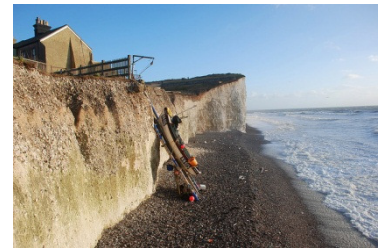




Sustainability Appraisal (SA) for the South Downs Local Plan



Findings of the SA of Issues and Options to accompany the South Downs Local Plan Options Consultation Document

February 2014

REVISION SCHEDULE					
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Draft	February 2014	Findings of the SA of Issues and Options published for consultation alongside the ' <i>Options Consultation Document</i> '.	Nick Chisholm-Batten Principal Consultant	Alex White Associate Director	Steve Smith Technical Director

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01 Introduction

- 1.1 Background
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- 1.4 What has plan making / SA involved up to this point?
- 1.5 Content of this report

1.1 Background

- 1.1.1 URS Infrastructure & Environment Ltd. has been commissioned to undertake a Sustainability Appraisal (SA) in support of the emerging South Downs Local Plan (SDLP).
- 1.1.2 The South Downs National Park Authority is in the early stages of preparing their Local Plan. The SDLP, which is due to be adopted in mid-2017, will set out how the South Downs National Park will evolve over coming years by setting the planning framework for the National Park.
- 1.1.3 The SDLP will provide a single reference point for planning policies within the National Park and set out the delivery of the dual purposes, duty, and vision of the National Park and the South Downs National Park Partnership Management Plan's (PMP) objectives and policies "on the ground" through planning decisions. It will do so through conforming to the requirements of the National Planning Policy Framework.
- 1.1.4 The *Options Consultation Document* for the SDLP is undergoing consultation for a period of nine weeks between February and April 2014. The aim of the options consultation, which represents the outcome of first stage in the SDLP's preparation process, is to gain views on potential approaches that the Local Plan policies can take on various key planning issues.
- 1.1.5 This report has been prepared to accompany the options consultation.

1.2 SA explained

- 1.2.1 SA is a mechanism for considering and communicating the impacts of an emerging plan, and reasonable alternatives in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding and mitigating negative effects and maximising opportunities and positive effects. Through this approach, the SA for the SDLP seeks to maximise the plan's contribution to sustainable development.
- 1.2.2 SA of the SDLP is a legal requirement¹. It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations), which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.²
- 1.2.3 The SEA Regulations require that a report is published for consultation alongside the draft plan that '*identifies, describes and evaluates*' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.4 The SA has been tailored to reflect the unique elements of the SDLP, which has been designed to reflect the dual purposes, duty and vision for the South Downs National Park.

1.3 This report

- 1.3.1 At the current stage of plan-making the South Downs National Park Authority is not consulting on a draft plan. Rather, the Authority is consulting on an initial '*Options Consultation Document*'. The document is the initial stage in developing the SDLP and represents the formal Regulation 18 stage (of the *Town and Country Planning (England) Regulations 2012*), whereby the local planning authority notifies stakeholders of its intention to produce a local plan.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report must be published for consultation alongside the 'Proposed Submission' plan document.

² Directive 2001/42/EC

³ Regulation 12(2)

- 1.3.2 This report has therefore been produced voluntarily with the intention of informing this early stage of preparation of the SDLP. Specifically, this report presents a consideration of the high-level approaches and alternatives presented within the *Options Consultation Document*. This is for the benefit of those who might wish to make representations through the options consultation and for the benefit of the plan-makers tasked with selecting preferred approaches to the SDLP.
- 1.3.3 The aim of the options consultation is to gain stakeholders' views on the approach SDLP policies can take on various key planning issues. At this early stage in the development of the SDLP it is anticipated that discussions on these issues will be broad and at a high level. However, the current report is viewed an important part of the audit trail in deciding what may or may not be reasonable alternatives for the SDLP.
- 1.3.4 A key role of this stage of the SA process is to inform the development of spatial options for the SDLP, including strategic site allocation options. In this context the current stage of the SA process will help refine the range of policy options proposed in the *Options Consultation Document* to allow coherent emergent spatial policies to emerge.

1.4 What has plan making / SA involved up to this point?

- 1.4.1 The *Options Consultation Document* concludes the first stage in the preparation of the SDLP. The document sets out 55 key issues which it is deemed the SDLP will need to address. These have been highlighted as key issues from the significant amount of consultation and engagement that has taken place over the past three years during the development of the National Park Vision, State of the National Park Report and most recently through the development of the South Downs National Park Partnership Management Plan.
- 1.4.2 For most of the issues the document sets out '*what we propose to do*' statements, which give the suggested approach for the SDLP to follow taking into account the National Park's Purposes and Duty, the requirements of national planning policy and guidance from documents such as the *English National Parks and the Broads: UK Government Vision and Circular 2010*, the *National Planning Policy Framework 2012* and the *Localism Act 2011*, and the evidence collected so far. The *Options Consultation Document* then sets out other realistic options and seeks feedback on these.
- 1.4.3 In June 2013, the SA Scoping Report was finalised by the National Park Authority following consultation with the statutory environmental bodies (English Heritage, the Environment Agency and Natural England) and other stakeholders. This current report has been prepared as the second stage of the SA process.
- 1.4.4 The purpose of the SA Scoping Report is to set out a scope for the SA in the form of a context review, a baseline data review and a review of key sustainability issues for the National Park. Drawing on this scope, it presents an 'SA Framework' of objectives and appraisal questions against which SDLP proposals can be appraised.
- 1.4.5 The SA Scoping Report can be accessed at the following weblink:

http://www.southdowns.gov.uk/data/assets/pdf_file/0003/421626/MasterSAScopingReport30Jun13.pdf

1.5 Content of this report

- 1.5.1 The *Options Consultation Document* presents a range of issues and options for consultees to consider. These have been grouped into eight themes, as follows:
- Landscape and Natural Resources;
 - Historic Environment;
 - Design;

- Settlement Strategy;
- Housing;
- Economy and Tourism;
- Community Facilities and Infrastructure; and
- Transport and Accessibility.

1.5.2 The SA at this stage has undertaken a high level consideration of the issues and options presented under these themes.

1.5.3 In this context, this report sets out:

- The methodology for the appraisal of the issues and options;
- Appraisal findings; and
- The next steps for the SDLP and accompanying SA process.



02 Appraisal Methodology

2.1 Themes and Issues

2.2 Appraising the Issues and Options

2.1 Themes and Issues presented in the *Options Consultation Document*

2.1.1 The *Options Consultation Document* presents a discussion of 55 ‘issues’ for focus on at this stage of plan development. These have been discussed under eight themes. The issues, and the themes under which they have been grouped, are as follows:

Table 2.1: Issues included in the Options Consultation Document

Theme	Issue
Landscape and Natural Resources	Issue 1 – How can the Local Plan best help conserve and enhance landscape character?
	Issue 2 – How can the Local Plan provide resilience for people, businesses and their environment?
	Issue 3 – How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?
	Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?
	Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?
	Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?
Historic Environment	Issue 7 – What approach should the Local Plan adopt to heritage at risk?
	Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?
	Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?
	Issue 10 – How might climate change impact upon the historic environment? To what extent should individual heritage assets be expected to contribute to climate change solutions?
	Issue 11 – How might the Local Plan best protect non-designated heritage assets from total loss or incremental change?
	Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?
	Issue 13 – How might new infrastructure projects affect the cultural heritage?
Design	Issue 14 – How should the Local Plan ensure the design of new development supports built environment character and conserves and enhances the National Park’s natural beauty, wildlife and cultural heritage?
	Issue 15 – How should the Local Plan best ensure the use of appropriate local materials?
	Issue 16 – How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?
	Issue 17 – Should the local plan include minimum space standards for new residential development?
	Issue 18 – How can the Local Plan best ensure that the design of streets and roads reduce vehicle dominance and speeds, enhance local distinctiveness and minimise signage clutter and light pollution?
	Issue 19 – How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?
	Issue 20 – How can the Local Plan address carbon reduction targets through energy efficiency schemes?
Settlement Strategy	Issue 21 – What development should the Local Plan permit outside settlements?
	Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?
	Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?
	Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?
	Issue 25 – What approach should the Local Plan adopt to development in Tier 2 settlements?
	Issue 26 – What approach should the Local Plan adopt to development in Tier 1 settlements?

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

2.1.2 For each of these issues, the *Options Consultation Document* proposes broad approaches for consideration and discussion. The document then sets out further options and seeks feedback on these.

2.2 Appraising the Issues and Options

2.2.1 Each of these issues has been appraised against the SA Framework agreed during the scoping stage. The SA Framework has been presented in Table 2.2 below⁴.

2.2.2 Included under each SA Objective is a reference to the broad sustainability theme to which it relates.

Table 2.2: SA Framework objectives and sub-objectives

South Downs Local Plan SA Objective (and sustainability theme)	SA sub-objectives
<p>1. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.</p> <p>(Housing)</p>	1.1: Enhance rural communities by providing good quality affordable housing for local people which meets the needs of communities now and in the future.
	1.2: Create communities characterised by integrated development which takes account of local housing needs and delivers the widest possible range of benefits consistent with NP purposes & duty.
	1.3: To make suitable provision for transit and permanent traveller sites based upon projected need.
<p>2. To improve the health and well-being of the population and reduce inequalities in health and wellbeing.</p> <p>(Health and Wellbeing)</p>	2.1: Optimise the benefits that the natural environment offers to contribute to peoples' health and well-being.
	2.2: Use environmental and building standards to ensure that places promote health and wellbeing.
	2.3: To contribute to a reduction in all aspects of rural crime through effective enforcement in partnership with other enforcement agencies.
<p>3. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.</p> <p>(Vitality of Communities)</p>	3.1: Supporting communities where children grow up and go to school.
	3.2: Supporting and empowering local communities to shape their own community (recognise the value of community and neighbourhood planning)
<p>4. To improve accessibility to all services and facilities.</p> <p>(Accessibility)</p>	4.1: Encourage partnership initiatives for the development of community facilities to meet local needs guided by the Community Hierarchy Study.
<p>5. To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism.</p> <p>(Cultural Activity)</p>	5.1: A sustainable tourism strategy that supports recreation businesses.
	5.2: Access to and representation of all sections of the community in NP facilities.
	See also S.O. 4.1
	See also S.O. 6.2
<p>6. To encourage development of the rural economy in a manner that balances agricultural and other business interests to maintain a living, valued landscape.</p> <p>(Rural Economy)</p>	6.1: Encourage development of efficient broadband throughout the area to encourage small business, communities & tourism in the Park.
	6.2: Encourage local industry and maintenance of a living cultural skills base that forms part of heritage now and into the future.
	6.3: Recognise and support core sectors of the South Downs economy such as food production, tourism and land management.
	6.4: Promote agri-environmental businesses and diversification that focuses on ecosystem services and enhancement of the local supply chain.

⁴ Please note, for the purposes of the appraisal stages of the SA process, the numbering of the SA Objectives has been updated from the numbering presented in the Scoping Report. The wording and ordering of the SA Objectives however remain the same.

South Downs Local Plan SA Objective (and sustainability theme)	SA sub-objectives
	6.5: Market towns to provide services to the rural hinterland.
7. To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures. (Climate Change Mitigation)	7.1: Promote appropriate retrofitting and upgrading of the existing housing stock and other buildings informed by the sense of place. 7.2: Implement policy of zero carbon new build homes by 2016 in accordance with government policy. 7.3: Supporting communities with the right LC / RE infrastructure in the right place. 7.4: Extension of wood planting , where appropriate both for carbon storage opportunities and to provide woodfuel sources.
8. To ensure the SDNP communities are prepared for the impacts of climate change. (Climate Change Adaptation)	8.1: Minimise the risk of flooding to new development through application of the sequential and exception tests. 8.2: Promote the uptake of sustainable drainage systems. 8.3: The achievement of integrated coastal zone management. 8.4: Promote the incorporation of rainwater harvesting in the built environment and measures to reduce water demand. Promote consideration of farm reservoirs and on-farm boreholes for local efficient abstraction under an “Abstract Well and Use Well” basis.
9. To conserve and enhance the region’s biodiversity. (Biodiversity)	9.1: Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitats, cognisant of the full range of stakeholder issues. 9.2: Conserve, enhance, restore, expand and reconnect areas of priority habitat (<i>‘Bigger, better, more and joined’</i>). See also S.O. 8.2, 8.3 and 8.4. 9.3: Address both water supply and demand issues for water supply in the context of NP purposes in partnership with water companies.
10. To protect and enhance the National Park’s countryside and historic environment and its enjoyment. (Landscape and Historic Environment)	10.1: Provision for equine and golfing recreational activities without compromise to the landscape and historic environment. 10.2: Achieve repair and / or enhancement of heritage assets currently identified as “at risk” to the extent that this status no longer applies. 10.3: Help the HE adapt to changing conditions arising from CC (warmer, wetter, infestations etc).
11. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel. (Sustainable Transport)	11.1: Provide sustainable access to services through community transport, neighbourcare car schemes, high speed broadband and mobile community facilities. 11.2: Work with other partners to develop a high quality, safe access network and better links between bus and trains and cycling opportunities. 11.3: Minimising the impact of vehicle infrastructure on landscape and communities. 11.4: A sustainable transport infrastructure for 2020 and beyond to accommodate increased movements to / from and between South Coast centres that affords protection for the SDNP landscape.

2.2.3 The *Options Consultation Document* does not present alternative options for all of the issues covered. For many of the issues covered a proposed approach ('option') is presented for consultation without a corresponding 'alternative' (as in many cases there is not deemed to be a reasonable alternative available). Appraisal of the National Park Authority's preferred approach is not a focus of SA at the current time, but will be in the future⁵. This will enable the combined effects of proposals to be considered as the Local Plan develops.

2.2.4 The issues where no alternative approaches have been proposed (that are likely to have a significant bearing upon sustainability objectives) include as follows:

Table 2.3: Issues where no alternative approaches proposed

Issue
Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?
Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?
Issue 29 – What approach should the Local Plan adopt to the redevelopment of major brownfield sites?
Issue 37 – How best should the Local Plan encourage Community Land Trusts?
Issue 38 – Identifying strategic goals for the economy.
Issue 49 – How best can the Local Plan ensure adequate infrastructure provision for new development?
Issue 50 – How best might the Local Plan address statutory requirements to support carbon reduction targets through low carbon / renewable energy schemes?
Issue 52 – How best should the Local Plan deal with proposals for strategic infrastructure?

2.2.5 For a number of issues, options deal with suggested approaches to plan-making 'procedure' as opposed to suggested policy approaches. It is often not possible to identify the likely substantive sustainability effects or implications associated with procedural options, although this is not to suggest that appraisal is not worthwhile. Where procedural options are considered, a brief commentary on these potential approaches is provided with the aim of informing and influencing the on-going development of these policy areas.

2.2.6 A number of the issues present more substantive options and as such more detailed appraisal can be undertaken of the relative merits of each option and against the baseline. For each of these options, the appraisal identifies and evaluates (using the SA Framework) the likely sustainability implications of each option in relation to the baseline and likely future baseline in the National Park. Each option is then ranked against the SA Framework. The detailed appraisal of options for these issues is presented in **Appendix A**.

2.2.7 A more detailed appraisal has been carried out for the following issues:

- Issue 21: What development should the Local Plan permit outside settlements?
- Issue 23: What approach should the Local Plan adopt to development in Tier 4 settlements?
- Issue 24: What approach should the Local Plan adopt to development in Tier 3 settlements?
- Issue 27: How should the Local Plan best take account of the adjoining settlements outside the National Park?
- Issue 28: What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?
- Issue 30: how best should the Local Plan ensure a 'sufficient' supply of housing?
- Issue 35: How best can the Local Plan ensure the housing needs of older people are met?

⁵ Specifically, the SA Report (presented at the time of the next consultation during Preferred Options) will present a timely appraisal of the Authority's preferred approach.

- Issue 39: Should the Local Plan safeguard existing employment sites?
- Issue 44: How should the Local Plan consider visitor accommodation?
- Issue 46: What approach should the Local Plan take to static holiday caravan sites?

2.2.8 Every effort is made to predict sustainability implications accurately; however, this is inherently challenging given the high level nature of many of the options at this early stage of plan-making and the associated uncertainty as to how the proposals would be delivered “on the ground”. In light of this, where sustainability implications are predicted, this is done with an accompanying explanation of the assumptions made.

2.2.9 The next chapter presents summaries of the evaluation of the proposed approaches and options put forward at this stage of plan-making.



03 Appraisal Findings

- 3.1 Introduction**
- 3.2 Landscape and Natural Resources**
- 3.3 Historic Environment**
- 3.4 Design**
- 3.5 Settlement Strategy**
- 3.6 Housing**
- 3.7 Economy and Tourism**
- 3.8 Community Facilities and Infrastructure**
- 3.9 Transport and Accessibility**

3.1 Introduction

3.1.1 Presented below are summary appraisal findings in relation to each of the issues presented in the *Options Consultation Document* that are the focus of SA at this current time.

3.2 Landscape and Natural Resources

Issue 1 – How can the Local Plan best help conserve and enhance landscape character?

3.2.1 Issue 1 presents two procedural options for protecting the South Downs’ landscape character.

3.2.2 A criteria-based policy to support landscape quality in the National Park has the potential to prevent the cumulative impacts of development proposals. However to be effective, a criteria-based policy should be supported by a strong evidence-base. If this is not available then there is the potential for beneficial development to be restricted unnecessarily.

3.2.3 In this context the National Character Area (NCA) profiles and their accompanying ‘Statements of Environmental Opportunity’ may not always provide sufficient detail to support robust criteria for development. Therefore, whilst the addition of Option 1a provides a further element of protection for landscape quality, there is scope for the effectiveness of the option to be undermined, including in terms of socioeconomic effects, without a robust evidence base to support it. Such criterion should be supported by a more detailed assessment of landscape sensitivity. This should be based on the Landscape Character Areas that have been defined in the Integrated Landscape Character Assessment for the South Downs National Park.

Issue 2 – How can the Local Plan provide resilience for people, businesses and their environment?

3.2.4 As defined by Natural England, Green Infrastructure (GI) is the active planning, creation, management and protection of green multifunctional spaces in built and urban environments which includes but is not limited to parks and gardens, natural and semi natural urban green spaces, green corridors and outdoor sports facilities.

3.2.5 Green infrastructure has the potential to be a vital element of spatial planning that is essential to provide wide ranging benefits to various sectors through the use of “green” and semi-natural features. Careful planning of GI delivers social, economic and environmental benefits that can be derived in a cost-effective and sustainable manner.

3.2.6 Natural England’s Framework for GI for the South East (2009)⁶ identifies seven key functions of GI:

1. Conservation and enhancement of biodiversity, including the need to mitigate the potential impacts of new development;
2. Creating a sense of place and opportunities for greater appreciation of valuable landscapes and cultural heritage;
3. Increasing recreational opportunities, including access to and enjoyment of the countryside and supporting healthy living;
4. Improved water resource and flood management and sustainable design;
5. Making a positive contribution to combating climate change through adaptation and mitigation of impacts;
6. Sustainable transport, education and crime reduction; and

⁶ LUC on behalf of Natural England, Environment Agency et al. (2009) *South East Green Infrastructure Framework: from Policy into Practice* http://segip.org/wp-content/uploads/2010/01/SEGIFramework_finaljul09.pdf

7. Production of food, fibre and fuel.

- 3.2.7 The delivery of a high quality multifunctional GI network therefore has the potential to deliver a range of benefits for the National Park. The delivery of new and improved GI provision is most effective when it is planned at a range of scales, including regional, sub-regional and local levels. This enables a coordinated approach to be taken which can seek to ensure the full range of benefits from a high quality GI network can be realised.
- 3.2.8 In this context the delivery of a Local Plan GI policy which is supported and informed by a South Downs GI Strategy (as set out by the proposed approach in the *Options Consultation Document*) will help ensure that the policy is based on a robust evidence base linked to an analysis of existing provision, deficiency and need.
- 3.2.9 This approach will also be significantly more effective in designing and managing GI as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits for the National Park than the piecemeal approach promoted by Option 2a. Option 2a is also less likely to effectively link with existing strategies prepared in adjoining and overlapping areas, such as in the Partnership for Urban South Hampshire (PUSH) region and East Hampshire.

Issue 3 – How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?

- 3.2.10 Issue 3 sets out three procedural options for biodiversity conservation and enhancement in the National Park. The proposed approach and the two additional options, rather than being alternative options, are potentially complementary approaches for the Local Plan. It is considered that all three options will help contribute to the enhancement of habitats and the protection of species in the National Park.
- 3.2.11 Option 3b supports the focus of the National Planning Policy Framework on Nature Improvement Areas⁷. Currently only one Nature Improvement Area (NIA), the South Downs Way Ahead NIA (which seeks to improve chalk ecosystems in the South Downs) has been progressed to date in the National Park. It is uncertain when further NIAs will be introduced in other areas of the National Park.

Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?

- 3.2.12 Geodiversity is the collective term describing the geological variety of the Earth's rocks, fossils, minerals, soils and landscapes together with the natural process which form and shape them. Geodiversity underpins biodiversity by providing diversity of habitat and the ecosystem, with the soil being the link between them. It also embraces the built environment by providing the basis for neighbourhood character and local distinctiveness through building stone and material.
- 3.2.13 The *Options Consultation Document* recognises the importance of the various services which the geodiversity of the National Park provides. In this context it is considered that the development of a stand-alone policy for geodiversity will be an appropriate means of addressing geodiversity issues through the Local Plan.

Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?

- 3.2.14 Issue 5 sets out three procedural options for delivering the broad preferred approach to water resources and quality.

⁷ Para 117 of the NPPF states: "...where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas."

- 3.2.15 Due to the requirement to meet Water Framework Directive (WFD) targets, the Local Plan should seek to set out policies both for addressing water quality and quantity. In this context, of the three additional options, only Option 5b addresses both water quantity and quality; both option 5a and 5c only focus on water quantity.
- 3.2.16 Option 5c, which seeks to introduce a policy of water neutrality, is likely to bring the widest benefits in terms of water quantity in the National Park through promoting an extension of Option 5a's focus on demand management/water efficiency. It does so through taking the concept of limiting water use to an end point of ensuring that total water use is no greater than at the beginning of the plan period. However there are potential implications of this approach in relation to whether such as policy would undermine housing delivery in some parts of the National Park.
- 3.2.17 For this reason, the policy would need to provide clarification on how this should be applied in the National Park, and where the water neutrality concept can be applied (for example whether to certain categories of development, or all development). It should also highlight the types of measures it is expected should take place and where. In this context the Environment Agency⁸ states that water neutrality is achievable through a combination of measures, including:
- Improving water efficiency of new housing;
 - Retrofitting existing homes with water efficient options;
 - Reducing demand from non-households;
 - Increasing the level of metering; and
 - Introducing variable tariffs.
- 3.2.18 Therefore through the development of a water neutrality policy, it should be considered where the Local Plan is in a position to enact appropriate measures, and how it would seek to implement these. It should also seek to set out how the plan will monitor progress towards water neutrality.
- 3.2.19 Whilst Issue 5 states that it seeks to address flooding issues, and flood risk is highlighted under "*other issues that can be considered in the Local Plan*", no specific approaches to flooding, or an explanation as to why flooding has not been discussed (for example due to mechanisms linked to existing flood risk requirements as applied to new development), is provided as part of this issue.

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

- 3.2.20 Issue 6 sets out three procedural options for this theme. If combined with a robust GI policy which promotes an integrated GI approach to development planning in the National Park (see Issue 2), it is considered that a combination of all three options would provide an appropriate basis for the development of policy which seeks to promote the protection of trees, woodlands and hedgerows in the National Park.

3.3 Historic Environment

Issue 7 – What approach should the Local Plan adopt to heritage at risk?

- 3.3.1 The proposed approach to heritage at risk provides a comprehensive approach to supporting a reduction in the number of designated buildings and structures deemed to be 'at risk' in the National Park.

⁸ See: <http://www.environment-agency.gov.uk/research/library/publications/40737.aspx>

3.3.2 Option 7a supports this through recognising that a more flexible approach to new uses of buildings can help increase the viability of restoration, particularly in light of the fact that buildings at risk are frequently structures where there is difficulty in finding a use, which makes securing their repair particularly difficult.

3.3.3 There is potential for the proposed approach to heritage at risk to differentiate between the two different categories of heritage at risk currently utilised by English Heritage, namely 1) buildings and structures at risk and 2) non-structural archaeology at risk. Also, within the buildings at risk category, there is potential for the relevant policy to highlight how the 267 buildings deemed to be 'vulnerable' (in addition to those deemed to be 'at risk') in the 2013 survey of buildings at risk in the National Park should be considered.

Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?

3.3.4 The proposed approach seeks to secure the optimum viable use for heritage assets in relation to the heritage value of the feature and their settings.

3.3.5 Of the two options included to support the proposed approach, it is considered that Option 8b is likely to provide the flexibility required to support the viability and vitality of features and areas of historic significance which have lost their previous use and to support community benefits in the areas in which they are situated.

Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?

3.3.6 In terms of the two options for the proposed approach for securing the optimum viable use for historic/traditional farm buildings in the National Park, Option 9a has greater potential for supporting new economic and community opportunities in rural areas, including through promoting opportunities for agricultural diversification and promoting the visitor economy. Option 9b has the potential to limit these opportunities for agricultural diversification through in effect 'sterilising' such opportunities by facilitating residential use.

3.3.7 For either option, ensuring that the key heritage features and settings of the structure or area are protected and where possible enhanced should be a key consideration for changes in use.

Issue 10 - How might climate change impact upon the historic environment? To what extent should individual heritage assets be expected to contribute to climate change solutions?

3.3.8 The proposed approach for Issue 10 promotes the inclusion of a policy to permit and encourage work to improve the energy performance of heritage assets. This is likely to provide benefits in relation to limiting energy use, reducing emissions and supporting the health and wellbeing of those using these assets. The provision of guidance to implement the policy (as promoted by Option 10a) would support this process through helping ensure that retrofitting of heritage assets is carried out sensitively in relation to their historic environment value and settings.

Issue 11 - How might the Local Plan best protect non-designated heritage assets from total loss or incremental change?

3.3.9 The proposed approach recognises the challenge of protecting non-designated heritage assets in the National Park through encouraging the consolidation of existing local heritage lists and adding new features through Conservation Area Appraisals.

3.3.10 The proposed approach however limits the inclusion of assets on the local list to those within conservation areas. Many non-designated features are located outside of conservation areas and provide a significant contribution to landscape and townscape character. In this context they are a significant contribution to the Special Qualities of the National Park.

3.3.11 The value of these sites can only be fully recognised through a concerted effort to identify and categorise these sites. Therefore Option 11b is recommended as an appropriate approach for supporting the protection and enhancement of non-designated heritage features in the National Park through creating a National Park-wide local list and introducing policy safeguards for these features.

Issue 12 - Should the Local Plan include a policy on enabling development to address heritage at risk issues?

3.3.12 'Enabling development' is development that would be unacceptable in planning terms but for the fact that it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved⁹.

3.3.13 Issue 12 seeks to use the guidance prepared English Heritage when considering enabling development. It also highlights that the use of enabling development should be exceptional in the National Park. Due to the high demand for the conversion and redevelopment of structures in the National Park, and the range of provisions put in place by English Heritage in regard to enabling development, this is supported by the SA process as an appropriate approach to addressing heritage at risk issues in the National Park.

Issue 13 - How might new infrastructure projects affect the cultural heritage?

3.3.14 The proposed approach for Issue 13 will be a vital means of reducing impacts of infrastructure proposals on cultural heritage assets and their settings, and ensuring that potential (and as yet unknown) features of historic environment, including archaeological features, are recorded and classified. This will be supported by Option 13a, which will promote the potential for newly discovered finds to provide an educational resource for the community and provide additional opportunities for dissemination of information relating to finds.

3.4 Design

Issue 14 - How should the Local Plan ensure the design of new development supports built environment character and conserves and enhances the National Park's natural beauty, wildlife and cultural heritage?

3.4.1 The proposed approach will help ensure that the design of new development meets community expectations, reflects the character of the built and natural environment and promotes development which supports landscape and townscape quality. This will be further supported by Option 14a through introducing a requirement for detailed characterisation studies to accompany development proposals.

3.4.2 It should be noted however that the viability of housing and affordable housing requirements will need to be balanced against high design specifications.

Issue 15 - How should the Local Plan best ensure the use of appropriate local materials?

3.4.3 The two options proposed for Issue 15 have a focus on sustainable and energy efficient materials (Option 15a) and the use of locally distinctive materials (Option 15b).

⁹ English Heritage (revision note 2012) *Enabling Development and the Conservation of Significant Places*

3.4.4 In practice Option 15b, through increasing the likelihood of using locally sourced materials, is likely to reduce the need for transportation over longer distances (and as such promote the sustainable sourcing of materials), do more to support the local economy and ensure that the character and distinctiveness of the National Park is protected through the use of materials traditionally used in the South Downs. For these reasons it is anticipated that Option 15b will bring a wider range of sustainability benefits than Option 15a.

3.4.5 As for Issue 14, it is recognised that the viability of housing and affordable housing requirements will need to be balanced against the use of locally distinctive and sustainable and energy efficient materials.

Issue 16 - How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?

3.4.6 The proposed approach for Issue 16 will support the future proofing of new buildings and development in the National Park through ensuring that a degree of adaptability is encouraged with design and layout. This will bring longer term benefits for residents, users of community facilities and those working in the National Park. This will be supported by the additional focus on the adaptability of mixed use and commercial activities provided by Option 16a, which recognises the particular need for the flexibility of such facilities to support the on-going vitality of the National Park.

3.4.7 As for Issues 14 and 15, the viability of housing and affordable housing requirements will need to be balanced against high design specifications.

Issue 17 - Should the local plan include minimum space standards for new residential development?

3.4.8 Three options have been proposed for determining whether minimum standards for the size of housing should be implemented for the National Park.

3.4.9 Due to the relatively limited degree of development likely to take place in the National Park, the implementation of minimum space standards for new residential development is less likely to lead to significant land take or have adverse effects on aspects such as landscape or townscape character, particularly if new development incorporates high quality design and layout which reflects local distinctiveness.

3.4.10 Overall, the implementation of appropriate minimum space standards would have benefits for quality of life and health and wellbeing of residents, including due to dwelling quality, usability and adaptability. Due to likelihood of new housing provision in the National Park being at least partly focussed on meeting existing needs, such a policy is therefore likely to have greater scope for improving the quality of the housing stock such as smaller dwellings and affordable housing. This has the potential for focussing benefits on groups with the most need, including key workers or rural workers.

3.4.11 It is uncertain whether the minimum space standards to be introduced nationally would meet the needs of residents in the National Park. In this context, **Option 17a** is likely to offer the greatest degree of flexibility for ensuring that new residential development is of high quality and meets the needs of residents through ensuring that minimum space standards implemented nationally are tailored to reflect specific requirements of different groups in the National Park.

Issue 18 - How can the Local Plan best ensure that the design of streets and roads reduce vehicle dominance and speeds, enhance local distinctiveness and minimise signage clutter and light pollution?

- 3.4.12 The proposed approach set out for Issue 18 will be a key means of supporting local character, promoting road safety, facilitating pedestrian and cycle accessibility and protecting and enhancing the quality of the built and natural environment. In this context the proposed approach will support a broad range of the SA Objectives.
- 3.4.13 In terms of street lighting, Option 18a, whilst proposing more lighting in certain areas, is less likely to have significant effects on tranquillity or light pollution due to the targeted approach put forward by the option. There is also significant potential for the policy to promote innovative lighting solutions which limit potential effects. This can draw on existing design guidance such as Hampshire County Council's *Street Lighting Design Guide* (2010)¹⁰. Through this approach potential effects of additional lighting can be mitigated through the appropriate design of street lighting in the National Park.
- 3.4.14 There is also further potential for the policy to be further tailored to reflect different parks of the park. For example an additional element could be provided for the parts of the National Park for which the National Park Authority are currently applying for International Dark Sky Reserve status.
- 3.4.15 Whilst the National Park Authority is in the position to influence this issue through appropriate design guides, it is recognised that street lighting is largely the responsibility of the Highways departments of Hampshire County Council, West Sussex County Council and East Sussex County Council.

Issue 19 - How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?

- 3.4.16 The proposed procedural approach presented for Issue 19 seeks to ensure that new development will meet national targets and building regulation standards relating to sustainability whilst reflecting the National Park's landscape and natural beauty. In effect this is likely to comprise the implementation of minimum sustainability standard for the National Park.
- 3.4.17 Options 19a and 19b have the potential to take this further through implementing National Park-specific standards. This has the potential to have a range of benefits, including increased energy efficiency, a limitation of greenhouse gas emissions, benefits for the health and wellbeing of residents, for supporting water quantity and quality, and increasing the adaptability of development areas to the effects of climate change. The approach also has the potential to promote a tailored approach to implementing sustainability standards for different types of development in the National Park, recognising that a "one size fits all" approach may not reflect the various socio-economic and environmental requirements of the National Park. For these reasons the SA process supports these two options.

Issue 20 - How can the Local Plan address carbon reduction targets through energy efficiency schemes?

- 3.4.18 The proposed approach for Issue 20 seeks to support energy efficiency improvements to existing buildings and introduce high energy efficiency standards for new development in the National Park. It also seeks to support opportunities for low carbon schemes.

¹⁰ Hampshire County Council (2010), *Street Lighting Design Guide, 4th Edition*
http://www3.hants.gov.uk/street_lighting_design_guide_4th_edition_.pdf

- 3.4.19 Option 20a would help increase the energy efficiency of existing properties through ensuring that property owners make energy efficiency improvements to the whole property when undergoing extensions. However, in some cases this would potentially discourage new extensions in some cases, particularly for project proponents with fewer resources. To ensure that high quality projects with socio-economic benefits for the National Park come forward, such a policy element should therefore be supported by additional funding streams or, potentially and where appropriate, exception cases.
- 3.4.20 Option 20b seeks to introduce targets for energy efficiency in the National Park which go beyond those proposed nationally. As reflected by Option 19b and 19c above, this is likely to increase the energy efficiency of new development in the National Park, with benefits for climate change mitigation, the quality of new housing and for the health and wellbeing of residents.
- 3.4.21 In terms of Option 20c, the extent to which new development which uses gas is more sustainable than other energy sources depends on the method of heating used. Therefore the implementation of a similar policy element would need to be supported by the development of a strong evidence base and set out which forms of energy are likely to be more sustainable, and in which circumstances. In this context the South Downs National Park: Low Carbon and Renewable Energy Study (SDNPA, May 2013) is an appropriate basis for such a policy.

3.5 Settlement Strategy

As highlighted in the methodology, due to the non-procedural nature of the options proposed for the issues under this theme, a more detailed assessment has been carried out for many of the issues under this Settlement Strategy. Appraisal tables have been presented in Appendix A. Summaries of these appraisal exercises have been presented below.

Issue 21 – What development should the Local Plan permit outside settlements?

- 3.5.1 In terms of landscape character, Option 21b ranks as the best performing option due to its focus on restricting development in the areas of the highest landscape value. Option 21c will help tailor development to reflect the four main National Landscape Character Areas present in the National Park, and as such support local distinctiveness in these areas. Consistent with paragraph 3.2.3 this would need to be supported by a more detailed assessment of landscape sensitivity based on the Landscape Character Areas that have been defined in the Integrated Landscape Character Assessment for the South Downs National Park
- 3.5.2 Options 21a and 21c would do more to support the vitality and vibrancy of communities in the areas of highest landscape value and support development which promotes the visitor economy. In this context Option 21b ranks as the worst performing options in relation to a number of the socio-economic SA Objectives through potentially restricting new development which supports agricultural diversification and the rural economy within the areas of highest landscape value, and restricting the development of key community facilities, amenities and services which supports the vitality of local areas. It also has the potential to restrict the development of housing which meets local needs in areas of the highest landscape value.
- 3.5.3 Another issue which can be considered is whether the implementation of higher landscape ‘standards’ in planning terms may devalue the remaining parts of the National Park.

Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?

3.5.4 The proposed approach for Issue 22 seeks to limit development in Tier 5 settlements, with only limited exceptions. Option 22a is the only additional option proposed for the Issue. It is considered that the addition of the criteria supported by the option will reduce the inflexibility of the proposed approach to Issue 22 through allowing small-scale development in Tier 5 settlements where the built form of settlements is not significantly extended and where landscape quality will be conserved and enhanced. It is anticipated that this will enable the provision of additional services or facilities or the facilitation of new development which supports agricultural diversification.

3.5.5 In this context the approach supported by Option 22a has the potential to do more to support the vitality of Tier 5 settlements.

Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?

3.5.6 Overall, Option 23b and Option 23c rank as the best performing options due to their focus on community provision, accessibility to services and facilities, their scope for enhancing local economic opportunities and their potential for helping to deliver local housing needs.

3.5.7 In this context, Option 23b will help engage processes which seek to deliver housing and community facilities which match community aspirations through promoting neighbourhood planning and similar processes. Option 23c, through encouraging collaboration between communities, and promoting clusters of facilities, has the potential to increase the viability of community services and improve their provision. Therefore both options have the potential to improve accessibility to services and facilities and support the local provision of services and amenities. Option 23a is likely to facilitate a less targeted approach to community provision, and as such does not perform as well against many of the SA Objectives.

3.5.8 Potential environmental effects, including on landscape quality, the historic environment and biodiversity assets are likely to be limited by the implicit limitation of new development facilitated by the proposed approach under Issue 23.

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

3.5.9 Options 24a and Option 24c rank as the best performing options due to their focus on community provision, accessibility to services and facilities, their scope for enhancing local economic opportunities and their potential for helping to deliver local housing needs.

3.5.10 In this context, Option 24a will help engage processes which seek to deliver housing and community facilities which match community aspirations through promoting neighbourhood planning and similar processes. Option 24c, through encouraging collaboration between communities, and promoting clusters of facilities, has the potential to increase the viability of community services and improve their provision. Both options therefore have the potential to improve accessibility to services and facilities and support the local provision of services and amenities.

3.5.11 Option 24b focusses on housing provision. Whilst it has the potential to deliver housing needs in Tier 3 settlements, the option does less to support community provision of services and facilities or improve accessibility to amenities for residents.

Issue 25 and 26 – What approach should the Local Plan adopt to development in Tier 2 and Tier 1 settlements?

- 3.5.12 The South Downs National Park Settlement Hierarchy Study¹¹ identified the current role and function of settlements in the National Park based on the number and type of facilities and services they provide. On this basis, the study determined that Lewes and Petersfield should be considered as 'Tier 1' settlements, with Midhurst and Liss considered as 'Tier 2' settlements. Following further studies, Petworth may also be considered as a Tier 2 settlement for the purposes of the Local Plan.
- 3.5.13 The proposed approaches for Tier 1 and 2 settlements proposed by the *Options Consultation Document* are similar in that they set out a range of provisions related to affordable and local housing provision, development on brownfield sites, a presumption in favour of locating retail, cultural, community, tourism and leisure facilities in or adjacent to centres and a sequential approach to employment land provision. The preferred approaches also highlight that Neighbourhood Development Plans should, when prepared, determine new settlement boundaries and site allocations, and where they are not prepared, the Local Plan should review settlement boundaries and propose allocations.
- 3.5.14 For both Tier 1 and Tier 2 settlements, the additional option highlights the possibility of allocating additional sites above that of the level deemed to be required for the town's local development needs. In this context, locating an additional element of development in the settlements with the broadest range of services and facilities and the most developed sustainable transport networks has the potential to support a range of the SA Objectives. This includes through supporting residents' accessibility to services, facilities and amenities, encouraging the use of sustainable modes of transport and promoting the settlements' vitality. Such an approach however has the potential to lead to additional direct and indirect effects locally in and around Tier 1 and 2 settlements, including, but not limited to, on the historic environment, landscape and townscape character, biodiversity assets and noise and air quality. In this respect potential impacts include from land take resulting from new development areas, a stimulation of traffic growth and the indirect and in-combination effects resulting from of an increased population and built footprint in each Tier 1 and 2 settlement.
- 3.5.15 These proposals have not been appraised in any further detail at this stage of the SA process due to the uncertainty surrounding these options. This is linked to the broad nature of the proposals under these issues and the lack of detail available on the specific locations and measures that will be implemented for each of the settlements, as well as the lack of reasonable spatial alternatives available at this early stage of development of the Local Plan. It is instead anticipated that the spatial elements of the proposed approach for Tier 1 and 2 settlements will be appraised in more detail through the appraisal of spatial options that will take place following the completion of consultation on the *Options Consultation Document* during the development of Preferred Options for the Local Plan.

Issue 27 – How should the Local Plan best take account of the adjoining settlements outside the National Park?

- 3.5.16 Option 27a, through developing a strategy which assumes that most facilities that serve the National Park are provided in settlements located outside of the National Park, is likely to undermine existing centres in the National Park through encouraging residents to travel outside of the National Park for accessing services and amenities. This is likely to affect the vitality and vibrancy of settlements in the National Park with knock-on effects reducing the accessibility of services, facilities and amenities for National Park residents. This will have implications for those reliant on local services and those without access to private transport.
- 3.5.17 Option 27b, through seeking to ensure that as many facilities as possible are provided within the National Park settlements, is likely to support the vitality of centres in the National Park through encouraging their use for day-to-day purposes. It will also support more inclusive communities by maximising residents' accessibility to local services and amenities and increasing residents' engagement with their local towns and villages.

¹¹ SDNPA (June 2013) South Downs National Park Settlement Hierarchy Study

3.5.18 For these reasons, Option 27b performs more favourably against the SA Objectives than Option 27a.

3.5.19 Whilst Option 27b ranks as the best performing option, elements of Option 27a are likely to be relevant for areas of the National Park which are closest to adjacent settlements (including for example areas of the National Park located close to Alton, Winchester, Haslemere, Chichester and Worthing). In this context, if all services are provided within the National Park, potential benefits linked to improving accessibility to facilities outside of the park may not be realised. Therefore there is potential for the policy to incorporate elements of the approach proposed by Option 27a in relevant parts of the National Park whilst also seeking to ensure the vitality of areas within the Park.

Issue 28 – What approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?

3.5.20 The extent to which the options support the SA Objectives depends largely on the nature of development proposed, its location and its proximity to services, facilities and amenities. For these reasons there is a high degree of uncertainty as to the relative merits of each of the options. However, in terms of landscape Option 28a has a greater potential to limit potential effects on landscape quality than Option 28b.

Issue 29 – What approach should the Local Plan adopt to the redevelopment of major brownfield sites?

3.5.21 A proposed approach has not been put forward for Issue 29 by the *Options Consultation Document*.

3.6 Housing

Issue 30 – How best should the Local Plan ensure a ‘sufficient’ supply of housing?

3.6.1 Overall Option 30c, through focussing a greater degree of housing in the larger settlements of the National Park (Tier 1, Tier 2 and Tier 3 settlements), is the best performing option in relation to the SA Objectives. This is due to these settlements offering the broadest range of services and facilities and having the most developed sustainable transport networks. Through focussing housing provision in these settlements, the option therefore has the potential to increase accessibility to amenities, limit the need to travel and facilitate an increase in the vitality and vibrancy of these key National Park communities.

3.6.2 Through promoting a relatively arbitrary approach to housing provision in the National Park, based on Local Authority boundaries, Option 30a is deemed to be the least favourably performing option, as it is less likely to reflect the specific needs and requirement of residents of the National Park.

Issue 31 – How best should the Local Plan address Housing Mix in the National Park?

3.6.3 The four options proposed for Issue 31 set out potentially complementary approaches to delivering a range of housing dwelling types, tenures and sizes in the National Park. These approaches are all considered to offer potential benefits in relation to this Issue.

3.6.4 As 1) the potential sustainability effects of the approaches put forward for Issue 31 depend largely on the location, layout and design of development, and 2) the options set out complementary approaches to the issue, it has not been possible to provide an effective comparison of the relative sustainability merits of these options at this stage of development of this element of the Local Plan.

Issue 32 – What approach should the Local Plan adopt to best meet local need?

3.6.5 The four options proposed for Issue 32 set out potentially complementary approaches to meeting local housing need in the National Park, including related to affordable housing provision and housing provision for those with a local connection. These approaches are all considered to offer potential benefits in relation to this Issue.

3.6.6 As 1) the potential sustainability effects of the approaches put forward for Issue 32 depend largely on the location, layout and design of development, and 2) the options set out complementary approaches to the issue, it has not been possible to provide an effective comparison of the relative sustainability merits of these options at this stage of development of this element of the Local Plan.

Issue 33 - What approach should the Local Plan adopt for rural exception sites?

3.6.7 The two options proposed for Issue 33 set out potentially complementary approaches for rural exception sites in the National Park. The two approaches are both considered to offer potential benefits in relation to this Issue.

3.6.8 Similar to Issues 31 and 32, as 1) the potential sustainability effects of the approaches put forward for Issue 33 depend largely on the location, layout and design of development, and 2) the options set out complementary approaches to the issue, it has not been possible to provide an effective comparison of the relative sustainability merits of these options at this stage of development of this element of the Local Plan.

Issue 34 – How best should the Local Plan meet the housing needs of agricultural and forestry workers?

3.6.9 The proposed approach to meeting the housing needs of agricultural and forest workers is supported by the SA process as it will promote traditional employment sectors, facilitate the on-going diversity of the local economy, and support the continued management of a living, valued landscape in the National Park.

3.6.10 The two options proposed for the issue seek to limit the size of agriculture or forestry workers accommodation (Option 34a) and restrict the quantity of additional residential accommodation for local workers (Option 34b). This is likely to limit the potential benefits of such a policy for such workers.

Issue 35: How best can the Local Plan ensure the housing needs of older people are met?

3.6.11 Options 35a, 35b and 35d propose complementary approaches to delivering housing provision for older people in the National Park. Option 35a and 35b also support the provision of such housing in larger and more sustainable settlements. This will support older people's accessibility to services and facilities, promote their health and wellbeing, and support the viability of centres.

3.6.12 Option 35c, through assuming that the market will deliver provision for older people, is less likely to lead to these benefits.

Issue 36: How best should the Local Plan ensure that the housing needs of gypsies, travellers and travelling showpeople are met?

3.6.13 The three options proposed for Issue 36 set out potentially complementary approaches to delivering the housing needs of gypsy, travellers and travelling showpeople. These approaches are all considered to offer potential benefits in relation to this Issue.

3.6.14 As 1) the potential sustainability effects of the approaches put forward for Issue 36 depend largely on the location, layout and design of new sites, and 2) the options set out complementary approaches to the issue, it has not been possible to provide an effective comparison of the relative sustainability merits of these options at this stage of development of this element of the Local Plan.

3.6.15 However, through following the principles set out in government policy, the proposed approach seeks to establish the use of best practice for sites delivery. This is supported by the SA process as it will help limit issues typically faced by the gypsy and travelling community, including related to for example access to education and health facilities (a major issue for gypsy and travelling community), noise and air quality issues linked to the poor location of sites (such as next to major roads), flooding issues and effective waste management.

Issue 37: How best should the Local Plan encourage Community Land Trusts?

3.6.16 The proposed approach for this issue seeks to encourage the establishment of Community Land Trusts (CLT) as a way of encouraging affordable housing for local people where the CLT proposals are consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park. Due to the range of socio-economic benefits likely to arise as a result of this approach, this is supported by the SA process.

Issue 38: Identifying strategic goals for the economy

3.6.17 The proposed approach under Issue 38 seeks to ensure that the Local Plan will set clear strategic goals for the local economy, which support the South Downs PMP. This is supported by the SA process.

3.7 Economy and Tourism

Issue 39: Should the Local Plan safeguard existing employment sites?

3.7.1 Option 39a and 39b both seek to limit effects of the loss of employment floorspace in the National Park. As such, both options will help support the National Park's economy, promote employment opportunities, and support accessibility to employment/economic opportunities. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land or floorspace and as such performs more favourably against the SA Objectives.

Issue 40: What approach should the Local Plan take to the allocation of additional employment land?

3.7.2 The two options proposed for Issue 40 set out potentially complementary approaches to delivering the allocation of additional employment land. Both approaches are considered to offer potential benefits in relation to this Issue.

3.7.3 As 1) the potential sustainability effects of the approaches put forward for Issue 40 depend largely on the location, layout and design of new sites, and 2) the options set out complementary approaches to the issue, it has not been possible to provide an effective comparison of the relative sustainability merits of these options at this stage of development of this element of the Local Plan.

Issue 41: How can the Local plan support new businesses, small local enterprises and the rural economy?

3.7.4 The proposed approach for Issue 41 seeks to increase the diversity of small businesses through supporting the delivery of small and flexible start-up business units. These are to be provided as parts of larger developments and/or the subdivision of industrial units into smaller units and be well designed with sustainable construction. This approach is supported by the SA process.

3.7.5 The additional option proposed for the Issue (Option 41a) is also supported where new start-up enterprise centres are located in accessible locations served by a range of transport modes and are well designed and adaptable in purpose.

Issue 42: What approach should the Local Plan take to the diversification of agricultural land and buildings

3.7.6 The proposed approach for Issue 42 seeks to support agricultural diversification where development is well designed and reflects its landscape setting. This is supported by the SA process as such an approach will help support the rural economy, promote agricultural diversification, increase opportunities for local people and promote the vitality of the National Park.

3.7.7 In terms of the two additional options proposed for the Issue, Option 42b has the potential to bring wider benefits in relation to the SA Objectives as it provides greater scope for agricultural diversification beyond traditional uses. However, if such an approach is taken forward, elements of Option 42a should be progressed to protect core agricultural uses, and uses which support the character and distinctiveness of the National Park. Alongside, to support appropriate uses, more specific guidance should be provided on the types of activities that are likely to be appropriate at such locations.

Issue 43: What approach should the Local Plan take to equine-related development

3.7.8 The proposed approach for Issue 43 and the additional option recognise the value of equine-related activities to the National Park, whilst seeking to ensure that such activities are of appropriate design and scale which conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park. This approach is supported by the SA process as it recognises the part equine activities can play for supporting the vitality of the National Park whilst also recognising the potential effects of such activities.

Issue 44 - How should the Local Plan consider visitor accommodation?

3.7.9 Options 44a and 44b, through promoting the development of visitor accommodation at more accessible locations, will support the use of sustainable modes of transport, limit the need to travel and support access to cultural facilities in the National Park. Both options are also likely to support the development of visitor accommodation in the larger settlements of the Park. This will support these settlements' vitality.

3.7.10 Option 44c seeks to take a more flexible approach to visitor accommodation, informed by Landscape Character Assessments. This has the potential to do more to support the rural economy through providing increased opportunities for diversification. Whilst the option also has the potential to support landscape protection in the more sensitive areas, there is some potential for a landscape-led approach to undermine landscape protection in areas of the National Park deemed to have less sensitive landscapes.

Issue 45 - How should the Local Plan consider types of tourism developments and recreational activities?

3.7.11 The proposed approach for the National Park seeks to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the other purposes of the National Park. This is supported by the SA process as a range of complementary social, environmental and economic benefits will arise from the effective planning and management of recreational and tourism activities.

3.7.12 In terms of the sustainability performance of the three options proposed for Issue 45, this will largely depend on the types of activities being considered and the specific locations. As this detail has yet to be worked up for the Local Plan, it is difficult to make informed conclusions about the relative sustainability merit of each of the proposed options.

Issue 46 - What approach should the Local Plan take to static holiday caravan sites?

- 3.7.13 Static caravan sites often have significant impacts on landscape quality through inappropriate siting, poor standard of design, high density, colour and lack of landscaping. Option 46a, through introducing a presumption against the development of such sites, and Option 46b, which seeks to restrict sites and support the redevelopment and relocation of such sites, will do most to limit effects from static caravan sites on landscape character in the National Park.
- 3.7.14 Option 46c, through enabling the development of such sites in conjunction with the National Park Purposes, and recognising the popularity of such accommodation, may do more to support the rural and visitor economy. However it is uncertain to what extent this option would support sustainable tourism in the Park. In this context it will be important to ensure that under this option sites have good accessibility to an adequate local highway network, are accessible by a range of transport modes and sites are unobtrusively sited and fully assimilated into the landscape.

3.8 Community Facilities and Infrastructure

Issue 47 - How best can the Local Plan ensure communities have access to local services?

- 3.8.1 Issue 47 sets out a flexible approach to the delivery of new and expanded community facilities in the National Park. It seeks to do this through initiating site selection processes which ensure that the Special Qualities of the National Park and Local Plan policies are addressed.
- 3.8.2 The three options propose additional (rather than alternative) approaches to delivering this proposed approach.
- 3.8.3 Option 47a seeks to ensure that new and expanded facilities and services are primarily located in Tier 1, Tier 2 and Tier 3 settlements. Locating services and facilities in the settlements with the most developed sustainable transport networks and in the most accessible locations has the potential to support a range of the SA Objectives. This includes through supporting residents' accessibility to services, facilities and amenities, encouraging the use of sustainable modes of transport and promoting these settlements' vitality.
- 3.8.4 Option 47b seeks to further support accessibility through promoting the enhancement and expansion of essential facilities and services in any settlement, with particular support given for facilities and services which can demonstrate a benefit to a cluster of settlements. This is supported through the SA process due to its focus on meeting community needs, improving accessibility to rural services, and supporting the vitality of rural communities. Option 47c provides further detail on how small-scale mixed use development through Options 47a and 47b can be delivered, including through the use of Community Right to Buy Orders. Option 47d promotes the shared and flexible use of new and existing buildings to allow a range of community facilities and services. These additional options are also supported through the SA process.

Issue 48 - How best can the Local Plan resist the loss of community infrastructure?

- 3.8.5 Issue 48 seeks to support the protection of existing local facilities and services in the areas where they are needed. It also promotes the use of Community Right to Bid powers. This is supported through Option 48a, which proposes including a policy resisting the loss of any community infrastructure except where there is no longer a demonstrable need. Due to the potential benefits for accessibility to services and facilities, including in rural areas, and the proposed approach's promotion of the vitality of rural areas, this is supported by the SA process.

3.8.6 Option 48b promotes a policy supporting communities who seek to designate Local Green Spaces. Whilst the designation of Local Green Spaces will support a range of aspects, such as landscape and townscape character, the historic environment and potentially biodiversity value, such designations should be planned and carried out in conjunction with green infrastructure planning delivered through the development of a Green Infrastructure Strategy for the National Park. This will support the quality of the green space through helping to determine the existing and potential value of the area, both in terms of its function and use and for implementing measures to enhance the space.

Issue 49 - How best can the Local Plan ensure adequate infrastructure provision for new development?

3.8.7 Issue 49 sets out a policy approach which seeks to ensure that new development will be required to provide new or improve infrastructure to mitigate its impact and support future residents or businesses. This includes through Section 106 legal obligations, CIL charges, other financial contributions or direct provision. Due to the additional pressure placed on existing infrastructure by new development, it is considered that such a policy approach will be essential to ensure that appropriate infrastructure is provided to provide for new development.

Issue 50 - How best might the Local Plan address statutory requirements to support carbon reduction targets through low carbon / renewable energy schemes?

3.8.8 Issue 50 sets out three options which seek to deliver renewable energy in the National Park in a way that is of a size, scale and design and in a location that is appropriate with conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

3.8.9 Option 50c seeks to develop a sensitivity analysis of National Park’s landscape for the purposes of renewable energy provision. Whilst this approach is likely to provide a degree of protection to the National Park’s most sensitive landscapes, it also has the potential to undermine the landscape quality of those parts of the National Park which are considered to be less sensitive.

3.8.10 Option 50a and Option 50b seek promote new renewable energy facilities where these are of a location, scale and design appropriate to the locality, with Option 50b having a preference for community schemes. Community renewable energy schemes can have a range of benefits, including a high level of participation and control, helping communities meet their energy requirements at lower cost, and with benefits for issues such as rural and fuel poverty. Such schemes can also support wider community development and promote more sustainable communities. Engagement in a local energy project can also help to change attitudes and behaviour towards renewables and energy demand. For this reason the community led-approach proposed by Option 50b has the potential to lead to a wider range of sustainability benefits.

Issue 51 - Expenditure of Community Infrastructure Levy

3.8.11 The two options for Issue 51 set out two different approaches to investing Community Infrastructure Levy (CIL) funds in the National Park. Option 51a seeks to prioritise funds in areas in close proximity to the new development which generated the CIL. This has the potential to focus benefits on those in the immediate area through supporting local community facilities and services. This will enable CIL funds to be effectively targeted to redress infrastructure deficiencies in the area where the development takes place. Such an approach will enable benefits to be directed to the needs of local residents and the vitality of the area.

- 3.8.12 Option 51b seeks to prioritise CIL funding on National Park-wide strategic projects. Whilst this increases opportunities for receiving match funding from other sources for such projects, and enables the benefits of the CIL to be felt over a wide area, the less targeted approach put forward through this option is less likely to meet localised infrastructure needs or help realise opportunities for improvements to local infrastructure. The option may also have implications for the deliverability of new development if it is deemed by the local community that the potential benefits of CIL funding will not be realised in the immediate area.

Issue 52 - How best should the Local Plan deal with proposals for strategic infrastructure?

- 3.8.13 Issue 52 seeks to ensure that the delivery of strategic infrastructure should only take place if the first Purpose of the National Park is met and the tests for major development set out in paragraph 16 of the NPPF are met. This is supported by the SA process.
- 3.8.14 Option 52a enables the Local Plan to support a limited number of strategic infrastructure proposals if they facilitate maximum or community gain in the immediate area or improvements elsewhere in the National Park. This may be an appropriate means to ensure that the major new infrastructure schemes proposed sub-regionally, regionally or nationally secure the maximum benefits for the National Park.

3.9 Transport and Accessibility

Issue 53 – How best should the Local Plan protect existing routes for use as sustainable transport routes?

- 3.9.1 The proposed approach for this issue seeks to identify and protect disused railway lines for sustainable transport use. This has the potential to bring a range of benefits for the National Park, including for the health and wellbeing of residents and visitors, enhancing tourism and recreational opportunities and safeguarding such routes for the future reinstating of rail lines.
- 3.9.2 There is also potential for these routes to help link up key green infrastructure assets in the National Park and provide benefits for biodiversity networks, landscape quality enhancements and recreational opportunities. In this context the safeguarding of these routes should be considered as part of a National Park-wide Green Infrastructure Strategy to help determine how the potential multifunctional benefits of the routes can be maximised.

Issue 54 – What should be the Local Plan’s approach to car parking?

- 3.9.3 The delivery of effective parking policies are key mechanisms for promoting accessibility, supporting modal shift and limiting the effects of car use on the natural and built environment.
- 3.9.4 In this context the proposed approach to car parking presented by Issue 54 seeks to ensure that new parking provision is tailored for the type of development proposed, local car ownership levels and the availability and opportunities for public transport locally. This will be supported by the requirement for all major developments to initiate a Green Travel Plan. The proposed approach is therefore considered to set out an appropriate mechanism for the delivery of car parking in the National Park which 1) seeks to support sustainable transport in the National Park and 2) recognises the continuing key role that the private car will take for accessibility in the National Park.
- 3.9.5 The key transport planning documents for the National Park are the current Local Transport Plans for West Sussex, East Sussex and Hampshire, which were adopted in 2011. The development of the Local Plan should therefore be carried out in close conjunction with the transport planning departments of the three county councils to ensure that the potential benefits from an effective integration of development and transport planning in the National Park are achieved.

Issue 55 – How best can the Local Plan ensure new developments are accessible?

- 3.9.6 The proposed approach for Issue 55 seeks to ensure that new housing or employment areas in the National Park are situated in locations with good public transport services. It also seeks to ensure that travel plans are required for all major developments.
- 3.9.7 This approach will have a range of benefits in relation to the SA Objectives, including through promoting accessibility by sustainable transport modes, stimulating modal shift and promoting healthier modes of travel. A limitation of traffic growth may also help reduce effects on air and noise quality, biodiversity assets, the historic environment and landscape quality.
- 3.9.8 It is also considered that the three options proposed for this Issue (Option 55a to Option 55c) are all appropriate approaches to support this aim through introducing elements which will promote and enable the use of sustainable modes of transport.

3.10 SA conclusions at this current stage

- 3.10.1 The SA findings highlighted above discuss the relative merits of different approaches for the 55 Issues considered through the *Options Consultation Document*.
- 3.10.2 It is not the role of SA to determine preferred options, but to identify, describe and evaluate the significant effects of the options presented and suggest mitigation measures. At this current stage in the plan-making process it has been possible to identify instances of options potentially leading to positive or negative effects, (or missed opportunities for benefits) in terms of one or more element of the baseline. In each instance, these findings should be considered by the National Park Authority, but need not necessarily mean that the option in question should be preferred or not preferred. It instead serves a role in developing policy options which may be appropriate to develop further.
- 3.10.3 The current stage of the SA process should be used to generate discussion on the identified trade-offs between sustainability considerations. If a trade-off is made it will often be the case that there is the potential to mitigate negative effects or redress missed opportunities. This includes through more detailed policy measures which implement the option in a way that is different to that currently envisaged or assumed.
- 3.10.4 A key role of this stage of the SA process will be to inform the development of spatial options for the Local Plan. In this context the current stage of the SA process will help refine the range of policy options to allow coherent spatial policies to emerge.



04 Next Steps

- 4.1 Preferred Options
- 4.2 Pre-Submission and Submission
- 4.3 Adoption and Monitoring

4.1 Preferred Options

- 4.1.1 Subsequent to the current consultation on the *Options Consultation Document* it is the National Park Authority's intention to prepare and then consult on a 'Preferred Options' draft plan. Development of the Preferred Options will be informed by the findings of this report and representations made through the current consultation.
- 4.1.2 A key part of the development of the Preferred Options will be the appraisal of further alternative options for the Local Plan. A key element of this process will be to undertake SA of spatial options, including strategic site allocation options. The current report is an important part of the audit trail in deciding what are not considered to be reasonable spatial alternatives for the Local Plan. In this context the current stage of the SA process will help plan-makers refine the range of policy options to allow coherent spatial policies to emerge.
- 4.1.3 To support the Preferred Options draft plan, a SA Report will be prepared. The SA Report, which will be presented for consultation alongside the Preferred Options, will provide the information required by the SEA Regulations.
- 4.1.4 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **there is a need for the report to answer the following four questions:**
1. What's the scope of the SA?
 - This question must be answered subsequent to a review of the sustainability context and baseline, and consultation with designated environmental authorities.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point alternatives are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next?
- 4.1.5 It is currently anticipated that the Preferred Options consultation will take place in early 2015.

4.2 Pre-Submission and Submission

- 4.2.1 Subsequent to consultation on the Preferred Options / SA Report the South Downs National Park Authority will prepare the proposed Submission Version of the Plan and then Publish this (in-line with Regulation 19 of the Local Planning Regulations, 2012) so that final representations can be made prior to the Plan being 'Submitted' (to Government, who will then appoint an Independent Planning Inspector to 'Examine' the Plan and pass judgement on its 'Soundness'). A further SA Report will be prepared to accompany the Pre-Submission document. Again, this will provide all of the information required by the Regulations.
- 4.2.2 The SA Report will subsequently be updated to reflect the Submission version of the Local Plan, which will be submitted for Examination in summer 2016.

4.3 Adoption and monitoring

- 4.3.1 Once judged to be 'Sound', it will be possible for the Authority to formally adopt the Plan. At the time of adoption an 'SA Statement' must be published that sets out (amongst other things):
- How SA and consultation responses have been taken into account when finalising the plan (which essentially means updating Part 2 of the SA Report); and
 - Measures decided concerning monitoring.

APPENDIX A: APPRAISAL TABLES

ISSUE 21: WHAT DEVELOPMENT SHOULD THE LOCAL PLAN PERMIT OUTSIDE SETTLEMENTS?

Set out below is an appraisal of alternative approaches to addressing housing location.

Option 21a:The Local Plan could apply the same policy across the whole National Park

Option 21b: The Local Plan could identify specific locations that are of high landscape sensitivity in which an especially restrictive approach should apply

Option 21c: The Local Plan could apply different policies for development in the countryside in each of the four main National Landscape Character Areas

Summary

In terms of landscape character, Option 21b ranks as the best performing option due to its focus on restricting development in the areas of the highest landscape value. Option 21c will help tailor development to reflect the four main National Landscape Character Areas present in the National Park, and as such support local distinctiveness in these areas. Consistent with paragraph 3.2.3 this would need to be supported by a more detailed assessment of landscape sensitivity based on the Landscape Character Areas that have been defined in the Integrated Landscape Character Assessment for the South Downs National Park.

Options 21a and 21c would do more to support the vitality and vibrancy of communities in the areas of highest landscape value and support development which promotes the visitor economy. In this context Option 21b ranks as the worst performing options in relation to a number of the socio-economic SA Objectives through potentially restricting new development which supports agricultural diversification and the rural economy within the areas of highest landscape value, and restricting the development of key community facilities, amenities and services which supports the vitality of local areas. It also has the potential to restrict the development of housing which meets local needs in areas of the highest landscape value.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		21a	21b	21c
1. Housing	Of the three options, Option 21b is less likely to promote the provision of new housing in communities located in the areas of highest landscape sensitivity in the National Park. Options 21a and 21c are more likely to provide consistent guidance across the National Park as to the types of development allowed and under which circumstances. Through taking forward these options there is a higher likelihood of the policy being less restrictive in terms of providing high quality affordable housing of relevant type and tenure in areas with the greatest need (for example in rural areas).	1	3	1
2. Health and Wellbeing	No implications at this level of detail.	-	-	-

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		21a	21b	21c
3. Vitality of Communities	In areas of the highest landscape value, Option 21b has the least likelihood of the three options of supporting development which contributes to the vitality and vibrancy of communities in this area through proposing an especially restrictive approach. Option 21c has the potential to support developmental uses which are tailored to support the special characteristics of the four Landscape Character Areas of the National Park. This may support the vitality of communities in this area.	2	3	1
4. Accessibility	Option 21b has the potential to restrict the development of key community facilities, amenities and services in communities located within the areas of highest landscape value. Options 21a and 21c provide a greater degree of flexibility in respect of the provision of new development which meets the requirements of local people.	1	3	1
5. Cultural Activity	Whilst Option 21b has the potential to ensure an increased level of protection of landscape character and distinctiveness in areas of highest landscape sensitivity (and as such supporting the quality of the visitor experience), it is less likely to promote development which promotes sustainable tourism. Likewise it is less likely to support an increase in engagement in cultural activity in the park.	1	3	1
6. Rural Economy	Option 21b has the potential to restrict new development which supports agricultural diversification and the rural economy within the areas of highest landscape value. Options 21a and 21c provide a greater degree of flexibility in respect of the provision of new development which can support the rural economy.	1	3	1
7. Climate Change Mitigation	No significant implications at this level of detail.	-	-	-
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-
9. Biodiversity	The more restrictive approach to development in areas of high landscape value has the potential to support biodiversity value of these areas.	2	1	2
10. Landscape and Historic Environment	Option 21b has the potential to ensure an increased level of protection of landscape character and distinctiveness in areas of highest landscape sensitivity. Supporting local distinctiveness, Option 21c will help tailor development to reflect the main four Landscape Character Areas present in the National Park. However this would need to be supported by a more detailed assessment of landscape sensitivity based on the Landscape Character Areas that have been defined in the Integrated Landscape Character Assessment for the South Downs National Park.	3	1	2
11. Sustainable Transport	No significant implications at this level of detail.	-	-	-

ISSUE 23: WHAT APPROACH SHOULD THE LOCAL PLAN ADOPT TO DEVELOPMENT IN TIER 4 SETTLEMENTS?

Option 23a: The Local Plan could allow a limited extension of the settlement to meet local needs for affordable housing, employment and community facilities, providing it conserves and enhances the landscape.

Option 23b: The Local Plan could allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other development (for example, market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process

Option 23c: The Local Plan could ensure collaboration between communities will be encouraged to allow economies of scale to support rural services. With community agreement, settlement would be grouped in clusters and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision).

Summary

Overall, Option 23b and Option 23c rank as the best performing options due to their focus on community provision, accessibility to services and facilities, their scope for enhancing local economic opportunities and their potential for helping to deliver local housing needs.

In this context, Option 23b will help engage processes which seek to deliver housing and community facilities which match community aspirations through promoting neighbourhood planning and similar processes. Option 23c, through encouraging collaboration between communities, and promoting clusters of facilities, has the potential to increase the viability of community services and improve their provision. Therefore both options have the potential to improve accessibility to services and facilities and support the local provision of services and amenities. Option 23a is likely to facilitate a less targeted approach to community provision, and as such does not perform as well against many of the SA Objectives.

Potential environmental effects, including on landscape quality, the historic environment and biodiversity assets are likely to be limited by the implicit limitation of new development facilitated by the proposed approach under Issue 23.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		23a	23b	23c
1. Housing	Option 23a and 23b are likely to support an additional degree of housing in Tier 4 settlements. Option 23b, through the development of a Neighbourhood Plan (or similar) process has additional potential to deliver housing which meets local needs in each settlement. Option 23c considers rural services and as such does not addressing housing in the National Park.	2	1	-
2. Health and Wellbeing	In terms of the three options, Option 23b has the most potential to deliver community needs within each settlement through engaging a process which seeks to match community aspirations. Option 23c, through encouraging collaboration between communities, however also has the potential to increase the viability of health and leisure services in groupings of settlements. Option 23a also includes some provision for new community facilities; however there may be less scope for the option to deliver community needs.	3	1	1

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		23a	23b	23c
3. Vitality of Communities	Of the three options, Option 23b has the most potential to deliver community needs within each settlement through engaging a process which seeks to match community aspirations. Option 23c, through encouraging collaboration between communities, however also has the potential to deliver services, facilities and amenities which serve groupings of settlements. Option 23a also includes some provision for new community facilities; however there may be less scope for the option to deliver community needs.	3	1	1
4. Accessibility	Of the three options, Option 23b has the most potential to improve accessibility to services and facilities through engaging a process which seeks to match community aspirations. Option 23c, through encouraging collaboration between communities, also has the potential to improve accessibility to services and facilities through delivering amenities which serve groupings of settlements. Option 23a also includes some provision for new community facilities; however there may be less scope for the option to improve accessibility to such amenities due to the less targeted approach proposed by the option.	3	1	1
5. Cultural Activity	Option 23a and 23b both have the potential to enable the provision of facilities which facilitates sustainable tourism and cultural activities in Tier 4 villages. Option 23c considers rural services and as such does not address tourism and cultural offer.	2	1	-
6. Rural Economy	Of the three options, Option 23b has the most potential to deliver economic needs within each settlement through engaging a process which seeks to match community aspirations. Option 23a also includes some provision for new employment facilities; however there may be less scope for the option to deliver community needs. Option 23c may also help support economic vitality by supporting clusters of services within villages	2	1	3
7. Climate Change Mitigation	All three options have the potential to support climate change mitigation through supporting the provision of services, facilities and amenities in Tier 4 villages. This will reduce the need to travel, limiting greenhouse gas emissions from transport. Options 23b and 23c have increased potential to support the local provision of services and facilities however.	3	1	1
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-
9. Biodiversity	All three options have the potential to have effects on habitats and species through enabling new development to take place in Tier 4 villages. However, these effects are likely to be very limited due to the restricted level of development proposed in these villages through the preferred approach to Issue 23 and its associated options.	1	2	2
10. Landscape and Historic Environment	All three options have the potential to have effects on landscape character and the historic environment through new development. However, the preferred approach to this issue seeks to ensure that effects on landscape quality are limited.	1	2	2

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		23a	23b	23c
11. Sustainable Transport	Of the three options, Option 23b has the most potential to increase the provision of local facilities through engaging a process which seeks to match community aspirations. Option 23c, through encouraging collaboration between communities, also has the potential to improve accessibility to services and facilities through delivering amenities which serve groupings of settlements. Option 23a also includes some provision for new community facilities; however there may be less scope for the option to improve accessibility to such amenities due to the less targeted approach proposed by the option.	3	1	1

ISSUE 24: WHAT APPROACH SHOULD THE LOCAL PLAN ADOPT TO DEVELOPMENT IN TIER 3 SETTLEMENTS?

Option 24a: Allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other development (such as market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process.

Option 24b: Allow some land to be allocated to meet objectively assessed needs for the wider housing market area, as determined through the Strategic Housing Market Assessment

Option 24c: Collaboration between communities would be encouraged to allow economies of scale to support rural services. With community agreement, Tier 3 villages would be grouped in clusters with other nearby settlements, and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision). Collaboration between communities would be encouraged to allow economies of scale to support rural services

Summary

Options 24a and Option 24c rank as the best performing options due to their focus on community provision, accessibility to services and facilities, their scope for enhancing local economic opportunities and their potential for helping to deliver local housing needs.

In this context, Option 24a will help engage processes which seek to deliver housing and community facilities which match community aspirations through promoting neighbourhood planning and similar processes. Option 24c, through encouraging collaboration between communities, and promoting clusters of facilities, has the potential to increase the viability of community services and improve their provision. In this context both options have the potential to improve accessibility to services and facilities and support the local provision of services and amenities.

Option 24b focuses on housing provision. Whilst it has the potential to deliver housing needs in Tier 3 settlements, the option does less to support community provision of services and facilities or improve accessibility to amenities for residents.

Potential environmental effects, including on landscape quality, the historic environment and biodiversity assets are likely to be limited by the implicit limitation of new development facilitated by the proposed approach under Issue 23.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		21a	21b	21c
1. Housing	Option 24a and 24b are likely to support an additional degree of housing in Tier 4 settlements. Option 24a, through the development of a Neighbourhood Plan (or similar) process has additional potential to deliver housing which meets local needs in each settlement if proposed through this process. Option 24b will base housing provision on objectively assessed needs determined through the SHMA. Option 24c considers rural services and as such does not address housing in the National Park.	1	1	-
2. Health and Wellbeing	In terms of the three options, Option 24a has the most potential to deliver community needs within each settlement through engaging a process which seeks to match community aspirations. Option 24c, through encouraging collaboration between communities, however also has the potential to increase the viability of health and leisure services in groupings of settlements. Option 24b focuses on housing provision and as such will have little influence on health and wellbeing of the population.	2	-	1

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		21a	21b	21c
3. Vitality of Communities	Of the three options, Option 24a has the most potential to deliver community needs within each settlement through engaging a process which seeks to match community aspirations. Option 24c, through encouraging collaboration between communities, however also has the potential to deliver services, facilities and amenities which serve groupings of settlements. Option 24b, through helping to meet objectively assessed housing needs, also has the potential to support the vitality of Tier 3 villages through increasing housing provision in these areas.	3	1	1
4. Accessibility	Of the three options, Option 24a has the most potential to improve accessibility to services and facilities through engaging a process which seeks to match community aspirations. Option 24c, through encouraging collaboration between communities, also has the potential to improve accessibility to services and facilities through delivering amenities which serve groupings of settlements. Option 24b is a housing-led option and its effect depends on the additional provision of services to meet new housing provision.	3	-	1
5. Cultural Activity	Option 24a and 24c both have the potential to enable the provision of facilities which facilitate sustainable tourism and cultural activities in Tier 4 villages. Option 24b considers housing provision and as such does not address tourism and cultural offer.	1	-	1
6. Rural Economy	Of the three options, Option 24a has the most potential to deliver economic needs within each settlement through engaging a process which seeks to match community aspirations. Option 24c may also help support economic vitality by supporting clusters of services within villages. Option 24b through potentially increasing housing provision, may lead to some benefits for increasing demand for goods and services in the village.	1	3	2
7. Climate Change Mitigation	Option 24a and 24c have the potential to support climate change mitigation through supporting the provision of services, facilities and amenities in Tier 4 villages. This will reduce the need to travel, limiting greenhouse gas emissions from transport. All of the options however have the potential to increase greenhouse gas emissions in villages through increasing the built footprint of these villages.	1	3	2
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-
9. Biodiversity	All three options have the potential to have effects on habitats and species through enabling new development to take place in Tier 4 villages. However, these effects are likely to be relatively limited due to the relatively restricted level of development proposed in these villages through the preferred approach to Issue 23.	3	3	3
10. Landscape and Historic Environment	All three options have the potential to have effects on landscape character and the historic environment through increasing the built footprint of Tier 3 villages.	3	3	3

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		21a	21b	21c
11. Sustainable Transport	Of the three options, Option 24a has the most potential to increase the provision of local facilities through engaging a process which seeks to match community aspirations. Option 24c, through encouraging collaboration between communities, also has the potential to improve accessibility to services and facilities through delivering amenities which serve groupings of settlements. Option 23b has less scope for encouraging sustainable transport modes (including walking and cycling) as it provides a focus on new housing without increasing local service provision. This is likely to increase the need to travel by car.	3	1	1

ISSUE 27: HOW SHOULD THE LOCAL PLAN BEST TAKE ACCOUNT OF THE ADJOINING SETTLEMENTS OUTSIDE THE NATIONAL PARK?

Option 27a: To develop a strategy for development which assumes that many of the facilities to serve the National Park’s population are provided in adjoining settlements outside its boundaries and to focus on developing sustainable transport links between the National Park and these neighbouring settlements and working with partners to enable this.

Option 27b: To develop a strategy that seeks to encourage as many facilities as possible to be provided within the settlements within the National Park, especially Tiers 1, 2 and 3.

Summary

Option 27a, through developing a strategy which assumes that most facilities that serve the National Park are provided in settlements located outside of the National Park, is likely to undermine existing centres in the National Park through encouraging residents to travel outside of the National Park for accessing services and amenities. This is likely to affect the vitality and vibrancy of settlements in the National Park with knock-on effects on reducing the accessibility of services, facilities and amenities for National Park residents. This will have implications for those reliant on local services and those without access to private transport.

Option 27b, through seeking to ensure that as many facilities as possible are provided within the National Park settlements, is likely to support the vitality of centres in the National Park through encouraging their use for day-to-day purposes. It will also support more inclusive communities by maximising residents’ accessibility to local services and amenities and increasing residents’ engagement with their local towns and villages. For these reasons, Option 27b performs significantly better against the SA Objectives than Option 27a.

Whilst Option 27b ranks as the best performing option, elements of Option 27a are likely to be relevant for areas of the National Park which are closest to adjacent settlements (including for example areas of the National Park located close to Alton, Winchester, Haslemere and Chichester). There is potential for the policy to incorporate elements of the approach proposed by Option 27a in relevant parts of the National Park whilst also seeking to ensure the vitality of areas within the Park.

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		27a	27b
1. Housing	The options set out approaches to delivering facilities in the National Park rather than new housing. No significant implications at this level of detail.	-	-
2. Health and Wellbeing	Option 27a, through assuming that many of the facilities to serve the National Park’s population are provided in adjoining settlements, is less likely to ensure good accessibility to health and leisure facilities for residents of the National Park. It also has the potential to increase the required distance travelled to such facilities, which may particularly affect those without access to private transport. In contrast Option 27b seeks to encourage as many facilities as possible within the National Park. This is likely to increase accessibility to health and leisure facilities.	2	1
3. Vitality of Communities	Option 27a, through assuming that many of the facilities to serve the National Park’s population are provided in adjoining settlements, is less likely to support the vitality and vibrancy of the National Park’s settlements. In contrast, Option 27b is more likely to support the vitality of settlements within the National Park through seeking to encourage as many facilities as possible to be provided within Tier 1, Tier 2 and Tier 3 settlements in the National Park.	2	1

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		27a	27b
4. Accessibility	Whilst Option 27a seeks to improve sustainable transport links to facilities outside of National Park boundaries, the provision of more facilities within the National Park's Tier 1, 2 and 3 settlements is likely to do more to support accessibility to services, facilities and amenities in the National Park.	2	1
5. Cultural Activity	Through encouraging residents to utilise settlements within the National Park for day-to-day needs, Options 27b has greater potential for increased engagement of residents with cultural activities in the National Park.	2	1
6. Rural Economy	Option 27a, through encouraging residents to go outside of the National Park for accessing services and facilities, is less likely to support the rural economy of the National Park.	2	1
7. Climate Change Mitigation	Through increasing the need to travel, Option 27a is more likely to stimulate an increase in greenhouse gas emission from transport.	2	1
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-
9. Biodiversity	No significant implications at this level of detail.	-	-
10. Landscape and Historic Environment	Option 27a, through encouraging residents to go outside of the National Park for accessing services and facilities, is less likely to facilitate enjoyment and understanding of the National Park's historic environment and landscape.	2	1
11. Sustainable Transport	<p>Option 27a, whilst seeking to improve sustainable transport links to facilities outside of the National Park, assumes that many of the facilities to serve the National Park's population are provided in adjoining settlements. This is more likely to increase the required distance travelled to such facilities. This is likely to particularly affect those without access to private transport.</p> <p>Improvements to sustainable transport links will be supported by Option 27b's focus on providing services in existing centres in the National Park. This will increase the demand for high quality transport links to Tier 1, 2 and 3 settlements in the National Park and help reduce the need to travel.</p>	2	1

ISSUE 28: WHAT APPROACH SHOULD THE LOCAL PLAN ADOPT FOR DEVELOPMENT PROPOSALS ON SITES WITHIN THE NATIONAL PARK THAT ADJOIN SETTLEMENTS OUTSIDE THE NATIONAL PARK?

Option 28a: The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that there is no other suitable, developable and deliverable sites outside or within the National Park to meet the objectively assessed need for development in that settlement and that it does not have a detrimental impact on the landscape settlements and working with partners to enable this.

Option 28b: The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that other suitable, developable and deliverable sites around the settlement have a greater impact on the National Park's landscape than the proposed site within the National Park.

Summary

The extent to which the options support the SA Objectives depends largely on the nature of development proposed, its location and its proximity to services, facilities and amenities. For these reasons there is a high degree of uncertainty as to the relative merits of each of the options. However, in terms of landscape Option 28a has a greater potential to limit potential effects on landscape quality than Option 28b.

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		28a	28b
1. Housing	No significant implications at this level of detail.	-	-
2. Health and Wellbeing	No significant implications at this level of detail.	-	-
3. Vitality of Communities	Uncertain merits: effects depend on the location of new development in conjunction with the location of existing centres and community facilities.	-	-
4. Accessibility	Uncertain merits: effects depend on the location of new development in conjunction with the location of existing centres and community facilities.	-	-
5. Cultural Activity	No significant implications at this level of detail.	-	-
6. Rural Economy	Unlikely to be significant implications: new employment development will be located adjacent to existing settlements.	-	-
7. Climate Change Mitigation	Through increasing the need to travel, Option 28a is more likely to stimulate an increase in greenhouse gas emission from transport.	2	1
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		28a	28b
9. Biodiversity	Uncertain merits: depends on the location, design and layout of new development areas.	-	-
10. Landscape and Historic Environment	Option 28b is less likely to have significant effects on landscape as it seeks to avoid detrimental effects on the landscape; Option 28b proposes an approach where the development will be approved where there is a smaller degree of impact on the National Park's landscape.	1	2
11. Sustainable Transport	Uncertain merits: effects depend on the location of new development in conjunction with the location of existing centres and community facilities.	-	-

ISSUE 30: HOW BEST SHOULD THE LOCAL PLAN ENSURE A ‘SUFFICIENT’ SUPPLY OF HOUSING?

Option 30a: The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set them for areas of the National Park, which could be based on local authority boundaries.

Option 30b: The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set individual levels of new housing provision for the different housing market areas that overlay the National Park.

Option 30c: The Local Plan will not set a specific level of new housing provision for the whole of the National Park but will set individual housing targets for major settlements (that is, those in settlement tiers 1, 2 and 3).

Summary

Overall Option 30c, through focussing a greater degree of housing in the larger settlements of the National Park (Tier 1, Tier 2 and Tier 3 settlements), is the best performing option in relation to the SA Objectives. This is due to these settlements offering the broadest range of services and facilities and having the most developed sustainable transport networks. Through focussing housing provision in these settlements, the option therefore has the potential to increase accessibility to amenities, limit the need to travel and facilitate an increase in the vitality and vibrancy of these key National Park communities.

Through promoting a relatively arbitrary approach to housing provision in the National Park, based on Local Authority boundaries, Option 30a is deemed to be the least favourably performing option, as it is less likely to reflect the specific needs and requirements of residents of the National Park.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		30a	30b	30c
1. Housing	Option 30a, through basing provision on local authority boundaries, is less likely to meet local housing needs than Option 30b, which is based on housing market areas, and Option 30c, which focuses on settlement tiers 1, 2 and 3.	3	1	1
2. Health and Wellbeing	No significant implications at this level of detail.	-	-	-
3. Vitality of Communities	Option 30b, which is based on housing market areas and Option 30c, which focuses on settlement tiers 1, 2 and 3 are more likely to provide housing which meets the needs of local people than Option 30a as the options are more specifically designed to meet more localised housing needs.	3	1	1
4. Accessibility	Option 30c, which focuses on Tier 1, Tier 2 and Tier 3 settlements, is likely to focus a greater degree of housing in the larger settlements of the National Park. As these are the settlements with the broadest range of facilities and services in the National Park, the option will do the most to improve accessibility to such amenities.	3	2	1
5. Cultural Activity	No significant implications at this level of detail.	-	-	-
6. Rural Economy	Option 30b may do most of the options to support the rural economy by setting individual levels of housing in the different housing market areas in the National Park. This may lead to an increase in affordable rural housing for key workers. Options 30a and 30c is less likely to support an increase in affordable rural housing for key workers.	2	1	2

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		30a	30b	30c
7. Climate Change Mitigation	Option 30c, which focusses on Tier 1, Tier 2 and Tier 3 settlements, is likely to focus a greater degree of housing in the larger settlements of the National Park. As these are the settlements with the broadest range of facilities and services in the National Park, the option will do the most to reduce the need to travel in the National Park, helping to limit greenhouse gas emissions from transport.	2	2	1
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-
9. Biodiversity	Uncertain merits: depends on the location, design and layout of new development areas.	-	-	-
10. Landscape and Historic Environment	All three options have the potential to have effects on landscape character and the historic environment through increasing the built footprint of Tier 3 villages.	3	3	3
11. Sustainable Transport	Option 30c, which focusses on Tier 1, Tier 2 and Tier 3 settlements, is likely to focus a greater degree of housing in the larger settlements of the National Park. As these are the settlements with the broadest range of facilities and services in the National Park, and the most developed sustainable transport networks, the option will do the most to reduce the need to travel in the National Park, and promote the use of sustainable modes of transport.	2	2	1

ISSUE 35: HOW BEST CAN THE LOCAL PLAN ENSURE THE HOUSING NEEDS OF OLDER PEOPLE ARE MET?

Option 35a: The Local Plan could set out that residential development for older people be provided through smaller properties and opportunities for flats and bungalows exclusively for those 55 / 60 years and over, and retirement accommodation and care homes in the more sustainable settlements (tiers 1, 2 and in some cases 3), both with access to a good range of services and facilities, including public transport

Option 35b: The Local Plan could identify specific appropriate sites in the larger and more sustainable settlements (tiers 1 and 2) for special needs housing, including the elderly.

Option 35c: The Local Plan could make no specific provision for elderly persons housing but assumes that this will be delivered by the market as part of the overall housing provision within the National Park.

Option 35d: The Local Plan could allow for appropriately sized annexes and free-standing accommodation to be built within the curtilage of existing properties where they do not detract from the existing built form

Summary

Options 35a, 35b and 35d propose complementary approaches to delivering housing provision for older people in the National Park. Option 35a and 35b also support the provision of such housing in larger and more sustainable settlements. This will support older people's accessibility to services and facilities, promote their health and wellbeing, and support the viability of centres.

Option 35c, through assuming that the market will deliver provision for older people, is less likely to lead to these benefits.

Sustainability topic	Discussion of relative merits of options	Rank of preference			
		35a	35b	35c	35d
1. Housing	Options 35a, 35b and 35d set out complementary approaches to older people's housing needs. Option 35c, through relying on the market, is less likely to deliver housing which meets the needs of older people.	1	1	4	1
2. Health and Wellbeing	Options 35a, 35b and 35d set out complementary approaches to housing needs which will support older people's health and wellbeing. Option 35c, through relying on the market, is less likely to deliver housing which meets the needs of older people. This is likely to have implications for the health and wellbeing of this group.	1	1	4	1
3. Vitality of Communities	Options 35a, 35b and 35d set out complementary approaches to housing provision which will help meet older people's housing needs. The options also support the provision of housing in larger and more sustainable settlements. This will support the vitality and viability of communities.	1	1	4	1

Sustainability topic	Discussion of relative merits of options	Rank of preference			
		35a	35b	35c	35d
4. Accessibility	Options 35a and 35b seek to encourage the location of older people's housing in Tier 1-3 settlements. This will help improve accessibility for older people to services and facilities. Option 35d also seeks to support the use of annexes and free standing accommodation for older people. This will support accessibility through family members.	1	1	4	3
5. Cultural Activity	No significant implications at this level of detail.	-	-	-	-
6. Rural Economy	No significant implications at this level of detail.	-	-	-	-
7. Climate Change Mitigation	No significant implications at this level of detail.	-	-	-	-
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-	-
9. Biodiversity	No significant implications at this level of detail.	-	-	-	-
10. Landscape and Historic Environment	No significant implications at this level of detail.	-	-	-	-
11. Sustainable Transport	Options 35a and 35b seek to encourage the location of older people's housing in Tier 1-3 settlements. This will help improve accessibility for older people to services and facilities.	1	1	4	3

ISSUE 39: SHOULD THE LOCAL PLAN SAFEGUARD EXISTING EMPLOYMENT SITES?

Option 39a: The Local Plan could adopt a sequential approach to the loss of employment land/ floorspace as follows:

- i) preference given to the redevelopment of the site whilst retaining the employment use on the whole site
- ii) if (i) is demonstrated as being unachievable, we will consider a mixed use development on the site, which includes some employment land/ floorspace
- iii) if both (i) and (ii) are demonstrated as being unachievable, we will then consider the loss of the employment land/ floorspace

Option 39b: Where development is proposed which would result in a loss of an existing active industrial or business use, the Local Plan could explore options for mitigation.

Summary

Option 39a and 39b both seek to limit effects of the loss of employment floorspace in the National Park. As such, both options will help support the National Park's economy, promote employment opportunities, and support accessibility to employment/economic opportunities. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land/floorspace and as such performs more favourably against the SA Objectives.

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		39a	39b
1. Housing	Both options have the potential to facilitate new housing provision through enabling mixed use or residential development if existing employment land is lost.	1	1
2. Health and Wellbeing	No significant implications at this level of detail	-	-
3. Vitality of Communities	Both options seek to limit effects of the loss of employment floorspace in the National Park, and as such will help maintain the vitality of communities in the National Park. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land/floorspace.	1	2
4. Accessibility	Both option 39a and 39b seek to limit effects of the loss of employment floorspace, and as such will help support accessibility to employment opportunities. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land/floorspace.	1	2
5. Cultural Activity	No significant implications at this level of detail	-	-
6. Rural Economy	Both option 39a and 39b seek to limit effects of the loss of employment floorspace, and as such will help support the rural economy in the National Park. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land/floorspace.	1	2
7. Climate Change Mitigation	No significant implications at this level of detail	-	-

Sustainability topic	Discussion of relative merits of options	Rank of preference	
		39a	39b
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-
9. Biodiversity	No significant implications at this level of detail.	-	-
10. Landscape and Historic Environment	No significant implications at this level of detail	-	-
11. Sustainable Transport	Both option 39a and 39b seek to limit effects of the loss of employment floorspace, and as such will help support accessibility to employment opportunities and reduce the need to need to travel. Option 39a however provides greater clarity as to the approach that should be taken when considering the loss of employment land/floorspace.	1	2

ISSUE 44: HOW SHOULD THE LOCAL PLAN CONSIDER VISITOR ACCOMMODATION?

Option 44a: The Local Plan could encourage the development of visitor accommodation to certain parts or areas, such as the larger settlements and/or areas within close proximity to visitor attractions.

Option 44b: The Local Plan could encourage development associated with visitor accommodation away from certain parts or areas, such as the less accessible areas.

Option 44c: The Local Plan could take a more flexible approach to visitor accommodation, informed by Landscape Character Assessments.

Summary

Options 44a and 44b, through promoting the development of visitor accommodation at more accessible locations, will support the use of sustainable modes of transport (and as such promote sustainable tourism), limit the need to travel and support access to cultural facilities in the National Park. Both options are also likely to support the development of visitor accommodation in the larger settlements of the Park. This will support these settlements' vitality.

Option 44c seeks to take a more flexible approach to visitor accommodation, informed by Landscape Character Assessments. This has the potential to do more to support the rural economy through providing increased opportunities for diversification. Whilst the option also has the potential to support landscape quality, there is some potential for a landscape-led approach to determining sites for visitor accommodation to undermine landscape protection in areas of the National Park deemed to have less sensitive landscapes.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		44a	44b	44c
1. Housing	The options set out approaches to delivering visitor accommodation in the National Park rather than new housing. No significant implications at this level of detail.	-	-	
2. Health and Wellbeing	No significant implications at this level of detail	-	-	
3. Vitality of Communities	Option 44a has the potential to support the vitality of settlements near visitor attractions through encouraging accommodation to be located close by. Similarly the presumption in favour of larger settlements would support the vitality of larger settlements. Similarly Option 44b is likely to support the vitality of more accessible areas, which are likely to be the larger towns and villages.	1	2	3
4. Accessibility	Options 44a and 44b will support the location of new visitor accommodation in more accessible areas. Options 44c will do less to support accessibility.	1	1	3

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		44a	44b	44c
5. Cultural Activity	Through encouraging the location of visitor accommodation in the more accessible locations of the National Park and at locations close to attractions, Options 44a and 44b will support sustainable tourism and improve accessibility to cultural facilities in the Park.	1	1	3
6. Rural Economy	Option 44c will do most to support the rural economy by enabling a more flexible approach to the provision of visitor accommodation. Options 44a and 44b are likely to focus development in larger settlements and close to visitor attractions.	2	2	1
7. Climate Change Mitigation	Through encouraging the location of visitor accommodation in the more accessible locations of the National Park and at locations close to attractions, Options 44a and 44b will support a limitation of greenhouse gas emissions from tourism-related transport.	1	1	3
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	
9. Biodiversity	No significant implications at this level of detail. Effect depends on location of visitor accommodation.	-	-	
10. Landscape and Historic Environment	Option 44c, by seeking to ensure that the location of visitor accommodation is informed by Landscape Character Assessments, will provide a degree of landscape protection. However there is a possibility that such an approach may undermine landscape protection elsewhere in the National Park.	2	2	1
11. Sustainable Transport	Through encouraging the location of visitor accommodation in the more accessible locations of the National Park and at locations close to attractions, Options 44a and 44b will support the use of sustainable modes of transport and reduce the need to travel.	1	1	3

ISSUE 46: WHAT APPROACH SHOULD THE LOCAL PLAN TAKE TO STATIC HOLIDAY CARAVAN SITES?

Option 46a: The Local Plan could have a presumption against the development of new static caravan parks across the National Park.

Option 46b: The Local Plan could restrict the development of new static caravan sites and support the appropriate redevelopment or relocation of existing sites only.

Option 46c: The Local Plan could allow the development of new static caravan parks that are appropriate in size and can be accommodated where they meet with the National Park Purposes, subject to the approach taken under Issue 42.

Summary

Static caravan sites often have significant impacts on landscape quality through inappropriate siting, poor standard of design, high density, colour and lack of landscaping. Option 46a, through introducing a presumption against the development of such sites, and Option 46b, which seeks to restrict sites and support the redevelopment and relocation of such sites, will do most to limit effects from static caravan sites on landscape character in the National Park.

Option 46c, through enabling the development of such sites in conjunction with National Park purposes, and recognising the popularity of such accommodation, may do more to support the rural and visitor economy. However it is uncertain to what extent this option would support sustainable tourism in the Park. In this context it will be important to ensure under this option that sites have good accessibility to an adequate local highway network, is accessible by a range of transport modes and sites are unobtrusively sited and fully assimilated into the landscape.

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		46a	46b	46c
1. Housing	The options set out approaches to delivering visitor accommodation in the National Park rather than new housing. No significant implications at this level of detail.	-	-	-
2. Health and Wellbeing	No significant implications at this level of detail	-	-	-
3. Vitality of Communities	Static caravan sites are unlikely to have significant effects on vitality of communities unless located directly outside settlements.	-	-	-
4. Accessibility	Option 46 c is more likely to locate static caravan parks in appropriate locations, including accessible locations.	-	-	1
5. Cultural Activity	The provision of new static caravan parks will support the visitor economy. However it is uncertain whether this will support sustainable tourism.	?	?	?

Sustainability topic	Discussion of relative merits of options	Rank of preference		
		46a	46b	46c
6. Rural Economy	Option 46c may do most to support the rural economy by enabling a more flexible approach to the provision of visitor accommodation. Options 45b and 45c will restrict new static caravan sites.	3	2	1
7. Climate Change Mitigation	No significant implications at this level of detail.	-	-	-
8. Climate Change Adaptation	No significant implications at this level of detail.	-	-	-
9. Biodiversity	No significant implications at this level of detail. Effect depends on location of static caravan sites.	-	-	-
10. Landscape and Historic Environment	Static caravan sites often have significant impacts on landscape quality through inappropriate siting, poor standard of design, high density, colour and lack of landscaping. Option 46a, through introducing a presumption against the development of such sites, and Option 46b, through restricting sites and supporting the redevelopment and relocation of such sites will do most to support landscape character in the National Park. Option 46c, whilst recognising that new static caravan sites should be designed to meet the Purposes of the National Park, is likely to have the most significant impacts on landscape character of the three options as it is the only option which facilitates additional sites.	1	2	3
11. Sustainable Transport	Option 46c is more likely to locate static caravan parks in appropriate locations, including accessible locations.	-	-	1