



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

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

October 2024

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# 1. Introduction

## *Background*

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

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

- 1) To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The National Park Authority also has a duty, when carrying out the purposes, to seek to foster the economic and social well-being of the local communities within the National Park.

In addition, Section 11A of the National Parks and Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023 also requires all relevant authorities, including statutory undertakers and other public bodies, to seek to further these purposes. Where there is an irreconcilable conflict between the statutory purposes, the first purpose of the National Park will be given priority (known as the Sandford Principle).

- 1.3 Local Plans include strategic, development management and allocation policies. [The National Planning Policy Framework 2023](#) (NPPF) provides the policy framework within which Local Plans are produced. The work on the Local Plan Review is taking place at a time of much change with planning reforms and this report is a useful tool to gather early information and feedback from statutory and key consultees.
- 1.4 **Change in Government and the Levelling Up and Regeneration Act 2023**The Levelling-up and Regeneration Bill was given Royal Assent on Thursday 26 October 2023 and is now an Act of Parliament (law). The Act brings forward a range of changes to the planning system such as replacement of SA/SEA and EIA with a system of environmental outcomes reports and changes to the Development Plan regime. The Act introduces National Development Management Policies as statutory policy which, together with the development plan, forms the policy standard against which planning applications must be determined. Development Plans will cover locally specific matters with issues that apply in most areas to be covered by new National Development Management Policies. In the event of conflict, it is the national policy when enacted which would take primacy over local policies. Section 245 of the Act is important for National Parks. It places a new duty which means that relevant bodies (including SDNPA, Planning Inspectorate, adjacent local authorities, and statutory undertakers)

will need to 'seek to further' the purposes of National Parks. This came into force on 26th December 2023.

- 1.5 Following a General Election on 4th July 2024, the new Government will be considering planning and changes to the planning system and has recently published a revised National Planning Policy Framework for consultation. Following the Levelling up and Regeneration Act, secondary legislation and guidance is still expected.
- 1.6 As noted above - further details on Environmental Outcome Reports are awaited. A government consultation exercise in March 2023 (undertaken by the previous government) sought views on how this new framework could work as a replacement to the existing environmental assessment regimes that have been transposed into domestic law from the Environmental Assessment of Plans and Programmes Directive and the Environmental Impact Assessment Directive. This will be kept under review through the Local Plan Review process. The work on the Local Plan Review is taking place at a time of much change with planning reforms and new Environmental Outcome Reports.

#### *The Sustainability Appraisal Process and Integrated Assessment Process*

- 1.7 The SDNPA is required to ensure that sustainable development is promoted throughout a plan's preparation. To assist in this process, the SDNPA must prepare a report assessing the sustainability of plans it prepares through undertaking a Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA). However, as the SDNPA is also undertaking an Integrated Impact Assessment (IIA), the purpose now will be to promote sustainable development, health and equality issues through better integration of social, environmental and economic considerations into the preparation of the LPR. To be effective, the appraisal process must be fully integrated into the plan making process and applied at each stage of document production. It will also be used to monitor the effectiveness of the plan during its implementation.
- 1.8 There are several reasons for undertaking an IIA during the development of local planning documents. It is usual practice to combine the processes of SEA and SA, as they share a few similarities. Whilst there are formalised approaches for both SA and SEA, only through the SEA is there a legal obligation to perform certain activities. An EqIA is required to be undertaken for plans, policies, and strategies by the Equality Act 2010. Although there is no statutory requirement to undertake Health Impact Assessment (HIA), its requirements have been considered to add value and depth to the assessment process.
- 1.9 A separate EqIA screening for each of the policies at Regulation 18 stage will be undertaken. In terms of the HIA, a set of clear assessment criteria will be included with section 6 on policies. This will result in each policy being appraised against the criteria and the needs of the identified groups/sections of the population.
- 1.10 The IIA will aid in development of the LPR by supporting plan preparation by challenging and testing iterations of the Local Plan, so that a more robust final document is produced. It will identify the potentially negative and positive effects of the LPR policies and provide an opportunity to mitigate potentially adverse effects and enhance positive effects to achieve economic, social, and environmental benefits. The IIA also allows stakeholders to make more informed comments and responses to the LPR during consultation, because the IIA gives a picture of several significant effects. The development of the IIA is an iterative process through each stage of Plan making,

with the IIA being refined and developed as more information is acquired and as the emerging Local Plan evolves.

- 1.11 The IIA will consider the requirements and scope of:
- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA).
  - Equalities Impact Assessment (EqIA).
  - Health Impact Assessment (HIA).
- 1.12 The IIA will not include a Habitats Regulation Assessment (HRA), but it will take account of the HRA findings. To be effective, the appraisal process must be fully integrated into the plan making process and applied at each stage of document production. It will also be used to monitor the effectiveness of the plan during its implementation.
- 1.13 To undertake the IIA process the following five stages should be completed:
- Stage A - Setting the context and objectives, establishing the baseline, and deciding the scope.
  - Stage B - Developing and refining alternatives and assessing effects.
  - Stage C – Preparing the IIA report.
  - Stage D – Seeking representations on the IIA report; and
  - Stage E – Post adoption reporting and monitoring.
- 1.14 The process and tasks of the IIA are detailed below.
- Review plans, programmes and policies that are appropriate to the scope of a sustainability appraisal of the National Park Management Plan and Local Plan.
  - Compare compatibility of the objectives of appropriate plans, programmes, and policies.
  - Identify sustainability issues for the South Downs National Park.
  - Identify available and appropriate baseline data.
  - Identify gaps in baseline data with respect to the most important sustainability issues.
  - Identify sustainability objectives.
  - Identify key issues.
  - Appraise emerging Local Plan policies and site-specific allocations (this will vary with the actual local development document in question).
  - Record appraisal results and how they have or have not influenced policy and site allocations.
  - Establish a monitoring regime for the indicators identified and carry out monitoring.

### *Reasonable Alternatives*

- 1.15 A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations<sup>10</sup> are not prescriptive as to what constitutes a reasonable alternative. Regulation 12 (2) of the SEA Regulations requires that:

The report must identify, describe, and evaluate the likely significant effects on the environment of—

- (a) implementing the plan or programme; and
- (b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

1.16 [The Government Guidance](#) on SA states that the appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic, and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- outline the reasons the alternatives were selected, and identify, describe, and evaluate their likely significant effects on environmental, economic, and social factors using the evidence base (employing the same level of detail for each alternative option).
- as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them.
- provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach considering the alternatives.

1.17 Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

1.18 The SEA Regulations require that an environmental 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’.

1.19 The IIA of reasonable alternatives involves assessing the performance of each option against the IIA framework. The appraisal is a qualitative exercise based on professional judgement taking into account the information gathered in the IIA Scoping Report. The framework is set out in the Scoping Report and the sustainability objectives are listed in section 2 below.

1.20 The magnitude of the impact of the different options on each objective is defined as significant positive effect, some positive effect, neutral or no link, significant adverse effect, adverse and uncertain effects (see Table A).

**Table A – Assessment key**

Significant likely adverse effect	--	Option in conflict with the objective and unlikely to be acceptable.	Significant likely positive effect	+	Option would significantly help with achieving objective
Likely adverse effect	-	Option in conflict with the objective.	Likely positive effect	++	Option/policy/site would help with achieving objective
Neutral/no effect	0	Option would neither help nor hinder the	Uncertain effects	?	More information needed

		achievement of the objective			
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### *The South Downs National Park and Local Plan*

- 1.21 The South Downs was established as a National Park in 2010 and was designated in recognition of its landscapes of exceptional beauty and importance. It contains over 1,600km<sup>2</sup> of England’s most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east.
- 1.22 The South Downs National Park Authority (SDNPA) became the Local Planning Authority on 01 April 2011. National Park Authorities are independent authorities operating within the local government framework.
- 1.23 The South Downs Local Plan covers the entire National Park and was adopted in July 2019. The adopted local plan can be read here: [South Downs Local Plan 2019](#).
- 1.24 The timeline for the Local Plan Review is set out in the revised Local Development Scheme (8<sup>th</sup> edition), which was approved by the Authority in December 2022. Details are set out in the [Committee Report](#).

### *The IIA Scoping Report*

- 1.25 There have been two versions of the Scoping Report. The first was developed in accordance with the government guidance for undertaking a SA in compliance with the SEA Directive but focussed solely on SEA and SA matters. The second version set out the scope for the IIA. In both cases, the Scoping Report sets out the context and objectives and established the baseline and scope for the IIA /SA. It identified some of the principal sustainability challenges and opportunities in the area which are relevant to the National Park and the Local Plan review.
- 1.26 The final version of the IIA scoping report is dated October 2024 and takes on board the comments from the 2023 and 2024 consultation exercise (see below). **Appendix A** sets out the key sustainability issues that emerged from the scoping report baseline analysis, together with characterisation of the future baseline based upon current evidence and trends.
- 1.27 It is a requirement that the Scoping Report is sent to the three statutory Consultation Bodies with environmental responsibilities. These are the Environment Agency, Historic England, and Natural England. Consultation took place in September - October 2023 and August – September 2024 and included the statutory agencies and all local authorities (District, Borough, County and Unitary). The consultation exercise also included the Health Authorities for the Counties. Feedback was also received colleagues within the SDNPA.
- 1.28 The IIA Scoping Report set out the following sections:  
*Context Review and Baseline Data*  
 An important step when seeking to establish the appropriate scope of an IIA/SA involves reviewing the sustainability context from key policies, plans and programmes. The Scoping Report also included a detailed baseline review which sets out the current and likely future situation in the plan area.



## *SA Framework*

Drawing on the review of the sustainability context and baseline, the IIA Scoping Report identified a range of sustainability issues that should be a particular focus of the IIA, ensuring that it deals with the most important sustainability issues. These issues were then translated into an IIA 'framework' of objectives and appraisal questions. The Framework provides a benchmark against which the sustainability effects of the Local Plan and alternatives can be identified and evaluated based on a structured and consistent basis. The objectives and sub objectives and appraisal questions which comprise the Framework provide a methodological framework for the appraisal of likely significant effects on the baseline. Further details on the IIA Framework are set out in the next section.

- 1.29 The comments received were then used to further shape the scoping report in preparation for the IIA. Following the receipt of the consultation responses on the Scoping Report, the Report was updated and amended to include additions to the background evidence and improved wording to the objectives and sub objectives and questions.
- 1.30 Some of key issues raised during the first consultation exercise in 2023 include:
- A request from the Environment Agency to update references and documents within the report. Reference was also made to greater clarification around the topic of water (surface & ground water, flooding, climate change).
  - Matters relating to water were also raised by Horsham District Council.
  - Natural England referenced multifunctional green infrastructure and requested this was highlighted in the report and the sustainability objectives.
  - East Sussex County Council highways requested that information is inserted regarding electric cars.
  - East Sussex County Council Public Health teams submitted a wide range of comments relating to expanding the existing information to include more detail on health and wellbeing, a request that the full scope of health and wellbeing are adequately covered in the report and changes to the sustainability framework and objectives.
- 1.31 Several comments were received in September 2024 following the second consultation exercise. These included further responses from East Sussex Public Health team. This resulted in several new sub objectives and new questions. These were added to Tables 5 and 6. Comments from Southern Water, Arun District Council, Lewes District Council and Natural England resulted in additions to Appendix A of the scoping report.
- 1.32 The Scoping Report was amended and developed in response to all the comments received following both consultation exercises. A selection of the responses include:
- Further reference documents and strategies have been added to Appendix A (of the scoping report) and within the main document.
  - The report was amended to create a new topic of Protecting and Sustainable use of Resources.

- Information was inserted into the report which explains that all objectives and sub objectives are inter-related.
- A sub-objective on multifunctional green and blue infrastructure was included.
- Soil, air, and minerals have been separated out to create a new sustainability objective.
- A title of one of the sections was amended to Community, Health & Wellbeing and further text was added to this section to take on board points from the SDNPA Health & Wellbeing Strategy.
- New sub objectives and further decision aiding questions were included.

1.33 The final [Scoping Report 2024](#) can be found on the SDNPA website.

#### *Structure of this Report*

- 1.34 At the current stage of plan-making, the National Park Authority is consulting on an early draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' IIA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.
- 1.35 The Regulation 18 Local Plan is accompanied by a significant number of evidence studies. A further group of evidence studies will be commissioned or undertaken by the SDNPA during 2025 ahead of finalising the Regulation 19 Local Plan. The final version of the IIA will take into account the conclusions from all the studies.
- 1.36 This section has introduced the National Park, the adopted Local Plan, and the IIA process.
- 1.37 The remainder of the report reflects the process the National Park is going through in relation to possible options for the Local Plan Review. These revolve around:
- The overall spatial strategy for growth in the National Park.
  - How much housing and employment growth should be accommodated in the National Park within the plan period.
  - How the overall spatial strategy, quantum of growth, large scale and small-scale sites might combine to form an overall strategy for growth for the National Park District within the plan period and beyond.
- 1.38 The report is structured into the following Sections:
- Section 2 The IIA Framework
  - Section 3 Growth Scenarios for the Local Plan Review
  - Section 4 Spatial strategy for the Local Plan Review
  - Section 5 Sites
  - Section 6 Policies
  - Section 7 Conclusion

## 2. The Integrated Impact Assessment Framework

- 2.1 This section will set out the sustainability objectives (known as the IIA Framework). It will amalgamate the sustainability issues identified in the previous section and the objectives set out in the SA to the South Downs Local Plan.
- 2.2 The SEA Directive also requires consideration not only of the current state of the environment but also 'the likely evolution thereof without implementation of the plan or programme'. This means that the IIA SA/SEA must consider the future baseline situation should the implementation of the policies within the Local Plan Review not take place.
- 2.3 This section identifies some of the principal sustainability challenges and opportunities in the area which are potentially relevant to the National Park and the Local Plan review.
- 2.4 The IIA Framework is a vital tool to enable the sustainability effects of SDNPA plans, policies, and programmes to be assessed.
- 2.5 The proposed framework for assessing the Local Plan Review policies comprises the eleven sustainability objectives and decision-making criteria listed below.
- 2.6 The sustainability objectives represent a mix of national and local outcomes relevant to the National Park and are based on the objectives used previously to assess the 2019 Local Plan. They have been re-assessed considering the updated national policy context, baseline information and sustainability issues set out in the Scoping Report. Where necessary they have been amended and re-ordered to create an up-to-date set of objectives to reflect any changes over the last 5 years.
- 2.7 The decision aiding questions are helpful during the assessment and will provide more direction and focus to the specific issues for each sustainability issue. They are used to check if policies are addressing the sustainability objectives. The questions will explain the focus of each sustainability objective more precisely. It should be noted that the criteria/questions are not meant as an exhaustive list.
- 2.8 Please note that all sustainability objectives and sub objectives are inter-related and there are clear cross references and relationships between each and all of them. They do not exist and cannot be assessed in isolation.
- 2.9 Section 17 of the [Environmental Assessment of Plans and Programmes Regulations 2004](#) states that 'the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action'. The impact of the Local Plan review on the sustainability objectives varies. For some IIA objectives, the LPR will be the most important instrument to achieve the targets; for other objectives, the Local Plan's contribution is limited. A monitoring framework will be included in the LPR and a section on monitoring will be included within the IIA. At the stage of developing the IIA, indicators will be included within the monitoring information. These will assist with measuring the impacts of each of the sustainability objectives.
- 2.10 The Sustainability Objectives (as set out in the Scoping Report) are as follows:

Table B Sustainability Objectives for the Local Plan Review

	Proposed sustainability objectives	Proposed sub objectives	Questions
1	To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.	<p>1.1: Retain functionality and provide resilience to the landscape character in response to climate change.</p> <p>1.2 Conserve and enhance the perceptual qualities of the South Downs National Park including the dark night sky reserve and the tranquil setting of the National Park.</p> <p>1.3 Conserve and enhance views to and from and within the National Park.</p>	<p>Will it conserve and enhance the landscape character of the South Downs National Park?</p> <p>Will it encourage appropriate management of designated landscapes?</p> <p>Will it protect and retain trees, woodlands and hedgerows?</p> <p>Will it conserve and enhance areas of tranquillity?</p> <p>Will it allow naturally functioning/natural processes?</p> <p>Does it consider views to and out of National Park, from close by and longer distance?</p>
2	To conserve and enhance the region's biodiversity and contribution to nature recovery.	<p>2.1 Maintain a functioning ecological network and conserve, enhance, restore, expand and reconnect areas of priority habitat.</p> <p>2.2 New development should contribute to nature recovery through biodiversity net gain and other delivery mechanisms.</p>	<p>What level of BNG will be achieved?</p> <p>Will it provide opportunities to make bigger, better and more joined up nature sites?</p> <p>Will it avoid, mitigate and in the last resort compensate for identified adverse impacts to the interest features on sites designated for nature conservation?</p> <p>Will it protect and enhance existing local sites of nature conservation importance or create new areas of nature conservation value?</p> <p>Will it protect ancient woodland and ancient and veteran trees?</p> <p>Will it allow biodiversity to adapt to the effects of climate change, including enhancement of ecological networks / corridors?</p> <p>Will it protect the range of biodiversity, including rare and vulnerable species where they occur?</p>

	Proposed sustainability objectives	Proposed sub objectives	Questions
3	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.	<p>3.1 To conserve the character of historic landscapes and the character of settlements and buildings and their setting.</p> <p>3.2 Improve access and understanding of local and cultural heritage.</p> <p>3.3 To enhance the distinctiveness and diversity of the local built environment and community spaces.</p>	<p>Will it protect, maintain and enhance listed buildings, conservation areas, archaeological sites, historic landscapes and the setting of these assets?</p> <p>Will it provide for increased access to and enjoyment of the historic environment?</p> <p>Will it encourage local cultural traditions?</p>
4	To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures.	<p>4.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>4.2: Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies.</p> <p>4.3 Maximise the use of low carbon and renewable energy within new developments and proposals.</p> <p>4.4 To minimise the impacts of climate change on the National Park's communities and habitats.</p> <p>4.5 To address food shortages and extreme weather conditions through mitigation and adaption measures such as sustainable design, providing shade, rainwater harvesting and reduced energy consumption, safeguarding soil health for food production and soil health for carbon sequestration.</p> <p>4.6 Maximise the use of nature-based solutions such as natural flood management.</p>	<p>Will it promote the value and benefits of natural resources and the use of sustainable materials?</p> <p>Will it encourage the use of energy efficiency and enable small-scale renewable energy schemes?</p> <p>Will it help in adapting to climate change?</p> <p>Will it reduce the risk from coastal, fluvial and surface water flooding?</p>
5	Protection & Sustainable Use of Resources.	<p>5.1 Minimise water consumption and maximise grey water recycling to reduce pressure on local water supplies.</p> <p>5.2 To address food shortages through mitigation and adaption measures such as safeguarding soil health for food production and soil health for carbon sequestration.</p> <p>5.3 To reduce land contamination and safeguard soil quality and quantity.</p> <p>5.4 To ensure air quality continues to improve and noise and light pollution are reduced.</p>	<p>Will it encourage water conservation and the sustainable use of water?</p> <p>Will it protect the quality of air and water and reduce greenhouse gas emissions?</p> <p>Will it ensure the sustainable use of soils and safeguard the best and most versatile agricultural land?</p>

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

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

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



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

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

### 3. Growth Scenarios for the Local Plan Review

#### Introduction

3.1 A key element of the Local Plan Review is to consider different approaches to delivering housing and employment in the National Park, including different growth scenarios. SDNPA has identified various options for its approach to the quantum of housing provision<sup>1</sup> to be provided over the plan period and the overall spatial strategy. This paper sets out:

- An overview of housing **growth scenarios**.
- A summary of the **background evidence** which has informed the selection of the options.
- The **methodology** for assessing these options.
- Defining **unreasonable options**.
- The **appraisal of the reasonable alternatives**; and
- **Summary and conclusions**.

#### Growth Scenarios

3.2 The IIA will need to consider several growth scenarios to be tested against the sustainability objectives. Each of the quantum options will consider the level of housing and employment growth<sup>2</sup> which would be provided in the National Park over the plan period. The quantum options set out in the HEDNA 2023 are listed below (quantum 2 – 6). There are 2 further options at either end of the table, and these are also listed below. This gives us 7 options in total. However, two of these are unreasonable options – please see below (Table C).

Table C – Growth Scenario Options

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

3.3 The scenarios are explained below. The text and information (where relevant) is taken from the [HEDNA](#). The key headlines are:

- As of 2021 the **population** of the South Downs National Park was 113,339, a growth of 0.9% since the 2011 Census. Since the 2011 Census the number of households has grown by 2.7% to 48,558.

<sup>1</sup> We are currently looking at housing growth. When the Employment Land Review (ELR) is completed, we will also need to look at different scenarios for employment.

<sup>2</sup> To follow

- **Over 65's** account for 26.6% of the population, much higher than the region and country. The opposite is true for the working age population which is under-represented.
- The South Downs National Park is exceptional in that no population projection are published for it and it includes parts of **four Housing Market Areas** and parts of twelve district council areas. As such it is considered that an alternative approach for assessing housing need is justified, and that is explored in the HEDNA.
- The HEDNA approached the assessment of housing need in the National Park in two ways –
- **Top Down** –examined the aggregate need for the local authorities in which the National Park is co-located using the standard method. This is then apportioned to the National Park based on a pro -rata of population inside and outside the National Park in each local authority. However, this approach does not look at the trends in population growth within the National Park and how need in future might differ from the current distribution of the population. This method produces a figure of 698 dpa for the National Park area.
- **Bottom Up** – this created a population and household projection specifically for the National Park using past trends and the most recent available data (Census 2021) and run this through the standard method using calculated affordability ratios for the National Park. This method produces a figure of 350 dpa based on a household growth of 234 dpa and a capped uplift of 40% and is compliant with government guidance.
- Further work was undertaken to see what level of housing would support more **positive population and economic** activity levels. This work shows that, to maintain the existing level of economically active population, then 276 dwellings per annum would need to be delivered. The delivery of 276 dwellings per annum will ensure a continuation of the existing labour force without changing commuting patterns.
- The HEDNA considers the **relationship between housing and economic** growth; seeking to understand what level of jobs might be supported by changes to the local labour supply (which will be influenced by population change).
- The analysis looks at the **labour-supply growth** likely to be required to meet job growth forecasts and then convert this into an estimate of household growth and hence housing need.
- The report showed estimates of **housing need set against the job growth** scenarios. The analysis shows a range of need across the National Park of between 384 and 450 dwellings per annum.

#### 3.4 Option 1 Very Low – below 234 dpa

This option sets out the delivery of less than 234 dpa. The figure of 234 is the average annual change across the National Park. A figure below this would be unable to provide housing that at the least – maintains the current trend.

### 3.5 Option 2 Low: 234 dpa

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

### 3.6 Option 3 Medium: 276 dpa

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

### 3.7 Option 4 Medium+: 350 dpa

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

### 3.8 Option 5 High: 384 – 450dpa

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

### 3.9 Option 6 High Growth: 698 dpa

The HEDNA examined the 'top down' approach to housing need using the standard method for the local authorities which overlap the National Park. This method produces a figure of 698 dpa for the National Park area. This is the equivalent of 5.8% of the aggregated need for the wider local authorities.

### 3.10 Option 7 Very High Growth: 699+dpa

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

## *Background Evidence*

3.11 The Local Plan Review must be consistent with the requirements of the [NPPF](#). Paragraph 61 states 'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance'. There may be exceptional circumstances, including relating to the demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. The Planning Practice Guidance identifies National Parks as an example of where such an alternative approach is justified.

3.12 Key sustainability issues and the Sustainability Framework are set out in the Scoping Report.

3.13 The scenarios were generated with the aim of testing different growth scenarios that emerged from the HEDNA 2023 which was specifically commissioned to inform the Local Plan review.

## Methodology

- 3.14 As part of this exercise, it is important to decide which of the options are unreasonable. This results in the unreasonable alternatives being removed from the appraisal process.
- 3.15 The SEA Regulations require that the alternatives to the elements of a Local Plan, such as growth options, are considered for inclusion in a plan that must be subject to SA are 'reasonable' therefore, alternatives that are not reasonable do not need to be subject to appraisal.
- 3.16 Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the National Planning Policy Framework) or site allocation options that are unavailable or undeliverable.
- 3.17 The Government [Circular](#) is a key document - English National Parks and the Broads UK Government Vision and Circular 2010. Paragraph 78 says: 'The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. This is a key element in identifying that the following options are considered unreasonable.'
- 3.18 Option 1 and Option 7 are unreasonable options for the following reasons:

### *Option 1 Very Low – below 234 dpa*

The figure of 234 dpa is the average annual change across the National Park and thus maintaining the current population trend. An option of delivering less than 234dpa is considered unreasonable as it would not plan for or meet the current population trend across the National Park and would result in a continual decline across the Park. This would result in a decline within the National Park, impacting on communities, economic growth and access to the housing market. It would also have an adverse impact on the ability to deliver adequate levels of affordable housing across the Park.

The Vision for National Parks is for them to be thriving, living, working landscapes notable for their natural beauty and cultural heritage. They inspire visitors and local communities to live within environmental limits and to tackle climate change. An extremely low option would not enable the National Park to thrive and support those living and working within the area. Paragraph 76 of the Circular states that the lack of affordable housing in many rural areas, including the Parks, has important implications for the sustainability of the Parks and their communities. This can have a detrimental effect on the local economy and undermine the social networks that are key components of sustainable rural communities.

### *Option 7 Very High Growth 699+ dpa*

An option to consider delivering more than 699dpa (i.e. going above the apportioned standard method figure) across the National Park was identified. This option is considered unreasonable because the figure represents a higher value than that attributed to the local authorities considered in the HEDNA and in the context of the landscape designation of a National Park and associated legislation, policy, and government guidance.

Paragraph 31 of the Circular states that major development in or adjacent to the boundary of a Park can have a significant impact on the qualities for which they were designated. Government planning policy towards the Parks in paragraph 183 of the

NPPF is that major development should not take place within a Park except in exceptional circumstances. Paragraph 182 of the [NPPF December 2023](#) states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. The [PPG Natural Environment](#) states the NPPF makes it clear the scale and extent of development in these areas [National Parks] should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. (Paragraph: 041 Reference ID: 8-041-20190721)

#### *Appraisal of the Reasonable Alternatives*

- 3.19 For the quantum of growth options, the appraisal of five options is presented. This ensures that all reasonable alternatives for the distribution of development in the National Park are tested.
- 3.20 Table D sets out the appraisal of each of the 5 options against the sustainability objectives.

Table D Summary of likely sustainability effects of the growth quantum options for the South Downs Local Plan Review

	Sustainability Objectives (SO)	Option Low – 234 dpa	Medium – 276 dpa	Medium + – 350 dpa	High – 384 – 450dpa	High Growth: 698 dpa
1	To conserve and enhance the National Park’s landscape character, functionality and perception and special qualities of the South Downs	0	?	?	-	--
2	To conserve and enhance the region’s biodiversity and contribution to nature recovery.	?	?	?	-	--
3	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage	0	-	-	--	--
4	To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures	-	?	+	-	--
5	Protection & Sustainable Use of Resources.	-	-	-	--	--
6	Employment and Economy.	-	0	+	++	-
7	Promote equality of opportunity and the elimination of discrimination	-		?	?	+
8	Contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities.	-	?	+	-	-
9	Create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car.	?	?	?	?	?



	Sustainability Objectives (SO)	Option Low – 234 dpa	Medium – 276 dpa	Medium + – 350 dpa	High – 384 – 450dpa	High Growth: 698 dpa
10	To ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.	-	+	+	+	+
11	Value, protect and enhance the character of settlements, neighbourhoods and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs	?	?	?	-	-
	TOTAL positives	0	1	4	2	2
	TOTAL negatives	6	2	2	7	8

- 3.21 In terms of summarising the appraisals of each of the options on the sustainability objectives – the following comments are made:
- 3.22 The higher number of houses proposed each year would have a negative impact on conserving and enhancing the landscape character and conflict with this SO (**to conserve and enhance the National Park’s landscape character, functionality and perception and special qualities of the South Downs**). The 2 medium options would require further assessment on the location, design, and layout of houses to assess the impact on this SO. The low option would have a neutral impact but is not considered to help/support this SO.
- 3.23 As BNG is mandatory via Environment Act 2021 so the options would all theoretically result in net gain. However, BNG is one aspect of biodiversity consideration and impacts to designated sites, protected species and overall ecology and habitat connectivity are matters which are outside of the Metric. Higher levels of housing growth would have adverse impacts in relation to this SO (**to conserve and enhance the region’s biodiversity and contribution to nature recovery**) as the greatest numbers of housing dpa would have the greatest impact. While the specific location of new growth will influence the significance of effects, it is expected that a high amount of land take and human activity could have a significant negative effect as well as impact areas of biodiversity designation. Even with a small amount of development, if located near to key designated areas could have an impact on this SO.
- 3.24 It is likely that all options would result in some level of growth in settlements and these locations contain a concentration of the designated and undesignated heritage assets, including Listed Buildings and Conservation Areas. It is considered that most of the options would conflict with this SO (**conserve and enhance the historic environment, heritage assets and their settings and cultural heritage**). The option at the lower end is neutral as allocation may not be near to heritage assets.
- 3.25 Higher levels of growth may present opportunities for the delivery of infrastructure which supports renewable energy generation, particularly where larger sites come forward and funding can be gained. In addition, they may provide the scale of development at which renewable energy schemes are viable. However, this needs to be balanced with the impact of new housing, human behaviour and increase in traffic. The sequential test will apply to the allocation of new sites in the National Park. The development of a higher amount of greenfield land is likely to increase the area of impermeable surfaces which may adversely impact flood risk in the National Park. Therefore, the higher and lower options conflict with this SO (**to ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures**).
- 3.26 The amount of greenfield land required for each option considered is likely to result in development occurring on some land which is of higher agricultural value. All options would have a conflict with this SO (**protection and sustainable use of resources**) with the higher dpas having the greatest impact. The lack of spatial element included within the options means that the impact on air quality is likely to be negative at this stage.
- 3.27 The high growth options may result in greater support for local employment facilities (shops/farm shops/food & drink for example) and is the economically led housing figure. The very high growth option is considered to have a negative impact on this SO (**economy and employment**) as it will have a detrimental impact on the landscape quality of the National Park for which much of the local employment supports and is

underpinned by. In addition, competition for land for housing may result in limited growth space for local businesses. Lower housing options may not support employment growth and lead to out commuting. The higher growth option may have a positive impact on equalities – providing more job and housing opportunities to allow for all sections of society to access these offers. It is considered the higher growth option will have a positive impact on this SO (**Promote equality of opportunity and the elimination of discrimination**).

- 3.28 For this SO (**contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities**), positive effects of all options are most likely where improvements are made within proximity of existing and new homes such as improved access especially for certain groups such as older people and people with disabilities. However, the higher growth options may result in added strain on services across the National Park. Delivering varying levels of growth in the National Park is not expected to impact on issues relating to occurrence and fear of crime. Some level of growth may result in improvements to open space and access to these.
- 3.29 For this SO (**create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car**), the impacts of delivering a specific level of new growth in the National Park relating to reducing the need to travel, encouraging modal shift and reducing congestion will depend largely on the location of new development in relation to sustainable transport links, services and facilities. Higher growth would result in greater journeys but in turn may generate funds to improve sustainable travel. For all options – there is uncertainty.
- 3.30 For this SO (**to ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.**), all the options provide for housing across the Park. The higher options would provide for a greater number and could address the needs of certain groups within the Park and to provide affordable housing. The lowest growth options will be uncertain in terms of addressing the wider needs of the community. This option also continues the existing trend whereby the affordable housing issue within the National Park is not addressed.
- 3.31 Higher growth options are likely to conflict with this SO (**value, protect and enhance the character of settlements, neighbourhoods, and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs**) as housing development may impact on the character of settlements and neighbourhoods. Design matters will be relevant to all options but detail on individual designs will be needed.
- 3.32 The following is a summary of each of the options and how they have been appraised:
- 3.33 The first option - Low – 234 dpa – is appraised as having a negative impact on SO4 (climate change) and on SO5, 6, 7, 8 and SO10. The low number of houses developed per year will have a detrimental impact on economic growth and will create limited opportunities for new facilities and open space. This growth option will be unable to

deliver affordable housing which is a key issue for the National Park. It would have a neutral impact on SO1 – conserving and enhancing the landscape and SO3 (heritage). This option has uncertain impacts on SO2 (biodiversity), SO9 (Transport) and SO11 (character of settlements).

- 3.34 The second option – Medium – 276 dpa is appraised as having a positive impact on SO 9 (good quality home). There are several uncertainties for this option. This include SO1, 2, 4, 7, 8,9 and 11. In most of these cases, it is unknown where housing development will be located. This means the impact of this option on the landscape, biodiversity, community health and wellbeing and the transport network requires further details and information. This option has a negative impact on the historic environment as it is likely development will be in settlements where there are historic centres and heritage assets.
- 3.35 The next option is also a Medium growth figure – 350dpa. Whilst there are several uncertainties for this option set against several of the SOs, there are some positive impacts. It will have a positive impact on SO4 (climate change) and SO6 (employment), SO8 and SO10 (good quality home). This option is appraised as having a negative impact on SO3 (heritage) and SO5 (resources). Where there are scores of ‘uncertain’ this mostly relates to the limited details at this stage especially the location of development.
- 3.36 The two highest options are 384 – 450 dpa and 698dpa. Both options score negatively against SO1 (landscape) and SO2 (biodiversity), SO3, 4, 5, 8 and 11. The option of 384-450dpa is appraised as having a positive impact on SO6 (employment) and SO10 (housing) as this may result in support for a range of employment offers (such as tourism and retail) and it should support a balanced growth in all areas of employment plus offer more housing opportunities. Both higher options are appraised as having positive impacts on SO10 (housing). High Growth option 698dpa has a positive impact on SO7 (promote equality of opportunity and the elimination of discrimination) as it may offer a wide range of benefits to all sections of society including housing, employment, and facilities.

### *Summary and Conclusion*

- 3.37 At this strategic level of assessment, certain assumptions have been made. The IIA inevitably relies on an element of subjective judgement. The options appraised for different quanta of housing growth were not associated with any spatial pattern or location of development. It was therefore difficult to appraise these figures against the sustainability objectives as the spatial implications of each were unknown. As such, whilst the IIA generally assesses each option individually, the assessments of these options are necessarily high level and focused on drawing out comparisons between the options.
- 3.38 The higher housing options have generally scored as conflicting with most of the sustainability objectives due to the impact they would have on several sustainability issues such as heritage, biodiversity, health and wellbeing and use of resources. These options would conflict with protecting the landscape of the National Park even if the exact spatial strategy is not known at this stage. However, the higher options are not in conflict with sustainability objective 10 – to provide a home – as the higher options will support the delivery of this objective and are likely to ensure all housing needs are provided. On balance the two higher development options are not considered appropriate options at this stage.

- 3.39 The lower option (234 dpa) has very few positive benefits. However – as the exact locations of housing sites is unknown, it is not clear what impact this option has on sustainability objectives 9 and 11. This option conflicts with the sustainability issue of supporting employment and preparing for climate change as it does not create the critical mass for opportunities to be harnessed. It cannot provide enough housing to address all needs across the park and is therefore in conflict with sustainability objective 10.
- 3.40 The middle two options will have varying impacts on the sustainability objectives but score best in seeking to balance growth needs for both housing and employment with protecting and enhancing principles. The impact on landscape and biodiversity will depend on spatial location but it should be possible to ensure housing delivery in locations where there is no conflict with these issues. The middle options have some conflict with heritage and uses of resources as will all development. It is not clear what the impact will be on transport but they both will help deliver the sustainability objectives of providing homes within the Park.
- 3.41 At this stage in the IIA development, the two medium options (276dpa and 350dpa) are the most appropriate in growth scenarios. However, it must be remembered that there are several unknowns embedded within the options. These uncertainties must be taken into account and further work is needed on the spatial strategy and sites before the growth options are considered in more detail.

## 4. Spatial Strategy for the Local Plan Review

### *Introduction*

- 4.1 A starting point for the Local Plan Review is for the National Park Authority to consider, in high level terms, the overall spatial strategy options for the distribution of development, taking into account the current settlement pattern and the relationship of the National Park with surrounding areas.
- 4.2 Paragraph 3.117 onwards in the adopted Local Plan sets out the level and distribution of housing growth. For each of the LP growth scenarios, two high-level development strategies were initially considered: dispersed development (where development would be spread across a wide range of settlements), and a concentrated strategy (where housing growth would be restricted to the five key settlements of Petersfield, Lewes, Midhurst, Liss and Petworth).
- 4.3 Some growth scenarios were, at an early stage, considered not to be reasonable alternatives. Of the remaining options tested through the SA, it was determined that a 'dispersed medium' development strategy would do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park.
- 4.4 This paper sets out:
- An overview of **spatial strategy options**.
  - A summary of the background evidence which has informed the selection of the options.
  - The **methodology** for assessing these options.
  - The **appraisal of the options**; and
  - **Summary and conclusions**.

### *The Options<sup>3</sup>*

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

**Table E<sup>4</sup>**

1	<i>Primary Settlements</i> Delivery of homes across the National Park with concentrations of housing allocations in the five primary settlements (Petersfield, Lewes, Midhurst, Petworth and Liss). This option will also include development on brownfield sites and small sites which are in the primary settlements.
2	<i>Primary settlements &amp; sustainable transport</i> Housing allocations across the National Park are in the primary settlements (see option 1) plus in areas with established sustainable transport infrastructure, specifically well-established bus routes, rail, and cycle routes sustainable for commuting. This options also includes

<sup>3</sup> Please note that these options will bring forward different levels of development. Details and development figures will be added once the LAA work is finished.

<sup>4</sup> Potential capacity figures for each option is to be added once the LAA is completed.

	development on brownfield sites and small sites either inside the main settlements or on sustainable transport routes.
3	<i>Brownfield land</i> Housing allocations delivered on brownfield sites only. These are sites outside of the primary settlements and not included in options 1 and 2.
4	<i>Small sites</i> Settlement enhancement sites (10 or less units) with a key focus on housing needs. These sites are not included in options 1 and 2 but are associated with settlements (they are not standalone small sites located away from settlements)
5	<i>Brownfield and Small sites</i> Brownfield sites and small sites developed for housing – dispersed across the National Park – a combination of options 3 and 4.
6	<i>Edge of the National Park</i> Housing to be allocated on gateway sites on edge of NP that provide benefits to the Park.
7	<i>New Settlement</i> Strategic growth is delivered as a new settlement (with circa 1,500 – 4,000 homes) <sup>5</sup> with a small remainder delivered at small sites across the National Park.
8	<i>Existing Local Plan – Policy SD25</i> Development delivered in towns and villages across the broad areas and river corridors of the National Park that can accommodate growth of a scale and nature appropriate to their character and function.

4.6 In considering the overall spatial strategy for the Local Plan Review, SDNPA may decide that a combination of more than one spatial strategy option is taken forward. However, this is uncertain, and so each spatial strategy option has been appraised on its own merits, against each SA objective.

4.7 The appraisal work presented below considers both the principle of focusing growth in line with each option and, where appropriate the implication of possible locations coming forward under that option. This is of relevance for consideration in relation to the appraisal of Options 6 and 7 as these are likely to be focussed on sites/spatial proposals.

#### *Background Evidence*

4.8 The adopted [Local Plan](#) considers the Development Strategy for the National Park in Strategic Policy SD25. The purpose of Policy SD25 is to identify towns and villages across the broad areas and river corridors of the National Park that can accommodate growth of a scale and nature appropriate to their character and function. These have been identified in line with two principal criteria: a) The future sustainability of the

<sup>5</sup> The range has been identified following a consideration of new settlement schemes including - proposal for 'Patching Garden Village' was for 1,200-1,500 homes. In 2017 the government announced its support for 14 new 'garden villages' – new communities of 1,500-10,000. Salt Cross Garden Village in South Oxfordshire is around 2,500 houses. Mayfields in Mid Sussex/Horsham is estimated to be 7,000 homes. Developments nearing the minimum size for a new settlement to be sustainable (around 4,500 homes) are likely to provide new services and facilities.

settlement, in terms of its facilities and services; and b) The form and character of the settlement within its landscape context.

- 4.9 The spatial strategy is set out in Chapter 3 of the Local Plan - to plan for a medium level of growth dispersed across the towns and villages of the National Park. The development strategy reflects the vision and objectives of the Local Plan and promotes sustainable development. It should be read in conjunction with the spatial portrait relating to the five broad areas that characterise the National Park: the Western Downs, the Western Weald, the Scarp Slope, the Dip Slope, the Coastal Plain and the four river corridors formed by the Rivers Arun, Adur, Ouse, and Cuckmere.
- 4.10 The Spatial Strategy of the Local Plan states that the level and distribution of growth is informed by a robust evidence base and engagement exercise that incorporates the results of informal and formal consultations on the Local Plan.
- 4.11 Paragraph 3.120 states that of the remaining options tested through the SA, it was determined that a 'dispersed medium' development strategy would do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park. The SA also identified the sustainability benefits of encouraging development in a range of small settlements to support local services, rather than limiting growth only to locations with public transport opportunities.

### *Methodology*

- 4.12 A key element of the Local Plan's development process to date has been to consider different approaches to delivering housing in the South Downs National Park. This has been considered in the context of enabling the National Park Authority to address local housing need as far as possible whilst also: 1) meeting the Purposes and Duty of the National Park and 2) conserving and enhancing the special qualities of the National Park.
- 4.13 The IIA Report presents the comparative effects of the eight options above, identifying where significant positive and negative effects have the potential to arise. The appraisal findings are presented under the sustainability objectives.
- 4.14 The work on appraising different spatial options results in appropriate assessment of broad location and balance of development across the National Park, the management of the housing supply, the balance between employment and housing and the delivery of affordable housing. Therefore, this work needs to be considered in association with the growth scenarios.
- 4.15 However, none of the spatial strategy options are considered unreasonable at this stage in the appraisal process. The strategic spatial options are broad regarding the spatial distribution of development and do not allocate sites for development. As such, this assessment has sought to flag where these options have potential to result in significant effects, but the actual effects will depend on the exact location, layout, and design of developments. The preferred option may take elements from a number of these strategic spatial options. Therefore, it is considered that all options are reasonable.
- 4.16 Government advice states that reasonable alternatives are the different realistic options<sup>6</sup> considered by the plan-maker in developing the policies in the plan. They

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<sup>6</sup> As referenced before – spatial strategy options will bring forward different levels of development. Details and development figures will be added once the LAA work is finished.



need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

- 4.17 The IIA needs to outline the reasons the alternatives were selected, and identify, describe, and evaluate their likely significant effects on environmental, economic, and social factors using the evidence base (employing the same level of detail for each alternative option). As part of this work, the IIA needs to identify any likely significant adverse effects and provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach considering the alternatives.
- 4.18 The appraisal is a qualitative exercise based on professional judgement taking into account the information gathered in the Scoping Report. The IIA framework is set out in the Scoping Report and the sustainability objectives are listed above.
- 4.19 The magnitude of the impact of the different options on each objective is defined as significant positive effect, some positive effect, neutral or no link, significant adverse effect, adverse and uncertain effects (see Table F).

**Table F – Assessment key**

Significant likely adverse effect	--	Option would conflict with the objective and unlikely to be acceptable.	Significant likely positive effect	+	Option would significantly help with achieving objective
Likely adverse effect	-	Option would conflict with the objective.	Likely positive effect	++	Option/policy/site would help with achieving objective
Neutral/no effect	0	Option would neither help nor hinder the achievement of the objective	Uncertain effects	?	More information needed

### *Appraisal of the Options*

- 4.20 Table G sets out the appraisal of each of the 8 options against the sustainability objectives. It is important to remember that locations for each of these options have not been set. This is of relevance to option 7 – new settlement. The exact location for this is not identified but it is assumed that it will be self-contained and will require the development of new facilities and transport systems. In addition, option 6 – development on the edge of the National Park may be in locations near to existing settlements where some co-sharing of facilities is experienced, or it may be in more rural locations where limited existing facilities exist. The exact locations are not identified.

Table G Summary of likely sustainability effects of the spatial strategy options for the South Downs Local Plan Review

	Sustainability Objectives (SO)	1 - Primary Settlements	2 - Primary settlements & sustainable transport	3 - Brownfield land outside settlements	4 – Small Sites near settlements	5 - Brownfield and Small sites	6 - Edge of the National Park	7 - New Settlement	8 - Existing Local Plan Policy 25
1	To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.	-	-	+	?	?	-	--	+
2	To conserve and enhance the region's biodiversity and contribution to nature recovery.	?	?	?	?	?	?	?	?
3	Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.	-	-	?	-	?	?	?	?
4	To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures.	+	+	-	-	-	?	+	+
5	Protection & Sustainable Use of Resources.	+	+	+	?	?	?	-	?
6	Employment and Economy	++	+	+	+	+	?	?	+
7	Promote equality of opportunity and the elimination of discrimination	+	+	?	0	?	?	+	+
8	Contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities	+	+	?	?	?	?	+	+
9	Create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car	++	++	+	?	?	?	-	+

	Sustainability Objectives (SO)	1 - Primary Settlements	2 - Primary settlements & sustainable transport	3 - Brownfield land outside settlements	4 – Small Sites near settlements	5 - Brownfield and Small sites	6 - Edge of the National Park	7 - New Settlement	8 - Existing Local Plan Policy 25
10	To ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.	++	++	+	?	?	++	+	++
11	Value, protect and enhance the character of settlements, neighbourhoods and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs	?	?	?	?	?	?	?	?
	TOTAL positives	7	7	5	1	1	1	4	7
	TOTAL negatives	2	2	1	2	1	1	3	0

- 4.21 Only 2 of the options (3 and 8) are considered to have a positive impact on this sustainability objective 1 - **to conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs**. Developing brownfield land is assumed to be primarily within urban areas and therefore could have a positive impact on conserving the landscape character. The existing policy within the Local Plan is due to consideration given to any landscape impact. The option of small sites/brownfield land would require further details on the exact location of development.
- 4.22 The effects of development in relation biodiversity in the National Park will depend in part on the design, specific location of development and as well as the sensitivities of nearby biodiversity designations and other undesignated habitat areas. This is currently unknown and therefore all effects recorded in relation to this SO (**to conserve and enhance the region's biodiversity and contribution to nature recovery**) are uncertain. There is a possibility that delivering development in brownfield sites will have less of an impact on biodiversity, but this is not a certain assumption and brownfield land may have valuable biodiversity on site. It is likely a new village will have a negative impact on this SO but as there are no details on location, this remains uncertain.
- 4.23 As above, the effects of development in relation to heritage assets and their settings will depend in part on the design and specific location of development which may allow for mitigation and enhancement to be incorporated. These factors are currently unknown. Several settlements (both smaller ones and the primary towns) will contain listed buildings and/or a core CA and therefore development could impact on these assets. A new village will probably not contain an historic core, but its location may negatively impact on the historic environment. It is appraised that the first 2 options have a negative impact on this SO (**conserve and enhance the historic environment, heritage assets and their settings and cultural heritage**). Concentrating development across small sites may lead to limited opportunities to enhance any heritage assets. This is negative.
- 4.24 For this SO (**to ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures**), all new development is likely to result in some level of carbon emissions, for example, as construction occurs, and as new homes and businesses require heat and electricity. Carbon emissions in the built environment can be reduced through energy efficient design and construction, and the inclusion of low energy and renewable energy sources to supply heat and power. There is potential for larger sites to deliver more carbon change adaption and mitigation, and these schemes will contribute towards the National Park's carbon neutral target. It is possible that some of these schemes will be delivered within larger settlements where co-existing opportunities such as using public transport can be achieved. Development of brownfield sites may result in increased and abnormal costs which may result in some of the energy efficiency designs are compromised and will have some degree of embodied carbon to consider which may compromise the ability to achieve net zero. Further details would be needed.
- 4.25 Locating development within and around the primary settlements and/or on brownfield land is likely to be positive in regards this SO (**protection and sustainable use of resources**) especially regarding protecting soils. Depending on location, developing in these locations may result in greater air quality issues but on balance, it is

considered they will have a positive impact. Brownfield land may include contaminated land but through development, this should involve a clean-up programme. A new village is likely to be located on greenfield and is therefore considered to have a negative impact on this SO. For the remaining options, further details are needed.

- 4.26 For this SO - **economy and employment** - concentrating homes and jobs at the larger settlements of the National Park could help strengthen the local economy through increasing its workforce and attracting investment to town centre locations. This approach would help to secure the vitality and viability of the more important town centre locations in the National Park. Spatial strategy options 2, 3, 4, and 8 could help to contribute to the local economy at the more rural locations in the National Park thereby supporting the diversification of the rural economy. The delivery of a new village could present an opportunity to build new business units but as the location is unknown at this stage – it is unclear if this will happen or if the location is sustainable for employers and employees. There is uncertainty centred on the option to build on the edge of the national park as locations are not clear at this stage. In some cases, there may be a positive benefit.
- 4.27 For this SO - **promote equality of opportunity and the elimination of discrimination** – options that provide a wide range of opportunities for all sections of society score positively. This includes spatial strategy options 1, 2, 7 and 8. Whilst the exact location is not known at this stage – it is likely a new settlement could provide a range of jobs, learning and support services. Existing settlements may also provide a range of services and providers. Having transport links will also enable communities to access a range of services.
- 4.28 For this SO - **contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities** - focussing development within existing larger settlements and primary towns has the potential to result in residents having a good level of access to existing health care facilities, and being able to access other existing facilities such as sports centres and open spaces which could promote the uptake of physical activities. However, the negative impact is that existing facilities may become over stretched. In addition, this option doesn't help provide facilities in smaller, rural areas where there may be a lack of provision. In all options, access to the countryside should be available but if development is not located near public transport nodes, then those without cars/private transport means may struggle. The level of growth provided at a new village could potentially provide critical mass to support the delivery of new healthcare provisions and areas of open space to the benefit of public health in the area. It is likely that the existing strategy in Policy 25 will contribute towards the wellbeing of residents through allocating development in sustainable locations. For the other options, there is uncertainty due to a lack of details plus allocating small sites, especially in rural areas, may mean there is a lack of suitable provision locally and residents will need to travel.
- 4.29 Directing development to the larger settlements which have a range of existing employment opportunities, education/healthcare facilities and amenities present. This is likely to reduce the need to travel further afield using private vehicle trips. There is a positive impact on this SO (**create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car**) for the

first 2 options as these relate to the larger settlements (whilst Midhurst and Petworth are not on a railway line – there are buses which serve the town). Option 3 (brownfield land) and the final option (policy 25) also has a positive impact on this SO. Directing growth to smaller settlements may result in out commuting. For several options, the details are unclear as the exact locations are not finalised. Not all small sites will be in small settlements, but they will be linked to existing settlement – however there is uncertainty around options 3-6. A new village may have bus and cycle links but unlikely to have a new train station. It is considered this will have a negative impact.

- 4.30 For this SO (to ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability), all the options will enable new housing to come forward. However, as there will be different development capacities for all the options, small sites alone are likely to deliver a small number of housing and affordable housing. Brownfield sites with abnormal development costs may not deliver the required affordable housing element but on balance is considered to have a positive impact on this SO. There are likely to be long lead in times and potentially long build out times for homes provided in a new village which are starting from nothing.
- 4.31 As with other SO, the details of design, scale, layout, and location are unknown at this stage. The impact of each option on this SO (value, protect and enhance the character of settlements, neighbourhoods, and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs) will be based on the detail. Locating development in the primary settlements – where there is a wide range of designs and scales/layouts within each urban area may mean that new development will value and protect any prevailing character more readily. However, this cannot be certain without further details.
- 4.32 The following is a summary of each of the options and how they have been appraised:
- The first option (primary settlements) is appraised as having a positive impact on 7 of the sustainability objectives. It will have a positive impact on employment and economy, climate change, equal opportunity, and new housing. The primary settlements will contain brownfield and small sites but together – existing facilities, open space and transport links will enable further positive benefits.
  - Option 2 – primary settlement and transport links has a similar positive impact on the same SOs. This option has the added benefit of directing development to areas where there are suitable transport links as well as the primary settlements.
  - Option 3 (brownfield land) has a positive impact on landscape as it is assumed most of this land will be within areas where there is some previously developed and not within the wider landscaped areas of the Park. However, this option does relate to brownfield sites excluded from options 1 and 2. Whilst exact locations are unknown – it is considered this option will have a positive impact on landscape. This option has a positive impact on 5 SOs.
  - There are several uncertainties around option 4 (small sites). This is mostly due to exact details of the sites is unknown and that whilst these sites are associated

with existing settlements – the impact is not certain. It is assumed that the settlement will contain heritage assets that may be negatively impacted by new development especially if they are small ‘infill’ type developments.

- Option 5 is brownfield and small sites in combination. There are several uncertainties in terms of impact on the SO. Where brownfield sites have been appraised as being positive against some of the SOs, this has not always been the same with Option 4 (small sites).
- Option 6 (edge of National Park) has only scored as having a positive impact against the housing SO. The other scores are either negative or uncertain. Again, this is a high and strategic appraisal exercise, and the exact sites are unknown.
- Option 7 new settlement has scored favourably against several SOs as it is considered new homes, facilities and open space will all be brought forward as a comprehensive scheme. However, this option will impact negatively on the landscape and the protection of resources and sustainable transport.
- Finally, option 8 scores positively against 7 SOs, including new homes, sustainable transport, wellbeing, and landscape.

### *Summary and Conclusions*

- 4.33 The actual effects of overall strategy options will depend heavily upon the precise location and scale of development, the development capacity, the quality of design and the delivery of supporting infrastructure. As such, this is a high-level appraisal and it is likely that a short list will be considered further in association with the growth scenarios and development figures.
- 4.34 Notwithstanding this matter, the summary of effects indicates that Option 1 (Primary Settlements) and Option 2 (primary settlements & sustainable transport) and Option 8 (existing Local Plan Policy 25) perform well. Option 3 (brownfield land outside primary settlements) also scores positively. Options 1 and 2 have a positive impact on protecting resources, sustainable transport and providing houses including affordable homes. They also have a positive impact on supporting the economy and employment. Depending on the exact location of the development, these options may have a negative impact on heritage assets and landscape, amongst other SO’s. Option 8 has a positive impact on landscape as it relates to the existing Policy within the Local Plan whereby development has been directed away from areas of high landscape sensitivity.
- 4.35 Options 6 (edge of the National Park) and 7 (new settlement) have limited positive impact on the SO’s. Option 7 has a positive impact on the health and wellbeing of the population as it may result in the creation of new facilities as well as enable people to access open space and countryside beyond the settlement. This also positively impacts on equal opportunities and equalities.
- 4.36 In conclusion – it should be noted that this is a high-level strategic appraisal and much of the detail on exact locations for development are unknown. These uncertainties must be taken into account and further work is needed on the spatial strategy and sites before the options are considered in more detail. Taking this into account and considering the options on their own merits - Options 1, 2, 3 and 8 are the most appropriate.

## 5. Sites

### *Introduction*

- 5.1 The South Downs National Park Authority has undertaken a Land Availability Assessment (LAA) which included a call for sites exercise in 2022 to identify and compile a list of sites that are being promoted for housing development. In addition to the sites submitted in 2022, the SDNPA also assessed sites that were originally highlighted during the SHLAA process in previous years. As well as these sites, a list of 'other' sites were recorded from a variety of sources such as neighbourhood plans and planning applications.
- 5.2 Stage 1 of the process to assess and refine the list of sites was to undertake an exclusion test. This removed sites which failed to meet initial criteria set out in the LAA methodology.
- 5.3 The Stage 2 test considered landscape, suitability, availability, and achievability of sites to identify which sites should be 'rejected' from further consideration and those sites which have 'potential' for further consideration. Further details are set out in the Site Selection Paper (currently being written). For each site, an assessment proforma was completed. These are non -SA workstreams required to be completed for sites considered across the National Park.
- 5.4 This section sets out the following:
  - A summary of the **background evidence and supporting information** regarding sites.
  - The proposed **methodology** for assessing sites.

### *Background Evidence*

- 5.5 The NPPF (Dec 2023) states that local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. One of the tests of soundness is for Local Plans to be positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.
- 5.6 Paragraph 69 states that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability.
- 5.7 One of the first areas of background evidence considered for the LPR was work undertaken for the previous Local Plan and how this and the accompanying SA considered the number of housing sites.
- 5.8 The Issues and Options SA document for the current SDLP, published in 2014 for consultation, set out several options relating to sites, but it did not consider each individual site.
- 5.9 The Preferred option SA report published in 2015 considered proposed allocated sites but did not assess or appraise a long list of sites to conclude on the preferred sites for allocation. However, it did list sites that were included/discarded from the SHLAA.



- 5.10 The Submission version SA (2018) for the Local Plan referred to settlements but not individual sites (in terms of using the SA as a sifting exercise for sites). The SA did appraise all sites that were included in policies (i.e. the allocated sites).
- 5.11 In terms of appraising a lengthy list of sites, the adopted Local Plan was supported by several background evidence documents. The first was the **Settlement Facilities Assessment 2015**. This was followed by the **Development Strategy** background paper 2017 which outlined LP Policy SD25: Development Strategy. Paragraph 4.2 states that as part of the early preparation of the Local Plan, the Authority identified the current role and function of settlements based on the number and type of facilities and services they provide, to inform the spatial strategy of the Local Plan. This led to categorisation of settlements into 5 tiers. The third was a **Sites and Settlement** paper 2017. This set out several factors which apply specifically to housing site selection.
- 5.12 The fourth background evidence document was the **Sites and Settlements Route Map** for Housing allocations 2018. The purpose of this report was to set out the route map for potential housing allocation sites, which were considered during the preparation of the emerging South Downs Local Plan (SDLP). It explains the process undertaken in assessing sites for housing and progressing the most suitable through to their allocation as set out in the South Downs Local Plan Pre-submission. The paper did not assess the sites in a SA format or against the SO. It did include the landscape assessments.
- 5.13 The Route Map gave an overview of the site selection process and set out the rationale for the selection of sites for individual settlements within the National Park. Appendix 1 lists all possible housing sites considered by the SDNPA for allocations both by local authority area and by settlement.
- 5.14 A short report by Mark Fessey from AECOM<sup>7</sup> considers site options in the SA process. His report states that whilst individual site options generate a high degree of interest, they are not reasonable alternatives (RA) in the context of most local plans. However, consideration is usually given to the merits of site options as part of the process of defining RA growth scenarios. This work can be quite light touch. Fessey sets out a process for defining RA growth scenarios via consideration of site options. He sets out the following steps in the process:
- Site options – the task is to gather and sift the ‘building blocks’ of growth scenarios. There is no pressure to undertake dedicated work as part of the SA process, and a key priority is avoiding duplication of effort, given there will also be non-SA workstreams looking at site options. However, it can be appropriate to undertake targeted appraisal of competing strategic site options.
  - Sub-area scenarios – the aim here is to consider site options individually and in-combination by sub-area (e.g. settlement) to arrive at a series of alternative site packages that can then be progressed to the next stage, where they are combined to form growth scenarios for the plan area. Conclusions on sites can then be drawn based on performance relative to other sites within the sub-area, regardless of performance against sites elsewhere.

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<sup>7</sup> [https://www.linkedin.com/posts/mark-fessey-34867328\\_site-options-in-sa-activity-7133744581921140736-roMC](https://www.linkedin.com/posts/mark-fessey-34867328_site-options-in-sa-activity-7133744581921140736-roMC)

*The proposed methodology for assessing sites*

- 5.15 From the LAA work undertaken for the LPR, there is a list of sites that ‘have potential’. It is important to note that the SA/IIA is not a decision-making document, rather it informs decisions. Therefore, there is a site selection process outside of the IIA. In the context of the SDNP, our geography is an important consideration. A separate document containing details on the sites and settlements will accompany the final IIA.
- 5.16 The decision to include a site for allocation is based on professional judgement, relevant and evidential technical studies and by consultation responses as part of an iterative process. All the allocated sites identified for possible allocation are subject to SA assessment.
- 5.17 The methodology is as follows:
- Stage 1 -For the sites – each proposed site will be appraised against the sustainability objectives. This is set out in Table H and the sites will be listed under the relevant settlement where they are located. The Table will contain the scores. Commentary will explain the reasons for the scores.
  - Stage 2 -For each of the settlements (where there are proposed new allocations) a map with key constraints will be included in the IIA. Key constraints (where they are present) include conservation areas, flood zones, protected areas and settlement boundaries. Site boundaries of Neighbourhood Plan allocations (if there are any) and existing Local Plan sites will also be shown. These are for sites that are not started/built but are allocated. Each settlement will be appraised against the SOs. This exercise will be a high level snapshot of each settlement. It will not be a deep, technical appraisal but will provide a general score against the objectives and will assist in understanding the various sustainability issues for each settlement. Each one will be appraised as a standalone settlement. Where there is only one site, this will still be appraised and considered against the key constraints. The settlement will also be appraised.
  - Matters relating to settlement priorities, visions within NDP and the main services (such as school/bus stops/railway stations) will be set out in the separate document.
  - Stage 3 -using the site scores from the first stage – then each site located within a settlement will be appraised in combination. A simple table illustration is as follows:

	Settlement name
	Settlement map (showing sites) and key constraints (listed above)
Site A	Results of stage 1 appraisal against SO
Site B	As Above (if more than one site) <sup>8</sup>

<sup>8</sup> Please note – this is for LPR sites only and not any NDP or Local Plan allocations which are shown on the maps. These sites will have been appraised during the NDP/LP process.

Site C	As Above (if more than one site)
Stage 2	High level snapshot of the overall settlement
Stage 3 In combination	Appraisal of all sites and impact of in combination/if all sites were brought forward. This includes NDP sites. Where there is only one site (LPR site), then an 'in combination' appraisal is not needed.

5.18 In conclusion – from the stages above, the IIA will summarise which sites (as standalone) score positively against the SO (this will be taken from stage 1), which settlements (stage 2 -as standalone) score positively and whether the site scores change when considered in combination on a settlement-by-settlement basis (stage 3).

5.19 Please note that Stages 2 and 3 are set out in a separate document – **Appendix B**.

5.20 Please see box below. This gives a flow diagram to the process and methodology.

All suitable sites are appraised against the SOs. Sites are listed under settlements. See Stage 1 table.



Each settlement has a map (containing some key constraints and sites) included within the SA.



Each settlement has a high level appraisal against the SO as standalone settlements. Stage 2.



Each site within a settlement (using the scores set out in stage 1 above) are appraised in combination. Stage 3.



Final list of allocated sites (and policy text) is appraised again in the SA.

### *Stage 1 – Assessment of sites*

- 5.21 The table below shows the scoring and appraisal of each proposed allocation site against the sustainability objectives. This appraisal is based on how the site presents now at this relatively early stage in the plan-making process, based on information available at the time of writing, and does not include any mitigation or details set out within the draft policy.
- 5.22 Information about the scoring and how these have been undertaken are set out in the commentary after the table. The same colours and symbols for the scores are the same as those used earlier in this document.
- 5.23 The site addresses and reference numbers are those used on the maps and by the SDNPA. These sites will form part of policy numbers, and these references will change.

Table H Stage 1 – Assessment of Sites<sup>9</sup>

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
Adur District Council												
Sompting	AD001/C4S-035 Land off Steepdown Road 30	-	+	-	?	+	0	-	?	-	++	-
Arun District Council												
Findon	AR009 Former allotments site 20	0	+	0	?	?	?	?	?	?	++	0
Chichester District Council												
Bury	CH003 Land East of Coombe Crescent 15	-	+	-	?	-	0	--	+	-	++	?
Cocking	CH199 C4S-150 Land east of A286 and	-	-	-	?	-	0	0	+	-	+	?

<sup>9</sup> An abridged version of each of the Sustainability Objectives is used in the table

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	north of Mill Lane 25	-	-	-	?	-	0	-	+	-	+	?
Easebourne	CH203 Land at former Easebourne School 8-10	-	+	-	?	-	0	-	-	-	+	?
	CH206 Land west of Budgenor Lodge 20	-	-	-	?	-	0	+	+	-	+	-
	CH147 Midhurst Community Hospital and 1-2 Rotherfield Mews 120 care home units 35 C3	-	-	-	-	0	-	+	+	+	++	?
Fernhurst	CH026 Land at Hawksfold 6-8	-	?	-	?	-	0	?	+	?	+	?
Lodsworth	CH215 Land West of The Street 5-10	-	+	?	?	-	0	-	?	?	+	+
Midhurst	CH165	-	+	?	?	-	0	+	+	?	++	?

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	Land east of Pitsham Lane 50-75											
	CH222 Land adjacent to The Grange Car Park 10 affordable	--	+	-	?	-	?	+	+	+	+	?
	CH218 Former Bus Depot, Pitsham Lane 6 affordable	+	?	0	?	-	0	+	+	-	+	?
	CH217 C4S-297 Land at Forest Road 5 affordable	+	?	+	?	-	?	+	+	-	+	?
Northchapel	CH074 Land west of Valentines Lea 25	-	-	-	?	-	0	?	+	-	+	?
Petworth	CH092 1/2 - Land at Rotherbridge Lane	-	?	0	?	-	-	+	+	-	+	+

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	(Parcel: Land to the rear of Rothermead) 6											
	CH093 2/2 - Land at Rotherbridge Lane (Parcel: Land west of Station Road) 8	-	?	0	?	-	0	+	+	-	+	-
	CH096 Land north of Northend Close 18	0	+	0	?	-	?	+	+	-	+	+
Rogate	CH236 Land west of Village Hall 9	-	?	-	?	-	0	-	+	-	+	-
East Hampshire DC												
Binsted	EA161 Land south of Lovell Gardens 10-12	-	-	0	?	?	0	-	+	?	+	?
Buriton	EA005 Land at Greenways	-	0	0	?	?	0	-	+	-	+	?



		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	Lane and Kiln Lane 11											
Liphook	EA216 Land at Westlands 8	-	+	0	?	-	0	+	+	+	+	?
	EA215 Land west of Liphook / Land at Westlands Park 250 14 traveller pitches	--	-	-	?	-	+	+	+	+	++	?
Petersfield	EA071 Land south of Paddock Way 100-150 C2 care home units / C3 flats	-	-	0	?	-	+	+	-	+	++	?
	EA182 Land at Drum Court, The Spain 21	0	?	-	?	0	-	+	+	+	++	?
	EA225 Land at Festival Hall 20 Commercial Car park	0	+	-	?	-	+	+	+	+	++	?

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	EA195 The Courtyard, Heath Road 8 Commercial	0	?	-	?	0	+	+	+	+	+	?
	EA187 Windward, Reservoir Lane 5	-	+	0	?	+	0	-	+	-	+	?
	EA067 Land at Penns Place 35 Sports hub Pitches	-	-	0	?	0	-	-	-	?	++	?
Sheet	EA200 Land off Merryfield Road, Sheet 8	0	-	0	?	0	0	+	+	+	+	?
Stroud	EA212 Land north of Winchester Road 15-20	--	-	0	?	-	0	-	+	-	+	0
West Liss	EA043 Land at Farnham & Station Roads 30 flats and/or 60-	--	-	-	?	-	0	+	+	+	++	?

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	bed care home.											
Horsham District Council												
Amberley	HO37_HO38_HO39 East Street Farm 25-45	-	?	-	?	0	+	-	+	?	++	?
Lewes & Eastbourne Councils												
Alfriston	WE014 Alfriston Court 25-30 care home units	--	+	-	?	0	+	-	+	-	++	?
Cooksbridge	LE090 Land at Beechwood Lane 23-26	0	-	0	?	-	0	+	+	+	++	?
Ditchling	LE148 Land rear 71 East End Lane 5	0	+	-	?	0	0	-	+	-	+	?
Kingston	LE124 Audiburn Farm, Ashcombe Lane	-	+	0	?	0	0	-	+	-	+	?

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	5	-	+	-	?	0	0	-	+	-	+	?
	LE118 Land at Beaumont, Wellgreen Lane 5	-	+	-	?	0	0	-	+	-	+	?
Lewes	LE141 East Sussex College, Mountfield Road 225	0	?	-	?	-	-	+	+	+	++	?
	LE103 Land behind the White Hart, 55 High Street 5	-	?	-	?	-	-	+	+	+	+	?
	LE133 Springman House, 8 North Street 16	-	?	-	?	?	0	+	+	+	+	?
	LE039 County Hall, St Anne's Crescent 240 Commercial Community uses	-	-	-	?	0	+	+	+	+	++	?
	LE114 Land at the rear of 49-	-	-	-	?	?	0	+	+	+	+	?

		1 National Park's landscape character, functionality and perception and special qualities.	2 Biodiversity and contribution to nature recovery.	3 Historic environment, heritage assets and their settings and cultural heritage.	4 Impacts of climate change and to address the causes of climate change.	5 Protection & Sustainable Use of Resources	6 Employment and Economy.	7 Promote equality of opportunity and the elimination of discrimination	8 Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	9 Efficient transport network	10 Good quality home, suitable to their need. New affordable homes.	11 Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	55 St Anne's Crescent 8											
	LE134 The Shelleys Hotel, 136 High Street 8	0	?	+	?	0	-	+	+	+	+	?
Seaford	LE109 Land at Seaford Golf Club, Firle Road 12	0	+	0	?	0	0	-	+	-	+	?
Mid Sussex District Council												
Hassocks	MI014 Land east of Lodge Lane 30	-	+	?	?	+	0	+	+	+	++	-
Winchester City Council												
Owlesbury	WI100 Land at Old Green Farm 10	0	-	0	?	0	-	-	+	-	+	?
	WI101 Land at Whites Hill Farm Commercial	-	-	-	?	0	+	-	+	-	+	?
Swanmore	WI102	-	-	0	?	0	0	-	+	+	+	?

		1	2	3	4	5	6	7	8	9	10	11
		National Park's landscape character, functionality and perception and special qualities.	Biodiversity and contribution to nature recovery.	Historic environment, heritage assets and their settings and cultural heritage.	Impacts of climate change and to address the causes of climate change.	Protection & Sustainable Use of Resources	Employment and Economy.	Promote equality of opportunity and the elimination of discrimination	Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	Efficient transport network	Good quality home, suitable to their need. New affordable homes.	Character of settlements, neighbourhoods and rural buildings. Highest quality of design.
Local Authority/ Settlement & Site Name	Reference, address & capacity											
	Land north of Dodds Lane 15											
Twyford	C4S_225 Land north of Hewlett Close 15	0	0	0	±	-	0	0	-	-	+	±

## *Conclusion and Summary on Sites and Settlement Appraisal*

- 5.25 This IIA report has assessed sites that are considered appropriate to take forward into the Local Plan review. Forty eight new site allocations are proposed. These sites were identified through the Land Availability Assessment 2024 (provisional findings), which reviewed over 800 sites across the National Park. They have been tested through this IIA and other evidence studies. The adopted South Downs Local Plan includes 37 site allocations, nine of which have been implemented. The remaining 28 need to be carried over into the new Local Plan.
- 5.26 The 'in combination' assessments (set out in Appendix B) includes sites that are allocated in the relevant Neighbourhood Plan (the South Downs Local Plan sits alongside 45 made Neighbourhood Development Plans, many of which also allocate sites) and in the adopted Local Plan. This assessment work looked at the cumulative impact of all sites coming forward on a settlement by settlement basis. This meant that reasonable alternatives within a settlement were appraised against the sustainability objectives.
- 5.24 Several observations and comments on the site allocation scores are set out below:
- Sites that were originally assessed as being of high or moderately high in landscape sensitivity were appraised as having a negative impact on the first sustainability objective.
  - In all cases, further information is required regarding the impacts and causes of climate change. This is because the details of how development can address climate change is within the details of the design and exact layout of each scheme.
  - Similarly, when appraising sites against the last sustainability objective (character of neighbourhood/high quality design), many of the sites were scored as requiring further information. The details of the design and layout of each of the developments are unknown at this stage. In the cases where sites have been scored as having a negative impact on design – this is often where the allocations are close to buildings or areas of character.
  - The appraisal against sustainability objective 9 – efficient transport network relates to the availability of a train station/ other transport options other than private vehicle/car use. It also relates to whether there is adequate walking and cycling provision, especially relating to rural roads with no pavements and adequate pedestrian routes to bus stops and other facilities.
  - Scores relating to objectives 7 and 8 are based on whether there are adequate employment, education and health facilities and opportunities within proximity to the site. If the site is rural and within a settlement with limited choices, then the score will be negative. Many sites have ease of access to open space and the countryside and therefore will score positively against objective 8.
  - Sites located near or abutting conservation areas and listed buildings (and any other heritage asset) will score negatively against objective 3.
  - If a site includes the creation of new employment opportunities and/or it is within a settlement with several nearby employment areas – this will be scored positively. In many cases, the impact is neutral. Any loss of employment floor

space (even if this relates to a hotel that is currently closed), the site is scored negatively. The appraisal of the sites against objective 2 (biodiversity) relate to site assessment information and whether there are nature conservation designated areas that will be impacted by the development and/or any opportunities to contribute towards nature recovery.

- 5.27 The cumulative assessments set out in Appendix B considers the sites and the settlement (as a standalone location). The results of this work will assist and inform the development of policies for the sites where mitigation and addressing key impacts can be included. The resulting policy for each site allocation will ensure negative impacts are mitigated and positive impacts are improved.



## 6. Policies

### *Introduction*

- 6.1 This section provides the sustainability appraisal results, including summary tables, and summing up mitigation measures, synergistic and cumulative effects for each of the policies.
- 6.2 Each of the policies, as well as alternative options (where appropriate), have been assessed against the SA Objectives in the Framework. The Regulation 18 version of the LPR does not arrange policies according to chapters. However, for this exercise, the Tables below have been ordered so that similar topics/policies are grouped together. Please note – this does mean that the policy numbers are not continuous in numerical order as they relate to the adopted Local Plan. Policy numbers will change in the Regulation 19 version of the Local Plan.
- 6.3 Integral to the IIA report is the process of assessing proposed policies against a set of health and wellbeing criteria. The integration has identified where there are health and wellbeing issues, which have then been explored through a distinct set of Health Impact Assessment (HIA) criteria.
- 6.4 This process has involved developing a clear assessment matrix for the HIA to test proposed policies in the Local Plan.
- 6.5 The summary tables for HIA are provided after each of the policies and these indicate where there is or is not a need to address health and wellbeing benefits further within the policy.
- 6.6 The HIA matrix is in addition to appraising the policies against the sustainability objective which includes objective 8:  
*Contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities.*
- 6.7 The HIA process includes a 2 stage approach. The first is a screening which asks the following of each main topic:
- Will the policy have a direct impact on health, mental health and wellbeing?
  - Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?
  - Will the policy affect an individual's ability to improve their own health and wellbeing?
- 6.8 If the answer is yes to any of the above questions, then a detailed HIA is undertaken for each topic/chapter. This focusses on the following questions:
- What are the direct impacts on health, mental health and wellbeing? (e.g. ill health, social exclusion, isolation, non-participation, safety).
  - What are the indirect impacts on health, mental health and wellbeing? (e.g. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption).

- What are the opportunities for self-improvement? (e.g. active, healthy food, access to services, employment etc).
  - Who will it effect? Will there be impacts on certain vulnerable groups? (older people, young people, those on low income, disabled etc)
  - How will negative impacts be mitigated? How will positive impacts be improved?
  - Any recommendation to amend the policy.
- 6.9 The purpose of carrying out an Equality Impact Assessment (EqIA) is to inform the development of each policy. The purpose is also to understand how policies can be strengthened so that they maximise the positive impacts of promoting equality and inclusion and, where the need arises, to remove or mitigate potential negative and discriminatory impacts of various proposals on specific groups<sup>10</sup>
- 6.10 EqIA is designed to ensure that discrimination does not occur in the drawing up of plans and policies, and that such plans or policies meet the requirements of equality legislation in the UK, most notably the Equality Act 2010. It is being used as part of the IIA to add value and depth to the assessment process.
- 6.11 To understand which groups of people (or individuals), may suffer discrimination, the Equality Act sets out a series of “protected characteristics”:
- age
  - disability
  - gender reassignment
  - marriage and civil partnership
  - pregnancy and maternity
  - race
  - religion or belief
  - sex, and
  - sexual orientation
- 6.12 As with the HIA – the EqIA is two-stage process:
- Stage 1: Screening - this involves the assessment of impacts of the strategy/plan against the protected characteristics outlined above. If no negative effects are identified during screening no further assessment is required.
  - Stage 2: Identify whether and to what extent there are any significant negative impacts on these groups arising from the plan and its policies and set out recommendations for mitigation.
- 6.13 The EqIA assessment is in addition to appraising the policies against the sustainability objective which includes objective 7:
- Promote equality of opportunity and the elimination of discrimination.*

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<sup>10</sup> Beyond Box-Ticking A short guide to meaningfully assessing Local Plan policy impacts on equality and inclusion TCPA

- 6.14 Socio-economic equality (low income groups) is an important addition to the protected characteristic listed above. This is because the needs of certain groups are key to achieving inclusive growth.
- 6.15 The assessment has been undertaken considering the categories of protected characteristics and highlighting potential impacts. It is important to note that identity and personal characteristics are multifaceted, and many people are part of multiple equality groups that may be at greater risk of disadvantage and social exclusion. Within the protected characteristic groups there are many sub-groups.

#### *Reasonable Alternatives*

- 6.16 For some policies, there are no reasonable alternatives (RA) that will be explored as there is little or no potential to meaningfully assess alternatives as having significant sustainability effects. This conclusion will have been made having considered, on balance, the potential RAs and their differential impacts. The details of any policy RA are set out in the tables below.

#### *Development Strategy*

- 6.17 The following policies relate to development strategy and include the following:
- Core Policy SD1 Sustainable Development
  - Core Policy: SD3 Major Development
  - Strategic Policy SD25: Development Strategy
- 6.18 These policies focus on where development should be concentrated across the National Park and major development. At this stage, an assessment has been made of the proposed policy against the position without a policy. This is considered appropriate as in all cases, the proposed policies have been brought forward from the adopted Local Plan, with amendments. These policies relate specifically to the National Park and the key constraints to development.
- 6.19 The following tables provide a summary of the sustainability appraisal of the policy options as well as a HIA and a EqlA of the proposed policies.

Table I (i) Policy Options for Sustainable Development, Development Strategy and Major Development

SA Objective	SD1	No SD1	SD3	No SD3	SD25	No SD25
National Park's landscape character, functionality and perception and special qualities	+	-	+	-	+	-
Biodiversity and contribution to nature recovery	+	-	+	-	+	-
Historic environment heritage assets and their settings and cultural heritage	+	-	+	-	+	-
Impacts of climate change and to address the causes of climate change.	+	?	?	-	+	?
Protection & Sustainable Use of Resources	0	-	-	-	+	-
Employment and Economy.	+	-	+	0	+	0
Promote equality of opportunity and the elimination of discrimination	0	0	0	?	+	?
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	-	+	-	+	-
Efficient transport network	0	0	0	0	+	?
Good quality home, suitable to their need. New affordable homes.	+	?	+	-	+	-
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	-	+	-	+	-
<b>SCORING</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>8</b>	<b>11</b>	<b>7</b>

Table I (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD1	Yes, significant positive impacts.	++	Permanent	Long term	Yes, links with policies on development strategy, nature recovery, cultural heritage and landscape protection, design and economy.	The long term impacts of this policy are in relation to landscape, cultural, beauty, biodiversity and heritage and ensuring development fits in with the local context. Longer term it will help to direct development and make clear where development is acceptable. It is positively written and supports sustainable development in accordance with the National Park purposes.
No SD1	Negative impact.	-	No Impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the special qualities of the National Park, although NPPF policies should ensure sustainable development is delivered and guidance on National Parks will need to be followed
SD3	Yes, significant positive impacts.	++	Permanent	Long term	Yes, links with policies on housing and employment development, landscape impact, and design.	The long term impacts of this policy are in relation to landscape, cultural, beauty and heritage impacts and ensuring development fits in with the local context and accommodates the health and sustainable needs of the community. The potential for significant adverse impact on the National Park will include the consideration of the impact of cumulative development
No SD3	Negative impact.	-	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the special qualities of the National Park, although NPPF policies should ensure sustainable development is delivered and guidance on National Parks will need to be followed.
SD25	Yes, significant positive impacts	++	Permanent	Long term	Yes, links with policies on housing and employment development, landscape impact, and design as well as development in the countryside and	The long term impacts of this policy are in relation to landscape, cultural, beauty, biodiversity and heritage impacts and ensuring development fits in with the local context. Longer term it will help to direct development and make clear where development is acceptable or in open countryside in principle. It considers development of brownfield land. The potential for significant adverse impact on the National Park will include the impact of cumulative development especially if not in accordance with the

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						development strategy. This will also impact on settlements, flood areas, dark skies and climate change.
No SD25	Negative impact.	-	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the special qualities of the National Park, although NPPF policies should ensure sustainable development is delivered and guidance on National Parks will need to be followed.

Table I (iii) HIA Framework for Development policies

HIA Screening	SD1	SD3	SD25
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes
Full HIA Assessment	SD1	SD3	SD25
What are the direct impacts on health, mental health and wellbeing?	The policy will direct where sustainable development is acceptable, and this should ensure locations for new development are within locations that benefit all members of the community to enable them to access services and open space.	The policy should ensure that major developments include a HIA to ensure a healthy and sustainable place that improves health and wellbeing outcomes for existing communities and future users of the development.	The policy will support development taking place within existing settlements, making use of brownfield land and efficient use of land. This will directly benefit the offer within settlements and ensure new facilities are locally accessible for everyone. This should be of direct benefit.
What are the indirect impacts on health, mental health and wellbeing?	Sustainable development will support the purposes of the National Park and have positive benefits in support of the landscape, beauty, nature and cultural heritage thus creating healthy places for people to live, work and visit.	An acceptable amount of green space and access to open space and services. Better quality of life through a good built and natural environment.	Through protecting the landscape, beauty and heritage of the National Park and supports community development – there are a wide range of indirect benefits including protecting positive places and access to the countryside and open space.
What are the opportunities for self-improvement?	Create positive environments (whether inside, outside, or both) where communities can be active physically and mentally.	Create positive environments (whether inside, outside, or both) where communities can be active physically and mentally.	Support the creation of positive environments (whether inside, outside, or both) where communities can be active physically and mentally
Who will it effect? Will there be impacts on certain vulnerable groups?	The policy should positively affect all members of the community. Details of exact developments are not highlighted but this overall sustainable strategy will oversee and guide detailed policies within the Local Plan.	Positively impact on all community members and vulnerable groups included. Design will need to be accessible and opportunities affordable within safe environments.	Positively impact on all community members and vulnerable groups included. Details of exact developments are not highlighted but this overall development strategy will ensure settlements are the

			primary focus for new development.
How will negative impacts be mitigated? How will positive impacts be improved?	This overall sustainable strategy will oversee and guide detailed policies within the Local Plan. Positive impacts will be harnessed to other policies within the Plan.	Other supportive policies should reduce any negative impact on amenity and development. Submission of HIA with development propels will ensure impacts are understood.	Other supportive policies should reduce any negative impact on amenity and ensure sustainable development and a focus on where development should go across the Park.
Any recommendation to amend the policy?	No policy changes	The policy should ensure that major developments include a HIA	No policy changes



Table I (iv) EqlA Framework for Development Policies

EqlA Screening	SD1	SD3	SD25
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	Yes	Yes
<b>Full EqlA Impacts</b>			
What are the direct impacts on Protected Characteristics?	The direct impacts will be positive as the policy focusses on sustainable locations for development. Sustainable locations could include existing settlements. Not all of these are the same in terms of function and range of services and facilities and transport options. Those with limited offer will have a direct negative impact on many of the protected characteristics especially the older generation, those who have a disability, those in low income groups, race, and gender.	Direct impacts from limiting major development within the National Park will include reducing the opportunities to build new or improved services and facilities as it is unlikely these may not be brought forward. This will impact all the protected characteristics and low income groups.	The direct impacts will be positive as the policy focusses on sustainable locations for development and will provide a list of settlements.
What are the indirect impacts on Protected Characteristics?	Indirect impacts may result in some groups not being able to easily access services if settlements are small, isolated with limited public transport options. This will impact on all the protected characteristics but especially those with disabilities, the young and old, low income groups and race.	Existing facilities, services and provision may not be adequate for any of the protected characteristics. The limit of major development opportunities could mean depending on existing facilities.	Indirect impacts may result in some groups not being able to easily access services if settlements are small, isolated with limited public transport options. This will impact on all the protected characteristics but especially those with disabilities, the young and old, low income groups and race.
How will negative impacts be mitigated? How will positive impacts be improved?	This policy sets out the key principles of the sustainable development strategy across the National Park. This is a positive policy with no intended negative discrimination of any of the protected characteristics. However, the policy will need to ensure that the location of development does not discriminate against those who are unable to travel (especially via private transport means). This	Further information should be submitted with major development proposals to ensure equalities are addressed and any impacts are recognised and mitigated/improved.	This policy sets out the key principles of the development strategy across the National Park. This is a positive policy with no intended negative discrimination of any of the protected characteristics. It is expected that the overall strategy will improve the socio-economic standing of the local community. However, the strategy will need to ensure that the location of development does not discriminate against those who are unable to travel (especially via private transport means).

EqIA Screening	SD1	SD3	SD25
	includes the young, elderly, those with disabilities.		This includes the young, elderly, those with disabilities.
Any recommendation to amend the policy?	No change	It is recommended that proposals for major development submit a EqIA as well as a HIA.	No change

## *Nature Recovery, Protected Areas and Ecosystems*

6.20 These policies group together the topics of protected areas, biodiversity and Ecosystems. The following RA or standalone considerations are appraised:

### **Core Policy SD2: Regenerative Design, Ecosystem Services and Environmental Net Gain**

A standalone policy on ecosystem services

### **Strategic Policy SD9 Nature Recovery**

Option SD9a A new standalone policy to support the objectives of the Local Nature Recovery Areas at 10% (matching national standard policy requirements)

Option SD9b: A new standalone policy to support the objectives of the Local Nature Recovery Areas at 20%

### **Strategic Policy SD10 The Sussex Bat Special Areas of Conservation (SAC): The Mens SAC, Ebernoe Common SAC and Singleton & Cocking Tunnels SAC**

A standalone policy on SAC areas.

### **Strategic Policy NEW2: Designated Sites Hierarchy**

A standalone policy on Designated sites

### **Strategic Policy NEW3: Arun Valley Special Protection Area (SPA): Functionally Linked Habitat**

A standalone policy on Arun Valley SPA

### **Strategic Policy NEW4: Arun Valley SPA/SAC/Ramsar – Water Neutrality**

A standalone policy on Water Neutrality

### **Strategic Policy NEW5: Wealden Heaths Phase II SPA – Urbanisation and Recreational Pressure**

A standalone policy on Wealden Heaths

### **Strategic Policy NEW6: Solent Coast SPAs – Recreational Pressure**

A standalone policy on Solent Coast

### **Strategic Policy NEW7: Solent Coast SPAs and SACs and the River Itchen SAC – Nutrient Neutrality**

A standalone policy on nutrient neutrality

Table J (i) Policy Options for Nature Recovery, Protected Areas and Ecosystems

SA Objective	SD2	SD9a	SD9b	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	++	+	++	+	++	++	+	++	++	++
Historic environment heritage assets and their settings and cultural heritage	+	+	+	0	0	0	0	0	0	0
Impacts of climate change and to address the causes of climate change.	++	+	+	+	+	++	+	+	+	+
Protection & Sustainable Use of Resources	+	+	+	0	0	0	++	+	+	+
Employment and Economy.	+	+	+	0	0	0	-	0	0	-
Promote equality of opportunity and the elimination of discrimination	?	?	?	0	0	0	-	0	0	-
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	0	0	0	0	0	0	0
Efficient transport network	+	0	0	0	0	0	0	0	0	0
Good quality home, suitable to their need. New affordable homes.	0	0	0	0	0	0	?	-	-	-
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	+	+	0	0	0	0	0	0	0
<b>SCORING</b>	<b>11</b>	<b>8</b>	<b>9</b>	<b>8</b>	<b>8</b>	<b>8</b>	<b>5</b>	<b>6</b>	<b>6</b>	<b>5</b>

Table J (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD2	Yes, significant positive impacts.	++	Permanent	Long term	Yes, with policies for sustainable development, protected areas and nature recovery, landscape, heritage and design and flood/water resources	The long term impacts of this policy are significant and are in relation to landscape, cultural, beauty, biodiversity and heritage and ensuring development will be permitted where they use regenerative design to restore ecosystem services and have an overall positive impact on biodiversity and the environment. It will create long term positive benefits for the National Park to balance development allocations that will create new built environments. Through embedding the requirements of this policy within the planning system – any cumulative impacts will be addressed and net gains harnessed.
SD9a	Yes, positive impacts.	+	Permanent	Long term	Yes, with nature recovery and policies for protected areas and development strategy/housing policies.	This policy has a lower positive impact score than 9b. However, it will have maximum impacts against each positive objective. Whilst this is the national policy position, the push to have a higher percentage of BNG could better respond to the climate emergency and reflect the need for greater biodiversity improvements. See below.
SD9b	Yes, significant positive impacts.	++	Permanent	Long term	Yes, with nature recovery and policies for protected areas and development strategy/housing policies. Policies for development will be directed by nature recovery/protected area policies.	This policy has a higher positive impact score than 9a. This policy places emphasis on ensuring that a suitable level of biodiversity net gain is delivered to maximise, based on overall viability the positive long term impacts of development. This will ensure that true biodiversity gains can be made, and a step change can be delivered to meet the ambitions of the Local Plan
SD10	Neutral impacts.	0	Permanent	Long term	Yes, with nature recovery and policies for protected areas and development strategy/housing policies. Policies for development will be directed by nature	This policy has a clearly defined remit and the area it is focussed on will be illustrated on a proposals map. Cumulative development that has a negative impact on biodiversity and the protected area will not be supported via this policy. It is specific to a certain location and the presence of bats. The policy requires that assessment reports are submitted with any proposals.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					recovery/protected areas policies.	
NEW2	Neutral impacts.	0	Permanent	Long term	Yes, with nature recovery and policies for protected areas and development strategy/housing policies. Policies for development will be directed by nature recovery/protected areas policies.	This policy has a clearly defined remit and hierarchy of protected areas. These are clearly shown on a proposals map. Cumulative development that has a negative impact on biodiversity and the protected areas will not be supported via this policy. It is specific to certain locations/protected area. The policy requires that assessment reports are submitted with any proposals – the type of assessment depends on the hierarchy and the level of designation.
NEW3	Neutral impacts.	0	Permanent	Long term	Yes, with policies for sustainable development, protected areas and nature recovery, landscape and flood/water resources	This policy has a clearly defined remit and the areas it is focussed on will be illustrated on a proposals map. Cumulative development that has a negative impact on biodiversity and the protected area will not be supported via this policy. It is specific to a certain location and the presence of swans and refers to linked habitats. The policy requires that appropriate surveys are submitted with any proposals.
NEW4	Yes, positive impacts	+	Permanent	Long term	Yes, with policies on sustainable development, use of resources, development (housing and commercial).	This policy refers to water neutrality and the location of developments within the Sussex North Water Resource Zone. The cumulative impact of development within this area of water stress is set out in the policy where all schemes will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This may impact on housing and commercial developments.
NEW5	Neutral Impacts	0	Permanent	Long term	Yes, with nature recovery and policies for protected areas, open space and recreation and development strategy/housing policies.	This policy has a clearly defined remit and the areas it is focussed on will be illustrated on a proposals map. Cumulative development (or a net increase in residential units) that has a negative impact on biodiversity and the protected area due to urbanisation and recreational pressure will not be supported via this policy unless an Appropriate Assessment is submitted.
NEW6	Neutral Impacts	0	Permanent	Long term	Yes, with nature recovery and policies for protected areas, open space and	This policy has a clearly defined remit and the areas it is focussed on will be illustrated on a proposals map. Cumulative development (or a net increase in residential units) that has a negative impact on biodiversity and the

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					recreation and development strategy/housing policies	protected area due to recreational pressure will not be supported via this policy unless mitigation via contributions/an appropriate assessments are submitted.
NEW7	Yes, positive impacts	+	Permanent	Long term	Yes, with nature recovery and policies for protected areas, open space and recreation and development strategy/housing policies and employment/tourism policies	Cumulative development that enables people to stay overnight (tourism/residential/camping etc) will result in discharge to protected areas. The policy seeks to manage such developments and sets out policy requirements whereby promoters must demonstrate that it will be nutrient neutral.

Table J (iii) HIA Framework for Nature Recovery policies

HIA Screening	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	No	No	No	No	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	No	No	No	No	No	No	Yes
Full HIA Assessment	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
What are the direct impacts on health, mental health and wellbeing?	The policy will directly impact the health and wellbeing positively through the requirement to ensure there is a positive impact on the environment including water, soils, active travel	The policy will directly impact on the protection and improvement in nature recovery and biodiversity across the National Park and within new development. This will result in open space and protected areas that will contribute and enhance the beauty and quality of the National Park.	N/A	N/A	N/A	N/A	The policy seeks to protect this historic landscape, and to ensure open space and areas of protection are prevented from the damaging effects of urbanisation and recreation. This means the biodiversity and quality of this area is protected for the future and for the enjoyment of the community.	The policy seeks to protect the designated area and to ensure the policy area (Solent SPA) is prevented from the damaging effects of urbanisation and recreation. This means the biodiversity and quality of this area is protected for the future and for the enjoyment of the community.	The policy seeks to protect the designated area and to prevent discharges into the SPAs, SACs and Ramsar sites of the Solent and River Itchen. The policy states this is likely to happen due to people in overnight accommodation. This will have a direct impact on tourism and locations where the community may travel to for holiday/open space/health benefits and recreation.
What are the indirect impacts on health,	Indirect benefits include action on flooding, improved	The indirect benefits will be supporting education and	The indirect benefits include protecting and assessing impacts	The indirect benefits include protecting and assessing impacts	The indirect benefits include protecting and assessing impacts	The indirect impacts may include development	Indirect impacts may be the limitations on recreational use	Indirect impacts may be the limitations on recreational use	Indirect impacts may be on tourism businesses and



HIA Screening	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
mental health and wellbeing?	environment, pollution and other health benefits.	learning about nature recovery and improved quality of life due to sharing space with nature. Also, opportunities for climate change mitigation	on the SAC areas highlighted in the proposals map. These will have indirect benefits of creating and maintaining protected areas which support the purposes of the National Park – its beauty, landscape and biodiversity.	on the various levels of protected areas as highlighted in the proposals map. These will have indirect benefits of creating and maintaining protected areas which support the purposes of the National Park – its beauty, landscape and biodiversity	on the SPA areas highlighted in the proposals map. These will have indirect benefits of creating and maintaining protected areas which support the purposes of the National Park – its beauty, landscape and biodiversity.	being restricted in parts of the National Park – the Sussex North Water Resource Zone. Whilst the policy sets how water neutrality will be addressed in this zone – there may be indirect impacts from restricted water use and housing/commercial development needs in this area.	of the protected landscape.	of the protected landscape.	local employment/eco nomy.
What are the opportunities for self-improvement?	The policy refers to active travel, the blue and green environments and creates and supports opportunities for the community to live, work and travel actively.	Ability to understand nature, potential better access to open space for recreational benefits.	N/A	N/A	N/A	N/A	Ability to understand more about the protected space and how recreational pressure can damage the fragile landscape.	Ability to understand more about the protected space and how recreational pressure can damage the fragile landscape.	Ability to travel and stay in part of the National Park and experience nature in local settings.
Who will it effect? Will there be impacts on certain vulnerable groups?	The policy will benefit all members of the community including low income groups who may work locally or on the land.	The policy will benefit all members of the community	The policy will benefit all members of the community	The policy will benefit all members of the community	The policy will benefit all members of the community	Limited housing and commercial development may impact on low income groups or those unemployed/without access to transport. However, it is unlikely to prevent all members of the community from taking part in healthy lifestyles and benefiting from the local environment.	The policy will benefit all members of the community.	The policy will benefit all members of the community	The policy may effect business owners of tourism accommodation and members of the gypsy and traveller community.

HIA Screening	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
How will negative impacts be mitigated? How will positive impacts be improved?	Positive impacts will improve through the co-existence of supportive policies. Negative impacts will be considered in detail as part of development proposals. These will need to submit a statement with the application.	Negative impacts will be the potential loss of farmland with the selection of land at least value. The policy requires that an assessment is submitted with development proposals.	Positive impacts will be harnessed through a suite of nature recovery and protected area policies	Positive impacts will be assessed through the requirements of the policy – for example HRA and EIAs need to accompany development proposals.	Positive impacts will be harnessed through a suite of nature recovery and protected area policies and the requirement to submit appropriate surveys with development proposals.	The policy is clear about how water neutrality will be addressed through a series of measures that will mean development can still come forward. Positive impacts from ensuring water restrictions become a normal part of new development will have wider positive benefits on use of resources and climate change and cost saving.	The policy is clear about how residential development and recreational pressure will impact on the protected area. It sets out the need for Assessments and mitigation measures. The policy addresses the negative impacts and is supported by other nature recovery/protected area policies in the Local Plan.	The policy is clear about how residential development and recreational pressure will impact on the protected area. It sets out the need for Assessments and mitigation measures. The policy addresses the negative impacts and is supported by other nature recovery/protected area policies in the Local Plan.	The policy is clear about how certain overnight accommodation/dwelling facilities can create discharge into protected areas. It sets out the need for a nutrient budget and mitigation measures. The policy addresses the negative impacts and is supported by other nature recovery/protected area policies in the Local Plan.
Any recommendation to amend the policy?	No change to policy	No change to policy.	No change to policy.	No change to policy.	No change to the policy	No change to the policy.	No change to the policy.	No change to the policy.	No change to the policy.

Table J (iv) EqIA Framework for Nature Recovery Policies

EqIA Screening	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	No	No	No	No	Yes	No	No	Yes
Full EqIA Impacts	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
What are the direct impacts on Protected Characteristics?	The direct impacts may be on certain socio economic groups such as low income residents and visitors who may work on the land or are unable to take part in active travel or live near areas of high pollution. The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	There are no elements of positive or negative discrimination of any of the protected characteristics	There are no elements of positive or negative discrimination of any of the protected characteristics	Limited housing and commercial development may impact on low income groups or those unemployed/without access to transport. This includes age (need for older persons accommodation), disabilities (adapted homes in locations within the water zone).	There is no positive or negative discrimination of any of the protected characteristics	There is no positive or negative discrimination of any of the protected characteristics	The direct impacts may be on certain socio economic groups such as low income residents and visitors who use local tourism accommodation such as camping for holidays and/or work in the tourism business. The policy requires these types of businesses to demonstrate that it will be nutrient neutral. The policy will directly impact on residential development which may include affordable and older person housing and gypsy and travelling show people.
What are the indirect impacts	Indirect impacts may focus on positive improvements to	The policy is written positively and there is no positive or	The policy is written positively and there is no positive or	There are no elements of positive or negative	There are no elements of positive or negative	Indirect impacts may include cost savings which will be positive to all protected	There are no elements of positive or negative	There are no elements of positive or negative	Indirect impacts may include positive improvements to

EqIA Screening	SD2	SD9	SD10	NEW2	NEW3	NEW4	NEW5	NEW6	NEW7
on Protected Characteristics?	the local environment.	negative discrimination of any of the protected characteristics	negative discrimination of any of the protected characteristics	discrimination of any of the protected characteristics	discrimination of any of the protected characteristics	characteristics and efficient water saving designs as part of new development.	discrimination of any of the protected characteristics	discrimination of any of the protected characteristics	the local environment and water ways within this part of the National Park.
How will negative impacts be mitigated? How will positive impacts be improved?	Members of the community (i.e. disabled people who could struggle with active travel) may benefit from improvements to the environment and health benefits such as pollution and flooding. This policy will enable the improvements to take place. The policy also supports local employment which will benefit all members of society including income groups	N/A	N/A	N/A	N/A	The policy is clear about how water neutrality will be addressed through a series of measures that will mean development can still come forward. This should benefit all members of the community especially those seeking affordable housing, older persons accommodation and accessible housing in locations where there is a need – where this falls within the Sussex North Water Resource Zone. Positive impacts from ensuring water restrictions become a normal part of new development will have wider benefits on use of resources and climate change and cost savings.	N/A	N/A	The policy is clear about how nutrient neutrality will be addressed through a series of measures that will mean development can still come forward. This should benefit all members of the community especially those developing residential accommodation, tourism accommodation and gypsy and travellers.
Any recommendation to amend the policy?	No change	No change	No change.	No change.	No change	No change	No change.	No change	No change

## *Landscape and Design*

6.21 The following policies relate to landscape and design:

- Strategic Policy SD4: Landscape Character
- Strategic Policy SD5: Design
- Strategic Policy SD6: Safeguarding Views
- Strategic Policy SD7: Relative Tranquillity
- Strategic Policy SD8: Dark Night Skies

6.22 At this stage, an assessment has been made of the proposed policy against the position without a policy. This is considered appropriate as in all cases, the proposed policies have been brought forward from the adopted Local Plan, with amendments. These policies relate specifically to the South Downs and the impact on landscape, design and tranquillity – key purposes of the National Park.

Table K (i) Policy Options for Landscape and Design

SA Objective	SD4	No SD4	SD5	No SD5	SD6	No SD6	SD7	No SD7	SD8	No SD8
National Park's landscape character, functionality and perception and special qualities	++	+	+	+	++	-	++	-	++	-
Biodiversity and contribution to nature recovery	+	+	+	+	0	0	+	-	+	0
Historic environment heritage assets and their settings and cultural heritage	+	+	+	+	0	0	+	0	+	0
Impacts of climate change and to address the causes of climate change.	0	0	+	0	0	0	+	0	0	0
Protection & Sustainable Use of Resources	+	0	+	0	0	0	0	0	0	0
Employment and Economy.	0	0	0	0	+	0	0	0	+	0
Promote equality of opportunity and the elimination of discrimination	0	0	0	0	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	0	+	+	+	0	+	0	+	-
Efficient transport network	0	0	+	0	0	0	0	0	-	0
Good quality home, suitable to their need. New affordable homes.	0	0	+	+	0	0	-	0	0	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	0	++	+	0	0	+	0	+	-
<b>SCORING</b>	<b>7</b>	<b>8</b>	<b>10</b>	<b>6</b>	<b>8</b>	<b>10</b>	<b>7</b>	<b>9</b>	<b>7</b>	<b>0</b>

Table K (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD4	Significant positive impact.	++	Permanent	Long Term	Yes, with policies on nature recovery, design, dark skies, heritage and recreation/walking/open space.	The long term impacts of this policy are in relation to landscape, culture, beauty, biodiversity and heritage and ensuring development proposals preserve and enhance the landscape character of the National Park. Longer term it will guide development, new planting and restoration. It is positively written and supports landscape character enhancement, and the cumulative impacts of development will be considered in the context of this policy.
No SD4	Neutral impact.	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the special landscape qualities of the National Park, although NPPF policies should ensure that landscape protection is delivered and guidance on National Parks will need to be followed. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents.
SD5	Significant positive impact	++	Permanent	Long Term	Yes, with policies on nature recovery, landscape, dark skies, heritage and recreation/walking/open space.	The long term impacts of this policy are in relation to design, landscape, culture, beauty, biodiversity and heritage and ensuring development proposals are landscape led designs with standards for housing proposals. Longer term, it will guide development and design. It is positively written and supports high quality design, and the cumulative impacts of development will be considered in the context of this policy.
No SD5	Significant positive impacts	++	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on a landscape led approach to design across the National Park, although NPPF policies should ensure that landscape protection is delivered and guidance on National Parks will need to be followed. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents
SD6	Neutral impact with some positive impacts	0	Permanent	Long Term	Yes, with policies on, landscape protection.	The long term impacts of this policy are in relation to landscape protection and safeguarding views. Development proposals will be permitted provided they

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.
No SD6	Neutral impact and no positive impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy, there may be some long term impacts on the views from and within the National Park. This may have a negative impact on tourism and the number of visitors to the Park. Although NPPF policies should ensure that some landscape protection is delivered – this may not focus on safeguarding views. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents
SD7	Significant positive impacts	++	Permanent	Long Term	Yes, policies on dark skies, landscape protection, walking and recreation and development.	The long term impacts of this policy are in relation to conserving and enhancing relative tranquillity and the associated impacts on the landscape, dark skies, beauty and biodiversity of the National Park. This may have a negative impact on new housing (and development) as the focus will be on enhancing tranquillity and development is the antithesis of tranquillity. Development, light pollution and urbanisation will have a cumulative impact on tranquillity.
No SD7	Neutral impact and no positive impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy, there may be some long term impacts on tranquillity and tranquil areas within the National Park. This may have a negative impact on health and enjoyment of the National Park and on the beauty of the location. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents
SD8	Significant positive impacts	++	Permanent	Long Term	Yes, policies on tranquillity, landscape protection, development and health.	The long term impacts of this policy are in relation to conserving and enhancing the intrinsic quality of dark night skies and the associated impacts on the landscape, tranquillity, beauty and biodiversity of the National Park. This may have a negative impact on transport networks and travel in general where lights might be needed for safety. Development, light pollution and urbanisation will have a cumulative impact on tranquillity
No SD8	Neutral impact and no positive impacts and some negative impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy, there may be some long term impacts on dark skies and the growth in light pollution across the National Park. This is not a sustainable or practical option as there is local distinctiveness for the South Downs



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						National Park which is not highlighted within the national documents

Table K (iii) HIA Framework for Landscape and Design policies

HIA Screening	SD4	SD5	SD6	SD7	SD8
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	No	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	No	Yes	No
Full HIA Assessment	SD4	SD5	SD6	SD7	SD8
What are the direct impacts on health, mental health and wellbeing?	Protection and enhancement of the National Park landscape character is important for overall health and wellbeing, protecting the open countryside and areas of beauty is important to the local community and visitors to the National Park.	The policy refers to housing space standards and outdoor amenity space which will have direct benefits for health and wellbeing. The policy also refers to daylight and sun light provision in development which will support health and wellbeing.	N/A	Protection of the rural, beauty of the landscape and areas of tranquillity is important for overall health and wellbeing. This is important for residents and visitors.	Protection of the rural and beauty of the landscape through dark skies and dark sky core is important for overall health and wellbeing. This is important for residents and visitors.
What are the indirect impacts on health, mental health and wellbeing?	This policy will enable people to access green space of high landscape value, to harness recreational benefits, tranquillity and importance of landscape character, especially within the National Park.	Ensures quality of the built environment which has positive effects on people's lives, how they use and appreciate space.	This policy will enable people to access green space of high landscape value, to harness recreational benefits, and enjoy views from and within the National Park.	Helps protect against amenity impacts and noise, busy areas. This assists with health and wellbeing, especially mental health and the feeling of being in the landscape as opposed to the urban environments.	Helps protect against amenity impacts and light pollution. This assist with health and wellbeing, especially mental health.
What are the opportunities for self-improvement?	Ability to lead an active lifestyle and recreation in the landscape settings of the National Park	Ability to lead an active lifestyle and recreation in the landscape settings of the National Park	Ability to lead an active lifestyle and recreation in the landscape settings of the National Park	Walks and recreation in areas of tranquillity and limited noise, traffic and other sounds will encourage an active lifestyle.	N/A
Who will it effect? Will there be impacts on certain vulnerable groups?	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is clear about not accepting development that will be harmful to the landscape character of the National Park and positively recommends how planting can achieve positive	The policy sets out several requirements for a landscape led approach to design which will mitigate for the impact of design on the landscape, character and cultural heritage of the	Positive impacts of this policy focus on protecting and safeguarding views within the National Park and ensuring the views benefit tourism areas and visible locations from public areas.	This is a positive policy that focuses on areas of tranquillity and requires development to take these into account. The cumulative impact of development on areas of	This is a positive policy that focuses on dark skies and requires development to take these into account. The cumulative impact of development on dark skies as defined by the policy will

HIA Screening	SD4	SD5	SD6	SD7	SD8
	landscape results and opportunities for restoration. Positive benefit also include referencing other policies in the Local Plan on climate change, heritage, nature recovery and recreation. However, landscape impacts from development may need to be qualified.	national Park. Positive impacts will be brought forward through this policy and a suite of policies on landscape character, heritage and construction.		tranquillity as defined by the policy will be addressed and negative impacts taken into consideration.	be addressed and negative impacts taken into consideration
Any recommendation to amend the policy	Recommendation that landscape assessment is submitted with major planning applications	No change	No change	No change	No change

Table K (iv) EqIA Framework for Landscape and Design Policies

<b>EqIA Screening</b>	<b>SD4</b>	<b>SD5</b>	<b>SD6</b>	<b>SD7</b>	<b>SD8</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	Yes	No	No	Yes
<b>Full EqIA Impacts</b>	<b>SD4</b>	<b>SD5</b>	<b>SD6</b>	<b>SD7</b>	<b>SD8</b>
What are the direct impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively. However, it will directly impact on older people and those on lower incomes who may be affected by the living standards set out in the policy and the conditions relating to day light and sun light. It might also impact on those lower incomes due to the condition relating to amenity space. The policy may also impact on those with disabilities due to the requirements of the policy.	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The direct impacts of the dark skies policy is on gender, disabilities and age. There may be impacts on other protected characteristics. The impact could result in certain groups not feeling safe in areas that are dark. This may curtail activities especially if outside during the darker hours in a day.
What are the indirect impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative indirect discrimination of any of the protected characteristics	The policy is written positively and there are no indirect positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative indirect discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative indirect discrimination of any of the protected characteristics	The indirect impacts are the same as the direct. Some groups may perceive that dark areas are unsafe and therefore will consider not taking part in activities outside daylight hours. This could have the impact of perceived danger.
How will negative impacts be mitigated? How will positive impacts be improved?	N/A	The policy is positively written and is intended to improve the design, amenities and living space of all the community with an emphasis on older peoples housing, accessible housing and amenity space for all accommodation. i	N/A	N/A	The policy refers to the dark skies and dark sky core. This does not impact on all areas of the National Park and therefore the negative impacts are only focused on the (generally) urban/settlement locations within the Park. Therefore, direct and indirect impacts are not felt across the entire National Park.
Any recommendation to amend the policy?	No change	No change	No change	No change	No change

### *Historical Environment and Cultural Heritage*

6.23 The following policies relate to the historical environment and cultural heritage:

- Strategic Policy SD12: Historic Environment and Cultural Heritage
- Development Management Policy SD13: Listed Buildings
- Development Management Policy SD15: Conservation Areas
- Development Management Policy SD16: Archaeology
- Strategic Policy SD18: The Open Coast

6.24 The policy options which are presented below represent policies that have been brought forward from existing adopted policies, some with slight/significant changes. As there are no identified reasonable alternatives in policy wording the IIA has assessed the proposed policy against not having a local policy and therefore relying on national policies in the NPPF.

Table L (i) Policy Options for Heritage

SA Objective	SD12	No SD12	SD13	No SD13	SD15	No SD15	SD16	No SD16	SD18	No SD18
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	+	+	+	+	++	+
Biodiversity and contribution to nature recovery	0	0	0	0	0	0	0	0	+	+
Historic environment heritage assets and their settings and cultural heritage	++	+	++	+	++	+	++	+	++	+
Impacts of climate change and to address the causes of climate change	0	0	0	0	0	0	0	0	+	+
Protection & Sustainable Use of Resources	+	+	+	+	+	+	+	+	+	0
Employment and Economy.	+	+	0	0	+	+	0	0	0	0
Promote equality of opportunity and the elimination of discrimination	-	-	-	-	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	+	+	+	+	+	+	0
Efficient transport network	0	0	0	0	0	0	0	0	0	0
Good quality home, suitable to their need. New affordable homes.	+	+	+	+	+	+	+	+	0	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	++	+	++	+	++	+	+	0	+	+
<b>SCORING</b>	<b>9</b>	<b>7</b>	<b>8</b>	<b>6</b>	<b>9</b>	<b>7</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>6</b>

Table L (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD12	Significant positive impact, with one negative.	++	Permanent	Long Term	Yes, there are links to other heritage policies such as listed buildings and conservation areas as well as policies on design and tourism.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to the substantial changes which are detailed in the proposed policy. The policy states that development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting. Cumulative impacts of development which harms a heritage asset, and the setting will be considered as part of the policy. It requires applicants to submit a heritage impact statement. The policy provides guidance on conflicts with other local plan policies and how these will be managed.
No SD12	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the historic environment and cultural heritage of the National Park, although NPPF policies should ensure that heritage protection is delivered and guidance on National Parks will need to be followed. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents.
SD13	Significant positive impact, with one negative.	++	Permanent	Long Term	Yes, there are links to other heritage policies such as historic environment and cultural heritage and conservation areas as well as policies on design and tourism.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to minor changes and clarification which are detailed in the proposed policy. Cumulative impacts of development which harms a listed building, and the setting will be considered as part of the policy. This has a positive long term impact on several objectives, and there are synergies with policies on heritage assets, built environment and design.
No SD13	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on listed buildings in the National Park, although NPPF policies should ensure that proposals for listed building is undertaken in accordance with national policy. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD15	Significant positive impact	++	Permanent	Long Term	Yes, there are links to other heritage policies such as historic environment and cultural heritage and listed buildings as well as policies on design and tourism	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to minor changes and clarification which are detailed in the proposed policy. Cumulative impacts of development which harms a conservation area will be considered as part of the policy. This has a positive long term impact on several objectives, and there are synergies with policies on heritage assets, built environment and design.
No SD15	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on conservation areas in the National Park, although NPPF policies should ensure that proposals for listed building is undertaken in accordance with national policy. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents.
SD16	Significant positive impact		Permanent	Long Term	Yes, there are links to other heritage policies such as historic environment and cultural heritage and listed buildings and conservation areas as well as policies on design and tourism	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to minor changes and clarification which are detailed in the proposed policy. Cumulative impacts of development which harms an archaeological asset will be considered as part of the policy. This has a positive long term impact on several objectives, and there are synergies with policies on heritage assets, built environment and design
No SD16	Neutral impact with some positive impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on archaeology in the National Park, although NPPF policies should ensure that proposals for areas of archaeology is undertaken in accordance with national policy. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents.
SD18	Significant positive impact	++	Permanent	Long Term	Yes, there are links to other heritage policies such as historic environment and cultural heritage and listed buildings and conservation areas as well as policies on design and tourism.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to minor changes and clarification which are detailed in the proposed policy. Cumulative impacts of development which harms the Sussex Heritage Coast and the undeveloped coastal zone of the National Park will be considered as part of the policy. This has a positive long term impact on several objectives, and there are synergies with policies on heritage assets and landscape.



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
No SD18	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the Sussex Heritage Coast in the National Park, although the Shoreline Management Plan should ensure that proposals for areas of the Sussex Heritage Coast is undertaken in accordance with national policy. This is not a sustainable or practical option as there is local distinctiveness for the Sussex coast and South Downs National Park which is not highlighted within the national documents

Table L (iii) HIA Framework for Heritage policies

HIA Screening	SD12	SD13	SD15	SD16	SD18
Will the policy have a direct impact on health, mental health and wellbeing?	No	No	No	No	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	No	No	No
Full HIA Assessment	SD12	SD13	SD15	SD16	SD18
What are the direct impacts on health, mental health and wellbeing?	N/A	N/A	N/A	N/A	N/A
What are the indirect impacts on health, mental health and wellbeing?	Ensures quality of the built environment, especially heritage and cultural assets – these have positive effects on people's lives, how they use and appreciate space and historic areas.	Ensures quality of the built environment, especially listed buildings – these have positive effects on people's lives, how they use and appreciate space and historic buildings	Ensures quality of the built environment, especially conservation areas – these have positive effects on people's lives, how they use and appreciate space and historic areas of conservation. This also includes trees and green areas within conservation areas.	Ensures archaeological assets are protected from harm and these will have a positive effect on people's lives, how they use and appreciate their environment and learn about their area.	Ensures the Sussex Heritage coast and the undeveloped coastal zone of the National Park are protected and can be enjoyed by all members of the community.
What are the opportunities for self-improvement?	N/A	N/A	N/A	N/A	N/A
Who will it effect? Will there be impacts on certain vulnerable groups?	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.	All members of the community will benefit from this policy.
How will negative impacts be mitigated? How will positive impacts be improved?	Policies within the Local Plan including this policy and others relating to listed buildings, conservation areas and design will ensure assets are conserved and enhanced in line with policy considerations. This will benefit the wider community and the built environment. The positive benefits of greater accessibility to the built heritage for wellness and enjoyment will be harnessed.	Policies within the Local Plan including this policy and others relating to historic environment, conservation areas and design will ensure assets are conserved and enhanced in line with policy considerations. This will benefit the wider community and the built environment. The positive benefits of greater accessibility to the built heritage for wellness and enjoyment will be harnessed.	Policies within the Local Plan including this policy and others relating to historic environment, listed buildings and design will ensure assets are conserved and enhanced in line with policy considerations. This will benefit the wider community and the built environment. There are positive community impacts of preserving heritage assets and historic environment. This is especially important	Policies within the Local Plan including this policy and others relating to historic environment, listed buildings and design will ensure archaeological assets are protected and preserved in line with policy considerations. This will benefit the wider community.	Policies within the Local Plan including this policy and others relating to heritage and coasts will ensure these assets are protected and preserved in line with policy considerations. This will benefit the wider community.

HIA Screening	SD12	SD13	SD15	SD16	SD18
			as it includes open space and trees.		
Any recommendation to amend the policy	No change	No change	No change	No change	No change

Table L (iv) EqlA Framework for Heritage

<b>EqlA Screening</b>	<b>SD12</b>	<b>SD13</b>	<b>SD15</b>	<b>SD16</b>	<b>SD18</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	Yes	No	No	No
<b>Full EqlA Impacts</b>	<b>SD12</b>	<b>SD13</b>	<b>SD15</b>	<b>SD16</b>	<b>SD18</b>
What are the direct impacts on Protected Characteristics?	There will be direct impacts for those with disabilities as historic buildings may not be suitable for disabled access.	There will be direct impacts for those with disabilities as listed buildings may not be suitable for disabled access	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
What are the indirect impacts on Protected Characteristics?	There may be some indirect impacts on those with low income or older persons who may not be able to find suitable housing in historic buildings.	There may be some indirect impacts on those with low income or older persons who may not be able to find suitable housing in listed buildings. The upkeep of listed buildings may be onerous for some of the protected characteristics.	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
How will negative impacts be mitigated? How will positive impacts be improved?	The Local Plan has a new policy relating to accessible homes.	The negative impacts of accessibility to and within listed buildings is not referred to in the policy.	N/A	N/A	N/A
Any recommendation to amend the policy?	Reference to access and historic buildings should be included in the policy.	Reference to access and listed buildings should be included in the policy.	No change	No change	No change

## *Climate Change, Renewable Energy and Flooding*

6.25 The following policies relate to climate change and renewable energy:

- Development Management Policy SD11: Trees, Woodland, Hedgerows and Scrub
- Strategic Policy SD48: Climate Change and Sustainable Use of Resources
- Development Management Policy SD51: Renewable Energy
- Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings
- Strategic Policy SD17: Protection of the Water Environment
- Strategic Policy SD49: Flood Risk Management
- Development Management Policy SD50: Sustainable Drainage

6.26 The policy options which are presented below represent policies that have been brought forward from existing adopted policies, some with slight/significant changes. As there are no identified reasonable alternatives in policy wording the IIA has assessed the proposed policy against not having a local policy and therefore relying on national policies in the NPPF.

Table M (i) Policy Options for climate change and renewable energy

SA Objective	SD11	No SD11	SD48	No SD48	SD51	No SD51	SD14	No SD14	SD17	No SD17	SD49	No Sd49	SD50	No SD50
National Park's landscape character, functionality and perception and special qualities	++	+	+	+	+	+	+	+	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	++	+	+	+	+	+	+	+	+	+	+	+	+	+
Historic environment heritage assets and their settings and cultural heritage	+	+	+	-	+	0	++	+	+	+	0	0	0	0
Impacts of climate change and to address the causes of climate change.	+	+	++	-	++	+	++	+	+	+	++	+	++	+
Protection & Sustainable Use of Resources	+	0	++	-	++	+	+	+	++	+	++	+	++	+
Employment and Economy.	0	0	-	0	+	0	0	0	0	0	+	+	+	+
Promote equality of opportunity and the elimination of discrimination	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	0	+	+	+	+	+	+	+	+	+	+
Efficient transport network	-	0	+	0	0	0	0	0	0	0	0	0	0	0
Good quality home, suitable to their need. New affordable homes.	0	0	0	-	+	+	0	0	0	0	+	+	+	+
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	+	+	0	+	0	+	+	+	+	+	+	+	+
<b>SCORING</b>	<b>9</b>	<b>6</b>	<b>10</b>	<b>0</b>	<b>11</b>	<b>6</b>	<b>9</b>	<b>7</b>	<b>8</b>	<b>7</b>	<b>10</b>	<b>8</b>	<b>10</b>	<b>8</b>

Table M (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD11	Significant positive impact, with one negative	++	Permanent	Long Term	Yes, with policies on landscape, conservation areas, design and climate change.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to the substantial changes which are detailed in the proposed policy. The policy relates to trees, woodland, hedgerows and shrubs and is not limited to those that are protected and/or in conservation areas. There are links to policies regarding conservation areas and development. This is a positive policy with clear information on how trees should be protected and retained. There may be a negative impact on transport systems as the policy seeks to direct new streets to be tree lined. This may impact on bus routes and cycle lanes.
No SD11	Positive impact, with several neutral negative	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on the protection of trees, hedgerows, woodland and shrubs in the National Park, although NPPF policies and planning legislation should ensure that proposals for trees is undertaken in accordance with national policy. This is not a sustainable or practical option as there is local distinctiveness for the South Downs National Park which is not highlighted within the national documents. In addition, this policy goes further than focusing on protected and/or trees in conservation areas and other formally protected woodland.
SD48	Significant positive impact	++	Permanent	Long Term	Yes, with renewable energy policies as well as landscape, dark skies, housing and employment development.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to the full review which are detailed in the proposed policy. The policy sets out a raft of standards and requirements to achieve net zero operational carbon. This impacts on a wide range of development types. The policy is specific and there may be some cumulative impacts, but it is standalone policy with a distinct set of requirements.
No SD48	Neutral impact with 5 negative impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on standards and requirements to achieve net zero operational carbon, although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option as

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents. In addition, this policy goes further than the advice in national guidance.
SD51	Positive impact	+	Permanent	Long Term	Yes, policies on climate change, landscape, heritage and development.	This policy option is carried forward from the adopted plan and is still fit for purpose, subject to the full review which are detailed in the proposed policy. The policy sets out details about renewable energy schemes and proposals and where they might be located. The policy is specific and there may be some cumulative impacts, but it is standalone policy with a focussed set of proposals and location requirements. b
No SD51	Neutral impact with some positive.	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting renewable energy in the National Park, although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents.
SD14	Significant positive impact	++	Permanent	Long Term	Yes, policies on climate change, landscape, heritage and development.	This policy option is carried forward from the adopted plan and is still fit for purpose. The policy specifically refers to climate change adaption and listed buildings.
No SD14	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting climate change adaption and listed buildings in the National Park, although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents
SD17	Significant positive impact	++	Permanent	Long Term	Yes, policies on climate change, landscape, heritage, walkways and right of way, nature recovery and development.	Development proposals affecting the water environment are clearly set out in the policy. This is topic specific policy information that deals with the water environment and does not deal with cumulative impact as the primary impact is addressed within the policy.
No SD17	Positive impact	+	No impact	-	N/A, would have to rely on national	Without the policy there may be some long term impacts on supporting the water environment in the National Park,



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					policies in the NPPF and guidance on National Parks	although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option, even though there are some positive impacts as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents
SD49	Significant positive impact	++	Permanent	Long Term	Yes, policies on climate change, landscape, heritage, water environment and nature recovery and development	The policy is detailed about flood risk management but refers to a number of corporate priorities and management plans. It is clear about flood protection, management and adaption. It does not refer to cumulative impacts but matters relating to flood risk management are set out in national policy and include the submission of an FRA for each proposal.
No SD49	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on for flood risk management in the National Park, although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option, even though there are some positive impacts, as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents
SD50	Significant positive impact	++	Permanent	Long Term	Yes, synergies with policies on flood risk, water environment and development.	The policy is detailed about sustainable drainage. It is clear about sustainable drainage, management and adaption. It has clear guidance on where and when sustainable drainage will be acceptable.
No SD50	Positive impact	+	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on for Sustainable Drainage in the National Park, although NPPF policies and planning legislation should ensure that some of these matters will be addressed. This is not a sustainable or practical option, even though there are some positive impacts, as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is not highlighted within the national documents



Table M (iii) HIA Framework for Climate Change policies

HIA Screening	SD11	SD48	SD51	SD14	SD17	SD49	SD50
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	No	No	No	No	Yes	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	No	No	Yes	No	Yes	No	No
Full HIA Assessment	SD11	SD48	SD51	SD14	SD17	SD49	SD50
What are the direct impacts on health, mental health and wellbeing?	Protection of the key features of the urban and rural landscape – trees and hedgerows is important for overall health and wellbeing, and is significant to so many residents	No direct impacts, it is more about the impacts of the development on people.	No direct impacts, it is more about the impacts of the development on people.	No direct impacts, it is more about the impacts of the development on people.	No direct impacts	Positive policy on providing safety and protection of life from flooding.	No direct impacts
What are the indirect impacts on health, mental health and wellbeing?	Trees and woodlands form important areas such as parks, countryside and town green areas and form boundaries to green open spaces - therefore assist in recreation and environmental quality	Better standard housing, climate change adaptation and quality of development. This will positively indirectly impact on the health and wellbeing of the local community.	Better quality of life and options for renewable energy for all types of buildings.	Better quality of life and options for climate change adaption in historic buildings.	Protection of the water environment and taking into account water quality and water course will have a positive indirect benefit on the community so they can enjoy the existing water course in the National Park and benefit from the water quality and landscape character of walking and accessing the water resource.	Protection of property, positive mental health and ability to manage flooding in key areas will positively impact on health and wellbeing.	Protection and enhancement of property, positive mental health and ability to manage surface water and drainage in key areas will positively impact on health and wellbeing.
What are the opportunities for self-improvement?	N/A	N/A	The policy will create opportunities to see benefits in	N/A	Opportunities to change behaviours, lead healthier	N/A	N/A

HIA Screening	SD11	SD48	SD51	SD14	SD17	SD49	SD50
			harnessing renewable energy and make lifestyle choices based on this.		lifestyles for the environment		
Who will it effect? Will there be impacts on certain vulnerable groups?	All members of the community will benefit from this policy.	All members of the community will benefit from this policy	All members of the community will benefit from this policy	All members of the community will benefit from this policy	All members of the community will benefit from this policy	Impacts all groups of society, especially those in vulnerable areas	Impacts all groups of society, especially those in vulnerable areas
How will negative impacts be mitigated? How will positive impacts be improved?	Policies within the Local Plan including this policy and others relating to the protection of trees give priority to enhancement rather than removal or damage to the asset. This will benefit the wider community and the built and rural environment. The positive benefits of being amongst trees, woodland and hedgerows for wellness and enjoyment will be harnessed.	The policy is detailed with expected standards to address climate change and encourage reduced energy use leading to the achievement of net zero operational carbon. The negative impacts could be felt within the industry seeking to build employment, residential and other use developments. However, the policy sets out clearly the expected standards.	The policy is detailed about where, and type of renewable energy will be supported. How to address negative impacts (on the landscape/heritage/ beauty) of the National Park are set out in the policy criteria. This policy is supported and complimented by other ones in the Local Plan so that positive impacts are embedded within the planning and development system.	The policy is detailed with expected standards to address climate change adaption in historic buildings. This policy is supported and complimented by other ones in the Local Plan, especially in relation to design, heritage and climate change so that positive impacts are embedded within the planning and development system.	The policy has many benefits as outlined in the policy. There could be Biodiversity net gains achieved alongside infrastructure delivered. There are specifics set out in the policy which is proactively write and will enable water environmental protection to take place across the National Park.	Supporting infrastructure will be required in areas vulnerable to flood risk. The policy sets out what is expected for development proposals and draws on national guidance as well as focusing on the key issues for the National Park.	Impacts on designated areas will be safeguarded through other supporting policies in the Local Plan. The policy is positively written with the recommendation that sustainable drainage is used for above ground multifunctional surface water management.
Any recommendation to amend the policy	No change	No change	No change	No change	No change	No change	No change

Table M (iv) EqIA Framework for climate change and renewable energy

<b>EqIA Screening</b>	<b>SD11</b>	<b>SD48</b>	<b>SD51</b>	<b>SD14</b>	<b>SD17</b>	<b>SD49</b>	<b>SD50</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	No	No	No	No	No	No
<b>Full EqIA Impacts</b>	<b>SD11</b>	<b>SD48</b>	<b>SD15</b>	<b>SD14</b>	<b>SD17</b>	<b>SD49</b>	<b>SD50</b>
What are the direct impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
What are the indirect impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
How will negative impacts be mitigated? How will positive impacts be improved?	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Any recommendation to amend the policy?	No change	No change	No change	No change	No change	No change	No change

### *Pollution and Contaminated Land*

6.27 The following policies relate to pollution and contaminated land:

- Development Management Policy SD54: Pollution and Air Quality
- Development Management Policy SD55: Contaminated Land

6.28 The policy options which are presented below represent policies that have been brought forward from existing adopted policies, some with slight/significant changes. As there are no identified reasonable alternatives in policy wording the IIA has assessed the proposed policies as standalone ones.

Table N (i) Policy Options for pollution and contaminated land

SA Objective	SD54	SD55
National Park's landscape character, functionality and perception and special qualities	+	+
Biodiversity and contribution to nature recovery	+	+
Historic environment heritage assets and their settings and cultural heritage	0	0
Impacts of climate change and to address the causes of climate change.	+	+
Protection & Sustainable Use of Resources	+	+
Employment and Economy.	+	0
Promote equality of opportunity and the elimination of discrimination	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+
Efficient transport network	+	0
Good quality home, suitable to their need. New affordable homes.	+	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	0
<b>SCORING</b>	<b>9</b>	<b>0</b>

Table N (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD54	Positive impact	+	Permanent	Long Term	Yes, with policies on contamination, climate change, dark skies and tranquillity and built environment/transport	This policy option is carried forward from the adopted plan and is still fit for purpose. The policy specifically refers to pollution and air quality and refers to cumulative impacts and states that development proposals will be permitted if levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation.
SD55	Neutral impact	0	Permanent	Long Term	Yes, with policies on pollution and built environment.	This policy option is carried forward from the adopted plan and is still fit for purpose. The policy is clear about ensuring development proposals provide the necessary evidence regarding contaminated land.



Table N (iii) HIA Framework for Pollution and Contaminated Land

HIA Screening	SD54	SD55
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	No
Full HIA Assessment	SD54	SD55
What are the direct impacts on health, mental health and wellbeing?	Positive policy on avoiding ill health through air and other forms of pollution	No direct impacts
What are the indirect impacts on health, mental health and wellbeing?	Opportunities for education and access to open space and nature. Opportunities to have a greater understanding of activities that limit pollution.	Focus on contaminated land and addressing the needs to investigate land contaminants will indirectly ensure areas are clear from possible health risks especially for residential/open space/recreation development.
What are the opportunities for self-improvement?	Opportunities to change behaviours, lead healthier lifestyles for the environment.	N/A
Who will it effect? Will there be impacts on certain vulnerable groups?	All members of the community will benefit from this policy.	All members of the community will benefit from this policy
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is positively worded and states clearly how development can cause pollution, leading to an impact on health. The negative impacts of pollution will be addressed through the policy with the added layer of referring to AQMA. The policy will be supported by others within the Local Plan that seeks to encourage non-polluting behaviours such as climate change, sustainable development, renewable energy and sustainable transport options.	The policy is positively worded and states clearly how contaminated land will be considered as part of development proposals.
Any recommendation to amend the policy	No change	No change

Table N (iv) EqIA Framework for climate change and renewable energy

EqIA Screening	SD54	SD55
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	No
Full EqIA Impacts		
What are the direct impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
What are the indirect impacts on Protected Characteristics?	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics	The policy is written positively and there is no positive or negative discrimination of any of the protected characteristics
How will negative impacts be mitigated? How will positive impacts be improved?	N/A	N/A
Any recommendation to amend the policy?	No change	No change

## *Housing*

6.29 These policies group together under the topic of housing. The following RA or standalone considerations are appraised:

### **Core Policy SD26: Supply of Homes**

A standalone policy on supply of homes

### **Strategic Policy NEW1: Accessible Homes**

Option New 1a A new standalone policy to require 5% of market housing to meet M4 (3) (a) standard (wheelchair adaptable dwellings) and proposals for affordable homes shall provide 15% wheelchair accessible homes (policy as written).

Option New 1b A new standalone policy to require 5% of market housing to meet M4 (3) (a) standard (wheelchair adaptable dwellings) and proposals for affordable homes shall provide 10% wheelchair accessible homes.

### **Strategic Policy SD27: Mix of Homes**

A standalone policy on mix of housing

No policy – let the market decide.

### **Strategic Policy SD28: Affordable Homes**

Policy SD28 as written

Option SD28a An option that does not refer to First Homes and the 30% discount.

Option SD28b An option that does not include criteria that affordable housing units are integrated throughout the development – let the market or provider decide.

### **Strategic Policy SD29: Rural Exception Sites**

Policy SD29 as written

No policy - rely on the NPPF.

Option SD29a An option that is not specific regarding the level of cross-subsidy to assist in rural exception site delivery for community led development.

### **Development Management Policy SD30: Replacement & Subdivision of Dwellings**

Policy SD30 as written

Option SD30a An option that restriction on the size of extensions / replacement dwellings is applied to all dwellings.

### **Development Management Policy SD31: Householder Development**

A standalone policy on householder development

### **Development Management Policy SD32: Rural Workers' Dwellings**

A standalone policy on rural workers' dwellings

No policy – rely on NPPF.

### **Strategic Policy SD33: Gypsies, Travellers and Travelling Show people.**

A standalone policy on supply of Gypsies, Travellers and Show people.

No policy – rely on NPPF.

Table O (i) Policy Options for Housing

SA Objective	SD26	New 1a	New 1b	SD27	No SD27	SD28	SD28a	SD28b	SD29	No SD29	SD29a	SD30	SD30a	SD31	SD32	No SD32	SD33	No SD33
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	0	+	+	+	+	-	+	+	+	+	+	+	+	-
Biodiversity and contribution to nature recovery	0	0	0	+	0	0	0	0	+	-	+	0	0	0	0	0	0	0
Historic environment heritage assets and their settings and cultural heritage	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Impacts of climate change and to address the causes of climate change.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Protection & Sustainable Use of Resources	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
Employment and Economy.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	-	0	0
Promote equality of opportunity and the elimination of discrimination	+	++	+	++	0	+	-	-	+	-	+	0	-	0	+	0	+	-
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	+	0	+	-	-	+	0	+	+	0	+	+	0	+	0
Efficient transport network	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Good quality home, suitable to their need. New affordable homes.	++	++	+	++	0	++	-	-	+	-	+	+	-	+	+	0	+	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	+	+	+	0	++	0	-	+	-	0	+	+	+	+	0	+	0
<b>SCORING</b>	<b>7</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>11</b>	<b>7</b>	<b>7</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>6</b>	<b>9</b>

Table O (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD26	Positive impact	+	Permanent	Long Term	Yes, with other policies on housing, landscape, sustainable development.	This policy option is carried forward from the adopted plan and is still fit for purpose but with substantial changes to reflect the current situation regarding housing supply. It accords with the spatial allocation of housing developments and work undertaken following the call for sites. Cumulative impact of housing coming forward has been appraised in this IIA on a settlement by settlement basis. Further details will be set out at Reg 19 stage.
New 1a	Positive impact	+	Permanent	Long Term	Yes, with other housing policies and transport/parking policies	This is a new policy and refers to compliance with building regulations and the percentage of accessible housing in market and affordable housing schemes (over 20 units). Further work is needed on viability. This option considers proposals for affordable homes shall provide 15% wheelchair accessible homes. This has a high number of positive scores, especially in relation to promoting equal opportunity and good quality homes to meet need.
New 1b	Neutral impact with some positive impacts	0	Permanent	Long Term	Yes, with other housing policies and transport/parking policies	This is a new policy and refers to compliance with building regulations and the percentage of accessible housing in market and affordable housing schemes (over 20 units). Further work is needed on viability. This option considers proposals for affordable homes shall provide 10% wheelchair accessible
SD27	Significant positive impact	++	Permanent	Long Term	Yes, other local plan policies on housing, accessible housing, affordable housing and landscape.	This policy option is carried forward from the adopted plan and is still fit for purpose, with only minor changes. The policy is clear about the housing mix and is based on the results of the recent HEDNA. It includes details on the impact on the purposes of the National Park and robust evidence.
No SD27	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting a housing mix that represents the needs across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is based on the HEDNA evidence.
SD28	Positive impact	+	Permanent	Long term	Yes, other housing policies on affordable	This policy is carried forward from the adopted plan and is still fit for purpose, with substantial changes. It is positive

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					and accessible housing	about providing affordable housing across the National Park.
SD28a	Neutral with 3 negative impacts	0	Permanent	Long Term	Yes, other housing policies on affordable and accessible housing but has weak synergies as this option is at odds with the Local Plan priorities	This policy option would have negative impacts on several sustainability objectives – especially relating to equalities, health and affordable homes for all members of the community, especially first time buyers. The cumulative impacts would be addressed in the Local Plan, but this is a standalone policy that refers specifically to affordable homes. The impact of not providing these would result in a housing market across the National Park which is unattainable to large numbers in society.
SD28b	Neutral with 4 negative impacts	0	Permanent	Long Term	Yes, other housing policies on affordable and accessible housing and design but has weak synergies as this option is at odds with the Local Plan priorities	This policy option would have negative impacts on several sustainability objectives – especially relating to equalities, health, design and character and affordable homes for all members of the community, especially first time buyers. The cumulative impacts would be addressed in the Local Plan, but this is a standalone policy that refers specifically to affordable homes. The impact of not providing these would be that housing market across the National Park becomes unattainable to large parts of society
SD29	Positive impact	+	Permanent	Long term	Yes, other policies on affordable housing and accessible housing, sustainable development and landscape/design	This policy is carried forward from the adopted plan and is still fit for purpose, with substantial changes. It is positive about providing affordable housing across the National Park
No SD29	Neutral with 5 negative impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting rural exception sites across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is a protected area of high landscape value and rural in character across a wide area. Due to the National Park status and the character of the area – the local plan needs to be clear about rural housing – away from settlements and urban areas.
SD29a	Neutral impact with some positive impacts	0	Permanent	Long Term	Yes, other policies on affordable housing and accessible housing, sustainable	This policy is largely neutral in impact as it would support affordable housing in rural exception sites but not reference a cross subsidy for community led development.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					development and landscape/design.	The policy would still include criteria on landscape impacts but would not specifically support community led schemes.
SD30	Neutral with some positive impacts		Permanent	Long term	Yes, other policies on housing and design, and parking.	This policy is carried forward from the adopted plan and has been subject to a full review.
SD30a	Neutral impact with both positive and negative impacts	0	Permanent	Long Term	Yes, other policies on housing and design, and parking.	This policy is considered to have a negative impact on several of the sustainability objectives. Through restricting the size of extensions / replacement dwellings to all dwellings instead of smaller dwelling, this limits the range of dwellings across the National Park. It may have an on housing availability across the National Park. .
SD31	Neutral with some positive impacts	0	Permanent	Long Term	Yes, other policies on housing, design, and parking.	The policy refers to criteria regarding extensions to existing houses and the considerations of each application. The policy does not specifically refer to cumulative impacts of various extensions and householder proposals especially if some of the extensions have been allowed via permitted development.
SD32	Positive impact	+	Permanent	Long Term	Yes, policies on housing need, affordable housing, rural exception policies and those regarding landscape, employment and design.	The policy requires that certain criteria is met before proposals for rural workers' housing are considered acceptable. This will manage the cumulative impact on the National Park. This policy is brought forward from the adopted local plan, but with substantial changes.
No SD32	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting rural workers' housing across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is a protected area of high landscape value and rural in character across a wide area. Due to the National Park status, the rural nature of the National Park and employment within rural sectors, the local plan needs to be clear about rural workers' housing.
SD33	Positive impact	+	Permanent	Long Term	Yes, but this is a specific policy relating to a certain requirement. There are synergies with	The policy does refer to over concentration of sites within a particular area. It also refers to the requirements of unidentified sites and how these will be considered.

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					policies on landscape, parking and amenity space.	
No SD33	Neutral impact with some negative impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on providing sites for gypsies, travellers and show people across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. The policy also considers locations within the Park.

Table O (iii) HIA Framework for Housing

HIA Screening	SD26	New 1	SD27	SD28
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes
Full HIA Assessment	SD26	New 1	SD27	SD28
What are the direct impacts on health, mental health and wellbeing?	Direct impact includes meeting housing needs which will encourage improved health and wellbeing for all community	Inaccessible or unadaptable space will have a negative direct impact on health and wellbeing, particularly mental and physical health	The policy helps meet housing needs, and brings forward a mix of housing which will ensure good health and wellbeing for all community	This policy allows members of society to access the housing market, overall positive impact on wellbeing and health.
What are the indirect impacts on health, mental health and wellbeing?	Housing in locations across the National Park will assist with health and wellbeing due to new houses and amenity space,	Encourages the ability to live in your home for a lifetime, adapt it to changing needs. Allows working from home if you cannot get to a place of employment and to lead an active life	Through ensuring needs are met throughout the local community – this will assist in maintaining health and wellbeing.	Opportunities to live in mixed communities, and ultimately own your own house or start on the housing ladder which has indirect benefits for health and mental wellbeing.
What are the opportunities for self-improvement?	New homes will bring forward the ability to feel part of a community, and hopefully access to local services.	Ability to be independent and live life how you wish and feel positive about health and wellbeing	The policy will create a mix of a different groups of people with all members of society feeling they are part of a community.	Ability to own part or all the house and be able to afford a house in the National Park (with possible local connections), better opportunity to access services and facilities



<b>HIA Screening</b>	<b>SD26</b>	<b>New 1</b>	<b>SD27</b>	<b>SD28</b>
Who will it effect? Will there be impacts on certain vulnerable groups?	A positive policy for all in society	A positive policy for all in society, will directly impact those with needs for adaptation (wheelchair users, mobility issues, older people etc)	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing and a mix of housing sizes to help all members of the community to move up and down the housing ladder.	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing and/or first time buyers. Could benefit those with a local connection.
How will negative impacts be mitigated? How will positive impacts be improved?	Other housing and environmental policies in the Local Plan will safeguard against negative impact of new houses. Positive impacts will also be addressed through other housing policies.	There should be no negative impacts of this policy unless developers are able to demonstrate the implementation of the policy is not practical and this is carried out on a regular basis. This could be addressed within the policy.	Other housing and environmental policies will safeguard against negative impacts. The policy sets out how impacts of housing can be assessed.	The policy sets out a raft of measures that will address financial implications and loopholes (such as splitting up development sites). This will ensure negative impacts are understood.
Any recommendation to amend the policy	No change other than updates to be made at Reg 19 stage.	No change to policy but viability work will enable consideration on percentage of accessible homes. Tightening of the wording around 'not practical' needs to be included.	No change.	No change

Table O (iii) HIA Framework for Housing continued

<b>HIA Screening</b>	<b>SD29</b>	<b>SD30</b>	<b>SD31</b>	<b>SD32</b>	<b>SD33</b>
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	No	No	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	No	No	No	Yes
<b>Full HIA Assessment</b>	<b>SD29</b>	<b>SD30</b>	<b>SD31</b>	<b>SD32</b>	<b>SD33</b>
What are the direct impacts on health, mental health and wellbeing?	The policy allows housing sites to come forward in rural areas which in turn, helps ensure good health and wellbeing for all community	N/A	N/A	New housing for rural workers will have a direct positive impact on health and wellbeing. However, the criteria must be addressed.	New provision for the travelling community has direct positive impacts on health and wellbeing, inclusion and participation in society

HIA Screening	SD29	SD30	SD31	SD32	SD33
What are the indirect impacts on health, mental health and wellbeing?	Living in a rural area, especially if there is a local connection and where the type of housing responds to local needs will help with mental and physical wellbeing.	Maintaining a range of house across the National Park that will be suitable for households of different sizes, including the retention of smaller houses will have a positive indirect impact on health and wellbeing.	Maintaining a range of house across the National Park that will be suitable for households of different sizes, including the retention of smaller houses will have a positive indirect impact on health and wellbeing. The need to extend housing to accommodate growth will also have a positive impact on wellbeing and may allow residents to remain within their existing communities.	The need for housing and the requirements outlined in the policy may have indirect impacts on mental wellbeing and health generally. However, these are important elements of the policy. If there is success with an application, there may be indirect benefits for rural workers to be near their land based enterprise.	The policy will indirectly help with avoiding isolation, integration into society, education and employment opportunities and considers amenity space.
What are the opportunities for self-improvement?	Ability to feel part of community, access to services and employment, inclusive society	N/A	N/A	N/A	Ability to be physically active and access services.
Who will it effect? Will there be impacts on certain vulnerable groups?	A positive policy for all in society, affordable housing beneficial for those who cannot afford access to market housing especially in rural areas and to meet need.	A positive policy for all in society, especially those who need and would like smaller properties within the Park.	A positive policy for all in society, especially those who would like to remain in their community.	A policy for all in society, especially rural workers.	Specific policy for the traveller community to assist in meeting their needs
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is clear about where and when rural exception housing will be applicable. This needs to be clear so that housing in part of the National Park that would not normally be supported – can be provided the criteria in the policy is met. The policy refers to impact on landscape and other matters.	Impacts are set out in the policy where a definition of a smaller property is detailed. This will ensure there is clarity regarding the percentage that a house can be extended should it fall in the 'small house' definition. However, there is no reference to other policies such as accessibility and adaptation especially about replacement dwellings.	The policy refers to criteria regarding extensions to existing houses and the considerations of each application. The policy does not specifically refer to cumulative impacts of various extensions and householder proposals especially if some of the extensions have been allowed via permitted development however, there are a number of criteria within the policy that will determine amenity space and other	The cumulative impact of rural workers' dwellings being developed across the National Park will be addressed via the specific criteria within the policy and will be considered on a case by case basis.	The policy does refer to over concentration of sites within a particular area. It also refers to the requirements of unidentified sites and how these will be considered.

HIA Screening	SD29	SD30	SD31	SD32	SD33
			standards that are important to wellbeing.		
Any recommendation to amend the policy	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.	Recommend there is cross referencing with other policies relating to accessible and adaptation housing.	No change	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.

Table O (iv) EqlA Framework for Housing

<b>EqlA Screening</b>	<b>SD26</b>	<b>New 1</b>	<b>SD27</b>	<b>SD28</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	Yes	Yes	Yes
<b>Full EqlA Impacts</b>	<b>SD26</b>	<b>New 1a</b>	<b>SD27</b>	<b>SD28</b>
What are the direct impacts on Protected Characteristics?	N/A	The policy will directly impact those requiring accessible housing either now or in the future. This includes those with mobility issues and older people.	N/A	N/A
What are the indirect impacts on Protected Characteristics?	The housing supply may be in locations where people who are on low incomes, disabled, older or younger cannot access – possibly due to cost of housing, lack of transport, limited employment	The accessible housing supply may be in locations where people who are disabled, older cannot access – possible due to, lack of transport, limited employment or topography, lack of services such as medical facilities	The policy will impact on all the Protected Characteristics although indirectly. The proposed mix will include housing for those on low incomes, older and younger people, those with families and those that are looking to downsize or upsize within the housing market.	The policy will impact on all the Protected Characteristics although indirectly. The policy refers to affordable housing which includes retirement and specialist care housing. Older and younger people, those with families and on low income will benefit from the policy.
How will negative impacts be mitigated? How will positive impacts be improved?	Further policies in the local plan relating to type and mix of housing will address the impacts.	Further consideration regarding locations across the National Park for accessible housing may assist with addressing the indirect impacts	The policy caters for a wide range of housing needs. This will be supported by other policies in the Local Plan.	The policy caters for a wide range of affordable housing needs. This will be supported by other policies in the Local Plan.
Any recommendation to amend the policy?	No change	No significant change – although considerations of locations may be required.	No change	No change

Table O (iv) EqIA Framework for Housing continued

<b>EqIA Screening</b>	<b>SD29</b>	<b>SD30</b>	<b>SD31</b>	<b>SD32</b>	<b>SD33</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	No	No	No	Yes
<b>Full EqIA Impacts</b>	<b>SD29</b>	<b>SD30</b>	<b>SD31</b>	<b>SD32</b>	<b>SD33</b>
What are the direct impacts on Protected Characteristics?	N/A	N/A	N/A	N/A	Gypsies and the travelling community are a Protected Characteristic. This policy will directly impact on them due to the focus of the policy and the consideration of sites.
What are the indirect impacts on Protected Characteristics?	The policy will impact on all the Protected Characteristics although indirectly. The policy refers to affordable housing as rural exception sites. This could impact on a wide range of people including older people, young people with a local connection and those with families and on low income who will benefit from the policy	The policy will impact on all the Protected Characteristics although indirectly. The policy refers to extending and replacing dwellings. Maintaining a stock of smaller houses across the National Park will benefit a wide range of people.	N/A	The policy may indirectly impact on low income groups if there are employed within land based enterprises.	The policy will also indirectly impact on the group as it details matters such as amenity space, parking areas and links to existing communities and infrastructure.
How will negative impacts be mitigated? How will positive impacts be improved?	The policy refers to rural exception sites and affordable housing. This will be supported by other policies in the Local Plan.	However, there is no reference to other policies such as accessibility and adaptation especially regarding replacement dwellings.	N/A	The cumulative impact of rural workers' dwellings being developed across the National Park will be addressed via the specific criteria within the policy and will be considered on a case by case basis.	The policy does refer to over concentration of sites within a particular area. It also refers to the requirements of unidentified sites and how these will be considered.
Any recommendation to amend the policy?	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.	Recommend there is cross referencing with other policies relating to accessible and adaptation housing	No change	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.	Recommend there is a cross reference to dark skies/tranquillity and pollution policies.

## *Employment and Economy*

6.30 These policies are grouped together under the topic of Employment and Economy. The following RA or standalone considerations are appraised:

### **Strategic Policy SD34: Sustaining the Local Economy**

A standalone policy on Local Economy

No policy – rely on NPPF.

### **Strategic Policy SD35: Employment Land**

Option SD35a Set target for employment land (policy as written)

Option SD35b Do not set a target for employment development.

### **Development Management Policy SD39: Agriculture and Forestry**

A standalone policy on Agriculture and Forestry

No policy – rely on NPPF.

### **Development Management Policy SD40: Farm and Forestry Diversification**

A standalone policy on Farm diversification

Have no policy or generally supportive policy.

### **Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings**

A standalone policy on conversion of redundant buildings

Have no policy or generally supportive policy.

### **Development Management Policy NEW8: Viticulture, Winemaking and Wine Tourism**

A standalone policy on Viticulture

Table P (i) Policy Options for Employment and Economy

SA Objective	SD34	No SD34	SD35a	SD35b	SD39	No SD39	SD40	No SD40	SD41	No SD41	New8
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	+	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	+	0	0	0	+	0	0	0	0	0	+
Historic environment heritage assets and their settings and cultural heritage	0	0	0	0	+	0	0	0	+	0	+
Impacts of climate change and to address the causes of climate change.	+	0	+	+	0	0	0	0	0	0	+
Protection & Sustainable Use of Resources	0	0	++	++	0	0	+	0	+	0	+
Employment and Economy.	++	+	++	+	++	+	++	+	+	+	+
Promote equality of opportunity and the elimination of discrimination	0	0	0	0	0	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	0	+	+	+	+	+	0	+
Efficient transport network	0	0	0	0	0	0	0	0	0	0	+
Good quality home, suitable to their need. New affordable homes.	0	0	0	0	0	0	0	0	+	0	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	0	0	0	+	0	+	0	+	0	+
<b>SCORING</b>	<b>7</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>7</b>	<b>8</b>	<b>6</b>	<b>8</b>	<b>7</b>	<b>9</b>	<b>9</b>

Table P (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD34	Positive impact	+	Permanent	Long term	Yes, other employment policies, design, transport, and tourism.	This policy option is carried forward from the adopted plan and is still fit for purpose with no change. It is specific and relevant to the National Park as it focusses on the key sectors, rural businesses, local employment and sustainable business. The cumulative impacts are not outlined as each proposal will be considered on its own merits and site specific criteria will be adhered to.
No SD34	Neutral impact with some positives	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on supporting local employment and the local economy. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park which is based on the HEDNA evidence and the key sectors within the Park.
SD35a	Positive Impact	+	Permanent	Long term	Yes, other employment policies, transport, landscape and pollution	The policy is positively written with clear information about employment land provision which has been provided by the HEDNA as background evidence. The policy sets out the criteria for protecting employment land.
SD35b	Neutral impact but with several positive.	0	Permanent	Long term	Yes, other employment policies, transport, landscape and pollution	The option is the same as the above but without the employment and provision. This information is required to provide an accurate policy and to ensure it complies with the background evidence on need and supply. It also means the policy is deliverable and achievable.
SD39	Positive Impact	+	Permanent	Long term	Yes, other employment and agricultural policies, landscape, access and design policies	This policy option is carried forward from the adopted plan and is still fit for purpose with no change. The policy refers to development proposals on a case by case basis and sets out the requirements in terms of access, impact on the landscape, character and cultural heritage.
No SD39	Neutral impact but with several positive	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on proposals for agriculture and forestry. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.
SD40	Positive Impact	+	Permanent	Long term	Yes, employment policies, agricultural	This policy option is carried forward from the adopted plan and is still fit for purpose with no change. The cumulative impact from farm diversifications schemes are not outlined



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					and landscape policies	as each proposal will be taken on its own merit and site specific criteria is included within the policy. Other impacts such as traffic, access, intensification, impact on landscape are covered in this and other policies.
No SD40	Neutral impact		No Impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on farm diversification. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.
SD41	Positive impact		Permanent	Long term	Yes, policies on housing, landscape, agriculture and employment	This policy option is carried forward from the adopted plan and is still fit for purpose with minor changes. The cumulative impact of conversion proposals will be assessed though the impact on a variety of key issues such as landscape, access and design.
No SD41	Neutral impact		No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on redundant agricultural buildings. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park and refers to landscape, character and conversion to residential use.
New8	Significant positive impact		Permanent	Long term	Yes, policies on cultural heritage, renewable energy, design, tourism, employment and agriculture	This is a new policy and is relevant to the National Park. It covers a wide range of issues and sets out the scale and location of new development and the expansion of existing businesses. These will be considered on a case by case basis, but cumulative impact will be assessed through the policy.

Table P (iii) HIA Framework for Employment and Economy

HIA Screening	SD34	SD35	SD39	SD40	SD41	NEW 8
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	No	No	No	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes
Full HIA Assessment	SD34	SD35	SD39	SD40	SD41	NEW 8
What are the direct impacts on health, mental health and wellbeing?	Allows and supports the local economy which will provide and retain local employment opportunities. This has a direct positive impact on mental health and wellbeing	This policy safeguards employment opportunities and proactively sets out provision for new employment development. This will have a direct impact on mental health and wellbeing.	N/A	N/A	N/A	The policy allows and supports the growth of viticulture which will offer a range of employment opportunities. These will have direct benefits for the local economy and the local community.
What are the indirect impacts on health, mental health and wellbeing?	The indirect benefits can include being part of an organisation, learning new skills, earning finance, meeting fellow colleagues. These can have a positive impact on health and wellbeing.	The indirect benefits will include retaining and providing employment opportunities cross the National Park which has a positive impact on health.	The indirect benefits relate to greater employment opportunities and ensure vitality of farming and agricultural business	The indirect benefits relate to greater employment opportunities and ensure vitality of farming and agricultural business	The indirect benefits relate to greater employment opportunities and ensure vitality of farming and agricultural business and possible conversion to residential for those in need of housing.	The indirect benefits can include being part of an organisation, learning new skills, earning finance, meeting fellow colleagues. These can have a positive impact on health and wellbeing. The viticulture growth could have an indirect benefit on the growth of tourism and locations to visit and enjoy.
What are the opportunities for self-improvement?	Supporting employment /learning goals and accessing services.	Supporting employment /learning goals and accessing services.	Access to a wider range of local employment opportunities.	Access to a wider range of local employment opportunities.	Access to a wider range of local employment opportunities and housing	Access to employment opportunities.

HIA Screening	SD34	SD35	SD39	SD40	SD41	NEW 8
Who will it effect? Will there be impacts on certain vulnerable groups?	Will impact all of community.	Will impact all of community	Will impact all community members but especially people of the working age and in farming/agricultural industries.	Will impact all community members but especially people of the working age and in farming/agricultural industries.	Will impact all community members but especially people of the working age and in farming/agricultural industries and those in need of housing.	Will impact all community members
How will negative impacts be mitigated? How will positive impacts be improved?	The policy will ensure that impacts on key sectors, rural economy and brownfield land are managed. Impacts on use of resources and supporting renewable energy could be included.	The policy will ensure there are employment opportunities in a variety of difference business classes across the National Park and that levels of provision will be in accordance with background evidence. It will also protect existing employment sites. There are clear policy requirements regarding the loss of employment land.	Potential impacts on the on amenity, landscape character will be considered through the policy	Potential impacts on the on amenity, landscape character and viability will be minimised through the policy.	Potential impacts on the on amenity, landscape character will be considered through the policy and the housing needs for key users/types of housing needs.	This is a positive policy that supports the group of viticulture whilst providing guidance on any impacts.
Any recommendation to amend the policy	Impacts on use of resources and supporting renewable energy to be included or links to relevant policies as these will have an indirect benefit on health and wellbeing.	No change	No change	No change	No change	No change

Table P (iv) EqlA Framework for Employment and Economy

<b>EqlA Screening</b>	<b>SD34</b>	<b>SD35</b>	<b>SD39</b>	<b>SD40</b>	<b>SD41</b>	<b>NEW 8</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	Yes	No	No	No	No
<b>Full EqlA Impacts</b>	<b>SD34</b>	<b>SD35</b>	<b>SD39</b>	<b>SD40</b>	<b>SD41</b>	<b>NEW 8</b>
What are the direct impacts on Protected Characteristics?	N/A	N/A	N/A	N/A	N/A	N/A
What are the indirect impacts on Protected Characteristics?	The policy will have an indirect impact on all members of the community but particularly on low income groups, disabled people who may struggle to find employment or access services/transport, members of society who do not speak English as their first language. This list is not exhaustive.	The policy will have an indirect impact on all members of the community but particularly those who have limited transport options and are looking for employment.	Will impact all community members indirectly but especially people of the working age and in farming/agricultural industries.	Will impact all community members indirectly but especially people of the working age and in farming/agricultural industries.	Will impact all community members indirectly but especially people of the working age and in farming/agricultural industries and those in need of housing.	Will impact all community members indirectly.
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is positively written and strongly encourages local employment and supply chains and supports employment in rural and settlement areas.	The policy is positively written.	The policy is positively written.	The policy is positively written	The policy is positively written	The policy is positively written
Any recommendation to amend the policy?	No change	No change	No change	No change	No change	No change

## *Retail and Tourism*

6.31 These policies are grouped together under the topic of Employment and Economy. The following RA or standalone considerations are appraised:

### **Strategic Policy SD36: Town and Village Centres**

Option SD36a A standalone policy (as written)

Option SD36b No settlements are outlined in the policy/no hierarchy.

### **Development Management Policy SD37: Development in Town and Village Centres**

Standalone policy

No policy or general policy

### **Development Management Policy SD38: Shops Outside Centres**

Standalone policy

No policy or general policy

### **Development Management Policy SD52: Shop Fronts**

Standalone policy

No policy or general policy

### **Strategic Policy SD23: Regenerative Tourism**

Option SD23a (policy as written)

Option SD23b - do not provide policy protection against the loss of tourism.

Option SD23c – policy does not include cross-reference to exception criteria policy SD25.

### **Development Management Policy SD24: Equestrian Development**

Standalone policy

No specific policy on equestrian developments.

### **Development Management Policy SD53: Advertisements**

Standalone policy

No policy or general policy

Table Q (i) Policy Options for Retail and Tourism

SA Objective	SD36a	SD36b	SD37	No SD37	SD38	No SD38	SD52	No SD52	SD23a	SD23b	SD23c	SD24	No SD24	SD53	No SD53
National Park's landscape character, functionality and perception and special qualities	+	0	+	+	+	+	+	+	+	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	0	0	0	0	0	0	0	0	+	+	0	+	0	0	0
Historic environment heritage assets and their settings and cultural heritage	+	0	+	0	+	0	+	0	+	+	0	+	0	+	0
Impacts of climate change and to address the causes of climate change.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Protection & Sustainable Use of Resources	0	0	0	0	0	0	+	0	+	+	0	+	0	0	0
Employment and Economy.	+	+	+	0	++	0	+	0	+	0	+	+	+	0	0
Promote equality of opportunity and the elimination of discrimination	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	0	+	0	+	0	0	0	+	0	+	+	0	0	0
Efficient transport network	+	0	+	0	0	0	0	0	+	+	+	+	0	0	0
Good quality home, suitable to their need. New affordable homes.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	0	+	0	0	0	+	0	+	0	0	0	0	+	0
<b>SCORING</b>	<b>6</b>	<b>10</b>	<b>6</b>	<b>10</b>	<b>7</b>	<b>10</b>	<b>6</b>	<b>10</b>	<b>8</b>	<b>6</b>	<b>7</b>	<b>7</b>	<b>9</b>	<b>8</b>	<b>10</b>

Table Q (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD36a	Positive impact	+	Permanent	Long Term	Yes, with other retail policies, sustainable development and heritage policies	This policy has been brought forward from the adopted local plan with no changes as the hierarchy remains the same. There is a clear distinction between the town and village centres which then compliments other policies in the Local Plan review. The policy refers to development being acceptable in the listed settlements – provided other policies are taken into account.
SD36b	Neutral impact	0	Permanent	Long Term	Limited synergies with other policies – possibly retail and shop policies	Due to the size and number of settlements within the National Park, a policy with settlements and the hierarchy removed so there is no clear distinction between the different towns and villages would mean the policy is not sound and cannot be clearly delivered. The sheer raft of different places of varying sizes and function leads to it being necessary to include a hierarchy.
SD37	Positive impact	+	Permanent	Long Term	Yes, other retail and shopping policies, heritage policies and employment policies.	This policy option is carried forward from the adopted plan and is still fit for purpose with minor changes. It has been updated to reflect the changes to use classes. The policy deals with change of use and development on a case by case basis and relates to the hierarchy of settlements as set out in Policy SD36.
No SD37	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on development in town and village centres. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. It is also linked to Policy SD36 which sets out the hierarchy of town and village centres.
SD38	Neutral impact with several positive impacts	0	Permanent	Long term	Yes, other retail and shopping policies, sustainable development and landscape.	This policy option is carried forward from the adopted plan and is still fit for purpose with minor changes. It has been updated to reflect the changes to use classes. Cumulative impacts will be considered in the retail impact studies.
No SD38	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on development in outside centres. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. In particular, the policy considers

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						garden centres and the impact on the Park and local economy.
SD52	Neutral impact with several positive impacts	0	Permanent	Long term	Yes, retail and employment policies, heritage and landscape and pollution/dark skies.	This policy option is carried forward from the adopted plan and is still fit for purpose with no changes. It is a proactive policy that concentrates on new and changes to shop fronts across the national park with a focus on heritage, design and low light pollution.
No SD52	Neutral impacts	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on shop front development and alteration. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. In particular, the policy considers the impact on the beauty and landscape of the Park.
SD23a	Positive impact	+	Permanent	Long term	Yes, policies in employment, landscape, heritage, transport and sustainable development	The policy has been the subject of a full review. It provides detailed policy guidance on tourism and tourism development both within settlements and outside. It sets out the criteria for the loss of tourism and covers a wide range of areas. The policy refers to the impacts of in combination developments and the criteria set out in the policy will consider cumulative impacts of tourism on several key issues such as landscape, beauty, heritage, the countryside.
SD23b	Neutral impact with some positive impact	0	Permanent	Long term	Yes, policies on employment, landscape and heritage	This option considers omitting the criteria in Policy SD23 that refers to the loss of tourism. The policy states that proposals which would result in the whole or partial loss of existing visitor accommodation, visitor attractions and/or recreation facilities will not be permitted unless there is evidence that the current use is financially unviable and a robust marketing campaign of at least 12 months or that it the special qualities of the National Park. Whilst this option means that the market will dictate whether an existing tourism use is no longer required and not viable - this element of the policy will ensure that there is robust consideration before a site can change the use or be developed for a different use.
SD23c	Neutral impact	0	Permanent	Long term	Yes, policies on employment, landscape and heritage	This option considers omitting the section that refers to proposals being located inside the settlement policy boundary, as defined on the Policies Map, unless it meets the exception criteria set out in Policy SD25. If the exception criteria is met, then the proposal will need to be



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
						informed by a contextual analysis and landscape appraisal to ensure it is proportionate and sensitive to the appearance, character, and setting of the local landscape. Policy SD25 is relevant to all proposals within the Local Plan. Policy SD25 does not refer to an exception but does set out the criteria for proposals outside settlements. Policy SD23 provides an added layer with a requirement for a contextual analysis and landscape appraisal. This is important to assess proposals in the countryside.
SD24	Positive impact		Permanent	Long term	Yes, policies on tourism, employment, landscape, transport and design.	This policy has been brought forward from the adopted local plan with minor changes. The policy is positively written and acknowledges the number of horses and equestrian activities can change the landscape and character of the National Park. This policy provides guidance on the impact.
No SD24	Neutral impact		No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on equestrian development. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. The National Park has established equestrian businesses and a cultural history of equestrian activities. The number of horses, and the way in which horses are both used and cared for, has the potential to change the use and character of landscape.
SD53	Neutral impact with several positive impacts	0	Permanent	Long term	Yes, policies on heritage, design and dark skies/light pollution	This policy has been brought forward from the adopted local plan with no changes. The policy is positively written and provides guidance on the design, materials and size of adverts across the Park. This policy provides guidance on the impact.
No SD53	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on adverts. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.



Table Q (iii) HIA Framework for Retail and Tourism

HIA Screening	SD36	SD37	SD38	SD52	SD23	SD24	SD53
Will the policy have a direct impact on health, mental health and wellbeing?	No	No	No	No	Yes	No	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	No
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	No	No	Yes	Yes	No
Full HIA Assessment	SD36	SD37	SD38	SD52	SD23	SD24	SD53
What are the direct impacts on health, mental health and wellbeing?	N/A	N/A	N/A	N/A	Direct benefits of creating and supporting tourism facilities which will benefit all visitors and local communities regarding employment, experiences, outdoor recreation and enjoyment.	N/A	N/A
What are the indirect impacts on health, mental health and wellbeing?	This policy ensures the vitality of the listed village and town centres which in turn will help improve the range of services and retail offer and access for those with limited means of transport.	This policy ensures the vitality of the town and village centres which in turn will help improve the retail offer and range of services and access for those with limited means of transport. This will also retain uses on the ground floor which will support the local economy. The policy also supports public realm improvements	The policy supports the development of small convenience stores and farm shops/garden centres. These are all important for the health and wellbeing of the community who feel able to access retail near where they live – often using local stores without a car or transport. This creates community cohesion for many. Farm shops will support	This policy supports new and changed shop front that respect the design and character of the local area. This will have an indirect impact on maintaining the character of an area which will lead to the local community appreciating their centre and living/working/visiting attractive settlements.	The indirect benefits include ability to access green space, provide education and employment associated with tourism.	There are some indirect impacts such as location of equestrian businesses, but these will have minimal influence on health and wellbeing. The positive impact of working on equestrian farms and riding horses will be important for many people.	N/A

HIA Screening	SD36	SD37	SD38	SD52	SD23	SD24	SD53
			local produce and supply chains.				
What are the opportunities for self-improvement?	Opportunities for a wider range of town centre services and facilities. These will compliment retail offers.	Opportunities for a wider range of town centre services and facilities. These will compliment retail offers.	N/A	N/A	Ability to be physically active, and to be at one with nature and experience new activities.	Ability to be physically active, recreation and activity benefits. Self-improvement from being with animals and outdoors.	N/A
Who will it effect? Will there be impacts on certain vulnerable groups?	Will impact all of community, ensuring sustainable access to services and facilities	Will impact all of community, ensuring sustainable access to services and facilities	This will impact all members of the community.	This will impact all members of the community.	Will impact a wide range of both the local community and visitors.	Mainly impact certain groups of society who undertake equestrian activities	N/A
How will negative impacts be mitigated? How will positive impacts be improved?	Increased employment levels locally and will assist with supporting transport options.	Increased employment levels locally and support for the local economy and public realm improvements.	Cumulative impacts will be considered through the retail impact assessments.	Development will be considered on a case by case basis, and the policy requirements will be considered as part of the application process.	Impacts on amenity and landscape character will be minimised through the policy and loss of tourism facilities are considered in the policy.	Impacts on amenity and landscape character will be minimised through the policy.	N/A
Any recommendation to amend the policy	No change	No change	No change	No change	No change	No change	No change

Table Q (iv) EqIA Framework for Employment and Economy

<b>EqIA Screening</b>	<b>SD36</b>	<b>SD37</b>	<b>SD38</b>	<b>SD52</b>	<b>SD23</b>	<b>SD24</b>	<b>SD53</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	No	No	No	No	No	No
<b>Full EqIA Impacts</b>	<b>SD36</b>	<b>SD37</b>	<b>SD38</b>	<b>SD52</b>	<b>SD23</b>	<b>SD24</b>	<b>SD53</b>
What are the direct impacts on Protected Characteristics?	N/A	N/A	N/A	N/A	N/A	N/A	N/A
What are the indirect impacts on Protected Characteristics?	The policy will indirectly impact on all members of the community but will especially assist those with access to town centres and people seeking retail or town centre employment. However, those living in smaller settlements (not listed) with limited retail facilities may find that local services decline.	The policy will indirectly impact on all members of the community but will especially assist those with access to town centres and people seeking retail or town centre employment.	The policy will indirectly impact on all members of the community but will especially assist those who can access local shops without the need for a private car and could walk or cycle to the shops.	The policy will indirectly impact on all members of the community	The policy will indirectly impact on all members of the community and visitors. However, matters relating to access within facilities is not highlighted. Accessibility in terms of being able to reach the facilities (transport/walking / sustainable forms) is included within the policy.	The policy will indirectly impact on all members of the community and visitors.	N/A
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is positively written. However, there may be a need to acknowledge that smaller settlements do offer services vital for some people.	The policy is positively written.	The policy is positively written.	The policy is positively written	Impacts on amenity and landscape character will be minimised through the policy and loss of tourism facilities are considered in the policy but accessibility into and within facilities is not clear.	The policy is positively written	N/A
Any recommendation to amend the policy?	No change but supporting text to refer to maintaining retail/facilities in smaller settlements where possible.	No change	No change	No change	Reference to improving accessible to and within tourism facilities should be added.	No change	No change

## *Open Space and Transport*

6.32 These policies are grouped together under the topic of Employment and Economy. The following RA or standalone considerations are appraised:

### **Development Management Policy SD43: New and Existing Community Facilities**

Standalone policy on Community Facilities

### **Strategic Policy SD45: Green Infrastructure**

SD45a Green Infrastructure (policy as written)

SD45b Green and Blue Infrastructure

### **Development Management Policy SD46: Provision and Protection of Public Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries**

SD46a policy as written

SD46b Developments of housing under 10 units provide open space.

No policy on open space

### **Development Management Policy SD47: Local Green Spaces**

Standalone policy

No policy on LGS – leave to NDPs/NPPF

### **Strategic Policy SD20: Walking/Wheeling, Cycling and Equestrian Routes**

Standalone policy

### **Strategic Policy SD19: Transport and Accessibility**

Standalone policy

No policy on Transport and Accessibility

### **Development Management Policy SD22: Parking Provision**

Standalone policy

No policy on parking

Table R (j) Policy Options for Open Space and Transport

SA Objective	SD43	SD45a	SD45b	SD46a	SD46b	No SD46	SD47	No SD47	SD20	SD19	No SD19	SD22	No SD22
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	+	+	+	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	0	+	+	+	+	0	+	0	0	0	0	+	0
Historic environment heritage assets and their settings and cultural heritage	0	0	0	0	0	0	0	0	+	+	0	+	0
Impacts of climate change and to address the causes of climate change.	0	+	+	0	0	0	0	0	+	+	0	0	0
Protection & Sustainable Use of Resources	0	+	+	-	-	0	+	0	+	+	0	-	0
Employment and Economy.	+	0	0	0	0	0	0	0	0	0	0	+	0
Promote equality of opportunity and the elimination of discrimination	+	0	0	0	0	0	0	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	+	+	+	+	+	+	0	+	+	0	+	0
Efficient transport network	0	+	+	0	0	0	0	0	+	+	+	+	0
Good quality home, suitable to their need. New affordable homes.	0	0	0	0	-	0	0	0	0	0	0	0	0
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	0	+	++	+	+	0	+	0	+	0	0	0	0
<b>SCORING</b>	<b>7</b>	<b>7</b>	<b>8</b>	<b>6</b>	<b>5</b>	<b>9</b>	<b>6</b>	<b>10</b>	<b>7</b>	<b>6</b>	<b>9</b>	<b>6</b>	<b>10</b>

Table R (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD43	Neutral impact with several positive impacts	0	Permanent	Long term	Limited synergies with other policies.	This policy has been brought forward from the adopted local plan with minor changes. The policy is positively written and supports the retention and enhancement of community buildings. The policy has limited focus on design, impact on landscape, sustainable transport links and accessibility within the building, gender neutral facilities. Does this include sports pavilions and other community buildings? To be provided in the supporting text.
SD45a	Positive impact	+	Permanent	Long term	Yes, with policies on landscape, nature recovery, transport, public realm, tourism and open space	This policy has been brought forward from the adopted local plan with minor changes. It is positively written and supports a range of green infrastructure as well as managing proposals that will harm. However, whilst the policy refers to blue spaces within the text – it does not specifically refer to blue infrastructure.
SD45b	Positive impact	+	Permanent	Long term	Yes, with policies on landscape, nature recovery, transport, public realm, tourism and open space	This policy has been brought forward from the adopted local plan with minor changes. It is positively written and supports a range of green infrastructure as well as managing proposals that will harm. This option refers to blue infrastructure and is in compliance with the sustainability objectives and is recommended to be taken forward.
SD46a	Neutral impact with several positive and one negative impact	0	Permanent	Long term	Some but limited. Synergies with public realm and green space and landscape.	This policy has been brought forward from the adopted local plan with a full review. There are some synergies, but many other links are missing such as use of resources, water management, design, heritage, light pollution, renewable energy and transport links. These are considered important for sustainability.
SD46b	Neutral impact with several positive and one negative impact	0	Permanent	Long term	Some but limited. Synergies with public realm and green space and landscape	As above – this policy considers removing the requirement of houses of 10 or more units to provide open space This will result in a negative impact for use of resources and the provision of housing. There are some synergies, but many other links are missing such as use of resources, water management, design, heritage and transport links. These are considered important for sustainability.



Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
No SD46	Neutral Impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on providing open space within developments and protecting facilities across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park and housing developments.
SD47	Neutral impact with some positive impacts	0	Permanent	Long term	Yes, with open space, green infrastructure, landscape and heritage	This policy has been brought forward from the adopted local plan with substantial changes. It is positively written and supports the identification of local green spaces which are listed and will be shown on the proposals map.
No SD47	Neutral impacts	0	No impact		N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on providing local green space across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.
SD20	Positive impact	+	Permanent	Long term	Yes, open space, transport, green infrastructure	This policy has been brought forward from the adopted local plan with substantial changes. It is positively written and conserves and enhances the non-motorised user route network. It includes several disused railway lines. However, the National Park contains several important footpath and routes that could be included within the policy such as the South Downs Way.
SD19	Positive impacts	+	Permanent	Long term	Yes, transport and sustainable development policies. However limited synergies with dark skies, light pollution, and climate change	This policy has been brought forward from the adopted local plan with minor challenges. It is positively written and supports transport development and infrastructure. However, there are limited synergies with dark skies, light pollution, and climate change and these matters could be included or links provided to other policies.
No SD19	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on transport development and infrastructure across the National Park. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.
SD22	Positive impact with one negative impact		Permanent	Long term	Yes, links with transport, development and sustainable transport	This policy has been brought forward from the adopted local plan with minor challenges. It is positively written and supports parking provision.
No SD22	Neutral impact		No impact	-	N/A, would have to rely on national	Without the policy there may be some long term impacts on parking provision across the National Park. This is not a

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
					policies in the NPPF and guidance on National Parks	sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park.

Table R (iii) HIA Framework for Open Space and Transport

HIA Screening	SD43	SD45	SD46	SD47	SD20	SD19	SD22
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Full HIA Assessment	SD43	SD45	SD46	SD47	SD20	SD19	SD22
What are the direct impacts on health, mental health and wellbeing?	Positive impacts from the policy include retaining and supporting new community facilities that relate to social inclusion, ability to access facilities and services.	The policy supports and promotes areas of green open space and infrastructure, which helps positive more mental health and physical activity	The direct benefits are central to this policy as it provides opportunities for education and access to open space and nature and sports facilities. a	The direct benefits are central to this policy as it provides opportunities for education and access to open space.	The direct benefits include and support for non-motorised access to a range of walkways and routes which are positive for health and wellbeing.	The direct benefits include better facilities for sustainable transport options which includes cycling, walking and public transport. These are good for health, well-being, and inclusion	N/A
What are the indirect impacts on health, mental health and wellbeing?	Providing a community service that can help with day to day life – health and wellbeing.	As above – improvement and better access to green infrastructure has a health benefit. Policy can be enhanced by including blue infrastructure.	The indirect benefits are as above. For those that wish to support open space and sports facilities as well as knowing these facilities are local to them – there are indirect benefits to health and wellbeing.	Even if the LGS is not public – it will provide a green space within a settlement that can be enjoyed by the local community.	Better opportunities for sustainable modes of transport that can be near settlements. These can be of indirect benefit and provide quiet, open space routes to enjoy	Opportunities for sustainable modes of transport to be accommodated near to settlements that will allow access to education, employment, leisure.	The indirect impact is for a range of parking options at home, employment and tourism with encouragement to use sustainable transport options or electric vehicles. This will impact on health and wellbeing especially if there is a reduction in noise and pollution.
What are the opportunities for self-improvement?	Ability to access services, employment and education and enjoy social interaction, learn	The policy allows the ability to be physically active and access green space, also to learn about the	Opportunities to change behaviours in relation to recreational activities	There may be options for LGS to be publicly accessible which would mean they are facilities for	Ability to be physically active, walk to services, work and education.	The policy allows people to be physically active, walk to services, work and education et	The policy encourages shift in personal choice of mode to sustainable transport options

HIA Screening	SD43	SD45	SD46	SD47	SD20	SD19	SD22
	a new skill, be part of the local community.	local natural environment		exercise and outdoor wellbeing.			or electric vehicles
Who will it effect? Will there be impacts on certain vulnerable groups?	This will benefit all those in the local community.	This will benefit all those in the local community. However, not all areas of green open space may be accessible to the public.	This will benefit all those in the local community.	This will benefit all members of the community	This will benefit all those in the local community.	Will impact all groups of society equally. It may mean those who cannot drive or afford to drive – are able to use other transport means.	Will benefit all groups of the community.
How will negative impacts be mitigated? How will positive impacts be improved?	The policy sets out guidance regarding the loss of community facilities.	Matters relating to accessibility are included within the policy. Access to blue infrastructure will strengthen the policy especially across the National Park	The policy is positively written	The designation of a LGS will often be through the neighbourhood plan process where this will have been assessed.	The policy could be enhanced by including key routeways and long distance walks such as the South Downs Way. e	The policy is positively written.	The policy includes details on design, use of SUDS and location as well as accessibility and electric cars and bikes. However, there is a concern regarding air pollution.
Any recommendation to amend the policy	No change	Include blue infrastructure in the policy.	No change	No change	The policy could be enhanced by including key routeways and long distance walks such as the South Downs Way	The policy could include links to dark skies, light pollution, and climate change.	The policy could include links with dark skies, light pollution, and climate change.

Table R (iv) EqlA Framework for Open Space and Transport

<b>EqlA Screening</b>	<b>SD43</b>	<b>SD45</b>	<b>SD46</b>	<b>SD47</b>	<b>SD20</b>	<b>SD19</b>	<b>SD22</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	Yes	Yes	Yes	No	No	No	Yes
<b>Full EqlA Impacts</b>	<b>SD43</b>	<b>SD45</b>	<b>SD46</b>	<b>SD47</b>	<b>SD20</b>	<b>SD19</b>	<b>SD22</b>
What are the direct impacts on Protected Characteristics?	The policy will have a direct impact on those with mobility issues and gender reassignment. The policy is not clear on how matters of equality will be taken into account especially for the expansion/enhancement of existing facilities.	N/A	N/A	N/A	N/A	N/A	N/A
What are the indirect impacts on Protected Characteristics?	The policy will indirectly impact those that are unable to access the facilities using public transport and possibly those on low incomes, but this will be on a case by case basis depending on the location of the facility. This may also impact on those who are older if they are unable to access the community facilities.	The policy will indirectly impact those that are unable to access the infrastructure due to mobility issues.	The policy will indirectly impact those that are unable to access the facilities using public transport and possibly those on low incomes, but this will be on a case by case basis depending on the location of the facility.	N/A	N/A	N/A	There may be an impact on those who cannot or afford to drive (young, older people, low incomes, disabled). The focus is on parking but there is guidance that provision is near to settlements where other forms of transport is available.
How will negative impacts be mitigated? How will positive impacts be improved?	The policy refers to the loss of community facilities and how this will be managed.	The policy does refer to accessibility.	The policy does refer to facilities being safe and accessible to all members of the community.	N/A	N/A	N/A	Matters relating to pollution can be addressed through encouraging and supporting the use of electric cars and cycles. In addition, the policy

EqIA Screening	SD43	SD45	SD46	SD47	SD20	SD19	SD22
							encourages parking to be within the settlements.
Any recommendation to amend the policy?	Recommend that the policy refers to gender neutral/accessibility within and to the building and sustainable transport.	No change	Recommend that the policy refers to accessibility within and to the building and sustainable transport	No change	No change	No change	No change

## *Infrastructure*

6.33 These policies focus on infrastructure. At this stage, an assessment has been made of the proposed policy against the position without a policy. This is considered appropriate as in all cases, the proposed policies have been brought forward from the adopted Local Plan.

- Development Management Policy SD21: Public Realm, Highway Design and Public Art
- Strategic Policy SD42: Infrastructure
- Development Management Policy SD44: Telecommunications and Infrastructure

Table S (i) Policy Options for Infrastructure

SA Objective	SD21	No SD21	SD42	No SD42	SD44	No SD44
National Park's landscape character, functionality and perception and special qualities	+	+	+	+	+	+
Biodiversity and contribution to nature recovery	+	0	+	0	+	0
Historic environment heritage assets and their settings and cultural heritage	+	0	+	0	+	0
Impacts of climate change and to address the causes of climate change.	0	0	0	0	0	0
Protection & Sustainable Use of Resources	0	0	+	0	0	0
Employment and Economy.	0	0	0	0	+	+
Promote equality of opportunity and the elimination of discrimination	0	0	0	0	0	0
Holistic health and well-being. To create and sustain healthy and sustainable vibrant communities.	+	0	0	0	+	+
Efficient transport network	+	+	0	0	0	0
Good quality home, suitable to their need. New affordable homes.	0	0	0	0	+	+
Character of settlements, neighbourhoods and rural buildings. Highest quality of design.	+	0	+	0	+	0
<b>SCORING</b>	<b>6</b>	<b>9</b>	<b>6</b>	<b>10</b>	<b>7</b>	<b>7</b>



Table S (ii) Summary of SA Impacts

Policy Options	Does this have a significant effect on the SA objective(s), whether positive, neutral or negative?	What is the likely impact?	Temporary or permanent impact?	Is this a short term or long term impact?	Are there synergies between other policies?	Commentary and cumulative impacts
SD21	Positive impact	+	Permanent	Long term	Yes, design, transport, landscape and sustainable development policies	This policy has been brought forward from the adopted local plan with minor changes. The policy is positively written and supports the public realm and public art proposals. This policy provides guidance on the impact.
No SD21	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on public realm, highway design and public art. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. The policy specifically refers to the character and landscape of the National Park.
SD42	Neutral impact with some positive impacts	0	Permanent	Long term	Yes, policies on telecommunications, public realm, landscape and heritage.	This policy has been brought forward from the adopted local plan with minor changes. The policy is positively written and supports infrastructure proposals. This policy provides guidance on the impact.
No SD42	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on infrastructure proposals. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. The policy specifically refers to the character and landscape of the National Park.
SD44	Positive impact	+	Permanent	Long term	Yes, policies on infrastructure, Landscape and ecology, new homes and employment/community development.	This policy has been brought forward from the adopted local plan with substantial changes. The policy is positively written and supports telecommunication proposals. This policy provides guidance on the impact.
No SD44	Neutral impact	0	No impact	-	N/A, would have to rely on national policies in the NPPF and guidance on National Parks	Without the policy there may be some long term impacts on telecommunications. This is not a sustainable or practical option as there is a requirement and standard set out in the policy specifically for the South Downs National Park. The policy specifically refers to the character and landscape of the National Park.

Table S (iii) HIA Framework for Infrastructure

<b>HIA Screening</b>	<b>SD21</b>	<b>SD42</b>	<b>SD44</b>
Will the policy have a direct impact on health, mental health and wellbeing?	No	Yes	No
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes	Yes
Will the policy affect an individual's ability to improve their own health and wellbeing?	Yes	Yes	Yes
<b>Full HIA Assessment</b>	<b>SD21</b>	<b>SD42</b>	<b>SD44</b>
What are the direct impacts on health, mental health and wellbeing?	N/A	Positive policy which allows the timely delivery of or improved infrastructure.	N/A
What are the indirect impacts on health, mental health and wellbeing?	The policy promotes better design, and public art which will have a positive impact on places and spaces. This will have an indirect impact on wellbeing and quality of life.	Allows residents to live well locally and have access to education and, facilities.	Indirect impacts include ability to access internet and other forms of telecommunications for day to day needs and avoids isolation. This is positive for mental health and for education and employment opportunities for residents.
What are the opportunities for self-improvement?	Encourages safe pedestrian activity and safe sustainable forms of transport, ability to be physically active in attractive locations.	Allows the community to participate in physical activities and access services.	Better access to services, employment and education.
Who will it effect? Will there be impacts on certain vulnerable groups?	Will impact all groups of society equally	Positive policy for all the community, will enable the provision of infrastructure to meet the needs of all.	Improved digital connectivity will be positive for all community groups, but there may be still members of community who are unable to access digital services and information.
How will negative impacts be mitigated? How will positive impacts be improved?	Strong design creates improved places and distinct environments, and this policy supports such proposals.	Any negative impacts on the environment will be mitigated through this and other policies in the plan.	It is important to remember that digital connectivity is not the solution to all society interactions. The local plan supports face to face interactions and the benefits of the outdoors and beautiful places.
Any recommendation to amend the policy	No change	No change	No change

Table S (iv) EqlA Framework for Infrastructure

<b>EqlA Screening</b>	<b>SD21</b>	<b>SD42</b>	<b>SD44</b>
Will it impact on the Protected Characteristics including certain social economic groups (i.e. low income groups)	No	No	Yes
<b>Full EqlA Impacts</b>	<b>SD21</b>	<b>SD42</b>	<b>SD44</b>
What are the direct impacts on Protected Characteristics?	N/A	N/A	N/A
What are the indirect impacts on Protected Characteristics?	The policy indirectly impacts on all groups but is especially positive for those with mobility issues. The policy supports accessible public realm and highway design.	The policy indirectly impacts on all groups.	Improved connectivity could lead to isolation for those that have mobility problems as face to face interactions may be difficult. In addition, those that cannot afford to be connected or find the digital world fast paced (for instance older people) may also be isolated from the digital world around them. b
How will negative impacts be mitigated? How will positive impacts be improved?	The policy is positively written.	The policy is positively written.	The Local Plan provides support for face to face interactions and activities through positive policies that promote the outdoors, tourism and nature based activities.
Any recommendation to amend the policy?	No change	No change	No change

## *Conclusion and Summary for Policies*

6.34 A summary of the significant social, environmental and economic effects of the Local Plan policies is presented below by each individual SA Objective.

### **Objective 1 To conserve and enhance the National Park's landscape character, functionality and perception and special qualities of the South Downs.**

6.35 Overall, the significant effects of the policies on this objective is positive. The National Park is of high landscape value and polices are focussed on conserving and protecting the landscape. New and existing policies concentrate on ensuring the landscape value is not compromised. Options that include having no policy also score as positive against this objective as national planning policies seeks to protect landscape in areas such as National Parks.

### **Objective 2 To conserve and enhance the region's biodiversity and contribution to nature recovery.**

6.36 In general, the significant effects of the policies on the biodiversity objective are positive. Several policies and recommendations will be promoted through the proposed environmental and nature recovery policies. Key areas of nature conservation designation will be protected and effectively managed. There are clear opportunities for biodiversity net gain firstly on proposed development sites.

### **Objective 3 Conserve and enhance the historic environment, heritage assets and their settings and cultural heritage.**

6.37 Overall, the significant effects of the policies on this objective are positive. Proposed heritage policies are identified as having positive effects on townscape and built environment. There are several policies that have a neutral impact on this objective. This tends to be where heritage or the historic environment is not specifically referenced within the policy. However, there are no negative impacts and the general presumption towards conserving and protecting heritage and cultural heritage is an important thread throughout the Local Plan.

### **Objective 4 To ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaption measures.**

6.38 The significant effects of the policies on this objective are a mix of neutral and positive. There is one example of requiring more information. Whilst this objective is a key theme throughout the Local Plan – there are examples where more explicit reference to preparing for the impacts of climate change and addressing the causes are needed.

### **Objective 5 Protection & Sustainable Use of Resources.**

6.39 Overall, the significant effects of the policies on this objective are a mix of positive and neutral. There are some examples where the impact is negative. This has been where policies have not addressed several issues within this objective. Policies relating to sports and recreation facilities may require the use of water. Policies relating to parking may result in higher levels of pollution. In these examples, the policies can be adapted to address the use of resources.

### **Objective 6 Employment and Economy.**

6.40 As above, the significant effects of the policies on this objective are a mix of positive and neutral. There are some examples where there is a negative impact on this objective. These are small in quantity and relate to where employment and the

economy may be affected by the sustainable use of resources. There is a normal conflict amongst planning policies and sustainability objectives, but this impact will have minimal effect on the delivery of policies.

**Objective 7 Promote equality of opportunity and the elimination of discrimination.**

6.41 There are several negative impacts of the policies on this objective. This has occurred when policies have not taken on board promoting and supporting equality of opportunity. Accessibility to listed buildings and historic environments has not taken equalities into account. Several of the new policies on nature conservation and use of resources may lead to restrictions in growth and development. This may impact on access to services. Policies on affordable homes will need to take equalities into account.

**Objective 8 Contribute towards improving the holistic health and well-being of the population and surrounding area and towards reducing inequalities. To create and sustain healthy and sustainable vibrant communities within the National Park and help towards improving accessibility for all to all services and facilities.**

6.42 The overall impact on this objective has largely been positive or neutral. Whilst many policies do not specifically refer to health and wellbeing, policies have supported or enabled healthy activities through access to open space, access to services, homes and employment opportunities. The HIA framework for each of the policies provides more detail assessment information.

**Objective 9 Create the opportunities to support and facilitate an efficient transport network by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel by car.**

6.43 The significant effects of the policies on this objective are a mix of neutral and positive. However, there are several examples of a negative impact. One of these relates to dark skies – which may have a negative impact on transport systems. This is because it is assumed some of the transport services that operate after dark (i.e. stations and bus stations) will need lighting. This may be a conflict with objectives and policies seeking to reduce light pollution. In addition, parking areas for bicycles will require lighting.

**Objective 10 To ensure that everyone has the access and opportunity to live in a good quality home, suitable to their need. Provide opportunities for new affordable homes. Support schemes which optimise the scope for environmental sustainability.**

6.44 Largely, the significant effects of the policies on this objective are positive. There are several neutral impacts. However, where there are negative impacts – this has been where the objective conflicts with the focus of the policy. Examples include tranquillity and nature recovery/protected areas. These policies generally do not support urban development.

**Objective 11 Value, protect and enhance the character of settlements, neighbourhoods and rural buildings within the National Park. To achieve the highest quality of design that is innovative, imaginable, and sustainable and reflects local distinctiveness and population needs.**

6.45 The significant effects of the policies on this objective are mostly positive impact, although there are some neutral scores. Most of the policies are overtly committed to protecting and enhancing the character of settlements and rural areas across the National park. None of the policies conflict with this objective.

### *Cumulative and Synergistic Effects*

- 6.46 The cumulative effects are those that result from the interaction of all policies and policy options, and with other plans, policies and programmes. The adverse impacts of some policies on a particular SA Objective may be outweighed by the benefits of others. As illustrated above - whilst overall effects on an objective may be positive and beneficial, there may still be discrete negative effects from individual policies.
- 6.47 The policies in the entirety of the Local Plan address most SA Objectives in a positive manner and contribute to the achievement of them. Cumulative impacts were assessed for each policy and 'in combination' impacts considered for the sites in a settlement by settlement basis.
- 6.48 However, there are two SA Objectives in particular that could suffer from cumulative, potentially adverse effects from the implementation of the Local Plan. The first is Objective 4 - to ensure the SDNP communities are prepared for the impacts of climate change and to address the causes of climate change through adaptation measures. In many cases, more information is needed in the policy and supporting text as to how each one addresses the causes of climate change. This cross cutting objective should be clearly included within each policy to ensure there are minimal negative impacts. The second one is Objective 5 Protection & Sustainable Use of Resources. This objective should be a golden thread running through the Local Plan to ensure resources are protected and their use is sustainable.
- 6.49 Synergistic effects can be described as those that are greater than the sum of the individual effects. They are identified in the summary of policy options as part of the sustainability appraisal process.
- 6.50 There are several examples of positive synergistic effects in the Local Plan. This includes:
- Protecting and enhancing the historic environment and cultural heritage of the South Downs National Park. A consequence of this is promoting tourism to the area, which could benefit the local economy. Employment opportunities generated by the tourist economy could assist with health and well-being.
  - Promoting sustainable forms of transport will assist with several associated beneficial policies such as reducing air pollution, improve the health and well-being of residents and visitors, support the creation of green infrastructure and sustainable development and protect and enhance the landscape.
  - Conserve and enhance the landscape character of the National Park is a thread that runs through the Local Plan due to exceptional beauty and important of the landscape. The policies within the Local Plan are key to ensuring the character is conserved and protected. This has a positive synergistic impact on the whole Plan and is central to all decisions and allocations of development.

### *Summary of health and equalities impact*

- 6.51 The SDNPA has fully integrated the important process of assessing proposed policies against a set of health and wellbeing and equalities criteria. The integration is mutually beneficial as the IIA process has identified where there are health and equalities impacts and this has then established if the impacts are direct or indirect and if they have any wider strategic impacts on health and wellbeing.

- 6.52 The process of HIA has demonstrated that whilst there were specific health and wellbeing impacts recorded, these were largely positive impacts which could be amplified by other supporting policies in the Local Plan. Several recommendations were made, and these tended to focus on ensuring clear links and synergies were made throughout the local plan to ensure key health and wellbeing matters were addressed and highlighted. An example of this includes policies on tranquillity and dark skies. These may mean that health and wellbeing and safety in exercising and outdoor activities are confined to the hours of day light.
- 6.53 The EqIA considered the implications of all policies on Protected Characteristics and low income groups. There are several recommendations set out under each of the policies. These have focussed on ensuring policies are correctly cross referenced to others in the Local Plan. Key areas to be considered include accessibility to community buildings and transport options. Accessibility to historic and listed buildings is also important. Many of the policies have direct or indirect impacts on equalities and these will need to be scrutinised for the Reg 19 version of the local plan.

*Work Required to Inform Regulation 19 Local Plan*

- 6.54 Several recommendations have been made in this report regarding policies, synergies and supporting justification. These are as follows:
- **Core Policy: SD3 Major Development**
- 6.55 Proposals for major development should submit a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA).
- **Strategic Policy SD4: Landscape Character**
- 6.56 Planning applications for major development to submit a landscape and visual impact assessment (LVIA).
- **Strategic Policy SD12: Historic Environment and Cultural Heritage**
  - **Development Management Policy SD13: Listed Buildings**
- 6.57 Both policies should refer to accessibility to the building and/or historic environment and within the building (if appropriate).
- **Strategic Policy NEW1: Accessible Homes**
- 6.58 Viability work will enable consideration on percentage of accessible homes. Recommendation that there is tightening of the wording around 'not to be practical' and this to be included in the policy or reasoned justification. Consideration given to location of accessible housing.
- **Strategic Policy SD29: Rural Exception Sites**
- 6.59 There needs to be a clear cross reference between this policy and policies on dark skies and tranquillity and pollution.
- **Development Management Policy SD30: Replacement & Subdivision of Dwellings**
- 6.60 Recommend there is cross referencing with other policies relating to accessible and adaptation housing.
- **Development Management Policy SD32: Rural Workers' Dwellings**

- **Strategic Policy SD33: Gypsies, Travellers and Travelling Showpeople**
- 6.61 There needs to be a clear cross reference between the above policies and those relating to dark skies and tranquillity and pollution.
- **Strategic Policy SD34: Sustaining the Local Economy**
- 6.62 It is recommended that the policy refers to impacts on the use of resources and supporting renewable energy. These matters could be included in the reasoned justification and/or links provided.
- **Strategic Policy SD36: Town and Village Centres**
- 6.63 No change recommended to the policy but consider that a reference should be included to support local retail/facilities in smaller settlements where possible.
- **Strategic Policy SD23: Regenerative Tourism**
- 6.64 A recommendation that reference should be included regarding accessibility to and within tourism facilities.
- **Strategic Policy SD45: Green Infrastructure**
- 6.65 Recommendation that the policy include blue infrastructure.
- **Strategic Policy SD20: Walking/Wheeling, Cycling and Equestrian Routes**
- 6.66 Recommendation that the policy could be enhanced by including key routeways and long distance walks such as the South Downs Way.
- **Strategic Policy SD19: Transport and Accessibility**
- 6.67 Recommendation to improve synergies between the policy and those focussed on dark skies, light pollution, and climate change.
- **Development Management Policy SD43: New and Existing Community Facilities**
- 6.68 The policy has limited focus on design, impact on landscape, sustainable transport links and accessibility within the building and gender neutral facilities. Does this include sports pavilions and other community buildings? This could be outlined in the supporting text. Recommend the policy refers to gender neutral/accessibility within and to the building and sustainable transport.
- **Development Management Policy SD22: Parking Provision**
- 6.69 Recommend there are improved synergies between the policy and those focussed on dark skies, light pollution, and climate change.
- **Development Management Policy SD46: Provision and Protection of Public Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries**
- 6.70 There are some synergies, but many other links are missing such as use of resources, water management, design, heritage, light pollution, renewable energy and transport links. These are considered important for sustainability. Recommendation that the policy refers to accessibility within and to the building and sustainable transport.



## 7. Conclusion

- 7.1 The draft Regulation 18 Local Plan and IIA will be central to a formal consultation for a minimum of 8 weeks in January to March 2025. The consultation will be open to all and will seek to inform and receive comments from the widest possible range of people. Methods of consultation will include:
- Email notifications to the statutory consultees set out in legislation, these include Town & Parish Councils, County and District Councils and relevant Unitary Authorities, government agencies and relevant utility service providers.
  - Email notifications to other organisations, groups or individuals who may have an interest in the Local Plan Review, including access forums, countryside and conservation groups, youth and elderly persons' groups and the development sector.
  - Email notifications to everyone registered for Local Plan updates.
  - Publicising the consultation through the SDNPA website, social media, through press releases, articles in regular South Downs Newsletters and radio and local TV coverage where opportunities arise. Content will be provided for Parish and Town Councils to include in their regular communications with residents.
- 7.2 The outcomes for the consultation exercise and this draft IIA will be considered and will inform the Regulation 19 version. A further iteration of the Integrated Impact Assessment will be published alongside the Regulation 19 Local Plan and submitted with it for examination by the Planning Inspectorate.
- 7.3 The results of the Regulation 18 consultation will help to inform the next stage of the Local Plan Review. This will need to take account of the additional evidence identified above and the significant legislative and policy changes at the national level.
- 7.4 The policies and proposed allocations in the Regulation 18 Local Plan and this IIA have been informed by a significant number of evidence base studies. A further group of evidence studies will be commissioned or undertaken by the SDNPA during 2025 ahead of finalising the Regulation 19 Local Plan. The final version of the IIA will take into account the conclusions from all the studies.