



South Downs Local Plan Review First consultation (Regulation 18)

Non-Technical Summary

Integrated Impact Assessment (to include Sustainability Appraisal / Strategic Environmental Assessment)

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 the **Climate Emergency, Nature Recovery and creating a National Park for All**.
- 1.2 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:

- 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.
- 2) 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 11A of the National Parks and Access to the Countryside Act 1949, as amended by 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, the first purpose of the National Park will be given priority (known as the Sandford Principle).

- 1.3 Local Plans include strategic, development management and allocation policies. [The National Planning Policy Framework 2023](#) (NPPF) provides the policy framework within which Local Plans are produced.
- 1.4 At the current stage of plan-making, the National Park Authority is consulting on an early draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' IIA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

The Sustainability Appraisal Process and Integrated Assessment Process

- 1.5 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). However, as the SDNPA is also undertaking an Integrated Impact Assessment (IIA), the purpose now will be to promote sustainable development, health and equality issues through better integration of social, environmental and economic considerations into the preparation of the LPR.
- 1.6 The IIA will consider the requirements and scope of:
 - Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).
 - Equalities Impact Assessment (EqIA).
 - Health Impact Assessment (HIA).
- 1.7 The IIA will not include a Habitats Regulation Assessment (HRA), but it will take account of the HRA findings.

Reasonable Alternatives

- 1.8 A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative.

- 1.9 The IIA of reasonable alternatives involves assessing the performance of each option against the IIA framework. The appraisal is a qualitative exercise based on professional judgement taking into account the information gathered in the IIA Scoping Report.

The IIA Scoping Report

- 1.10 There have been two versions of the Scoping Report. The final version of the IIA scoping report is dated October 2024 and takes on board the comments from the 2023 and 2024 consultation exercise. **Appendix A** to the main IIA document sets out the key sustainability issues that emerged from the scoping report baseline analysis, together with characterisation of the future baseline based upon current evidence and trends.
- 1.11 The final [Scoping Report 2024](#) can be found on the SDNPA website.

2. The Integrated Impact Assessment Framework

- 2.1 This section sets out the sustainability objectives (known as the IIA Framework). The IIA Framework is a vital tool to enable the sustainability effects of SDNPA plans, policies, and programmes to be assessed. The proposed framework for assessing the Local Plan Review policies comprises the eleven sustainability objectives listed below.

Sustainability Objectives for the Local Plan Review

	Proposed sustainability objectives
1	To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.
2	To conserve and enhance the region's biodiversity and contribution to nature recovery.
3	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.
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.
5	Protection & Sustainable Use of Resources.
6	Employment and Economy.
7	Promote equality of opportunity and the elimination of discrimination
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.
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.
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.
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.

3. Growth Scenarios for the Local Plan Review

Introduction

- 3.1 A key element of the Local Plan Review is to consider different approaches to delivering housing and employment in the National Park, including different growth scenarios. SDNPA has identified various options for its approach to the quantum of housing provision to be provided over the plan period and the overall spatial strategy.

Growth Scenarios

- 3.2 The IIA will need to consider several growth scenarios to be tested against the sustainability objectives. Each of the quantum options will consider the level of housing and employment growth which would be provided in the National Park over the plan period. The quantum options set out in the HEDNA 2023 are listed below (quantum 2 – 6). There are 2 further options at either end of the table set out below. This gives us 7 options in total.

Growth Scenario Options

Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Very Low: below 234 dpa	Low: 234 dpa	Medium: 278 dpa	Medium +: 350 dpa	High: 384 – 450dpa	High Growth: 698 dpa	Very High Growth: 699+dpa

3.3 The scenarios are explained below. The text and information (where relevant) is taken from the [HEDNA](#). The HEDNA approached the assessment of housing need in the National Park in two ways –

- **Top Down** – examined the aggregate need for the local authorities in which the National Park is co-located using the standard method. This is then apportioned to the National Park based on a pro-rata of population inside and outside the National Park.
- **Bottom Up** – this created a population and household projection specifically for the National Park using past trends and the most recent available data (Census 2021) and run this through the standard method using calculated affordability ratios for the National Park.

3.4 Option 1 Very Low – below 234 dpa

This option sets out the delivery of less than 234 dpa. A figure below this would be unable to provide housing that at the least – maintains the current trend.

3.5 Option 2 Low: 234 dpa

The figure of 234 is the average annual change across the National Park and thus maintaining the current population trend (albeit this is declining). This option is therefore considered a reasonable one to include as it maintains the current population trend.

3.6 Option 3 Medium: 276 dpa

The HEDNA carried out work to see what level of housing would support more positive population and economic activity levels. This work shows that, to maintain the existing level of economically active population, then 276 dwellings per annum would need to be delivered.

3.7 Option 4 Medium+: 350 dpa

Meeting locally derived need. As stated above, the HEDNA created a ‘bottom up’ population and household projection. This method produces a figure of 350 dpa.

3.8 Option 5 High: 384 – 450dpa

The estimates of housing need set against the job growth scenarios shows a range of need across the National Park of between 384 and 450 dwellings per annum. This range is an economic led housing figure.

3.9 Option 6 High Growth: 698 dpa

The HEDNA examined the ‘top down’ approach to housing need using the standard method for the local authorities which overlap the National Park. This method produces a figure of 698 dpa for the National Park area.

3.10 Option 7 Very High Growth: 699+dpa

This option takes the Local Plan beyond the full standard method housing figure.

Methodology

3.14 As part of this exercise, it is important to decide which of the options are unreasonable. This results in the unreasonable alternatives being removed from the appraisal process.

- 3.15 Option 1 and Option 7 are unreasonable options for the following reasons:
Option 1 Very Low – below 234 dpa
 The figure of 234 dpa is the average annual change across the National Park and thus maintaining the current population trend. An option of delivering less than 234dpa is considered unreasonable as it would not plan for or meet the current population trend across the National Park and would result in a continual decline across the Park.
- Option 7 Very High Growth 699+dpa*
 An option to consider delivering more than 699dpa (i.e. going above the apportioned standard method figure) across the National Park was identified. This option is considered unreasonable because the figure represents a higher value than that attributed to the local authorities considered in the HEDNA and in the context of the landscape designation of a National Park and associated legislation, policy, and government guidance.
- 3.16 The following is a summary of each of the options and how they have been appraised:
- 3.17 The first option - Low – 234 dpa – is appraised as having a negative impact on SO4 (climate change) and on SO5, 6, 7, 8 and SO10. It would have a neutral impact on SO1 – conserving and enhancing the landscape and SO3 (heritage). This option has uncertain impacts on SO2 (biodiversity), SO9 (Transport) and SO11 (character of settlements).
- 3.18 The second option – Medium – 276 dpa is appraised as having a positive impact on SO 9 (good quality home). There are several uncertainties for this option. This include SO1, 2, 4, 7, 8,9 and 11. This option has a negative impact on the historic environment as it is likely development will be in settlements where there are historic centres and heritage assets.
- 3.19 The next option is also a Medium growth figure – 350dpa. It will have a positive impact on SO4 (climate change) and SO6 (employment), SO8 and SO10 (good quality home). This option is appraised as having a negative impact on SO3 (heritage) and SO5 (resources).
- 3.20 The two highest options are 384 – 450 dpa and 698dpa. Both options score negatively against SO1 (landscape) and SO2 (biodiversity), SO3, 4, 5, 8 and 11. The option of 384-450dpa is appraised as having a positive impact on SO6 (employment) and SO10 (housing). Both higher options are appraised as having positive impacts on SO10 (housing). High Growth option 698dpa has a positive impact on SO7 (promote equality of opportunity and the elimination of discrimination).

Summary and Conclusion

- 3.21 The IIA inevitably relies on an element of subjective judgement. Whilst the IIA generally assesses each option individually, the assessments of these options are necessarily high level and focused on drawing out comparisons between the options.
- 3.22 The higher housing options have generally scored as conflicting with most of the sustainability objectives. On balance the two higher development options are not considered appropriate options at this stage.
- 3.23 The lower option (234 dpa) has very few positive benefits. This option cannot provide enough housing to address all needs across the park and is therefore in conflict with sustainability objective 10.
- 3.24 The middle two options will have varying impacts on the sustainability objectives but score best in seeking to balance growth needs for both housing and employment with protecting and enhancing principles. At this stage in the IIA development, the two medium options (276dpa and 350dpa) are the most appropriate in growth scenarios.

4. Spatial Strategy for the Local Plan Review

Introduction

- 4.1 A starting point for the Local Plan Review is for the National Park Authority to consider, in high level terms, the overall spatial strategy options for the distribution of development, taking into account the current settlement pattern and the relationship of the National Park with surrounding areas.

The Options

- 4.5 Eight overall strategy options have been identified by the SDNPA, and each has been considered against the sustainability objectives in the SA. These are non-site-specific options and are as follows:

1	<i>Primary Settlements</i> Delivery of homes across the National Park with concentrations of housing allocations in the five primary settlements (Petersfield, Lewes, Midhurst, Petworth and Liss). This option will also include development on brownfield sites and small sites which are in the primary settlements.
2	<i>Primary settlements & sustainable transport</i> Housing allocations across the National Park are in the primary settlements (see option 1) plus in areas with established sustainable transport infrastructure, specifically well-established bus routes, rail, and cycle routes sustainable for commuting. This options also includes development on brownfield sites and small sites either inside the main settlements or on sustainable transport routes.
3	<i>Brownfield land</i> Housing allocations delivered on brownfield sites only. These are sites outside of the primary settlements and not included in options 1 and 2.
4	<i>Small sites</i> Settlement enhancement sites (10 or less units) with a key focus on housing needs. These sites are not included in options 1 and 2 but are associated with settlements (they are not standalone small sites located away from settlements)
5	<i>Brownfield and Small sites</i> Brownfield sites and small sites developed for housing – dispersed across the National Park – a combination of options 3 and 4.
6	<i>Edge of the National Park</i> Housing to be allocated on gateway sites on edge of NP that provide benefits to the Park.
7	<i>New Settlement</i> Strategic growth is delivered as a new settlement (with circa 1,500 – 4,000 homes) with a small remainder delivered at small sites across the National Park.
8	<i>Existing Local Plan –Policy SD25</i> Development delivered in towns and villages across the broad areas and river corridors of the National Park that can accommodate growth of a scale and nature appropriate to their character and function.

Methodology

- 4.6 The IIA Report presents the comparative effects of the eight options above, identifying where significant positive and negative effects have the potential to arise. The appraisal findings are presented under the sustainability objectives. None of the spatial strategy options are considered unreasonable at this stage in the appraisal process.
- 4.7 The appraisal is a qualitative exercise based on professional judgement taking into account the information gathered in the Scoping Report.

Summary and Conclusions

- 4.8 The actual effects of overall strategy options will depend heavily upon the precise location and scale of development, the development capacity, the quality of design and the delivery of supporting infrastructure.
- 4.9 The summary of effects indicates that Option 1 (Primary Settlements) and Option 2 (primary settlements & sustainable transport) and Option 8 (existing Local Plan Policy 25) perform well. Option 3 (brownfield land outside primary settlements) also scores positively. Option 8 has a positive impact on landscape as it relates to the existing Policy within the Local Plan whereby development has been directed away from areas of high landscape sensitivity.
- 4.10 Options 6 (edge of the National Park) and 7 (new settlement) have limited positive impact on the SO's.

- 4.11 In conclusion – it should be noted that this is a high-level strategic appraisal and much of the detail on exact locations for development are unknown. Taking this into account and considering the options on their own merits - Options 1, 2, 3 and 8 are the most appropriate.

5. Sites

Introduction

- 5.2 The South Downs National Park Authority has undertaken a Land Availability Assessment (LAA) which included a call for sites exercise in 2022 to identify and compile a list of sites that are being promoted for housing development.

The proposed methodology for assessing sites

- 5.5 From the LAA work undertaken for the LPR, there is a list of sites that ‘have potential’. The decision to include a site for allocation is based on professional judgement, relevant and evidential technical studies and by consultation responses as part of an iterative process. All the allocated sites identified for possible allocation are subject to IIA assessment.
- 5.6 In conclusion, the IIA will summarise which sites (as standalone) score positively against the SO (this will be taken from stage 1), which settlements (stage 2 -as standalone) score positively and whether the site scores change when considered in combination on a settlement-by-settlement basis (stage 3).

Conclusion and Summary on Sites and Settlement Appraisal

- 5.25 The IIA report has assessed sites that are considered to have potential to take forward into the Local Plan review.
- 5.23 Several observations and comments on the site allocation scores are set out below:
- Sites that were originally assessed as being of high or moderately high in landscape sensitivity were appraised as having a negative impact on the first sustainability objective.
 - In all cases, further information is required regarding the impacts and causes of climate change.
 - Similarly, when appraising sites against the last sustainability objective (character of neighbourhood/high quality design), many of the sites were scored as requiring further information. In the cases where sites have been scored as having a negative impact on design – this is often where the allocations are close to buildings or areas of character.
 - The appraisal against sustainability objective 9 – efficient transport network relates to the availability of a train station/ other transport options other than private vehicle/car use. It also relates to whether there is adequate walking and cycling provision, especially relating to rural roads with no pavements and adequate pedestrian routes to bus stops and other facilities.
 - Scores relating to objectives 7 and 8 are based on whether there are adequate employment, education and health facilities and opportunities within proximity to the site. Many sites have ease of access to open space and the countryside and therefore will score positively against objective 8.
 - Sites located near or abutting conservation areas and listed buildings (and any other heritage asset) will score negatively against objective 3.
 - If a site includes the creation of new employment opportunities and/or it is within a settlement with several nearby employment areas – this will be scored positively. Any loss of employment floor space (even if this relates to a hotel that is currently closed), the site is scored negatively. The appraisal of the sites against objective 2 (biodiversity) relate to site assessment information and whether there are nature conservation designated areas that will be impacted

by the development and/or any opportunities to contribute towards nature recovery.

6. Policies

Introduction

- 6.1 This section provides the sustainability appraisal policy results. Each of the policies, as well as alternative options (where appropriate), have been assessed against the SA Objectives.
- 6.2 The HIA process includes a 2 stage approach. The first is a screening which asks the following of each main topic:
- Will the policy have a direct impact on health, mental health and wellbeing?
 - Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
 - Will the policy affect an individual's ability to improve their own health and wellbeing?
- 6.3 If the answer is yes to any of the above questions, then a detailed HIA is undertaken for each policy/option.
- 6.4 The purpose of carrying out an Equality Impact Assessment (EqIA) is to inform the development of each policy. To understand which groups of people (or individuals), may suffer discrimination, the Equality Act sets out a series of "protected characteristics":
- 6.5 As with the HIA – the EqIA is two-stage process:
- Stage 1: Screening - this involves the assessment of impacts of the strategy/plan against the protected characteristics outlined above. If no negative effects are identified during screening no further assessment is required.
 - Stage 2: Identify whether and to what extent there are any significant negative impacts on these groups arising from the plan and its policies and set out recommendations for mitigation.
- 6.6 Socio-economic equality (low income groups) is an important addition to the protected characteristic listed above. This is because the needs of certain groups are key to achieving inclusive growth.

Reasonable Alternatives

- 6.7 For some policies, there are no reasonable alternatives (RA) that will be explored as there is little or no potential to meaningfully assess alternatives as having significant sustainability effects.

Cumulative and Synergistic Effects

- 6.8 There are two SA Objectives in particular that could suffer from cumulative, potentially adverse effects from the implementation of the Local Plan. The first is Objective 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. The second one is Objective 5 Protection & Sustainable Use of Resources.
- 6.9 There are several examples of positive synergistic effects in the Local Plan. This includes:
- Protecting and enhancing the historic environment and cultural heritage of the South Downs National Park.
 - Promoting sustainable forms of transport will assist with several associated beneficial policies such as reducing air pollution, improve the health and wellbeing of residents and visitors, support the creation of green infrastructure and sustainable development and protect and enhance the landscape.

- Conserve and enhance the landscape character of the National Park is a thread that runs through the Local Plan due to exceptional beauty and important of the landscape.

Summary of health and equalities impact

- 6.10 The process of HIA has demonstrated that whilst there were specific health and wellbeing impacts recorded, these were largely positive impacts which could be amplified by other supporting policies in the Local Plan.
- 6.11 The EqIA considered the implications of all policies on Protected Characteristics and low income groups. There are several recommendations set out under each of the policies.

Work Required to Inform Regulation 19 Local Plan

- 6.12 Several recommendations have been made in this report regarding policies, synergies and supporting justification. These are as follows:
- 6.13 **Core Policy: SD3 Major Development.** Proposals for major development should submit a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA).
- 6.14 **Strategic Policy SD4: Landscape Character Planning** applications for major development to submit a landscape and visual impact assessment (LVIA).
- 6.15 **Strategic Policy SD12: Historic Environment and Cultural Heritage and Development Management Policy SD13: Listed Buildings.** Both policies should refer to accessibility to the building and/or historic environment and within the building (if appropriate).
- 6.16 **Strategic Policy NEW1: Accessible Homes.** Viability work will enable consideration on percentage of accessible homes. Recommendation that there is tightening of the wording around 'not to be practical' and this to be included in the policy or reasoned justification. Consideration given to location of accessible housing.
- 6.17 **Strategic Policy SD29: Rural Exception Sites.** There needs to be a clear cross reference between this policy and policies on dark skies and tranquillity and pollution.
- 6.18 **Development Management Policy SD30: Replacement & Subdivision of Dwellings.** Recommend there is cross referencing with other policies relating to accessible and adaptation housing.
- 6.19 **Development Management Policy SD32: Rural Workers' Dwellings and Strategic Policy SD33: Gypsies, Travellers and Travelling Showpeople.** There needs to be a clear cross reference between the above policies and those relating to dark skies and tranquillity and pollution.
- 6.20 **Strategic Policy SD34: Sustaining the Local Economy.** It is recommended that the policy refers to impacts on the use of resources and supporting renewable energy. These matters could be included in the reasoned justification and/or links provided.
- 6.21 **Strategic Policy SD36: Town and Village Centres** No change recommended to the policy but consider that a reference should be included to support local retail/facilities in smaller settlements where possible.
- 6.22 **Strategic Policy SD23: Regenerative Tourism.** A recommendation that reference should be included regarding accessibility to and within tourism facilities.
- 6.23 **Strategic Policy SD45: Green Infrastructure** Recommendation that the policy include blue infrastructure.
- 6.24 **Strategic Policy SD20: Walking/Wheeling, Cycling and Equestrian Routes.** Recommendation that the policy could be enhanced by including key routeways and long distance walks such as the South Downs Way.
- 6.25 **Strategic Policy SD19: Transport and Accessibility.** Recommendation to improve synergies between the policy and those focussed on dark skies, light pollution, and climate change.
- 6.26 **Development Management Policy SD43: New and Existing Community Facilities.** The policy has limited focus on design, impact on landscape, sustainable transport links and accessibility within the building and gender neutral facilities Recommend the

policy refers to gender neutral/accessibility within and to the building and sustainable transport.

- 6.27 **Development Management Policy SD22: Parking Provision.** Recommend there are improved synergies between the policy and those focussed on dark skies, light pollution, and climate change.
- 6.28 **Development Management Policy SD46: Provision and Protection of Public Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries.** There are some synergies, but many other links are missing such as use of resources, water management, design, heritage, light pollution, renewable energy and transport links. These are considered important for sustainability. Recommendation that the policy refers to accessibility within and to the building and sustainable transport.

7. Conclusion

- 7.1 The draft Regulation 18 Local Plan and IIA will be central to a formal consultation for a minimum of 8 weeks in January to March 2025. The outcomes for the consultation exercise and this draft IIA will be considered and will inform the Regulation 19 version. A further iteration of the Integrated Impact Assessment will be published alongside the Regulation 19 Local Plan and submitted with it for examination by the Planning Inspectorate.