	There is an omission in terms of plans and programmes. It has been noted that on page 119 in Appendix A that the Arun Local Plan 2011-2031 is not included within the list of Local Plans, which becomes important because it has substantial allocations and has a large proportion in the north of the District that falls within the park. This would also help to tie in with the list of 'Made' Neighbourhood plans.	Appendix A has been updated to include the Arun Local Plan.
Public Health East Sussex	Some of our points in Table 5 and Table 6 on the Framework: sub objectives and questions have not been included which we want to reiterate. The points have been included as issues but not followed through to sub objectives or specific questions. These are: Aging population – Under Communities, Health and Wellbeing sub objective include 'Support the health and wellbeing needs of an aging population through access to services and facilities and appropriate design.' Under Design question include 'Will it support the needs of vulnerable groups such as the creation of dementia friending environments Food growing - Under Communities, Health and Wellbeing question include 'Will it support healthy eating and lifestyles through increasing food growing opportunities and access to healthy food choices.	A new sub objective 8.7 has been added to Table 5 (and 6). A design question has been added to Table 6. A further question has been added to Table 6 regarding food growing.

Consultation Exercise 2024		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
	The Scoping Report is unclear how key aspects of an HIA will be incorporated within the IIA and how the SA/SEA process has been changed. An important part of the HIA is the identification of impacts on specific population groups particularly those most vulnerable, it is unclear how the proposed process and framework will specifically consider this.	Further information has been added to para 1.11. A new para (2.14) has been added to provide links to other examples set out by the team. Further information has been included in para 2.15.
	Paragraph 2.14 mentions '...making recommendations for mitigation where necessary'. An HIA also needs to show where benefits to health and wellbeing can be maximised and enhanced, it is not just about mitigation, this should be reflected in the IIA process	Para (now 2.15) has been amended.
	We would recommend using the approach we developed with Rother District Council (RDC). This is an example of how HIA can be integrated into an SA/SEA.	A new para at 2.14 includes links and details of recommended examples.
West Sussex County Council	"Reference could be made to the following documents in the relevant parts of the IIA:  Community, Health and Wellbeing <ul style="list-style-type: none"> <li>West Sussex Joint Health and Wellbeing Strategy 2019 – 2024</li> <li>Joint Strategic Needs Assessment (JSNA)</li> </ul> Protection and Sustainable Use of Resources  West Sussex Minerals and Waste Safeguarding Guidance "	These documents and links have been added to Appendix A.
Lewes District Council	The latest report on Air Quality for the Lewes AQMA is available from the Sussex Air website.	A link to the Sussex Air website is provided in Appendix A of the scoping report.
	Welcome the further integration of coastal management into the objectives including references to the Sussex Heritage Coast. For example, reference could be included within sub objective 1.2.	Further additions have been made to Appendix A and Table 6.

Consultation Exercise 2024		
Authority/Stakeholder	Summary of comments	Summary of changes to Scoping Report
	Evidence relating to affordable housing need in the assessment appears to be outdated and could be supplemented with information from constituent local authority Housing Needs Assessments. The Lewes District LHNA was published during November 2023 and is available to view on our consultation portal.	Evidence from the HEDNA 2023 instructed by and written for the National Park has been used to provide background evidence for the scoping report. This is the most updated evidence document produced for the Local Plan Review. Reference is made to the various (general reference) to the local authority housing needs assessment. References in Table 4 (dated 2010 and 2011) have been removed.
	We are somewhat concerned that the assessment highlights the provision of smaller bungalows as a measure to increase the supply of affordable housing. In view of the land supply constraints within the park, the provision of bungalows may not be the most efficient way of meeting general affordable housing needs; there is no guarantee that older people will downsize from larger properties and this provision may stymie affordable housing supply for other groups.	References in Table 4 have been amended to reflect the information in para 4.152. This information is taken from the 2023 HEDNA
	We suggest that indicator 10.1 is amended to reflect the housing needs of the different groups set out in the NPPF, not just older and young people.	Sub objective 10.1 has been amended.
	The assessment notes the risks related to under provision of rural workers dwellings and increased in-commuting. It may be helpful to include indicators in relation to these aspects of the assessment.	The information in Table 4 has been amended.
	We would welcome further integration of blue infrastructure into the sustainability objectives. For example, sub-objective 11.4 could be updated to include multifunctional green and blue infrastructure.	Sub objective 11.4 has been updated.