

# Site Selection Background Paper

(Including Assessment of Site Allocations against Major Development Considerations)

## South Downs Local Plan Review – First consultation (Regulation 18)

OCTOBER 2024

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## Introduction

1. The South Downs National Park Local Plan was adopted July 2019. In line with planning regulations and the National Planning Policy Framework (NPPF), the South Downs National Park Authority (the Authority or SDNPA) is reviewing its Local Plan.
2. The Local Plan Review will determine the overall strategy for future development across the South Downs National Park for at least 15 years from adoption (the period to 2042), including addressing housing need.

## Purpose of the Paper

3. This Background Paper outlines the context and basis upon which the proposed new site allocations in the Regulation 18 consultation document have been selected. It summarises the process taken in identifying sites for allocation of new housing, including other development uses where a mixed use is proposed.
4. This Paper should be read alongside the Local Plan Review evidence base including the Housing and Economic Development Needs Assessment, Gypsy, Traveller and Travelling Showpeople Accommodation Assessment, Land Availability Assessment and Employment Land Review.
5. The decision to include a site for allocation is based on professional judgement, relevant and evidential technical studies ("the evidence base"); and in due course, consultation responses and evidence submitted during the Regulation 18 public consultation.
6. All the allocations have been made in line with the Local Plan Review spatial strategy for a medium level of development dispersed across the towns and villages of the National Park. All the proposed sites identified for allocation and their 'reasonable alternatives' are subject to Sustainability Appraisal and Strategic Environmental Assessment (combined within the Integrated Impact Assessment).

## National Park Purpose and Special Qualities

7. The purposes of National Parks are to:
  - 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

National Park Authorities also have a duty when carrying out these purposes to seek to foster the economic and social well-being of communities within the National Park.

8. As such, the provision of an appropriate quantum of market and particularly affordable housing in the SDNP through suitable allocations in the Local Plan should support its future social and economic sustainability.

## National Policy and Guidance context

### National Planning Policy Framework (NPPF)

9. The NPPF sets out that plans should achieve sustainable development. NPPF paragraphs 82-83 sets out that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development reflecting local needs, particularly for affordable housing; and that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
10. NPPF paragraph 181 sets out that the allocation of land for development should prefer land of lesser environmental or amenity value, where consistent with other policies. NPPF paragraph 182 reflects the National Park Purposes in that great weight should be given to conserving and enhancing the landscape and scenic beauty and to the conservation and enhancement of wildlife and cultural heritage in National Parks, and that the scale and extent of development should be limited and sensitively located and designed to avoid or minimise adverse impacts.
11. NPPF paragraph 183 sets out that planning permission should be refused for major development in National Parks other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. A summary of the Assessment of Site Allocations against Major Development Considerations is provided in Paragraph 23 below, which considers if the proposed site allocations could be regarded as major development under the terms of NPPF 183, and next steps if a proposed site allocation is determined to be major development.
12. NPPF paragraph 69 requires that local planning authorities should have a clear understanding of the land available in their area for development through the preparation of a **Land Availability Assessment**; and that from this, planning policies should identify a sufficient supply and mix of 'deliverable' sites (to provide five years' worth of housing); and 'developable' sites to provide a supply of housing over the longer term.
  - To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.
  - To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged. Planning Practice Guidance
13. The Planning Practice Guidance sets out how local authorities should support sustainable rural communities by recognising the issues facing rural areas in terms of housing supply, affordability and the role of housing in supporting the broader sustainability of villages and smaller settlements; and that all settlements can play a role in delivering sustainable development in rural areas. It also underlines that NPPF policies for protecting National Parks 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.

### English National Parks and the Broads: UK Government Vision and Circular 2010

14. The purpose of the Vision and Circular is to provide policy guidance on National Parks in England. The Vision and Circular sets out in paragraphs 28 and 76-79 that National Park Authorities have a key role, as planning authorities, in the delivery of affordable housing.

A lack of affordable housing in National Parks can have a detrimental effect on the local economy and undermine the social networks that are key components of sustainable rural communities. The expectation set out in the Circular are that National Parks are not suitable locations for unrestricted housing and the expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

15. The Circular also sets out in paragraphs 68-75 that National Park Authorities must ensure that, in their work furthering National Park Purposes, they give sufficient weight to socio-economic interests including providing employment. The Circular recognises that Park Authorities can play a catalytic role in maintaining thriving rural economies through fostering an appropriate planning regime, encouraging new development to broaden the economic base and fostering more diverse and higher-value local employment opportunities.

## Local Policy Context

### South Downs National Park Partnership Management Plan 2020-2025

16. The **Partnership Management Plan** is the overarching five-year strategy for the management of the South Downs National Park. It provides a framework for the Local Plan Review with the overarching aim of delivering sustainable development through taking a landscape-led and ecosystem services approach. The Plan identifies major issues, which includes the provision of new housing and infrastructure and the pressure this is placing upon the National Park.
17. The Plan sets out 10 outcomes to achieve the Plan Vision. Outcome 9 'Great Places to Live' states: *Communities in the National Park are more sustainable with an appropriate provision of housing to address local needs and improved access to essential services and facilities.*
18. The Plan is clear that a priority is to increase affordable housing stock in the National Park, with focus on exemplary design and using local sustainable materials. The PMP is being reviewed alongside the Local Plan and the results of this review will feed into the Regulation 19 version of the Local Plan Review.

## Evidence base

19. The site assessment and selection process is informed by relevant appraisals, assessments and evidence studies which support the Draft Local Plan. These include:
  - Integrated Impact Assessment (incorporating Sustainability Appraisal/Strategic Environmental Assessment/ Equalities Impact Assessment (EqIA)/ Health Impact Assessment (HIA))
  - Habitats Regulation Assessment (HRA)
  - Land Availability Assessment (LAA)
  - Employment Land Review (ELR)
  - Gypsy and Traveller Accommodation Assessment (GTAA)
  - Assessment of Site Allocations against Major Development Considerations
  - Transport Assessment (TA)
  - Strategic Flood Risk Assessment (SFRA)

20. These are outlined below at each relevant stage of the **Site Selection Process**.
21. Provisional findings of the **Employment Land Review** show that current overall supply does meet the needs identified in the HEDNA, but the balance between uses requires correcting as there is a surplus of industrial land and a shortage of office land. Policy changes are therefore proposed in policy SD35 to facilitate changes of use between industrial buildings and offices rather than pursuing specific site allocations. This Site Selection Paper therefore only addresses employment where it forms part of primarily housing allocations.
22. A **Gypsy and Traveller Accommodation Assessment** study assesses the need across the National Park. It pulls together the outcomes of individual existing GTAA's for parts of the National Park and updates them for the plan period and carries out a more detailed refresh for the areas of Brighton & Hove, Adur and Worthing Councils. The SDNPA, Adur and Worthing Councils, and Brighton & Hove City Council GTAA will be published alongside a recent update of the East Hampshire GTAA. It provides the evidence base and further work will be undertaken before Regulation 19 to try and identify additional sites to meet these needs. One site is proposed in the Regulation 18 consultation as part of the strategic site at Liphook.
23. An **Assessment of Site Allocations against Major Development Considerations** was made to determine whether proposed housing allocation sites comprised 'major' development in line with the NPPF Paragraph 183 and sets out the next steps if a proposed site allocation is determined to be major development.
24. The Assessment identified the following proposed housing sites as potentially comprising major development by virtue of their nature and scale:

Proposed Local Plan Allocation	Details
SDXX - Land west of Liphook, Liphook	250 dwellings / 12-14 traveller pitches/ other uses to be determined / 25.2ha in size
SDXX - East Sussex College, Mountfield Road, Lewes	225 dwellings / 5.4ha in size
SDXX - County Hall, St Anne's Crescent, Lewes	240 dwellings

25. However, following further assessment against the criteria of setting and potential impact on National Park purposes, only the Liphook strategic site is considered to be major development. The reasoning is summarised as follows:

Proposed Local Plan Allocation	Stage 1 Assessment Summary
SDXX - Land west of Liphook, Liphook	Considered as major development due to the scale of the proposed allocation on undeveloped land outside of a defined settlement boundary and its potential impact on a characteristic and sensitive landscape and on the purposes of the NP (potentially impacting upon almost all the Special Qualities of the NP).
SDXX - East Sussex College, Mountfield Road, Lewes	Not considered major development. Despite its scale, the proposed allocation would have limited impact on the Special Qualities of the NP as it is mostly contained within the defined settlement boundary on a well located, previously developed and managed site, at a scale commensurate with existing development and character of the settlement and surroundings in an area of uncharacteristic and low landscape sensitivity.
SDXX - County Hall, St Anne's Crescent, Lewes	Not considered major development. Despite its scale, the proposed allocation would have limited impact on the Special Qualities of the NP as it is contained within the defined settlement boundary on a well located previously developed, managed site, and at a scale commensurate with existing development and the character of the settlement and historical surroundings in an area of uncharacteristic and moderate landscape sensitivity.

26. The above conclusions are subject to scrutiny of evidence received through the Regulation 18 public consultation and further technical landscape work on proposed allocations. The **Assessment of Site Allocations against Major Development Considerations** is appended to this Paper as Appendix A.

## Site Selection Process

### Overview

27. Decisions on the proposed new site allocations are informed by evidence and professional judgment. Essentially, the process is iterative - that is, it is informed by national policy and the evidence studies, and by consultation responses throughout the development of the Plan - weighing all these factors together to determine the most appropriate allocation sites to deliver the Local Plan Development Strategy.
28. In line with the spatial strategy of the Local Plan, some modestly scaled development can and should be supported in and adjacent to rural settlements to support the rural economy, to help sustain infrastructure and services, and to provide quality and choice of housing for existing and new residents.
29. Wherever possible, allocation sites comprising previously developed land should be prioritised. Focusing new development in or adjacent to settlements wherever developable land is available not only helps protect the landscape of the National Park but complements efforts to encourage the appropriate improvement of the built environment via redevelopment and conversion of vacant and/ or underutilised sites and buildings.
30. The Land Availability Assessment found a limited supply of sites on previously developed land, or on available and developable sites within the settlement boundary as defined in current development plans. In any case, the supply is unlikely to address the housing needs of the area. As such, the Land Availability Assessment also considered sites adjacent to but outside settlement boundaries and previously developed land anywhere in the National Park.
31. The scale of individual sites i.e. their size in relation to the size of a host settlement, is an important factor if the existing character of a settlement is to be maintained and development is to be successfully integrated over time.
32. Whilst a site may be classed as 'has potential' in the Land Availability Assessment, this does not mean it will necessarily be allocated in the Local Plan Review. The Authority therefore needs to make decisions on which sites should be allocated in the Local Plan Review based on a range of factors, including cumulative factors, identified in the evidence studies.

### Site selection process

33. The selection process for housing allocations in the Local Plan Review is undertaken in three Steps, informed by relevant appraisals, assessments and evidence studies which support the Draft Local Plan.
- Step 1: Identification of sites with development potential through the Land Availability Assessment
  - Step 2: Consideration of Site Assessment through the Land Availability Assessment
  - Step 3: Development Scenario / In-Combination Testing



34. The site selection process determines the most sustainable and developable sites in accordance with the NPPF. This ensures that the process is consistent with the principles of sustainable development and maintaining the purposes of the National Park.
35. This Section explains the steps undertaken at each stage.

### Step 1 Identification of sites with development potential through the Land Availability Assessment

36. The NPPF requires all strategic policy-making authorities to have a clear understanding of available development land in their area through the preparation of a Land Availability Assessment (LAA) (see Paragraph 12 above).
37. The Authority prepared an updated LAA to support the Local Plan Review. This included a review of the methodology to ensure it complies with Guidance and reflects best practice. The geographical area covered by the LAA is for the South Downs National Park, that covers parts of 12 district, borough and unitary local authority areas.
38. The LAA includes:
  - Sites included in the 2016 Strategic Housing Land Availability Assessment that supported the preparation of the adopted SDNP Local Plan (2019)
  - Sites submitted for consideration for allocation through Neighbourhood Development Plans
  - Sites submitted since the 2016 SHLAA and sites submitted during a 'call for sites' held August and September 2022
  - Sites submitted post 'call for sites', that allowed sufficient time to be assessed and included in the LAA update.
39. The full LAA methodology is available to view on the SDNPA website.
40. Step 1 of the site selection process is undertaken through the LAA and identifies the total pool of sites available for consideration and assessment.
41. The LAA assessed approximately 800 sites that were promoted for residential use, either solely or as part of a mixed-use development. This formed the initial pool of sites for consideration for housing allocation in the Local Plan Review.
42. The LAA (Stage 1) provides an initial sift of this initial pool of sites based on applicable national and local designations and site location. Sites not meeting these criteria are deemed unlikely to represent sustainable development as set out in the NPPF and excluded from further assessment. Sites not meeting a minimum site size threshold are also excluded.

### Step 2: Consideration of Site Assessment through the Land Availability Assessment

43. All sites not excluded from the initial sift are subject to detailed assessment against the full Site Selection Criteria through LAA Stage 2 Assessment. This process ensures only the most suitable and deliverable sites are proposed for allocation.
44. The LAA utilises a set of selection criteria to determine the most sustainable and developable sites in accordance with the NPPF. To assess each housing site consistently and develop a shortlist of the most suitable sites for inclusion in the Draft Local Plan, criteria including impact on landscape, key characteristics and special qualities of the National Park, relevant land designations, constraints, access to services, infrastructure and transport are applied.



45. A full list of the criteria is set out in the full LAA methodology, available to view on the SDNPA website.
46. Sites rejected at this stage are not subject to further assessment and are not tested as 'development scenarios' in Sustainability Appraisal and other evidence testing at Step 3.
47. The Draft (Regulation 18) Local Plan public consultation process will provide site promoters the opportunity to verify and comment on the provisional assessment and conclusions.

### Step 3: Development Scenario / In-Combination Testing

48. All sites that progress past Step 2 are deemed as 'has potential' for development and subject to detailed testing and due diligence, as these form the sites with the greatest potential for allocation.
49. Following assessment, 122 sites are assessed as 'has potential' for development. This includes the remaining (undeveloped) adopted South Down National Park Local Plan housing site allocations to be carried over into the new Local Plan (subject to changes); Neighbourhood Development Plan housing allocations; and sites subject to extant planning permission where the principle of development is already established.
50. This left a pool of 52 new sites assessed as 'has potential' for development. Of these, 48 are proposed as potential housing allocations for Regulation 18 public consultation as follows:

Reference	Site Address	Capacity
<b>Strategic Sites</b>		
EA215	Land west of Liphook / Land at Westlands Park	250 homes (including 66-unit care home) 12-14 traveller pitches Quantity of other uses tbc
LE039	County Hall, St Anne's Crescent, Lewes	240 dwellings 3,500 sqm County Hall requirement and other uses tbc
LE141	East Sussex College, Mountfield Road, Lewes	225 homes
<b>Other Sites</b>		
WE014	Alfriston Court, Sloe Lane, Alfriston	25-30 C2 care home units
HO037-038	East Street Farm, Amberley	25-45 homes
EA161	Land south of Lovell Gardens, Binsted	12 homes
EA005	Land at Greenways Lane and Kiln Lane, Buriton	11 homes
CH003	Land East of Coombe Crescent, Bury	15 homes
CH199	Land east of A286 and north of Mill Lane, Cocking	25 homes
LE090	Land at Beechwood Lane, Cooksbridge	30 homes
LE148	Land rear of 71 East End Lane, Ditchling	5 homes
CH147	Midhurst Community Hospital and 1-2 Rotherfield Mews, Easebourne	120 C2 care home units / C3 retirement units or 35 C3 homes
CH203	Land at former Easebourne School, Easebourne	8-10 homes
CH206	Land west of Budgenor Lodge, Easebourne	20 homes
CH026	Land at Hawksfold, Fernhurst	6-8 homes
AR009	Former Allotments north of The Quadrangle, Findon	20 homes
MI014	Land east of Lodge Lane, Hassocks	30 homes
LE118	Land at Beaumont, Wellgreen Lane, Kingston	5 homes
LE124	Audiburn Farm, Ashcombe Lane, Kingston	5 homes
LE103	Land behind the White Hart, 55 High Street, Lewes	5 homes

Reference	Site Address	Capacity
LE114	Land at the rear of 49-55 St Anne's Crescent, Lewes	5 homes
LE133	Springman House, 8 North Street, Lewes	16 homes
LE134	The Shelleys Hotel, 136 High Street, Lewes	8 homes
EA216	Land at Westlands, Liphook	8 homes
CH215	Land West of The Street, Lodsworth	10 homes
CH165	Land East of Pitsham Lane, Midhurst	50-75 homes
CH217	Land at Forest Road, Midhurst	5 homes
CH218	Former Bus Depot, Pitsham Lane, Midhurst	6 homes
CH222	Land adjacent to The Grange Car Park, Midhurst	10 homes
CH074	Land west of Valentines Lea, Northchapel	25 homes
WI100	Land at Old Green Farm, Owslebury	5-10 homes
WI101	Land at Whites Hill Farm, Owslebury	5 dwellings 1,500 sqm employment
EA067	Land at Penns Place, Petersfield	35 dwellings & Sports hub
EA071	Land south of Paddock Way, Petersfield	100 -150 C2 care home units / C3 homes
EA225	Land at Festival Hall, Petersfield	20 homes and commercial floorspace
EA182	Land at Drum Court, The Spain, Petersfield	21 homes
EA187	Land at Windward, Reservoir Lane, Petersfield	5 homes
EA195	The Courtyard, Heath Road, Petersfield	8 homes and 170sqm commercial
CH092/ CH093	Land at Rotherbridge Lane, Petworth	14 homes
CH096	Land north of Northend Close, Petworth	18 homes
CH236	Land west of Village Hall, Rogate	9 homes
LE109	Land at Seaford Golf Club, Firle Road, Seaford	12 homes
EA200	Land off Merryfield Road, Sheet	8 homes
AD001	Land off Steepdown Road, Sompting	30 C3 dwellings / C2 care home units
EA212	Land north of Winchester Road, Stroud	15-20 homes
WI102	Land north of Dodds Lane, Swanmore	15 homes
WI056	Land north of Hewlett Close, Twyford	15 homes
EA043	Land at Farnham and Station Roads, West Liss	30 C3 homes and/or 60 bed C2 care home units

51. This left a very small pool of 4 sites that were promoted for residential development, either solely or as part of a mixed-use scheme, assessed as 'has potential' for development in principle, but are not proposed for housing allocation in the Draft Local Plan for the following reasons:

LAA Reference	Site	Settlement	Status
HO039	East Street Farm (Bottom Field)	Amberley	This site was submitted to the LAA alongside the adjacent top and middle fields. It is considered that due to the open and sensitive landscape of this field and the cumulative impact of allocating it for residential development alongside the top and middle field would be unacceptable. This area of the site is not proposed for allocation and instead its potential for biodiversity /open access is highlighted.

LAA Reference	Site	Settlement	Status
EA177	Quin Hay Farm	Froxfield	This site was promoted for residential use as part of a mixed development but is considered only suitable for employment uses. Residential development is considered unsuitable in this remote countryside location and deemed to constitute unrestricted housing growth in the countryside.
EA199	Lords Farm, Waterworks Road	Sheet	This site was promoted for residential use as part of a mixed development. It is considered suitable primarily for employment uses. This would not prejudice the vacant dwellinghouse being developed for 1 or 2 dwellings (only) subject to the criteria under Policy SD30 of the Adopted SDLP and as amended in the Local Plan Review
EA059/ EA079	Units 1 and 2, The Domes, Durford Road	Petersfield	This site was promoted for residential or employment uses. The site is allocated in the Petersfield Neighbourhood Development Plan for employment use (Class E(g)) and it is considered only suitable for this employment use.

52. The Park Authority therefore proposes to allocate almost all sites assessed 'has potential' for development for housing/ mixed use, other than where employment use is deemed as either solely or primarily the suitable use of the site or where the cumulative impact with a proposed adjacent residential allocation is thought unacceptable and an alternative use identified.
53. While site assessment at Step 2 is carried out on an individual site basis, Step 3 includes testing the sites proposed for allocation 'in-combination' with each other by way of a likely development scenario through the Integrated Impact Assessment (incorporating Sustainability Appraisal).

### Integrated Impact Assessment

54. The **Integrated Impact Assessment** considers the requirements and scope of:
- Sustainability Appraisal (including Strategic Environmental Assessment)
  - Equalities Impact Assessment
  - Health Impact Assessment
55. The Integrated Impact Assessment (IIA) is a key part of the evidence base for the Local Plan Review to promote sustainable development, health and equality issues through better integration of social, environmental and economic considerations into the preparation of the Plan. To ensure this is effective, the appraisal process is fully integrated into the plan

making process and applied at each stage of document production and will be used to monitor the effectiveness of the Plan during its implementation.

56. The Sustainability Appraisal element is a systematic process that must be carried out during the preparation of a Development Plan. Its role is to promote sustainable development by assessing the extent to which the Plan, when judged against all reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. This allows for the consideration of opportunities to improve environmental, social and economic conditions in the local area and identify how to mitigate the impact of development.
57. The 48 sites considered as potential allocated sites are assessed against the Integrated Impact Assessment (Sustainability) Framework to consider the sustainability credentials of each site independently; and cumulatively with remaining (undeveloped) adopted South Down National Park Local Plan and Neighbourhood Development Plan site allocations on a settlement-by-settlement basis. This process therefore informs the choices made and to identify where mitigation and addressing key impacts can be included in development criteria. The resulting policy for each site allocation will ensure negative impacts are mitigated and positive impacts are improved and will help identify the preferred development scenario.

#### Habitats Regulations Assessment

58. The IAA does not include a **Habitats Regulations Assessment** but accounts for its findings. The Assessment of Local Plans is required by the Conservation of Habitats and Species Regulations to meet the requirements of the Habitats Directive. A screening assessment is carried out to identify likely significant effects of European nature conservation sites (a European site), i.e. Special Protection Areas, Special Areas of Conservation and Ramsar sites.
59. The purpose of the screening is to:
  - Identify all aspects of the Plan which would have no effect on a European site, so that they can be eliminated from further consideration in respect of this and other plans
  - Identify all aspects of the Plan which would not be likely to have a significant effect on a European site (i.e. would have some effect, because of links/connectivity, but which are not significant), either alone or in combination with other plans or projects, and which therefore do not require 'appropriate assessment'
  - Identify those aspects of the Plan where it is not possible to rule out the risk of significant effects on a European site, either alone or in combination with other plans or projects. This provides a clear scope for the parts of the Plan that will require 'appropriate assessment'.
60. Where proposed Local Plan site allocations are deemed to have likely significant effects on a European site, and the subsequent appropriate assessment does not identify any suitable mitigation to address these effects, this will result in the allocation being deleted from the Local Plan Review.
61. At this stage, the HRA identifies a number of likely significant effects with the proposed housing allocations but does not recommend any are removed from consideration. The outcomes will be considered alongside the response to the Regulation 18 consultation to inform the Regulation 19 version. Further iterations of the HRA will assess any changes to the Local Plan Review and will be published alongside the Regulation 19 Local Plan and submitted with it for examination by the Planning Inspectorate.

## Other evidence

### Transport Assessment

62. The **Transport Assessment** identifies the potential impacts of growth, considering packages of sustainably focused measures required to achieve the most sustainable outcomes for the preferred development option. It considers the potential impacts of the preferred growth strategy and identifies the package of measures required to increase sustainable transport use and reduce the impact of private cars.

### Water Cycle Study

63. The **Water Cycle Study** provides an assessment of the impact of the Local Plan Review development strategy on water infrastructure and the water environment. A Stage 1 Report has been prepared which looks at water supply and identifies significant water stress in the area, noting that current Water Resource Management Plans are based on lower growth predictions than are coming forward in new and emerging Local Plans. In terms of wastewater the report notes that 13 of the 45 wastewater treatment works are likely to be close to capacity during the plan period due to already committed development, excluding growth from future allocations and any planned upgrades. Policy recommendations are included which will be taken into account along with other representations made during the Regulation 18 consultation. A Stage 2 Report will carry out a more detailed analysis of water supply and wastewater provision.

### Strategic Flood Risk Assessment (SFRA)

64. The **Strategic Flood Risk Assessment** will identify the areas within the National Park at risk of flooding from all sources and will assess the proposed allocations against this information. This will be carried out alongside the Regulation 18 consultation and will inform decisions on site allocations and be published with the Regulation 19 Local Plan.

## Next Steps

65. This Paper sets out information on the key factors and key studies that have influenced the selection of sites and summarises the process of site selection. It is not exhaustive and does not seek to set out in detail all the information drawn from the relevant evidence base studies, site research or explain individual site choices.
66. The Paper outlines the robust and transparent process used in the selection of sites for inclusion in the development strategy of the Draft Local Plan. The process enables evidence-based decisions to be made on the most sustainable development strategy for the National Park.
67. The Draft Local Plan itself guides the development a potential site might be required to deliver, and the Integrated Impact Assessment sets out an analysis of the performance of the sites and the reasonable alternative sites against the agreed Sustainability Objectives.
68. The amount of supply will be reviewed alongside progress of the Local Plan Review. The Local Plan Review will determine the housing provision figures for the National Park as informed by the purposes and duty of the National Park, the findings of the Site Selection process, the Housing and Economic Needs Assessment (HEDNA) and other evidence such as the Integrated Impact Assessment and Habitats Regulations Assessment.
69. The Site Selection Process will likely be iterative to address the housing need in the National Park, with the outcomes at Steps 2 and 3 revisited, if necessary, to ensure these requirements have been fully considered based on evidence submitted during the Regulation 18 public consultation. A further call for sites may also be held at Regulation

18 public consultation.

# Appendix A - Assessment of Site Allocations against Major Development Considerations

## Introduction

1. The purpose of this Assessment is to demonstrate that the national planning policy on major development in designated landscape has been fully considered in the preparation of the Local Plan Review First Consultation (Regulation 18) document. It sets out an approach to assess if the proposed housing site allocations could be regarded as major development. It then sets out next steps if a proposed site allocation is determined to be major development.
2. Each proposed site allocation is assessed as a matter of planning judgement considering national policy. It is important to note that this process is only to determine if a proposed site allocation is major development. The process of determining whether a site is suitable for allocation in the Local Plan is made through the site selection process for the Local Plan and is a separate decision-making process.
3. The major development assessment process will help meet the statutory purposes and duties for the National Park which 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

**National Park Authorities also have a duty when carrying out these purposes to seek to foster the economic and social well-being of communities within the National Park.**

4. The National Planning Policy Framework (NPPF) provides Government policy for conserving and enhancing landscape beauty. Paragraph 183 sets out that planning permission should be refused for major development in National Parks other than in exceptional circumstances and where it can be demonstrated the development is in the public interest. Consideration of such applications should include an assessment of:
  - a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy
  - b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way
  - c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

NPPF Footnote 64 sets out that: *“For the purposes of paragraphs 182 and 183, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined”.*



## Definition of Major Development

5. The NPPF does not define what constitutes major development in the National Park. Footnote 64 of the NPPF is however clear that major development is a matter for the decision maker considering the nature, scale and setting of the proposed development and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
6. The South Downs National Park Authority sought legal advice on the matter from James Maurici KC in 2011 and 2014 (now known as the 'Maurici opinions') and subsequently from Toby Fisher in 2017.
  - The Maurici opinions set out a series of principles (derived from caselaw, guidance and appeal decisions) to be applied by decision makers when determining whether a proposed development could be regarded as major development:
    - It is a **matter of planning judgement to be decided by the decision maker** considering all the circumstances and the context of the site.
    - The phrase **"major development"** is to be given its ordinary meaning. It would be wrong to apply the definition of major development contained within the Town and Country Planning (Development Management Procedure) (England) Order 2015; to apply any set or rigid criteria for defining major development; and the definition should not be restricted to development proposals that raise issues of national significance.
    - The decision maker may consider whether the proposed development has the **potential to cause a significant adverse impact on the purposes for which the area has been designated or defined**, rather than whether there will indeed be a significant adverse impact from the proposed development.
    - The decision maker may consider the proposed development in its **local context** as a matter of planning judgement.
    - There **may be other considerations, but which may not be determining factors whether a proposed development is major development**. For example, if the proposed development is Environmental Impact Assessment (EIA) development.
    - The **ordinary sense of the word 'major' is important and the decision maker should take a common sense view** as to whether the proposed development could be considered major development.
  - In Mr Fisher's 2017 legal opinion, he was of the view that:
    - *"... it would arguably amount to an error of law to fail to consider paragraph [183] at the site allocations stage of plan making for the National Park. The consequence of doing so would be to risk allocating land for major development that was undeliverable because it was incapable of meeting the major development test in the NPPF."*
7. An assessment is therefore required to consider whether the proposed site allocations are deemed as major development. Such an assessment is a matter of planning judgement to be decided by the decision maker in the common sense meaning of the word 'major' and the local context.

## Methodology

8. There are two stages of assessment:
  - Stage 1 – Determining major development
  - Stage 2 – Consideration of major development
9. Stage 1 Assessment is carried out prior to the Local Plan (Regulation 18) public consultation (this Assessment). It will be undertaken again (Stages 1 and 2) to support the next stage of the plan-making process, the Proposed (Regulation 19) Submission Local Plan. This will be based on evidence submitted at Regulation 18 public consultation (see Paragraph 18).

### Stage 1 – Determining major development

10. Stage 1 Assessment is based on the factors set out in footnote 64 of the NPPF set out in Figure 1.

Figure 1: Stage 1 – Determining major development

Factor (NPPF footnote 64)	Assessment notes	Potential source/s of information
Nature of development	<ul style="list-style-type: none"> <li>• Type of proposed allocation e.g. housing/ employment/ mixed use</li> <li>• Likely form of proposed allocation e.g. dwelling mix/ employment use</li> </ul>	<ul style="list-style-type: none"> <li>• Land Availability Assessment</li> <li>• Local Plan Review (Regulation 18)</li> </ul>
Scale of development	<ul style="list-style-type: none"> <li>• Size of proposed allocation e.g. number of dwellings/ employment space</li> <li>• Size of proposed allocation in relation to the existing settlement, e.g. the increase in the size of the settlement through either land area and/ or number of households</li> <li>• Whether scale of proposed allocation is in keeping with the scale of the surrounding landscape</li> <li>• Note there is no threshold for when the scale of development is regarded as major. Each proposed allocation is assessed considering a combination of qualitative assessment factors</li> </ul>	<ul style="list-style-type: none"> <li>• Local Plan Review (Regulation 18)</li> <li>• SDNP GIS</li> </ul>
Setting of development	<ul style="list-style-type: none"> <li>• Spatial relationship of the proposed allocation in the local context of settlement form e.g. settlement extension/ infilling/ landscape/ heritage assets</li> <li>• Spatial context e.g. historic settlement pattern in the wider area</li> </ul>	<ul style="list-style-type: none"> <li>• SDNP GIS</li> <li>• Conservation Area Appraisals</li> <li>• Historical maps</li> <li>• Neighbourhood Development Plans</li> <li>• Landscape Sensitivity Analysis</li> <li>• South Downs Integrated Landscape Character Assessment</li> <li>• Site Visit</li> </ul>
Potential for significant adverse impact on the National Park Purposes for which the area has been designated:	<p>Assessment of the potential impact of the proposed allocation:</p> <p>Landscape assessment considers:</p> <p>Distinctiveness (sense of place) based on:</p> <ul style="list-style-type: none"> <li>• Historic Landscape Analysis</li> <li>• Landscape Character</li> </ul> <p>Visibility based on:</p> <ul style="list-style-type: none"> <li>• Visual Sensitivity</li> </ul>	<ul style="list-style-type: none"> <li>• South Downs Integrated Landscape Character Assessment</li> <li>• Landscape Sensitivity Analysis</li> <li>• SDNP Special Qualities</li> <li>• Site visit</li> </ul>

Factor (NPPF footnote 64)	Assessment notes	Potential source/s of information
	<ul style="list-style-type: none"> <li>Relationship to Settlement Pattern and Edge Qualities</li> </ul> <p>Impact on Key Characteristics and Special Qualities (see Figure 1 Note 1) of the National Park:</p> <p>Together these criteria allow a conclusion on Landscape Sensitivity and for an assessment on the potential for significant adverse impact on the NP Purposes.</p>	
Conservation and enhancement of the National Park	<ul style="list-style-type: none"> <li>Assessment of the potential for the proposed allocation to conserve and enhances the NP (utilising criterion above)</li> </ul>	<ul style="list-style-type: none"> <li>As above</li> </ul>
Can the proposed allocation be described as 'major' in the ordinary meaning of the word?	<ul style="list-style-type: none"> <li>Assessment considers the context of the SDNP noting: <ul style="list-style-type: none"> <li>The more isolated and rural the setting, the more likely development is considered 'major'</li> <li>This is a matter of planning judgement - opinions will vary between individuals e.g. because of experiences and views towards development</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
Draft SDNP (Regulation 18) Local Plan - Core Policy SD1: Sustainable Development	<ul style="list-style-type: none"> <li>Assessment considers the proposed allocation against the requirements set out in Core Policy SD1: Sustainable Development</li> </ul>	<ul style="list-style-type: none"> <li>Local Plan Review (Regulation 18)</li> </ul>
Cumulative impacts	<ul style="list-style-type: none"> <li>Assessment considers if the proposed allocation could lead to cumulative impacts when considered alongside other proposed allocations as this may contribute to additional impacts on the National Park</li> <li>This will inform the site selection process for the Local Plan Review as it determines if a site is acceptable development and suitable for allocation</li> </ul>	<ul style="list-style-type: none"> <li>Local Plan Review (Regulation 18)</li> <li>Sustainability Appraisal</li> <li>Landscape sensitivity analysis</li> <li>Site Selection Background Paper</li> </ul>
Conclusion	<ul style="list-style-type: none"> <li>Assessment considers all the above factors to determine if the proposed allocation is deemed major development. This could be down to a single or a combination of factors</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>

Figure 1 Note 1 – South Downs National Park Special Qualities: 1. Diverse, inspirational landscapes and breathtaking views 2. A rich variety of wildlife and habitats including rare and internationally important species 3. Tranquil and unspoilt places 4. An environment shaped by centuries of farming and embracing new enterprise 5. Great opportunities for recreational activities and learning experiences 6. Well conserved historical features and a rich cultural heritage 7. Distinctive towns and villages, and communities with real pride in their area

11. If, at the Stage 1 assessment, a proposed site allocation is deemed major development, then it proceeds to the Stage 2 assessment - consideration of major development.

## Stage 1 Assessment

12. The Local Plan proposes 48 sites for housing allocation. Of these, three sites are considered to hold potential as major development (Figure 2).

Figure 2 – Site considered to hold potential as major development

Proposed Local Plan Allocation	Details
SDXX - Land west of Liphook, Liphook	250 dwellings / 12-14 traveller pitches/ other uses to be determined / 25.2ha in size
SDXX - East Sussex College, Mountfield Road, Lewes	225 dwellings / 5.4ha in size
SDXX - County Hall, St Anne's Crescent, Lewes	240 dwellings

13. A summary of the Stage 1 Assessment is provided in Figure 3.

Figure 3 – Stage 1 Assessment Summary

Proposed Local Plan Allocation	Stage 1 Assessment Summary
SDXX - Land west of Liphook, Liphook	Considered as major development due to the scale of the proposed allocation on undeveloped land outside of a defined settlement boundary and its potential impact on a characteristic and sensitive landscape and on the purposes of the NP (potentially impacting upon almost all the Special Qualities of the NP).
SDXX - East Sussex College, Mountfield Road, Lewes	Not considered major development. Despite its scale, the proposed allocation would have limited impact on the Special Qualities of the NP as it is mostly contained within the defined settlement boundary on a well located, previously developed and managed site, at a scale commensurate with existing development and character of the settlement and surroundings in an area of uncharacteristic and low landscape sensitivity.
SDXX - County Hall, St Anne's Crescent, Lewes	Not considered major development. Despite its scale, the proposed allocation would have limited impact on the Special Qualities of the NP as it is contained within the defined settlement boundary on a well located previously developed, managed site, and at a scale commensurate with existing development and the character of the settlement and historical surroundings in an area of uncharacteristic and moderate landscape sensitivity.

14. The above conclusions are subject to scrutiny of evidence received at Regulation 18 public consultation.

## Stage 2 – Consideration of major development

15. If, at the Stage 1 assessment, a proposed site allocation is deemed to be major development, then it proceeds to Stage 2 assessment - consideration of major development.
16. Stage 2 Assessment (Figure 4) is based on Paragraph 183 of the NPPF and will include consideration of:
- Any exceptional circumstances
  - If the development is in the public interest
  - A justification of need
  - Any alternative ways of meeting that need
  - An assessment of harm
17. An exploration of exceptional circumstances is required by the SDNPA at the plan-making stage as this:

- Facilitates the consideration of different options in setting a spatial development strategy to meet the housing needs of the Park and to lessen any potential harm.
  - Reduces the risk that an allocated site is undeliverable at the planning application stage because it cannot meet the major development test as set out in the NPPF.
18. Stage 2 assessment will be undertaken to support the next stage of the plan-making process, the Proposed (Regulation 19) Submission Local Plan, alongside a refresh of the Stage 1 Assessment. This is because the site allocations are at a relatively early stage and many of assessment factors cannot currently be determined. In addition, it is an expectation of the SDNPA that the site promoters submit evidence that exceptional circumstances exist and that it is in the public interest for the site to remain under consideration for allocation. The refresh of Stage 1 assessment and the Stage 2 assessment will be based on evidence submitted during the Regulation 18 public consultation.
19. The exceptional circumstances 'test' for any site allocated in the Local Plan will also be reviewed at planning application stage as there may be changes during the passage of time between Local Plan allocation and planning application. It will also help to meet the requirements of Paragraph 183 of the NPPF.

Figure 4 - Stage 2 – Consideration of major development

Factor (NPPF Paragraph 183)	Assessment notes	Potential source/s of information
The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy	Could include: <ul style="list-style-type: none"> <li>• Housing land supply/ provision of affordable homes for local people/ other relevant NPPF policies.</li> <li>• Infrastructure improvements</li> <li>• Compliance with the Development Plan</li> </ul>	<ul style="list-style-type: none"> <li>• NPPF</li> <li>• SDNP Local Plan (2019)</li> <li>• Draft SDNP Local Plan</li> <li>• Sustainability Appraisal</li> <li>• Site Selection Background Paper</li> </ul>
The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way	Could include: <ul style="list-style-type: none"> <li>• Reference to other known sites and reasonable alternatives, and the potential to deliver</li> <li>• Compliance with the Development Plan</li> <li>• Potential cumulative impacts</li> </ul>	<ul style="list-style-type: none"> <li>• SDNP Local Plan (2019)</li> <li>• Draft SDNP Local Plan</li> <li>• LAA</li> <li>• Sustainability Appraisal</li> <li>• Site Selection Background Paper</li> </ul>
Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.	Could include: <ul style="list-style-type: none"> <li>• Reference to the SDNP Special Qualities and proposed mitigation measures.</li> </ul>	<ul style="list-style-type: none"> <li>• SDNP Local Plan (2019)</li> <li>• Landscape and Visual Impact Assessment (LVIA)</li> <li>• SDNP Special Qualities</li> <li>• Draft SDNP Local Plan</li> <li>• Local Plan policy wording</li> </ul>
Demonstration that the development is in the public interest	Could include: <ul style="list-style-type: none"> <li>• Reference to the interaction between the landscape and people e.g. opportunities to promote opportunities for the understanding and enjoyment of the special qualities of the NP.</li> <li>• Compliance with the Development Plan</li> </ul>	<ul style="list-style-type: none"> <li>• SDNP Local Plan (2019)</li> <li>• Draft SDNP Local Plan</li> <li>• SDNP Partnership Management Plan 2020-2025</li> <li>• Public Rights of Way network</li> <li>• Current land use</li> </ul>
Other exceptional circumstances	Reference to any other relevant material considerations	

20. Stage 2 sets out the matters that could be considered and potential sources of information. The assessment will consider that if despite giving the greatest weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area

and promoting opportunities for the understanding and enjoyment of the Special Qualities of the National Park, there are exceptional circumstances and that the proposed site allocation is in the public interest.

## Appendix I – Major Development Assessment for Proposed Site Allocations

Policy Reference	SDXX	LAA Reference	EA215
Site	Land west of Liphook	Settlement	Liphook
Proposed development	250 / 12-14 traveller pitches/ SANG/ Quantity of other uses to be determined	Gross site area (ha)	25.2
<b>Stage 1 - Determining major development</b>			
Nature of development	<p>The site is in a prominent location to the west of Liphook, outside, but adjacent to the defined settlement boundary.</p> <p>The proposed allocation is for 250 dwellings (including custom and self-build), retirement living and care home provision (66-unit care home included within this overall figure); 12-14 traveller pitches; and other uses (including a medical centre) - quantities to be determined.</p>		
Scale of development	<p>Using the area of the defined settlement boundary, the site (as a whole) represents an increase of around 13% to Liphook and around a 8% increase in the number of dwellings. The site is significant in scale, covering an area of 25.2ha, with around 10.4ha considered potentially suitable for built development.</p> <p>The site covers an expansive area with modern medium density development on its northern side; modern medium density development transitioning into older lower density development on its eastern side; and dispersed, mostly older sporadic development and countryside on its southern and western sides. It is considered that whilst the development has the potential to be at a scale commensurate with the character of the settlement and surroundings, and that with careful mitigation could be integrated into the landscape (it includes a substantial area outside of built development for the provision of mitigation measures), it would represent a very large and obvious (strategic scale) extension to the settlement with the potential to significantly alter the western edge of the settlement.</p>		
Setting of development	<p>The site comprises arable agricultural land bound by B2070 Portsmouth Road to the east. The site includes protected trees and priority habitats with adjacent Sites of Importance for Nature Conservation and ancient woodland with a green infrastructure function including connections to the wider habitat mosaic. Development would introduce a large built form into undeveloped countryside and create a large-scale extension to the nucleated settlement of Liphook.</p> <p>Development of the site would form an extension to Liphook and represent a significant encroachment into the countryside. It is considered that development would not be incongruous in terms of its spatial relationship with the settlement form and in the context of the historical settlement development pattern. although great care will need to be taken in this regard due to the scale of the proposed extension.</p>		



<p>Potential for significant adverse impact on the National Park Purposes for which the area has been designated</p>	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other Local Authorities and organisations, National Park Authorities also have a duty to seek to foster the economic and social wellbeing of communities within the Park in carrying out the purposes.</p> <p>The site demonstrates characteristics of LCA M3: Woolmer Forest/ Weaver's Down Farmland and Heath Mosaic with strong landscape distinctiveness. the site is assessed as open in nature with high visibility, and it is concluded that the site has a high landscape sensitivity, mostly due to its scale, National Park boundary location, and visibility from local viewpoints and the wider countryside. This is reflected in the emerging Neighbourhood Development Plan which identifies part of the site as an 'identified local view'.</p> <p>The site would lead to development in the NP. Built development could lead to changes to the landscape and its character. In terms of impact on the NP purposes, the scale of the site suggests that development may impact on almost all the Special Qualities of the NP: SQ No.1 – Diverse, inspirational landscapes and breathtaking views; SQ No.2 - Rich variety of wildlife and habitats (SPA, ecology designations, &amp; priority habitats); SQ No.4 – An environment shaped by centuries of farming and embracing new enterprise; No.6 – Historical features &amp; cultural heritage (Little Boarhunt and archaeology); and No.7 – The distinctive town/ community of Liphook which is outside the National Park.</p>
<p>Conservation and enhancement of the National Park (impact on Special Qualities of the NP)</p>	<p>The proposed allocation would deliver a quantum of open market housing with a significant proportion of affordable housing to the local area.</p> <p>Draft policy provision recognises that built development would need to be designed with identified constraints in mind to conserve or enhance the NP and the potential for the site to deliver these. This includes a need to deliver an innovative, comprehensive, sympathetic and well-integrated extension to Liphook, informed by a landscape led, detailed masterplan, that respects its setting within the National Parkland integrates the settlement into the landscape in an appropriate manner; and provides inter alia green infrastructure, open space including the provision of a SANG and green infrastructure biodiversity net gain, flood mitigation / SuDS, and PRoW enhancements.</p> <p>If designed carefully and sympathetically, development could conserve and enhance the Special Qualities of the NP including those identified above, in particular enhancing No.5 – Opportunities for recreational activities (PRoW connection and SANG provision) and No.7 – The distinctive town/ community of Liphook which is outside the National Park.</p>
<p>Can the proposed allocation be described as 'major' in the ordinary meaning of the word?</p>	<p>Yes - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.</p>
<p>Draft South Downs National Park (Regulation 18) Local Plan Core Policy SD1: Sustainable Development</p>	<p>One of the key principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes. In pursuit of the Purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park and as such is seeking a medium dispersed growth strategy, reflecting the multi-centric character of the many towns and villages spread across the National Park and the need for their communities to thrive and grow sustainably. However, where it appears there is conflict, greater weight will be attached to the first of the NP purposes which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</p> <p>It is concluded at this stage of the plan making process that the proposed site allocation is in accordance with draft Core Policy SD1: Sustainable Development despite its scale due to the nature of proposed development which seeks to integrate it with its setting and as it has the potential to provide significant mitigation measures including those made in draft policy provision that would enable development whilst meeting the NP Purposes. This will be assessed further to assess any evidence submitted at Regulation 18 public consultation. It would also be assessed further prior to the determination of any planning application.</p>



Cumulative impacts	<p>One of the key considerations of principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes as set out above. This includes considering the cumulative impacts of development. Since there are no other proposed site allocations near this site, it is considered unlikely there will be any cumulative impacts at a local scale.</p>
Conclusion	<p><b>MAJOR DEVELOPMENT</b></p> <p>The site is significant in scale, covering an area of 25.2ha with around 10.4ha considered potentially suitable for built development. This would represent a very large and obvious (strategic scale) extension to the settlement with potential to significantly alter the western edge of the settlement. Development of the site could potentially cause a degree of harm as it represents a significant encroachment into the countryside and could lead to changes in the landscape and character - particularly as the landscape sensitivity is assessed as high at this location, mostly due to its scale. It could also impact on almost all the Special Qualities of the National Park but noting it also offers significant opportunities for enhancements. Overall, the proposed allocation is well located and at a scale commensurate with the character of the settlement and surroundings and could on balance conserve or enhance the Special Qualities of the NP whilst helping to meet housing need. However, it is concluded that due to the scale of the proposed allocation and its potential impact on landscape and the purposes of the NP, it should be considered as a major development.</p> <p>With a landscape led approach with sympathetic and exemplary design and appropriate mitigation measures not limited to, and as set out above and in its draft Local Plan allocation, it is deemed to have potential to enable the SDNPA to take a positive approach to development that reflects the presumption in favour of sustainable development whilst enabling the SDNPA to carry out its purposes and hold due regard to its duty. This view is subject to scrutiny of evidence received at Regulation 18 public consultation.</p>

Policy Reference	SDXX	LAA Reference	LE141
Site	East Sussex College, Mountfield Road	Settlement	Lewes
Proposed development	225 dwellings	Gross site area (ha)	5.4
<b>Stage 1 - Determining major development</b>			
Nature of development	The site is located on the southeast edge of Lewes. It comprises of three parcels of land of previously developed land within the East Sussex College Campus, north and south of Mountfield Road. Around 1ha of the allocation is outside the defined settlement boundary (the northwest parcel is almost entirely within the defined settlement boundary / around 50% of the northeastern and south parcel are outside the boundary). The emerging proposed allocation is residential for 225 dwellings.		
Scale of development	<p>Using the area of the defined settlement boundary, the site represents around 1.5% of the total area and an increase of 0.3% to Lewes and around a 3% increase in the number of dwellings.</p> <p>The overall site is bound by a railway to the north with modern medium density residential development to the northwest and the Railway Land SINC to the north and northeast; open land to the south and east; and a mix of medium density modern development, commercial and sports uses to the west. It is considered that the development is at a scale commensurate with the character of the settlement and surroundings.</p>		
Setting of development	<p>Development would mostly be within the defined settlement boundary of Lewes with around 20% of the site forming an extension to Lewes, albeit in the sense of being contained within the College Campus.</p> <p>The site comprises of a mixture of modern and older buildings, extended Victorian buildings, areas of hardstanding including car parking and managed grounds that includes protected trees. Lewes Conservation area is immediately to the west of the south parcel and to the southwest of the northwest land parcel with potential archaeological interest.</p> <p>Development of the site would represent a change in land use within the settlement boundaries of Lewes on previously developed land and within the context of a managed site. It is considered that development would not be incongruous in terms of its spatial relationship with the settlement form and in the context of the historical settlement development pattern.</p>		
Potential for significant adverse impact on the National Park Purposes for which the area has been designated	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other Local Authorities and organisations, National Park Authorities also have a duty to seek to foster the economic and social wellbeing of communities within the Park in carrying out the purposes.</p> <p>The previously developed nature of the site means the site is uncharacteristic of the LCA G2: Ouse Valley sides character area and it is concluded that the site has very weak landscape distinctiveness. Whilst the site is assessed as having intermittent views, its visibility is moderate, and it is concluded that the site has Low Landscape Sensitivity.</p> <p>The site would lead to development in the NP. At a local scale, built development could lead to changes to the landscape and minor changes to character deemed as uncharacteristic of its area. In terms of impact on the NP purposes, development could potentially impact on the following Special Qualities of the NP : long distance views from higher ground (SQ No.1); on the adjacent SINC (SQ No.2); and on the adjacent conservation area and loss of Victorian building/s (SQ No. 6).</p>		

<p><b>Conservation and enhancement of the National Park</b></p>	<p>The proposed allocation would deliver a quantum of open market housing with a significant proportion of affordable housing to the local area.</p> <p>Draft policy provision recognises that built development would need to be designed with identified constraints in mind to conserve or enhance the NP and the potential for the site to deliver these. This includes the need to deliver a comprehensive, sympathetic and well-integrated redevelopment of a previously developed site that respects the townscape character and heritage significance of its setting within of the National Park, having regard for the site's prominent location on the southeastern edge of Lewes, its green infrastructure function and its interrelationship with the adjacent Railway Land Meadows Site of Importance for Nature Conservation and wider intervisibility from the south. In addition, draft policy provision seeks to retain the historic buildings and boundary flint faced walls so far as possible on the southern land parcel and incorporate these into the redevelopment of this site; consider its interrelationship and impact on the adjacent Lewes Conservation Area and designated heritage assets and conserve and enhance the setting of both; safeguard and enhance where possible existing vegetation belts on all site boundaries and within the site, having regard to numerous mature trees including many under tree preservation orders; and undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted.</p> <p>If designed carefully and sympathetically, development could conserve and enhance the Special Qualities of the NP including those identified above.</p>
<p><b>Can the proposed allocation be described as 'major' in the ordinary meaning of the word?</b></p>	<p>No - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.</p>
<p><b>Draft South Downs National Park (Regulation 18) Local Plan Core Policy SD1: Sustainable Development</b></p>	<p>One of the key principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes. In pursuit of the Purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park and as such is seeking a medium dispersed growth strategy, reflecting the multi-centric character of the many towns and villages spread across the National Park and the need for their communities to thrive and grow sustainably. However, where it appears there is conflict, greater weight will be attached to the first of the NP purposes which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</p> <p>It is concluded at this stage of the plan making process that the proposed site allocation is in accordance with draft Core Policy SD1: Sustainable Development due to its nature, scale and setting with the potential to provide mitigation measures including those made in draft policy provision that would enable development whilst meeting the NP Purposes. This will be assessed further to assess any evidence submitted at Regulation 18 public consultation. It would also be assessed further prior to the determination of any planning application.</p>
<p><b>Cumulative impacts</b></p>	<p>One of the key considerations of principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes as set out above. This includes considering the cumulative impacts of development. Whilst there are other proposed site allocations in the settlement, none are near this site, and it is considered unlikely there will be any cumulative impacts at a local scale.</p>

<b>Conclusion</b>	<p><b>NOT MAJOR DEVELOPMENT</b></p> <p>Development of the site could potentially cause a degree of harm, but this is deemed to be limited due to the nature of the development and local conditions in landscape and character, the latter of which is no longer characteristic to the area. In addition, the landscape sensitivity at this location is assessed as low. The proposed allocation is mostly contained within a well located, previously developed and managed site and at a scale commensurate with existing development and the character of the settlement and surroundings which could on balance conserve or enhance the Special Qualities of the NP whilst helping to meet housing need. With a landscape led approach with exemplary design and appropriate mitigation measures not limited to, and as set out above and in its draft Local Plan allocation, it is deemed to have potential to enable the SDNPA to take a positive approach to development that reflects the presumption in favour of sustainable development whilst enabling the SDNPA to carry out its purposes and hold due regard to its duty. This view is subject to scrutiny of evidence received at Regulation 18 public consultation.</p>
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<b>Policy Reference</b>	SDXX	<b>LAA Reference</b>	LE039
<b>Site</b>	County Hall, St Anne's Crescent	<b>Settlement</b>	Lewes
<b>Proposed development</b>	240 / c3,500 sqm office space (tbd) / Appropriate small-scale town centre uses (tbd) / Community uses (tbd)	<b>Gross site area (ha)</b>	4.1
<b>Stage 1 - Determining major development</b>			
<b>Nature of development</b>	The site is located close to the centre of Lewes. It comprises of three parcels of land that are a mixture of previously developed land, open space and managed grounds. The site is entirely within the defined settlement boundary. The emerging proposed allocation is to be determined and is predominantly residential for 240 dwellings, around 3,500 sqm of office space with potential for small scale town centre uses and community uses.		
<b>Scale of development</b>	<p>Using the area of the defined settlement boundary, the site represents around 1.2% of the total area with around a 3% increase in the number of dwellings. The site is contained entirely within the settlement boundary.</p> <p>To the north of the overall site is a mix of older medium density housing and historic buildings including designated assets; to the east is older housing set within large plots (with a proposed SDNP LP housing allocation immediately to the east); to the southwest/west a Cemetery designated as a SINC/LWS; and a mix of modern and older medium density housing to the south.</p> <p>It is considered that the development has potential to be at a scale commensurate with the character of the settlement and surroundings.</p>		
<b>Setting of development</b>	<p>The two most northerly land parcels consist of extensive areas of hardstanding in use as car parking and a late 1960s office block. These two areas are largely incongruous to adjacent development and the office block with the wider landscape. The southern land parcel consists of a derelict school (a non-designated heritage asset) set within a large verdant plot. The site contains two Neighbourhood Plan allocations for housing. The site is entirely within the Lewes Conservation area with a number of designated heritage assets to the north and northeast including a Grade I listed church. The land contains a numerous trees including many under tree preservation orders and holds potential archaeological interest.</p> <p>Development of the site would represent a change in land use within the settlement boundaries of Lewes on previously developed land and within the context of a managed site. It is considered that in the context of existing use and potential future uses, development would not be incongruous in terms of its spatial relationship with the settlement form and in the context of the historical settlement development pattern.</p>		

<p>Potential for significant adverse impact on the National Park Purposes for which the area has been designated</p>	<p>The purposes of the NP are to: 1 - To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and 2 - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Working in partnership with other Local Authorities and organisations, National Park Authorities also have a duty to seek to foster the economic and social wellbeing of communities within the Park in carrying out the purposes.</p> <p>The previously developed nature of the site means the site is uncharacteristic of the LCA G2: Ouse Valley sides character area and it is concluded that the site has weak landscape distinctiveness. Whilst the site is assessed as having intermittent views, its visibility is high, largely because of its prominent location on a slope crest which falls sharply to the south. It is concluded that the site has Moderate Landscape Sensitivity.</p> <p>The site would lead to development in the NP. At a local scale, built development could lead to changes to the landscape and minor changes to character given it is deemed as uncharacteristic of its area. In terms of impact on the NP purposes, development could potentially impact on the following Special Qualities of the NP: long distance views (SQ No.1); on the adjacent SINC/LWS (SQ No. 2); and on the adjacent conservation area and historic townscape including designated and non-designated assets (SQ No. 6).</p>
<p>Conservation and enhancement of the National Park</p>	<p>The proposed allocation would deliver a quantum of open market housing with a significant proportion of affordable housing to the local area.</p> <p>Draft policy provision recognises that built development would need to be designed with identified constraints in mind to conserve or enhance the NP and the potential for the site to deliver these. This includes the need to deliver an innovative, sympathetic and well-integrated redevelopment that respects the townscape character and heritage significance of its surroundings and setting within of the National Park, having regard for: the site's prominent location and steep topography through the design including appropriate building heights and utilising locally characteristic materials; its green infrastructure function, particularly its interrelationship with the adjacent Lewes Cemetery SINC / LWS; the Lewes NDP designations for housing on two areas of this site; its interrelationship and impact on the Lewes Conservation Area and designated and non-designated heritage assets, including the Grade I listed Church of St Anne and St Anne's School located within the south parcel; safeguarding and enhancing where possible existing vegetation belts on all site boundaries and throughout the site including with numerous mature trees, many under tree preservation orders; to incorporate a Public Right of Way footpath that crosses the north parcel into the scheme design and improve the permeability of the site for NMU users; and undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted.</p> <p>If designed carefully and sympathetically, development could conserve and enhance the Special Qualities of the NP including those identified above, in particular helping to improve long distance views particularly through the potential removal of the 1960s office block (SQ No.1); and improving the sites place and interrelationship with the adjacent conservation area and historic townscape including designated and non-designated assets (SQ No. 6).</p>
<p>Can the proposed allocation be described as 'major' in the ordinary meaning of the word?</p>	<p>No - Note this is a matter of planning judgement and opinions will vary between individuals e.g. because of experiences and views towards development.</p>



<p><b>Draft South Downs National Park (Regulation 18) Local Plan Core Policy SD1: Sustainable Development</b></p>	<p>One of the key principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes. In pursuit of the Purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park and as such is seeking a medium dispersed growth strategy, reflecting the multi-centric character of the many towns and villages spread across the National Park and the need for their communities to thrive and grow sustainably. However, where it appears there is conflict, greater weight will be attached to the first of the NP purposes which is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</p> <p>It is concluded at this stage of the plan making process that the proposed site allocation is in accordance with draft Core Policy SD1: Sustainable Development due to its nature, scale and setting with the potential to provide mitigation measures including those made in draft policy provision that would enable development whilst meeting the NP Purposes. This will be assessed further to assess any evidence submitted at Regulation 18 public consultation. It would also be assessed further prior to the determination of any planning application.</p>
<p><b>Cumulative impacts</b></p>	<p>One of the key considerations of principles of the spatial strategy set out in the draft Local Plan is to take a positive approach to development that reflects the presumption in favour of sustainable development whilst meeting the NP Purposes as set out above. This includes considering the cumulative impacts of development. There are other proposed site allocations in the settlement, including one adjacent to the west of the site. However, this is small (8 dwellings / 0.4ha) and it is considered that collectively, there is unlikely to be any cumulative impacts at a local scale.</p>
<p><b>Conclusion</b></p>	<p><b>NOT MAJOR DEVELOPMENT</b></p> <p>Development of the site could potentially cause a degree of harm, but this is deemed to be limited due to the nature of the development and local conditions in landscape and character, the latter of which is no longer characteristic. In addition, the landscape sensitivity at this location is assessed as moderate. The proposed allocation is mostly contained within a previously developed area, well located and at a scale commensurate with existing development and the character of the settlement and surroundings and could on balance conserve or enhance the Special Qualities of the NP whilst helping to meet housing need, particularly if the 1960s office block is removed. With a landscape led approach with exemplary design and appropriate mitigation measures not limited to, and as set out above and in its draft Local Plan allocation, it is deemed to have potential to enable the SDNPA to take a positive approach to development that reflects the presumption in favour of sustainable development whilst enabling the SDNPA to carry out its purposes and hold due regard to its duty. This view is subject to scrutiny of evidence received at Regulation 18 public consultation.</p>