Local Plan Options Consultation

February – April 2014

Summary of Responses
1. **The Options Consultation**

1.1 The Local Plan Options Consultation was launched on 28 February 2014 and ran for just over 8 weeks (in line with the *Statement of Community Involvement 2014*), until 30 April 2014.

1.2 The Options Consultation was a non-statutory stage of the local plan process, but represented an opportunity to meet the requirements of the Regulation 18 of the *Town and Country Planning (Local Planning) (England) Regulations 2012*, which states that local planning authorities should make stakeholders aware of its intention to produce a local plan and invite comments about what the Local Plan should contain.

1.3 The *Options Consultation Document* is divided into 10 chapters and covers 52 of the key planning issues that will be addressed by the National Park Local Plan. For most of the 52 issues there is a proposed approach for the Local Plan taking into account the legislation and national policy that relates to National Parks, followed by one or more potential other policy options. Respondents were asked for their views on the proposed approach and the other options set out. Respondents were also asked if there are any other options they would like considered or if there were other issues that the Local Plan should consider.

1.4 Over 1300 contacts were notified of the consultation when it was launched. The consultation was publicised using a number of methods and the Planning Policy Team met with a number of stakeholders during the consultation to encourage and facilitate responses. This included holding three parish council workshops and meetings with representatives of other local authorities, the South Downs Network, South Downs Society, South Downs Land Managers Group, South Downs Local Access Forum and South Downs Partnership.

2. **The Responses**

2.1 In total, 159 stakeholders responded to the consultation. There were, on average, 45 responses to each question, representing in excess of 5300 individual responses. A range of stakeholders responded to the consultation, including West Sussex, East Sussex, Hampshire and Surrey County Council, district and borough councils (including one adjoining Borough Council), 40 town and parish councils, Natural England, English Heritage, the Environment Agency and the Marine Management Organisation, landowners and developers, estates, infrastructure or service providers (Portsmouth Water, Southern Water, Thames Water and the Mobile Operators Association) and a number of individuals.

3. **Summary of Responses and Implications for the Local Plan**

3.1 The *Options Consultation Document* included a number of questions on the issues and options set out. These included 4 main types of question:

(i) Whether respondents agreed with the approach set out under ‘What we propose to do’ (Yes/No)

(ii) Whether respondents agreed with one or more options (Yes/No or multi select options)

(iii) Any other options which respondents thought should be considered? (Free text comment)

(iv) Any other issues which respondents thought the Local Plan should address? (Free text comments)

3.2 The responses to the first two types of question are presented below using graphs. In addition, officers have read through and summarised the responses to the second two types of question to identify alternative options, other suggested issues that the Local Plan should deal with and any other general comments made.
3.3 The responses to the consultation demonstrate general support for the approaches proposed and in many cases demonstrate support for a particular option. However, it is important to recognise that there were a relatively small number of respondents to many of the questions (average of 45). In addition, those responding were not required to choose an option or state if they supported the proposed approach for each issue. Therefore, it is important to consider the results of these questions alongside the comments made.

3.4 The detailed comments will be taken into account alongside the evidence base and other considerations, such as national policy and guidance, to produce the Preferred Options Document. This will be the first draft of the Local Plan, including draft policies and proposed site allocations. The reasons for selecting a particular approach or preferred option will be clearly set out in this document, which will be published for public consultation.

3.5 Once the SDNPA has considered the comments received on the Preferred Options outlined with the first draft of the Local Plan, a final draft Local Plan will be prepared. This will be published as a 'Pre-Submission' version, where comments can be made on the soundness (i.e. whether the plan is positively prepared, justified, effective and consistent with the national policy) and legal compliance of the plan. All representations made at this stage, along with the Pre-Submission version of the plan, will then be submitted to the Planning Inspectorate (on behalf of the Secretary of State), which will appoint an Inspector to carry out an examination of the plan.
Chapter 3 – Landscape and Natural Resources

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

**What we propose to do**

The Local Plan to include a criteria-based policy which ensures the conservation, management and enhancement of the National Park’s landscape, supported by sector, issue and/or area specific policies.

**Do you agree with this approach?**

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<thead>
<tr>
<th>Yes</th>
<th>94% (51)</th>
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<tr>
<td>No</td>
<td>6% (3)</td>
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Comments made by those that disagreed with the approach included:
- that they did not understand what a criteria-based approach meant, and
- that this question cannot be treated in isolation.

**Do you agree with the following option?**

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<tr>
<th>Option</th>
<th>Results</th>
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<tbody>
<tr>
<td>Yes</td>
<td>77% (36)</td>
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<tr>
<td>No</td>
<td>23% (11)</td>
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Comments made in favour of the option included:
- This type of policy should be applied on a proportionate and case-by-case basis
- The NPPF requires Local Plans to identify land where development would be inappropriate

Comments made against the option included:
- Such an approach could devalue and put greater development pressure on those sites / areas not selected as being ‘especially sensitive to change’.
- The option is too general and needs to be more specific
- Drawing lines on maps regarding landscape sensitivity may be difficult to draw objectively.

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

**What we propose to do**
The Local Plan to include a green infrastructure policy that encourages green infrastructure initiatives and will help underpin the commitment to conserving and enhancing the natural environment, cultural heritage and landscape character of the National Park in the face of both development pressure and climate change. Such a policy will be supported and informed by a GI Strategy setting out the approach to the provision of GI in and around the National Park.

**Do you agree with this approach?**

| Yes | 93% (51) |
| No  | 7% (4)   |

The comments made on this issue included:
- An all-embracing Green Infrastructure (GI) strategy should be at the core of the plan
- A GI policy / strategy should take into account GI projects that are just beyond the National Park boundary
- The level of private owned land may make a comprehensive GI strategy difficult to deliver
- Need for protective policy for existing GI

**Do you agree with the following option?**

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<tr>
<th>Option</th>
<th>Results</th>
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<tbody>
<tr>
<td>Yes</td>
<td>47% (20)</td>
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<tr>
<td>No</td>
<td>53% (23)</td>
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The comments made on this option included:
- The provision of GI should not be at the expense of the viability of development proposals and should include sufficient flexibility
- An ad hoc approach is considered inconsistent with the NPPF, and particularly para.165, and the scale of most development in the National Park is not sufficient to provide significant GI improvements
- A piecemeal approach will result in a disjointed GI network that is not fit for purpose.

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

**What we propose to do**

The Local Plan to incorporate a criteria-based policy ensuring the conservation and enhancement of protected habitats and species, with the level of protection being commensurate with their status, and is pro-active in seeking to significantly enhance biodiversity, for example through the expansion of the local ecological network and re-establishment of species. Encourage new development to contribute to the local ecological network by incorporating features to promote biodiversity and contribute to green infrastructure, supported by a Green Infrastructure Strategy, which informs
development proposals, other spatial policies within the Local Plan and the identification and management of designated sites.

The following designated site hierarchy will be applied:

**International Sites** - Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites

**National Sites** - Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)

**Local Sites** - Sites of Interest for Nature Conservation (SINCs) in Hampshire and Sites of Nature Conservation Interest (SNCIs) in Sussex, Local Nature Reserves (LNRs), Local Geological Sites and semi-ancient woodland not identified within (ii) above.

Outside of these areas, new development, where appropriate, will be required to contribute to the protection, management and enhancement of biodiversity.

*In line with national policy, a sequential approach to the impact of development on biodiversity should be applied as follows:*

1. harm will be avoided
2. if 1. cannot be avoided (that is, through locating development on an alternative site with less harmful impacts) then the impact of development should be adequately mitigated, and
3. if both 1. and 2. are demonstrated as being unachievable, then the impact should be compensated for.

Do you agree with this approach?

<table>
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<tr>
<th>Yes</th>
<th>94% (48)</th>
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<td>No</td>
<td>6% (3)</td>
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The comments made on this issue included:

- The Local Plan would benefit from a policy advising on the requirements for ecological assessments supporting planning applications
- RSPB and others respondents said that it is not possible to provide compensatory habitat for certain habitats, such as ancient woodland
- Proposed approach is considered in line with the mitigation hierarchy advocated by the NPPF, but Natural England say that a simple sequential approach for biodiversity is not appropriate for statutorily protected sites and Hampshire and IOW Wildlife Trust say that with regard to Natura 2000 sites step 3 should only be applied in exceptional circumstances
- The Local Plan could include a specific policy on development affecting heathland, such as a 400 metre exclusion zone around Special Protection Areas (SPAs) and SSSI (Sites of Special Scientific Interest) heathland, and National Nature Reserves, and development within a wider specified zone should contribute to access management measures and alternative greenspace.
- SDNPA should set out the priorities for both the quality and extent of habitats and species across the National Park.
- The Local Plan should include policies addressing coastal issues.

Do you agree with either of the following options?
The comments on made on these options included:

Option 3a
- Environment Agency consider this approach could provide opportunities to minimise encroachment on river corridors and address flood risk and other consenting issues

Option 3b
- A strong variation in response to this option
- Those opposing specific controls on development in Nature Improvement Areas (NIAs) believe that it is not appropriate as they were not intended to be a planning designation, particularly in a National Park

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

**What we propose to do?**
The Local Plan to include a policy that seeks to conserve geological conservation interests and geodiversity.

**Do you agree with this approach?**

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<th>Yes</th>
<th>96% (43)</th>
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<tr>
<td>No</td>
<td>4% (2)</td>
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The comments on this issue included:
- A number of the responses commenting on mineral working activities and are outside the current remit of the Local Plan

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

**What we propose to do**
Do you agree with this approach?

The comments made on this issue included:

- Natural England emphasize that there are a number of water-related issues that the Local Plan needs to address: water demand, water discharge, ground water recharge, and flooding.
- The Local Plan needs to consider water at a catchment scale to ensure improvements in water management, not on a case-by-case basis.
- Development needs to take into account climate change and increasing rainfall, use of grey water and similar technologies could assist.
- Development in the flood plain would need to be designed in such a way to minimise impact and minimise risk of flooding.
- RSPB would like to see the Plan safeguard areas for flood storage or set back of coastal defences.
- The Environment Agency recommend that the Local Plan include policies providing for protection and enhancement of water quality, both surface and groundwater, and that all new homes should achieve, as a minimum, internal water use of 105 litres / per head / per day and commercial development should meet BREEAM excellent standards.

Do you agree with the following options?

Option 5a - The Local Plan could include a policy focusing on demand management/ water efficiency.
The comments made on these options included:

- There can be unexpected consequences of such a policy as proposed in Option 5a.
- Policy should ensure that drainage solutions do not result in groundwater contamination.
- Portsmouth Water responded saying that the Local Plan does not need a policy on water neutrality just support the concept in the Water Resource Water Management Plan.
- Question as to whether ‘water neutrality’ is achievable.
- The Environment Agency says that there should be recognition of potential carbon and cost implications and suggests that there would need to be a clear definition of ‘water neutrality’.

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

**What we propose to do**

The Local Plan to specify clear criteria to ensure the protection and protective buffering of trees and woodland subject to Tree Preservation Orders and trees within Conservation Areas.

**Do you agree with this approach?**
The comments made on this issue included:

- National Park should take proactive steps to use woodland in a way that provides sustainable fuel, and enhances biodiversity
- The Woodland Trust recommends a policy stating that there must be the strongest possible level of protection for ancient woodland, advocate the creation of woods close to residential areas and identify that tree disease should be mentioned and woodland creation would assist in ensuring a resilient woodscape
- It is not possible to replace ancient or veteran trees
- It is important to encourage mixed woodland and that the Local Plan should specify native trees.
- Portsmouth Water believe that there should be discretion given for development to take place which is in the wider public interest which has an adverse impact on woodland, subject to adequate mitigation
- Hampshire and IOW Wildlife Trust point out there is nothing intrinsically different in trees and woodland from other vegetation types and question whether separate policies are required other than managing of trees in conservation areas and subject to tree preservation orders (TPOs).
- Lewes District Council and the National Trust point out that trees subject to TPOs or in conservation areas are protected by existing legislation so a Local Plan policy is not required.

**Do you agree with either of the following options?**

<table>
<thead>
<tr>
<th>Option 6a - The Local Plan could, where appropriate, seek to retain existing trees, woodland and hedgerows, require adequate protection between existing trees and woodland and proposed development and, where appropriate, require the planting of appropriate new trees and other vegetation.</th>
<th>Yes</th>
<th>58% (18)</th>
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<tbody>
<tr>
<td>Option 6b - The Local Plan could specify clear criteria to ensure the adequate protection and protective buffering of ancient and veteran trees and ancient woodland, particularly referencing ancient woodland outside SSSIs.</td>
<td>No</td>
<td>42% (13)</td>
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Comments made on these options included:

- RSPB highlight that tree planting needs to be in appropriate locations, which is not in areas of heathland.

Are there any other issues that the Local Plan should address?

Natural England and others highlight that the Local Plan needs to be explicit in meeting the NPPF requirement to have a strategic approach to enhance the natural environment.
Chapter 4 – Historic Environment

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

What we propose to do

The Local Plan to outline the approach of the National Park Authority and its partners in relation to heritage at risk, that is to monitor the condition of designated heritage assets, identify those already at risk or vulnerable, exploit opportunities to secure their repair and enhancement, including the use of the community infrastructure levy, and take a proactive role in addressing heritage at risk, working with partners and communities and seeking external funding as necessary.

Do you agree with this approach?

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<th>Yes</th>
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<tr>
<td></td>
<td>94% (47)</td>
<td>6% (3)</td>
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Do you agree with the following option?

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<tr>
<th>Option</th>
<th>Results</th>
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<tbody>
<tr>
<td>Yes</td>
<td>90% (37)</td>
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<tr>
<td>No</td>
<td>10% (4)</td>
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Option 7a was widely supported, including by organisations such as the National Trust, the NFU and the South Downs Land Managers, and English Heritage. The latter qualified its support and considers that reference should be made to the National Park Authority’s statutory powers and their use as a last resort if necessary.

Of the four negative responses, two of the respondents expanded on their reasons for doing so.

- One respondent saw it as very much a last resort which requires sensitive handling, particularly with building interiors and period features.
- Patching Parish Council reported strong disagreement with Option 7a but did not expand beyond this.

Other comments included:

- The danger of setting precedents, with each site being taken on its merits.
- Any development should meet Code for Sustainable Homes Level 6.
- CIL should not be used on privately owned buildings.
Local Plan Options Consultation (February – April 2014) - Summary of Responses

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

**What we propose to do**

The Local Plan to seek to secure the optimum viable use for heritage assets, that is consistent with, or least harmful to, the character and appearance of the heritage assets affected and their wider setting.

**Do you agree with this approach?**

| Yes | 96% (48) |
| No | 4% (2) |

**Do you agree with either of the following options?**

| Option 8a - The Local Plan could adopt a generally restrictive policy approach to the conversion of historic assets to new uses. In conservation terms, the original use is usually the best one for the preservation of any particular historic asset. Alternatives should only be entertained if the original use is wholly and demonstrably defunct. | 35% (16) |
| Option 8b - The Local Plan could adopt a policy approach to conversion of historic buildings to other uses, on a case-by-case basis. Policy guidance may still be required regarding the neighbourliness of certain uses, the balance of uses in town centre locations, or the long-term preservation of certain architectural features, such as historic shopfronts. | 65% (30) |
The majority of respondents supported Option 8b but a significant minority preferred the more rigid approach represented by 8a. This group included a number of parish councils, some individuals, and East Sussex County Council.

Comments made on Option 8b included:
- The CLA supported Option 8b but pointed out that the word ‘conservation’ would be preferable to ‘preservation’

**Are there any other options you think need to be considered?**

CPRE Hampshire (South Downs and Central Group) suggests consideration of the possibility that ancient buildings are left to decay naturally where they have lost their original use and are beyond repair.

The National Trust would prefer a criteria-based approach.

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

**What we propose to do**

The Local Plan to set out a policy seeking to secure the optimum viable use for historic/traditional farm buildings that is consistent with, or least harmful to, the character and appearance of the buildings affected and their wider setting.

**Do you agree you agree with this approach?**

<table>
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<tr>
<th>Yes</th>
<th>100% (49)</th>
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<tr>
<td>No</td>
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**Do you agree with either of the following options?**

| Option 9a - The Local Plan could adopt a policy approach to conversions where planning permission is required which favours business and community uses over residential, and only allows the latter where all other uses have been demonstrated to be unviable. | 36% (15) |
The responses indicate a general preference for the flexibility represented by Option 9b, sometimes qualified by the suggestion that judgements should be made on a case-by-case basis. Again, a significant minority supported the more rigid approach represented by 9a.

Comments made on these options included:

- English Heritage supports the approach of 9a but adds that either option needs to be caveated with the text “whilst carefully conserving their special interest”

Are there any other options you think need to be considered?

CPRE Hampshire (South Downs and Central Group) suggests consideration of the possibility that agricultural buildings are left to decay naturally, particularly those which already have bats/owls nesting in them.

Issue 10 – How can the Local Plan best ensure the appropriate management of the climate change impact upon the historic environment?

What we propose to do

The Local Plan to include a policy to permit and encourage work to improve the energy performance of heritage assets consistent with their character and appearance and that of their wider setting

Do you agree with this approach?

| Yes | 93% (42) |
| No | 7% (3) |

Do you agree with either of the following options?

| Option 10a – Guidance could be developed, underpinned by a policy in the Local Plan, which attempts to provide clarity about the potential impacts of various forms of retrofitting and detailed guidance over which options are most suitable in different contexts. |
|---|---|---|
| Option | Results |
| Yes | 92% (36) |
| No | 8% (3) |
Comments made on this option included:

- English Heritage supports Option 10a and points out that it has produced its own guidance - *Heritage and Local Plans: How to create a sound plan under the NPPF*.

**Issue 11 – How can the Local Plan best protect non-designated heritage from total loss or incremental change?**

**What we propose to do**
The Local Plan to encourage the consolidation of local lists and add new entries within conservation area identified according to established criteria as part of the Conservation Area Appraisal process. Heritage assets of strong merit will be afforded consideration under the determination process.

**Do you agree with this approach?**

<table>
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<tr>
<th>Yes</th>
<th>100% (51)</th>
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<td>No</td>
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**Do you agree with either of the following options?**

| Option 11a - The Local Plan could highlight that no further co-ordinated attempt to identify non-designated heritage assets will be made and provide no special policy for their preservation. | 7% (3) |
| Option 11b - As resources permit, survey probable non-designated heritage assets for the creation of a National Park-wide local list, selected against carefully considered, pre-established criteria. The Local Plan could provide a policy safeguard to ensure that their special interest is considered and given appropriate weight in the planning decision-making process. | 93% (39) |

There is a clear majority in favour of the creation of a Local Heritage List for the National Park.
Are there any other options you think need to be considered?

Hambledon Parish Council suggests asking Parish Councils to prepare local lists and Lynchmere Parish Council suggests that there should be a reference to heritage assets identified in Neighbourhood Plans.

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

**What we propose to do**

The Local Plan to use the guidance set out by English Heritage when addressing any proposals for enabling development. The use of enabling development should be exceptional in the National Park.

**Do you agree with this approach?**

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<th></th>
<th>Yes</th>
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<tr>
<td></td>
<td>88%</td>
<td>12%</td>
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<td></td>
<td>(43)</td>
<td>(6)</td>
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Are there any other options you think need to be considered?

There is a little support for widening the concept of enabling development to allow it to be used to meet more generic heritage costs (e.g. revenue costs of an estate as a whole) rather than a specific, capital cost to address a specific heritage asset.

**Issue 13 – What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?**

**What we propose to do**

The Local Plan to adopt an approach that ensures that the impact of new infrastructure proposals on known heritage assets is fully considered in dealing with planning applications and that proper provision is made for dealing with the discovery of previously unknown heritage assets in the course of construction.

**Do you agree with this approach?**

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<th>Yes</th>
<th>No</th>
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<tr>
<td></td>
<td>98%</td>
<td>2%</td>
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<td>(45)</td>
<td>(1)</td>
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Do you agree with either of the following options?
There is a clear majority in favour of Option 13a.

Are there any other options you think need to be considered?

One respondent suggest that the term ‘infrastructure project’ should be clearly defined

Are there any other Historic Environment issues that the Local Plan should address?

A range of other issues were mentioned:
- Historic Churches and Chapels
- Sunken Lanes and ancient boundaries, including historic rights of way
- Historic landscape types
- Battlefields
- Historic cemeteries
- Ancient Forests
- Mills and Ponds
- Nesting sites for migrant birds affected by conversion of buildings
- Historic local landed families (extinct and surviving)
- Historic trading or cattle routes
- Folklore
- Non-designated historic designed

English Heritage made a number of wider ranging comments. It has produced a guide to the requirements which should inform the preparation of the local plan and it is important that this guides the preparation of formal policies.
Chapter 5 – Design

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

What we propose to do

Develop and publish Design Guidance in consultation with local communities, building on Village Design Statements

The Local Plan to require all development to be of a high design quality that demonstrates how it responds to the local landscape and built environment character.

Do you support this approach?

| Yes | 100% (50) |
| No  | 0% (0)   |

Do you agree with the following option?

Option 14a - The Local Plan could set out that development applications be supported by robust built environment characterisation studies and that designers integrate defining characteristics into development proposals.

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<th>Option</th>
<th>Results</th>
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<tr>
<td>Yes</td>
<td>85% (33)</td>
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<td>No</td>
<td>15% (6)</td>
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Comments on this option included:

- More weight and consideration should be given to Village Design Statements.
- Some support for modern, good-quality design, provided it respects the setting.
- The need to recognise individuality and that each settlement has its own identity and there is diversity across the National Park which would need to be accommodated within any guidance.
- This should not prevent the development of energy efficient/eco-homes.
- The need to recognise the cumulative effect of small scale development and extensions.
- This needs to be proportionate with detailed character studies considered too onerous (except for larger scale developments) and that this would need to be applied to acknowledge that each proposal should be assessed on its merits. Considered more appropriate to spend time on sense of place and local distinctiveness in relation to site context/characteristics rather than on characterisation studies.
- Important to use local materials (i.e. to reflect local geology) and that attention is paid to the local vernacular, not just traditional detailing.
- Support for preparing development briefs on allocated sites.
- Need to consider what is appropriate for agricultural and farm buildings (i.e. consideration of function/fit for purpose).
**Issue 15 - How can the Local Plan best ensure the use of appropriate materials?**

**What we propose to do**

The Local Plan to encourage the use of local building materials, particularly where their use will contribute to sustainable landscape management and local employment.

**Do you support this approach?**

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<th>96% (48)</th>
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<tr>
<td>Yes</td>
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<td>No</td>
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<td>4% (2)</td>
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Comments on this issue included:

- Important not to be too restrictive – potential impact on viability of development. Also is potential that contemporary design using high quality design solutions can be appropriate without harming the landscape.
- Need to include/address the presence and supply of local materials and their associated cost.
- Objection to ‘regardless of source’ as an unsustainable option.
- Options considered to be at odds with the proposed approach.
- Some support where locally sourced materials are not available or where matching the locally distinctive appearance can only be achieved by sourcing from elsewhere.
- National Trust support a policy to encourage the use of local materials, but that priority should be given to the materials most appropriate for the historic character of the building, with a greater emphasis on more sustainable/energy efficient materials on new buildings.

**Do you agree with either of the following options?**

<table>
<thead>
<tr>
<th>Option 15a - The Local Plan could encourage the use of the most sustainable, energy efficient materials regardless of source.</th>
<th>38% (11)</th>
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<tbody>
<tr>
<td>Option 15b - The Local Plan could encourage the use of materials which match locally distinctive appearances, regardless of source or energy performance.</td>
<td>62% (18)</td>
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Comments on these options included:

**Option 15a**

- Some commented that materials matching locally distinctive appearances could be used with energy efficient materials.
Option 15b

- Question how achievable this would be and what 'match locally distinctive approaches' means. Considered to be too variable for Option 15b to be meaningful.
- Option 15b as most appropriate within a Conservation Area.

Are there any other options you think need to be considered?

A mix of the two options suggested - preference for locally distinctive materials, but with a caveat that this should sustainable and energy efficient (e.g. Option 15a alternative – with materials which match locally distinctive materials or Option 15b alternative – removing 'regardless of energy performance')

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

**What we propose to do**

The Local Plan to require development to demonstrate robustness to changing social, economic and environmental circumstances.

The Local Plan to require public spaces to demonstrate viability for multiple uses, rather than specific or inflexible uses.

The Local Plan to require buildings to be designed so that they can be adapted.

Do you agree with this approach?

Do you agree with the following option?

| Option 16a – The Local Plan could include a policy whereby buildings within major developments incorporating mixed-use and commercial activities will be required to demonstrate a higher level of adaptability and robustness to change than those which are predominantly housing-led. This recognises that commercial and mixed-use environments are subjected to higher pressure to change than residential environments.  |
|---|---|
| **Option** | **Results** |
| Yes | 93% (28) |
| No | 7% (2) |

Comments on this issue included:

- Support for flexibility and adaptability, with specific references made to buildings for life and lifetime homes.
- That any policy needs to be allied with a flexible approach to allowing new uses in buildings.
Comments that were not in support of the approach included:

- Potential impact on viability
- A one size fits all approach is not feasible for the whole national park
- That these standards are being brought in through building regulations which would make this policy redundant.
- Good design and architectural merit are important and good design dictates that buildings should be used for their intended purposes.

**Issue 17 - Should the Local Plan include minimum space standards for new residential development?**

**Do you agree with any of the following options?**

<table>
<thead>
<tr>
<th>Option</th>
<th>Percentage</th>
<th>Comments</th>
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| 17a - The Local Plan could set local minimum space standards for new residential development. | 41% (24) | - Minimum standards should take into account different needs and preferences and should be informed by local needs and shortfalls in housing.  
- Need to ensure affordability.  
- Suggest minimum standards should be tiered for different house types. |
| 17b - The Local Plan could follow the Government’s approach, adopting nationally set space standards, if introduced. | 27% (16) | - Should wait for the outcome of the consultation on local space standards. |
| 17c - The Local Plan could avoid setting minimum space standards. | 19% (11) | - Should be considered on a case by case basis and this would need to take into account site constraints. Not considered to be appropriate to apply a single standard across the National Park.  
- Should be market led.  
- Potential impact on viability and have a negative impact on affordability. |
• Considered contrary to NPPF para 50 stating that local plans should deliver a wide choice of high quality homes.
• This will be incorporated in building regulations which would make the policy redundant.

Other comments included:
• Need to consider external space standards.

**Issue 18 - How can the Local Plan best ensure that the design of streets and roads reduces vehicle dominance and speeds, enhances local distinctiveness and minimises signage clutter and light pollution?**

**What we propose to do**

**Develop Design Guidance and a Design Protocol for highways.**

The Local Plan to ensure that development is designed in accordance with the Guidance/Protocol to raise the quality of the public realm and, where appropriate, to engage with the quality of the characteristic built and natural environment of the area, rather than using standardised highway measures which can erode the distinctiveness and quality of places.

The Local Plan to ensure that signs, road markings, barriers, street lighting and traffic signals will be kept to a minimum to reduce clutter and keep to a minimum the impact on dark-night skies from light pollution.

The Local Plan to ensure that the shared function of roads, streets and spaces within settlements is recognised and priority given to non-motorised movement.

The Local Plan to ensure that additional light spill is kept to the absolute minimum.

**Do you agree with this approach?**

| Yes | 96% (47) |
| No  | 4%  (2)  |

Comments made on this issue included:
• Support for design guidance/design protocol for highways.
• NFU and the estates raise the need to consider the operational requirements of agricultural machinery. Concern raised regarding prioritising non-motorised movement.
• Potential impact of inappropriate signage, street furniture and highways surfaces on local character and distinctiveness.
• Local Plan should have regard of the County Strategic road network identified in the Transport Plans (County Councils).

**Do you agree with the following option?**

| Option 18a – The Local Plan could set out that street lighting is desirable in certain circumstances, such as within village and town centres. Rather than limiting lighting in all circumstances a more graded approach will help limit lighting to where it is really necessary. |
|---|---|
| Option | Results |
| Yes     | 65% (22) |
| No      | 35% (12) |
The comments made on this option include:

- Need to retain traditional appearance of village lighting.
- Any light pollution unacceptable in National Park.
- Lighting should be limited to safe minimum necessary and be more cost effective.
- Local communities should be involved – no one size fits all for the National Park.
- Should use latest technology to minimise the impact on dark skies.
- CLA request that consideration is made for security and safety requirements of lighting, including on farms and commercial premises. Policy should not prevent lighting in these developments.

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

**What we propose to do**

The Local Plan to ensure that the levels of carbon emissions and sustainable design standards from new development meet national targets and building regulation standards and that the location and design of new development give great weight to the National Park's landscape and natural beauty.

**Do you agree with this approach?**

<table>
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<tr>
<th>Yes</th>
<th>94% (49)</th>
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<tbody>
<tr>
<td>No</td>
<td>6% (3)</td>
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**Do you agree with one of the following options?**

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<tr>
<th>Option 19a - Using an existing assessment model, the Local Plan could set standards which are higher than national targets and cover a wider range of sustainability criteria (such as Bioregional's 'One-Planet Living')</th>
<th>21% (7)</th>
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<tr>
<td>Option 19b - The Local Plan could set sustainability standards, specifically tailored to the SDNPA.</td>
<td>79% (26)</td>
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The comments on this issue include:

- Portsmouth Water comment that it should not be necessary to set specific policies as this is covered by national targets.
- Support for tailored standards – reference made to South East as an area of water stress which could justify higher standards.
- NFU comment that farming should be exempt from the policy and considered more appropriate to use industry led initiatives.
• Policy could be more effective as an outline (e.g. as part of design guidance) rather than a specific approach.
• Portsmouth Water comment on the risk of unintended consequences (i.e. Code for Sustainable Homes Level 5/6 producing less water efficient homes).
• The Environment Agency recommends this policy is linked to a policy on water efficiency standards.
• Need to support retaining and upgrading of existing buildings in first instance.
• Potential impact on viability.
• Consider the key elements of Code for Sustainable Homes – be prepared that this could be scrapped.
• Portsmouth Water comments that building regulations are the best means for delivering sustainable developments and refurbishments.
• Need for more clarity on what the standards would be and their impact. Option 19a considered to be potentially subjective and open to challenge.

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

What we propose to do
The Local Plan to support energy-efficiency schemes on existing buildings where they do not impinge on the National Park’s Purposes. For new build, exploit the Government’s emerging zero-carbon policy to secure high standards of energy efficiency in new build and, where appropriate, target opportunities for ‘allowable solutions’ into local low-carbon schemes including energy-efficiency schemes.

Do you agree with this approach?

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<tr>
<th>Yes</th>
<th>96% (46)</th>
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<td>No</td>
<td>4% (2)</td>
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Do you agree with any of the following options?

Option 20a - The Local Plan could include a 'consequential improvements' policy requiring property owners seeking planning permission to extend their property to make energy-efficiency improvements to the whole of their property.

|  | 23% (13) |
The comments made on these options included:

**General comments**
- Proposed options considered to be overly restrictive (National Trust) and represent too much regulation.
- The National Trust support allowing energy efficient proposals on existing buildings where they do not affect character.
- Consideration should be given to restricting solar panels and solar farms.
- Hampshire County Council comments that no apparent link between the Energy Study and Issue 20.
- Potential impact on viability – policy wording would need to be sufficiently flexible.
- NFU suggest a more incentive based approach and supporting rural energy schemes to promote local, low carbon energy supplies.
- All options will need to be supported by a robust evidence base.

**Option 20a**
- Considered to be unrealistic and punitive approach.
- Support a percentage threshold for extensions where proposals are required to include energy saving measures

**Option 20c**
- May be difficult to justify restricting development that cannot be connected to mains gas.
- This should only apply to major developments. Not appropriate to apply to smaller schemes and should be weighed against the local need for building.
- Portsmouth Water comment that this may result in oil heating being used in place of gas – risk of pollution from oil storage facilities particularly in source protection zones.
- Gas supply for new development is not always possible and considered to be no justification in planning terms to restrict development in this way.
Are there any other options you think need to be considered?

- Suggest a variation of Option 20a, b and c is preferable.
Chapter 6 – Settlement Strategy

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

What we propose to do

Within the countryside outside settlements, and where consistent with the National Park’s first Purpose, the Local Plan to:

- Normally allow development on previously developed land (brownfield sites) in relation to agriculture and forestry (including related infrastructure), farm diversification, tourism, appropriate recreation\(^1\) and the promotion of the understanding and enjoyment of the countryside but put in place strict controls on greenfield land.

- Not permit new residential development, except in special circumstances, for example where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset; or on a rural exception site (these are discussed in Chapter 7: Housing and Chapter 4: Historic Environment).

Do you agree with this approach?

![Poll: Yes 84% (47) No 16% (9)]

Comment made on this issue included:

- There should be an opportunity for smaller parish and settlements to extend their Settlement Policy Boundary to allow development which responds directly to local need.
- Too restrictive in terms of meeting housing need. Special circumstances should include where there is no 5 year housing land supply and high housing need (as long as it does not negatively impact Purposes). There may also be special circumstances where development outside settlement policy boundary could be appropriate, especially where it forms an extension to the settlement and has no negative landscape impact. Supports the criteria based approach with a general policy about Previously Developed Land (PDL) and focus on inside existing Settlement Policy Boundary.
- Need to define the settlements before it is possible to comment on policy regarding development in different types of settlement.
- The plan should recognise that some limited Greenfield development may be required for tourism and visitor accommodation. Existing settlements may not be appropriate or have capacity for this type of development, and the nature of this accommodation may require alternative locations, which will require green field development.
- Need to be more explicit about the use of PDL first, with development outside the settlement on PDL in exceptional circumstances and very rarely development on greenfield outside the settlement (for appropriate uses – e.g. tourism, agriculture, forestry).

\(^1\) However, in light of research published in 2005, the Government recognises that not all forms of outdoor recreation are appropriate in each Park and that activities which would have an adverse impact on the Parks’ special qualities and other people’s enjoyment of them may need to be excluded (in order to meet the requirements of section 11A (2) of the 1949 Act)’ English National Parks and the Broads: UK Government Vision and Circular 2010, para.26.
• As written, the Authority’s proposal could be seen as implying that agricultural and forestry development would only be allowed on PDL, which would be excessively restrictive. Preference should be given to the redevelopment of PDL, but this should not be an essential requirement: agricultural or forestry development will normally need to be within a specific location, which is unlikely to be brownfield (English Heritage).
• Strictly controlling development outside settlements is not appropriate and does not have due regard to the importance of towns and villages in the vitality and viability of the National Park.
• Need for robust evidence to support this proposal. The approach should be (i) identify need, (ii) assess capacity, (iii) identify environmental constraint and (iv) decide on level of development.
• This issue which restricts brownfield sites with the Park to certain uses, does not address the needs of some large previously developed sites such as the cement works in Shoreham and Halewick Lane ex-tip site in Sompting where value uses (such as employment) are required in order to help their restoration and improvement.
• Provision will be contained within this policy to permit new development of houses of an outstanding and innovative nature, particularly where they may form part of a wider scheme for landscape conservation and enhancement (in accordance with para 55 of NPPF).

Comments on the proposal relating to rural workers included:
• Caution must be taken with the rural worker policy, applications must be scrutinised as the need for rural workers to be located on site isn’t as essential as it was in the past.
• Support for allowing residential development for rural workers on PDL agricultural/forestry. This policy should also allow for those retiring from the farming industry to allow them to remain in the community. Criteria and controls should be placed on this type of development to ensure it remains in its function in perpetuity.

Please choose one of the following options to deliver the proposal outlined above:

| Option 21a - The Local Plan could apply the same policy across the whole National Park. | 24% (12) |
| Option 21b - The Local Plan could identify specific locations that are of high landscape sensitivity in which an especially restrictive approach should apply. | 53% (26) |
| Option 21c - The Local Plan could apply different policies for development in the countryside in each of the four main National Landscape Character Areas. | 22% (11) |
The comments on these options included:

Option 21a
- A single policy for the whole park is most appropriate but the method for assessing applications must still be done on a case by case basis, using criteria based approach.

Option 21b
- Should not define some areas as being more sensitive as this may lead to other areas being considered less sensitive and appropriate for unrestricted development

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

**What we propose to do**

The Local Plan to include a policy whereby permission will be granted for housing development in Tier 5 settlements in special circumstances, such as where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset or; on a rural housing exception site, in accordance with the NPPF.

The Local Plan will not define settlement policy boundaries for any Tier 5 settlements and existing settlement boundaries would not be carried forward into the Local Plan.

**Do you agree with this approach?**

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<td>Yes</td>
<td>73% (33)</td>
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<td>No</td>
<td>27% (12)</td>
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**Do you agree with the following option?**

<table>
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<tr>
<th>Option 22a – The Local Plan could allow small-scale development which does not significantly extend the built form of settlements and where the landscape will be conserved and enhanced.</th>
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<tr>
<td>Option</td>
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Comments made on this issue included:
- Any allowance of small scale growth could lead to incremental growth of settlements without associated facilities and services.
- Development in Tier 5 settlements should be considered appropriate if it has support from the local community and there is a clear need demonstrated for that development.
- Extensions to Tier 5 settlements should only be considered in exceptional circumstances once PDL/brownfield sites have been explored or exhausted elsewhere.
- A restrictive policy in relation to Tier 5 settlements could lead to such settlements never becoming more sustainable. It should be recognised that small scale incremental development can lead to services and facilities being provided.
• Concern regarding removing all Tier 5 settlements SPB and not carrying forward existing SPB in the local plan, some Tier 5 settlements may be appropriate for small scale growth to meet local needs.
• The number of Tier 5 settlements means a more flexible approach is required which allows communities to deliver small scale development which does not detract from landscape quality or natural beauty.
• If special circumstances allow for small scale development in very rural locations scrutiny and enforcement will be key. Need to ensure rural worker housing is retained and prevented from being extended and then made available on the open market, which then required further development of rural worker dwellings.
• Settlements should not be considered unsustainable just because people have to use private car to access services, people in larger settlements will use the private car to access local services so this is not an appropriate measure for ‘sustainable’
• Some support for small scale development where there is a demonstrated need and local support for the development. Good design will be essential.

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

What we propose to do

The Local Plan to:
• Include a policy whereby development on brownfield land and other sites within the existing built-up area/settlement boundary of Tier 4 settlements will normally be allowed.
• Ensure housing development will be for affordable and local housing needs only.
• Ensure there would be a presumption in favour of community facilities, small-scale retail development and business units, including live-work housing, and against the loss of such facilities.
• Ensure that, unless reviewed through Neighbourhood Plans, current settlement boundaries in Tier 4 villages will be incorporated into the Local Plan unchanged.
• Ensure that where there is no existing settlement boundary, and a Neighbourhood Plan is not proposed, the Local Plan will propose a settlement boundary, in close consultation with the community.

Do you agree with this approach?

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<tr>
<td>Yes</td>
<td>88% (43)</td>
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<td>No</td>
<td>12% (6)</td>
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In addition to the above approach we could also consider the following options?

Option 23a - The Local Plan could allow a limited extension of the settlement to meet local needs for affordable housing, employment and community facilities, providing it conserves and enhances the landscape. 47% (26)
Comments made on this issue included:

- Extension of Tier 4 settlement boundaries should only be carried out in consultation with those settlements, where the SDNPA consider it necessary to extend the boundary.
- Many brownfield/PDL sites will fall outside settlement boundaries; these sites should still be considered for development, it may be appropriate to re-define settlement boundaries to recognise this.
- The statement for Issue 23 is perfectly adequate and there is no need to go beyond this approach for Tier 4 settlements.
- Views into and out of settlements should be considered when allowing development in any settlement.
- The focus should be on development in brownfield locations only in Tier 4 settlements. A general presumption in favour of development in Tier 4 settlements could lead to the loss of important historical centres of villages.
- Development in Tier 4 settlements should not be limited to only affordable housing, often these communities will require affordable housing but small amount of market housing may be required to ensure development is viable.
- A cluster based approach could be difficult to implement as often Tier 4 settlements do not consider themselves to be part of a larger cluster.
- Define sustainability, it shouldn’t be restricted to just transport and access, many more factors make a sustainable settlement.
- East Sussex County Council comments that Option 23a is the only one to mention conservation and enhancement of the landscape. Options 23b and 23c raise concerns in this context. A collaborative approach between settlements is supported as it could reduce the pressure for new infrastructure development.
- English Heritage comment that Option 23a and 23b are potentially acceptable, but both would need to ensure that due regard is had to the historic environment (including historic landscapes) as well as the landscape.
- The policies for each settlement type state that loss of community facilities will be resisted. Hampshire County Council, as a service provider requests that clarification is made by cross-referencing to issue 48 (community infrastructure) in any subsequent draft criteria-based policy, in order to be consistent with paragraph 70 of the NPPF.
- Lewes District Council comment that the meaning of “local housing needs” and “small-scale retail and business” development will need to be very carefully defined in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency in accordance with NPPF Paragraph 17.
- The proposed approach is considered contrary to the approach which has been already found sound by Inspectors appointed to act on behalf of the Secretary of State.

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

**What we propose to do**

- Within Tier 3 villages, development on brownfield land and other sites within the built-up area/settlement boundary will normally be allowed.
- There would be a presumption in favour of community facilities, small-scale retail development and business units (including live-work housing) and against the loss of such facilities, to meet local needs.
- A limited allocation/settlement extension may be made to meet local development needs, including for affordable and local housing.
- Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale in keeping with the existing settlement, and do not have a potentially adverse landscape impact.
- Where Neighbourhood Plans are not proposed, site allocations required for housing, the review of existing settlement boundaries and the creation of new settlement policy boundaries will be proposed by the Local Plan, in close consultation with the community.
Do you agree with this approach?

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<th>Yes</th>
<th>95% (40)</th>
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<tr>
<td>No</td>
<td>5% (2)</td>
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Do you agree with any of the following options?

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

| Option 24a | 49% (24) |

Option 24b - Allow some land to be allocated to meet objectively assessed needs for the wider housing market area, as determined through the Strategic Housing Market Assessment (see Chapter 7: Housing).

| Option 24b | 22% (11) |
Comments made on this issue included:

- Focusing development on a single site should be avoided unless there is community support for the proposal, the local plan should encourage developments of different tenure and type to ensure mixed sustainable communities.

- Community support for changes to settlement policy boundary or allocation of sites for development is crucial to the success of the local plan.

- A broad presumption in favour of development in Tier 3 settlement boundaries could lead to the loss of important green spaces or negative changes to the characteristics of settlements.

- To meet objectively assessed need some extension to Tier 3 settlement boundary will be necessary, it is unlikely that Tier 1 & 2 settlements will deliver the required housing provision, therefore 24b is preferred option.

- East Hampshire District Council commented that Option 24b is the most realistic in considering development in Tier 3 settlements which will allow some land to be allocated to meet objectively assessed needs for the wider housing market area.

- Sussex Wildlife Trust comments that it is unclear what “These villages are relatively sustainable” means. If sustainability is meant in terms of these settlements being big enough to maintain facilities then it is not consistent with rest of paragraph which implies that expansion is needed to be able to continue to provide the current level of services. This introduction to this settlement category does not justify the expansion indicated. If these settlements are sustainable then there is no need for expansion. If they are not sustainable then there is no indication that expansion will make them so.
Issue 25 - What approach should the Local Plan adopt to development in Tier 2 settlements?

What we propose to do

- Within Tier 2 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.
- Subject to landscape and other constraints, land will also be allocated to meet the settlement’s objectively assessed local development needs, including for affordable and local housing. The location and quantity of development proposed will be informed primarily by a landscape assessment of each settlement to determine the direction of growth (if any).
- A presumption in favour of retail development within existing shopping centres and, if no suitable sites are available there, then on sites immediately adjoining centres.
- A presumption in favour of community, tourism, cultural and leisure facilities and other town centre uses (of an appropriate scale and type) within centres and, if no suitable sites are available there, on sites immediately adjoining centres. Loss of community facilities will be resisted.
- Provision for an appropriate amount of employment uses (B1, B2 and B8 use classes) within, on the edge of and outside centres in accordance with the sequential approach which seeks to allocate the most central and sustainable site first before considering one further out from the centre. Support will be for the retention of existing employment where there is reasonable prospect of the site being used for this purpose.
- Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale and in keeping with the existing settlement, and do not have an adverse impact on the landscape. Where Neighbourhood Plans are not proposed, the Local Plan will review Tier 2 settlement boundaries and allocate required sites for housing, business and other uses, in close consultation with the community.

Do you agree with this approach?

| Yes | 95% (35) |
| No | 5% (2) |

In addition to the above approach do you agree with the following option?

Option 25a – To allocate sufficient sites in the Tier 2 settlements to make a contribution towards the development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints; these would be in excess of the town’s local development needs, in recognition of the additional services and facilities available in those towns.

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<tr>
<th>Option</th>
<th>Results</th>
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<tbody>
<tr>
<td>Yes</td>
<td>91% (29)</td>
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<tr>
<td>No</td>
<td>9% (3)</td>
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The comments made in relation to this issue included:

- A cautious approach should be taken in providing housing in Tier 2 settlements to provide for the wider housing market area. The provision of housing in a National Park must be
predominantly for local people with housing need. Any market housing should also be provided for local people that will contribute to the local economy.

- Concerns mainly raised by developers relating to the statement 'given these constraints the objectively assessed need is likely to exceed the capacity of the National Park to accommodate it'. Their concerns relate primarily to the fact that the strategy has started from a negative position and that the plan should in fact start from a positive position looking to accommodate the objectively assessed need.
- Tier 2 settlements are likely to have to provide some strategic allocations (to provide housing beyond the needs of the settlement alone) therefore allocations in these settlements beyond what is identified in neighbourhood plans could be appropriate.
- Although Tier 2 settlements may be appropriate for development should they be considered appropriate for major development, in exceptional circumstances (NPPF), the local plan should be looking to provide some of the objectively assessed housing need outside the designated area.
- The clustering of some Tier 3 settlements may allow for some objectively assessed need to be delivered in Tier 3 settlements where there is no capacity in Tier 2 settlements.
- Petworth Town Council state that it should be considered as a Tier 2 settlement.

Option 25a

- Only if necessary to meet objectively assessed needs in the SHMA and always subject to landscape constraints (CPRE Hampshire).
- Chichester District Council state they would support this approach and consider that it may be appropriate for Tier 2 settlements to contribute to meeting housing, employment and other development needs within their wider local catchment area where this extends outside the National Park boundary.
- Sussex Wildlife Trust comments that no reference to an objectively assessed environmental need whereby development is the constraint on the need for growth in natural capital. This issue also details policies for development in key settlements inside the National Park. However, the Plan will need to demonstrate how this is better than similar policies for settlements outside the Park. Option 25a is not supported.

Issue 26 - What approach should the Local Plan adopt to development in Tier 1 settlements?

What we propose to do

- Within Tier 1 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.
- Subject to landscape and other constraints, land will also be allocated to meet each settlement's objectively assessed local development needs, including for affordable and local housing. The location and quantity of development proposed will be informed primarily by a landscape assessment of each settlement to determine the direction of growth (if any).
- A presumption in favour of retail development within existing shopping centres and, if no suitable sites are available there, then on sites immediately adjoining centres.
- A presumption in favour of community, tourism, cultural and leisure facilities and other town centre uses (of an appropriate scale and type) within centres and, if no suitable sites are available there, on sites immediately adjoining centres. Loss of community facilities will be resisted.
- Provision for an appropriate amount of employment uses (B1, B2 and B8 use classes) within, on the edge of and outside centres in accordance with the sequential approach which seeks to allocate the most central and sustainable site first before considering one further out from the centre. Support will be for the retention of existing employment where there is reasonable prospect of the site being used for this purpose.
Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale and in keeping with the existing settlement, and do not have an adverse impact on the landscape. Where Neighbourhood Plans are not proposed, the Local Plan will review Tier 1 settlement boundaries and allocate required sites for housing, business and other uses, in close consultation with the community.

Do you agree with this approach?

| Yes | 95% (36) |
| No | 5% (2) |

In addition to the above approach do you agree with the following option?

**Option 26a** – To allocate sufficient sites in the Tier 1 settlements to make a contribution towards development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints; these would be in excess of the town’s local development needs, in recognition of the additional services and facilities available in those towns.

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<th>Option</th>
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<tr>
<td>Yes</td>
<td>94% (33)</td>
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<tr>
<td>No</td>
<td>6% (2)</td>
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Comments made on these options included:
- Landscape capacity should be the primary factor considered in assessing whether these key settlements can accommodate further growth. It should be noted that if the larger settlements can not accommodate more growth provision will need to be found outside the NP.
- The Local Plan should take a positive approach to development, landscape constraints shouldn’t be the starting point, meeting objectively assessed needs should be.
- Tier 1 settlements and their surroundings will be appropriate locations for development of tourism and visitor accommodation due to their enhanced transport links.
- These sustainable settlements should accommodate housing need from a wider area, even areas outside the NP boundary.
- There doesn’t appear to be any differentiation between the type of development in Tier 2 and Tier 1. The Local Plan proposes the same approach for both tiers.
- Support for the recognition that Tier 1 settlements are likely to pass the ‘exceptional circumstances’ test in NPPF.
- CPRE Hampshire commented that it is essential that landscape constraints are given priority in the quantity of development allocated. The point may well be reached soon at both Petersfield and Lewes where no further development other than on brownfield land can be accommodated without unacceptable impact on the landscape.
- Lewes District Council agreed with proposed approach, but commented that the meaning of “local development needs”, the “appropriate scale and type” of town centre uses and the appropriate amount” employment development will need to be very carefully defined in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency in accordance with NPPF Paragraph 17.
- National Trust - We consider that there needs to be more explanation of (and indeed consultation on) the proposed settlement hierarchy. It is not clear from the document what type of settlements fall into what category and it is extremely hard to comment on the
above without reference to examples of the types of settlements in each category – only Tier 1 and 2 being named.

- Sussex Wildlife Trust commented that there is a strong presumption in favour of physical growth; not just redevelopment of existing sites but also “on adjacent sites”, a policy approach that could encourage sprawl. They would like to see stronger emphasis counter-balancing development need – such as with a Natural Capital Asset Plan.

- Natural England commented that it is not clear whether the plan is arguing that the ‘exceptional circumstances’ test has been met. The major development test requires the consideration of a number of factors, some of which have not been included in the reasoning in this section. They advise that, based on the reasoning provided in the plan, the ‘exceptional circumstances’ test has not been met. Both additional reasoning and robust evidence would be required to ascertain whether the ‘exceptional circumstances’ test has been met. In particular they advise that the Authority would need to demonstrate that the scope for developing elsewhere outside the designated area had been fully considered in the context of the duty to cooperate. In addition to be consistent with the NPPF aspiration to enhance the natural environment, they wish to see the cumulative impact of new housing on the landscape assessed and policy requirements put in place to ensure that housing, cumulatively, did not prejudice the attainment of this aspiration.

**Issue 27 - How can the Local Plan best take account of the adjoining settlements outside the National Park?**

**What we propose to do**

Through seeking to comply with the Duty to Co-operate, the SDNPA will meet with neighbouring authorities and other relevant public bodies to discuss cross-boundary strategic planning issues on an on-going basis.

**Do you agree with this approach?**

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<th>Yes</th>
<th>96% (46)</th>
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<td>No</td>
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**In addition to the above approach do you agree with the following option?**

| Option 27a - To develop a strategy for development which assumes that many of the facilities to serve the National Park’s population are provided in adjoining settlements outside its boundaries and to focus on developing sustainable transport links between the National Park and these neighbouring settlements and working with partners to enable this. | 58% (22) |
Comments made on these options included:

- The Duty to Cooperate should work in both directions and beyond the duty to provide housing. For example where there are pressures on land in areas outside the National Park, the National Park could provide community facilities etc., which contribute to need outside the National Park.

- Provision of services outside the National Park is appropriate to serve those settlements on the periphery of the National Park, but it is not sustainable to expect communities in the centre of the park to travel out to access essential services.

- Where possible facilities should be provided in the National Park. With an ageing population access to essential facilities becomes harder when you do not have access to a private car and there is a poor public transport.

- The Duty to Cooperate should also relate to parishes that are split by the National Park boundary. Improving transport links to major settlements in the park for those settlements split on the edge is also important so this shouldn’t be over looked.

- Duty to Cooperate will be complicated as there are so many neighbouring authorities and all at different stages of planning, how can SDNPA expect cooperation in terms of exporting housing numbers if the neighbouring authority has an up to date plan.

- There needs to be a mix of both options. Large scale facilities with large footprints will be suited to urban environments outside the National Park (hospital, sports facilities) smaller facilities (retail etc.) should be provided where possible in the National Park to ensure sustainability of settlements.

- The next iteration of the Local Plan should set out in more detail how it will deliver the Duty to Cooperate so this is clear for people to see how development is spread across the park and its neighbouring authorities.

- Placing development outside the National Park will still have an impact on National Park Special Qualities, for example on tranquillity.

- There is already significant pressure on ageing facilities both inside and outside the National Park, this should be taken into account when promoting further growth and development.

- Eastbourne Borough Council stated that larger settlements in the National Park should provide as many facilities as possible to serve their surrounding population. This would compliment the facilities that are being provided outside of the National Park, and reduce the need for residents in central areas of the Park to travel to reach these facilities.

- Waverley Borough Council expressed concern if there was a demonstrated need for a facility, and that the presumption was that it could be provided in an adjoining authority. Waverley recognises that Haslemere is seen as a gateway to the National Park, but it does have constraints, such as the Green Belt, and AONB as well as being in close proximity to the SPA. There are also concerns about the pressures on infrastructure. There are long-standing local concerns about the issue surrounding Haslemere station arising from it being a well used fast connection to London and the local parking issues, and intensive use of the A286, particularly as designated HGV route.

- Adur and Worthing Councils commented that they are unable to contribute to shortfall in housing provision as they are unable to meet their own needs as identified in the coastal duty to cooperate study 2013.
**Issue 28 - What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?**

**What we propose to do**

The Local Plan to include a policy that will only permit development on land within the National Park, on sites adjoining settlements situated just outside the boundary, following a comprehensive landscape assessment of the whole settlement.

The Local Plan to include a policy that will only permit development on such sites where it can be demonstrated that it will not have an adverse landscape impact and conserves and enhances the natural beauty, wildlife and cultural heritage.

**Do you agree with this approach?**

| Yes | 90% (36) |
| No | 10% (4) |

**In addition to the above approach do you agree with the following option?**

| Option 28a - The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that there is no other suitable, developable and deliverable site outside or within the National Park to meet the objectively assessed need for development in that settlement and that it does not have a detrimental impact on the landscape. | 75% (18) |
Comments made on these options included:

- Paragraph 115 & 116 of the NPPF means the SDNPA do not necessarily have to find the objectively assessed housing / development required. This may have to be found outside the National Park.
- Strong reservations about development on the periphery of the National Park as these areas are often extremely high biodiversity, open space value for more built up areas just outside the National Park.
- In these circumstances the National Park will work closely with the neighbouring authority to reach the best outcome for the given settlement, especially where Neighbourhood Plans are being developed.
- Further clarification is required regarding ‘exceptional circumstances.’
- This situation should only be considered appropriate in exceptional circumstances, it should not be written as a permissive policy.
- Both options should relate to the size and type of development proposed, otherwise it risks being restrictive to enable sustainable development in some settlements.
- More detailed information will be required in terms of the comprehensive landscape assessment, so those proposing development can understand what they are required to produce in these circumstances.
- An appropriate balance needs to be sought between the economic and social interests of local communities and the conservation and enhancement of the natural beauty of the National Park.
- Natural England commented that there should be caveats regarding conserving and enhancing natural beauty and the historic environment.
- Arun District Council commented that more information is required on: (i) what type of development triggers this small scale, medium scale, large scale, allocations, commercial? (ii) the extent of the required landscape assessment should be proportionate to the size of the development.

**Issue 29 - What approach should the Local Plan adopt for the redevelopment of major brownfield sites?**

The Options Consultation Document makes reference to three important strategic brownfield sites in key locations within the National Park:

- Syngenta, Fernhurst
- Shoreham Cement Works, Upper Beeding
- North Street, Lewes

**Do you have any views on how these sites should be developed?**

- Strong support for development on brownfield sites, but the development must enhance the National Park through good landscaping and high quality materials and design
- Each site should be individually assessed incorporating local community engagement in any proposals, especially where neighbourhood plans are being developed
- Developments need to provide a mix of uses which responds to local needs, also large scale development like this should be carried out over an appropriate period of time to allow the existing settlements to adjust to the new development
- This type of redevelopment is supported as long as associated infrastructure is in place or will be provided
- Where these uses were predominantly employment some employment should remain, so mix use is appropriate
- Focus for some of these sites (Shoreham) should be Purpose 2, using the features to encourage visitors and tourism
- The impact on neighbouring settlements and neighbouring authorities must be taken into account
- The following additional sites were suggested/mentioned:
  - Butser Hill chalk quarries
  - Stedham Sawmills
  - Singleton Station
  - Duncton Quarry
  - Lancing College
  - Halewick Lane ex-tip
- Detailed comment from Callstone Ltd on Shoreham Cement Works regarding the proposed uses for the site, and the benefits to be gained by all planning authorities in the surrounding area.
- Comer Homes made detailed comments on Syngenta including the history of the site and a wide range of potential uses and benefits which could result from the redevelopment of this site
- The Environment Agency made detailed comments on all three sites included in the options paper regarding flood risk, possible contamination and general environmental impact
- Natural England commented that brownfield sites can be rich in wildlife. Appropriate survey work needs to be undertaken prior to any allocation, to establish whether any allocation is deliverable.
- Sussex Wildlife Trust commented that all of the brownfield sites listed are key areas with major impacts on the National Park. So any development there should fundamentally be about delivering National Park Purposes. As a large site at the narrowest most sensitive part of the Park, Shoreham Cement Works is possibly the most significant. It is of a type and location where very significant environmental enhancement should be expected in any plan. Key issues here will be chalk and wetland habitat restoration alongside development that does not create infrastructure demands above the local area’s ability to deliver (specifically the road).
Comments on the Settlement Hierarchy Study 2013

In addition to general comments made on the Issues relating to the Tiers set out in the Settlement Hierarchy Study, a number of specific comments were made in relation to the methodology and the findings of the study. These included:

- The settlement hierarchy needs to be scrutinised thoroughly to ensure settlements are in the correct tier before proposing extensions to settlement boundaries.
- The scoring system used to assess a settlements position on the hierarchy should not give an equal score to all types of facility, for example a sports pitch or play area should not carry the same weight as a primary school or local shop.
- The interconnectivity of settlements is not considered, groups of Tier 5 settlements may have a range of services which can contribute to a sustainable settlement, but considered separately each settlement would not be highlighted as a sustainable location for growth. Para 55 of NPPF states ‘For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.’ For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.
- Some settlements (Coldwaltham) are described as Tier 5 yet have a primary school, a review of the settlement hierarchy is required to ensure that the correct score and therefore position on the hierarchy is given for all settlements.
- An additional tier should be created for settlements with no facilities, where development would be inappropriate.
- A simple scoring methodology is not appropriate to score settlements sustainability, for example access to a main line train station should carry far more weight than access to a village hall, shop or cafe.
Chapter 7 – Housing

Issue 30 - How can the Local Plan best ensure a 'sufficient' supply of housing?

What we propose to do

The Local Plan will set out a level of new housing (combined affordable and market) provision for the National Park. The level of the new housing provision set out in the Local Plan will be determined from:

- the 'objectively assessed need' of the National Park as determined through the SHMA, and
- the constraints identified from the evidence base, particularly the landscape character assessments of the major settlements and how paragraphs 115 and 116 of the NPPF are met.

Do you agree with this approach?

| Yes | 88% (43) |
| No | 12% (6) |

Do you agree with any of the alternative approaches set out below?

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

  - 14% (9)

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

  - 9% (6)
Comments made on these options included:

- Should be assessed in zones.
- Should involve parish councils and communities and include local landscape assessment as part of evidence base. Reiterates role of neighbourhood plans.
- Windfalls should be factored into the land supply figures.
- Not convinced of need for a National Park-wide SHMA. Some parts have already been included in two previous SHMAs.
- Should be a brownfield-first policy, including intensification.
- Key worker priority in affordable homes. New homes should be affordable to locals and small.
- Houses should be added to small villages to keep them local and alive, but no second homes.
- Concerns over Settlement Hierarchy Tiers 3 and 4 as no control over loss of certain types of services.
- Tiers 4 and 5 should be considered for housing to ensure strategy is deliverable if Tiers 1-3 cannot provide the required level. Also, SHLAA should inform this consideration.
- Comments from developers generally comment that all objectively assessed need across National Park area should be met as a minimum and that social and economic needs outweigh landscape constraints.
- General criticism of ‘objectively assessed need’ in principle, and how to address it.
- Wealden District Council suggests setting a National Park-wide target and then sub-divide by settlement. This could be done later through allocating DPDs.
- General preference amongst adjoining local authorities to be able to delineate the need within their respective areas - particularly for affordable housing (which may lean towards Option 30a) although this could be achieved from a combination of all options.
- Eastbourne Borough Council suggests Option 30b would be most supportive of Duty to Cooperate and could make it easier to meet unmet need from adjoining local authorities. Does not support Option 30a as it does not provide the necessary flexibility across housing market areas.
- Winchester City Council suggests SDNP needs to work with local authorities to determine housing need.
- Waverley Borough Council expects pressure for housing to increase there if SDNPA cannot meet its own objectively assessed need.
- English Heritage suggests the constraints to meeting the objectively assessed needs should include the historic environment and refer explicitly to paragraph 14 and footnote 9 of the NPPF.
Adur/Worthing Councils comments that SDNPA should consider accepting development within boundary along coastal urban fringe through the Duty to Cooperate to meet a need that relates to the urban areas adjacent to the National Park but within the Housing Authority areas.

**Issue 31 - How can the Local Plan best address housing mix in the National Park?**

**What we propose to do**

The Local Plan to set out how, through meeting housing requirements and building sustainable communities, residential development will provide:

- a range of dwelling tenures, types and sizes based on identified local needs to meet a range of housing requirements of the local community, including the elderly and those with special or supported needs, and
- a range of affordable housing types and sizes, based on the local need.

New housing development will be required to ensure that it contributes to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

**Do you agree with this approach?**

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<th>Yes</th>
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**To deliver the above approach, do you agree with one or more of the following options?**

- **Option 31a - Put an emphasis on the delivery of smaller properties for market tenures, and a mix of sizes for affordable tenures, unless indicated otherwise by local housing need information and whilst respecting the setting of the development site.**
  
  67% (40)

- **Option 31b - Existing properties should not be extended excessively, further diminishing the existing property stock of small and medium sized dwellings (definition of ‘excessive’ in this context would be**
Comments made on these options included:

- Size restriction should apply to Tiers 3, 4 and 5 rather than settlement boundaries to ensure rural affordability.

- Specific protection for ‘small dwellings’ in their own right (with robust criteria for what constitutes a ‘small dwelling’) further than just any proportional enlargement limit for all housing. This would protect the affordability of small houses, protect rural character and protect the landscape.

- Tenure and size mix is essential to meeting housing need – simply building more housing to meet market appetite does not address local need.
• The widespread opposition to Option 31e and specific comments suggest any size restrictions should apply universally within settlements as well, not just in countryside.
• Several comments suggesting it is not realistic to “conserve and enhance” National Park, should instead “not adversely affect”. Further, the level of enhancement should be proportional and rural workers and agricultural development should not be required to conserve and enhance. Estate housing should also be encouraged as far as possible.
• Limits on extensions to preserve affordability should not inhibit reasonable extensions which could accommodate growing families or elderly relatives and should be clear in its objectives and not overburdening.
• Replacement dwellings or extensions should not be allowed to incrementally increase indefinitely. Should be a policy tying enlargement to a proportion of the original size (perhaps 50%?)
• Local housing need is certainly a factor but the Authority should be realistic about the purchasers of market housing being in-migrants.
• Tenure and mix should be determined site-by-site to ensure appropriate for the settlement, not prescribed.
• Selborne Parish Council particularly noted opposition to size restrictions outside of policy boundaries but supported all other options.

Are there any other options you think need to be considered?

Expanding Option 31d, allow one house on a large to be replaced by two small houses to cater for smaller sized needs.

Consider policy on second homes.

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

What we propose to do

The Local Plan to set out a proportion for affordable housing provision of all residential development proposals, subject to confirmation that this level is achievable from the Viability Assessment[1]². Affordable homes will normally be required to be built on-site, unless it can be demonstrated to be unsuitable, where a financial contribution would be required. Affordable housing will need to remain available as affordable housing for people with a local connection in perpetuity.

Do you agree with this approach?

| Yes | 93% (50) |
| No | 7% (4) |

Do you agree with any of the following options?

---

² South Downs National Park Authority Viability Assessment Community Infrastructure Levy and Affordable Housing (Dixon Searle LLP, 2013)
Option 32a - The Local Plan could include a 'local connections' policy for the provision of affordable housing within parishes and towns in the National Park, with local connection being defined as those households unable to access the open housing market and having a residential, employment, family or primary carer connection within first the local parish (whether wholly or only partly within the National Park) and second neighbouring parishes.

Option 32b - The Local Plan could include a policy that all residential development, that is one net additional dwelling, should contribute towards the provision of affordable housing.

Option 32c - The Local Plan could include a policy that there is a dwelling threshold, either by site area or number of dwellings, for the provision of affordable housing on market housing sites.

Option 32d - The Local Plan could set an affordable housing proportion of at least 40 per cent, subject to confirmation that this level is achievable from the updated Viability Assessment. This provision will normally be on-site, unless it can be demonstrated to be
Comments made on these options included:

- Locally set affordable housing targets should be based on locally set need and employment opportunities.
- Local connections policy should apply to market housing also.
- Risk of cliff-edge numbers just below any threshold set – so all sites should contribute.
- Use higher CIL charges if sites don’t provide affordable housing.
- Gross affordable housing provision should be in proportion to existing settlement sizes to avoid overwhelming ghettoisation.
- Local connection criteria should include 8 years as resident. Should accidentally prevent people nearby but outside of parish boundaries from rightly benefiting and remaining equitable to users.
- Contributions from single dwellings (especially self build and agricultural workers accommodation) could be too onerous.
- Proportions should be viability-led rather than target-led.
- Comments on the compound cost of affordable housing, CIL, sustainability measures etc. impacting on the viability of development.
- Wealden District Council recommended its own Affordable Housing Policy WCS8 which sets a site size threshold and proportional requirement.
- Eastbourne Borough Council supports the approach and recommends its own Affordable Housing Policy where AH proportions are varied by area – depending on value. (Similar to the CIL viability zones).

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

**What we propose to do**

The Local Plan to support and encourage rural exception schemes, provided they are led and supported by local communities, on sites either within the settlements or immediately adjacent to either:

- settlement policy boundaries, or
- the built form, where there is no settlement policy boundary defined, and
- where the National Park’s first Purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage is supported.

The scale of the development proposal will need to be modest in size and relate well, in terms of location and size, to the existing settlement. The focus of new housing on rural exception sites will need to be on affordable housing and the need for a small proportion of market housing must be demonstrated through a Viability Assessment.

**Do you agree with this approach?**

- Yes: 92% (45)
- No: 8% (4)
Do you agree with either of the following options?

| Option 33a -- The Local Plan could set a site threshold for rural exception sites (if the option of setting a site threshold for the number of homes on rural exception sites was taken forward that threshold would be defined at the Preferred Options Draft Local Plan stage). | 41% (14) |
| Option 33b -- The Local Plan could extend the definition of housing permitted on rural exceptions sites to allow individual 'self-build' schemes to come forward where supported locally. | 59% (20) |

Comments made on the options included:

- Confusion over the meaning of “threshold” in this option.
- Exceptions Sites should not necessarily have to adjoin settlement boundaries if overriding preferences exist for an alternative site.
- Should consider agricultural land classification.
- Several comments in support of market housing on Exception Sites to support viability but others expressing this should be a last resort.
- Several parties concerned about the affordability credentials / relevance of self-build and management structures as these would differ from affordable housing providers or estate managers.
- Wealden District Council advises not to be too prescriptive as Exception Sites should be allowed maximum flexibility.
- East Hants District Council / HARAH provide useful comments about on-site market housing and needs surveys. Critical of self-build credentials as either affordable or cross-subsidising market housing. Suggests probably neither and so has no place on an NPPF compliant exception site.
- Chichester District Council recommends their limit of 15 units for Exception Sites and suggests market housing should be allowed as a last resort only.

Issue 34 - How can the Local Plan best meet the housing needs of agricultural and forestry workers?
What we propose to do

The Local Plan to set a policy whereby tied affordable residential accommodation for local workers within close proximity\(^3\) to agricultural or forestry enterprises, including temporary workers, will be permitted in the countryside as an exception provided:

- it is essential for the workers to live permanently at or near their place of work in the countryside
- it is in keeping with the local context, and does not adversely affect National Park Purposes
- is retained in perpetuity as accommodation for local agricultural and forestry workers, and
- other residential properties on the farm or economic unit have not been sold or redeveloped for other uses within the recent past.

Do you agree with this approach?

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Do you agree with either of the following options?

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<th>Option 34a - In addition to the approach described above, the Local Plan could limit the size of such accommodation for agricultural or forestry workers (the definition of the threshold on property sizes permitted should this option be taken forward will be defined in the Preferred Options Draft Local Plan).</th>
<th>61% (17)</th>
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<td>Option 34b - The allowance of additional affordable residential accommodation for local workers could be restricted by the Local Plan to instances where there has been no sale of another residential property on the estate.</td>
<td>39% (11)</td>
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\(^3\) The definition of ‘close proximity’ in this context will be provided through the Preferred Options Draft Local Plan.
Comments made on these options include:

- General concern about exploitation of this allowance.
- Support for limiting size to prevent value or size exceeding appropriate levels for agricultural workers as originally intended.
- Questioning need for on-site agricultural workers given the predominance of autonomous technology.
- Also support for permanent local workers rather than transient temporary workforce.
- The NPPF policy sets our sufficient guidance and additional restrictions are unnecessary except maybe good design.
- The sale of estate housing on the open market does not necessarily mean there is no future need for workers accommodation. Rural workers accommodation should also include retired farmers and should be defined flexibly to allow workers who indirectly contribute to the rural economy – not necessarily in farming and agriculture.
- Chichester District Council recommends a rural exception site size limit of 15 units.

Are there any other options you think need to be considered?

- Expanding policy beyond agriculture and forestry workers to include key workers and those involved in cultural heritage.

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

What we propose to do

The Local Plan to include a policy to encourage new residential development which aims at providing accommodation for the older people, both those in early retirement and those needing some form of care.

Do you agree with this approach?

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Do you agree with any of the alternative options set out below?

| Option 35a - The Local Plan could set out that residential development for older people be provided through smaller properties and opportunities for flats and bungalows | 59% (35) |
Comments made on these options included:

- Should be focused in Tiers 1 and 2 where there is supporting infrastructure; others suggest it should relate to 'local' need irrespective of settlement tier.

- Many comments focusing on avoiding an over-concentration of elderly accommodation to ensure sustainable mixed communities. New development should focus on maintaining independence and links with the wider community.

- Consider age-threshold; 55 is often considered too young. Also, ‘size’ is less relevant than ‘type’.

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

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

Option 35d - The Local Plan could allow for appropriately sized annexes and free-standing accommodation to be built within the curtilage of existing properties where they do not detract from the existing built form.
Disabled-access accommodation should be given same support as elderly accommodation. Also that there is an over-focus on elderly accommodation but other sections of society’s needs should also be met, including through life-time homes standards.

Any annexation must be tied to the principle dwelling to avoid exploitation. But annexes are preferable to bespoke, exclusive elderly accommodation. Other comments suggest targeting elderly accommodation frees up existing family housing.

Estate landowners have offered to discuss how they might provide housing to the benefit of elderly/retired members of local communities.

Hampshire County Council – as provider of adult services in its area – has requested specific targets for growth of accommodation for older and vulnerable people to ensure their needs are met as it does not believe that the market will provide this. Also requests specific reference to ‘extra-care’ to support the County Council’s Project Extra Care Programme.

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

**What we propose to do**

The Local Plan to identify sites to provide a 15-year supply to meet identified accommodation needs, working with our partners/adjoining authorities. A policy will be included within the Local Plan setting out the criteria for assessing sites and applications. This will follow the principles set out in Government policy.

**Do you agree with any of the following options?**

| Option 36a - The Local Plan could identify specific locations for temporary stopping places to provide alternatives to illegal encampment for those gypsies and travellers passing through (‘temporary stopping places’ are areas where gypsies or travellers can stop for up to 28 days). | 57% (28) |
Comments made about these options included:

- SDNPA must take into account concerns of local people both within and bordering the National Park.
- Option 36b should be related to a continued identified-need. Existing sites should only enjoy continued support where they are suitable in terms of wider local plan policies.
- Should not focus solely on rural sites as urban locations are nearer to amenities.
- Eastbourne Borough Council supports partnership working to identify a 15-year supply of sites and refers to its Local Plan Policy D6. East Sussex County Council, Chichester District Council, Brighton and Hove City Council and others support the options for identifying a supply of sites.
- Arun District Council promote joint working with Coastal West Sussex authorities to identify sites and advises that Travelling Show People have different needs which may need to be addressed in a different policy.
- Southern Water advise that sites considered adjacent to wastewater treatment works or major pumping stations should be far enough away to allow adequate odour and noise dispersion.
Issue 37 - How can the Local Plan best encourage Community Land Trusts?

What we propose to do

The Local Plan to encourage the establishment of Community Land Trusts as a way of encouraging affordable housing for local people where the CLT proposals are consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage.

Do you agree with this approach?

| Yes | 100% (39) |
| No | 0% (0) |

Comments made on this issue included:

- Angmering Estate requested discussion with the NPA on how housing can be provided for its workers without ceding control to an independent and separate management organisation.

Are there other Housing issues that the Local Plan should address?

- Shorter time limits on implementation of planning permission.
- More provision of smaller accommodation for single-person households.
- “Major Development” should be defined.
- Second homes issues.
- House-building is partly consumed by reducing/dispersing household numbers/occupants rather than new needs from new people.
- Brownfield-first policies and promotion of SUDS systems in design.
- Housing Density: should match the surrounding character.
Chapter 8 – Economy and Tourism

Issue 38 - What strategic goals should the Local Plan set for the local economy?

What we propose to do
The Local Plan will set clear strategic goals for the local economy, which will support the Partnership Management Plan.

Do you agree with this approach?

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What strategic goals for the local economy should we consider in the Local Plan?

There were many suggestions for potential strategic goals, including:

- Milland Parish Council stated that priority economic issues are addressed and limited resources targeted
- Ensuring jobs for local people and fostering thriving and sustainable communities
- Support for small and medium sized enterprises, and new enterprises
- Supporting clusters of businesses
- Supporting infrastructure delivery, including transport
- Facilitating the knowledge economy, including home working
- Selborne Parish Council made reference to sustainable growth within the National Park constraints
- Hambledon Parish Council referred to the provision of broadband
- Businesses supporting the special qualities of the National Park, the Partnership Management Plan objectives and the National Park’s purposes
- Having a flexible approach
- Supporting local agricultural and forestry businesses and enabling diversification, where appropriate, and appropriate forms of tourism, including visitor accommodation
- Angmering Estate referred to the role farm estates and farms make and that they should be able to improve and adapt their business activities
- Ensure thriving town and village centres

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

What we propose to do
The Local Plan to:
- consider up-to-date evidence on the need for employment land and/or commercial floorspace and consider the suitability of existing land to meet the identified business needs. Where appropriate, the Local Plan will aim to safeguard employment land to ensure sites are available to meet the short- and long-term needs, and will have a presumption against the loss of employment land and set criteria within policy against which the loss of employment land/floorspace will be judged.
• avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. However, where appropriate, the Local Plan will encourage the redevelopment of such sites, retaining the employment use but providing improved facilities or making better use of the site.

Do you agree with this approach?

<table>
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<tr>
<th>Option: Yes</th>
<th>Number of responses: 38</th>
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<tr>
<td>Option: No</td>
<td>Number of responses: 1</td>
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Comments made on this issue included:

- Impact on the environment and the traffic levels, including vehicle movements and vehicles sizes, on rural roads
- If it is important to the local community then it should be retained, whether or not it has been ‘run-down’ prior to an application for change of use
- Determining factors should include: how long it has been vacant, how long it has been marketed for, its location and the local need for employment sites
- Avoidance of long-term protection of employment sites where there is no reasonable prospect of a site being used for that purpose
- Essential that current employment land is safeguarded.

Do you agree with either of the following options to help deliver the approach outlined above?

Option 39a - The Local Plan could adopt a sequential approach to the loss of employment land/floorspace as follows: (i) preference given to the redevelopment of the site whilst retaining the employment use on the whole site; (ii) if (i) is demonstrated as being unachievable, we will consider a mixed-use development on the site, which includes some employment land/floorspace; (iii) if both (i) and (ii) are demonstrated as being unachievable, we will then consider the loss of the employment land/floorspace.
Local Plan Options Consultation (February – April 2014) - Summary of Responses

Comments made on these options included:
- It is important to consider car parking and green travel plans
- Retain small units for small and start-up businesses
- Retention of employment sites should be subject to commercial viability plans
- The Authority should outline what information may be required to demonstrate that an employment site is no longer required.

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

What we propose to do

The Local Plan to:
- identify if there is a need for new employment sites within the National Park through regular assessments and monitoring of take-up of different employment floorspace. Part of this consideration will include a review of existing employment sites.
- set criteria for the provision of new employment land/floorspace.

Do you agree with this approach?

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<td>93% (38)</td>
<td>7% (3)</td>
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In addition to the above approach do you agree with any of the following options?

| Option 40a - Allocate new employment sites to accommodate the need for new or expanding businesses in appropriate locations. | 41% (9) |
| Option 40b - Allocate mixed-use sites to accommodate the need for new or expanding businesses. | 59% (13) |

Comments made on these options included:
- What are the criteria for 'appropriate' locations?
- Broadband speeds and availability
Where possible on brownfield sites

Need to safeguard the character and environment of the National Park – no overall quantitative target should be set for additional employment land

Criteria should be tailored to the settlement hierarchy, conserving the integrity of rural lanes

Landscape constraints must be adequately factored into the proposed approach.

What criteria do you think are important in determining the location of new employment sites?

The responses to this question included:

- Local housing and infrastructure is available and affordable
- Transport access, local labour markets and the costs of site and buildings
- Must take account of landscape and environmental constraints and tranquillity
- Encourage the re-use of brownfield sites
- Good broadband connection
- Location, geography and site layout.

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

What we propose to do

The Local Plan to:

- support the sustainable growth and expansion of a range of businesses and enterprise in rural areas, both through appropriate conversion of existing buildings and well-designed new buildings, where consistent with National Park Purposes.

- support the delivery of small and flexible start-up business units, by encouraging the provision of small units as part of larger developments and/or encouraging the appropriate conversion or sub-division of industrial units into small units. Such units must be well designed and of sustainable construction and ensure that they meet National Park Purposes.

Do you agree with this approach?

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<tr>
<td>Yes</td>
<td>95% (41)</td>
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Do you agree with the following option?

Option 41a – Allocate land for start-up enterprise centres located where there is demonstrated to be a strong market demand.

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<tr>
<td>Yes</td>
<td>75% (21)</td>
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<td>25% (7)</td>
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Comments made on this option included:

- Much depends on the location and local impacts, particularly traffic
- All development proposals must be in keeping with their surrounding and enhance them
Local Plan Options Consultation (February – April 2014) - Summary of Responses

- Do not agree with growth and expansion in rural areas
- Many start-ups will need to expand or move to larger premises to grow. Enterprise centres should include a mix of size units
- High-speed broadband provision is critical
- Business development should be focussed in appropriate locations and the conversion of existing buildings.

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

**What we propose to do**

The Local Plan to support appropriate development associated with the expansion of businesses and enterprise in rural areas, subject to the development being of a high quality, both through the well-designed conversion of existing buildings and high-quality new buildings, which reflects its landscape setting.

**Do you agree with this approach?**

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<td>96% (45)</td>
<td>4% (2)</td>
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**Do you agree with either of the following options to help deliver the approach outlined above?**

- **Option 42a - The Local Plan could support a limited scale of farm diversification on the premise that the diversification supports the core agricultural use and development in accordance with the National Park’s Purposes. This may also include the development of buildings to enable on-site processing and sale of products grown on site.**

  54% (20)

- **Option 42b - The Local Plan could allow for more diverse economic use of agricultural buildings where it is considered to promote the National Park Purposes.**

  46% (17)
Comments made on this option included:

- All impacts from the development proposals should be factored in, especially traffic along rural lanes
- Where they are in appropriate locations and in keeping with the natural surroundings
- Impact of lighting, noise, odours and discharges should be minimised
- ‘limited’ scale diversification would be sufficient supportive for farm and rural estate businesses. Diversification should only be refused where they are in conflict with the Purposes.
- English Heritage state that care should be taken to conserve and enhance the architectural and historic significance of traditional buildings
- The NFU raises concerns about raising design quality to the extent that conversion schemes become uneconomic
- The South Downs Land Managers’ raise an issue about limiting the sale of products of farm shops to local products which they consider will make most operations uneconomic and recommend the use of the National Farmers’ Retail and Marketing Association’s guidelines
- The Wiggonholt Association has reservations about diversification of existing farm buildings which then triggers requirements for the construction of new farm buildings.

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

What we propose to do

The Local Plan to:

- support appropriate development and diversification of agricultural and other land-based rural businesses where such development conserves and enhances the natural beauty, wildlife and cultural heritage (Purpose One) and the landscape character of the National Park
- require planning applications for development associated with the keeping of horses to be accompanied by sufficient information to demonstrate that the associated impacts conserve and enhance the natural beauty and wildlife, for example by including details of fencing and landscaping.

Do you agree with this approach?

| Yes | 98% (40) |
| No | 2% (1) |

Do you agree with following option?

**Option 43a** – Alongside the Local Plan, the National Park Authority could develop guidance on the keeping of horses and equine development. Any policy and or guidance would need to acknowledge the different impacts associated with commercial and domestic equine-related development.

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<th>Option</th>
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<td>92% (34)</td>
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Comments made on this option included:

- Damage by heavy overgrazing should be a consideration
- Selborne Parish Council agreed that the keeping of horses should be required to comply with the agricultural practice set out with the requirements of the Single Farm Payment, and traffic impact from horse-related movements should be a consideration
- Hambledon Parish Council and Winchester City Council both referred to policies being required on the cumulative impact of equine development, and so-called mobile field shelters
- Enforcement is a key issue associated with equine-related development
- CPRE raised the issue of sub-division of open fields by fencing can change the character of a rural area
- The CLA mention that the use of land for equestrian-related uses is an important diversification opportunity for farmers and an important sport and recreation activity and does not support guidance on the keeping of horses
- Hampshire County Council mentioned that the keeping of horses should be focused in locations that take into account the bridleway network.

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

**What we propose to do**

To meet the second Purpose to promote opportunities for the understanding and enjoyment of the special qualities by the public, the Local Plan to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the National Park's first Purpose.

The Local Plan to have a presumption against the loss of visitor accommodation and set criteria within policy, against which the loss of accommodation will be judged.

**Do you agree with any of the following options to deliver the proposal outlined above (relating to visitor accommodation)?**
Comments made on these options included:

- Visitor accommodation must not be at the expense of affordable accommodation for local people.
- Sompting Estate consider that in pursuance of Purpose Two, and Purpose One, it is vital in planning for visitor accommodation should be permitted in rural areas.
- Bignor Parish Council highlight the Houghton Forest holiday cabin proposal as one that is inappropriate in a precious landscape.
- The Alice Holt Community Forum state that it is strongly opposed to any form of built or tented development within Alice Holt Forest.
- Amberleigh House Limited considers that the Local Plan must support the delivery of a great range and diversity of visitor accommodation to support Purpose Two. Appropriate development proposals should be supported in locations where there is demand and the Plan should take a flexible approach, although hotel provision is often best located on the edge of settlements and where well served by public transport and the road network.
- Hampshire County Council point out that such development proposals must be informed by landscape character assessments and that small scale development and conversions of existing buildings will be generally less visually intrusive than larger proposals.

What criteria do you think are important in determining if visitor accommodation should be retained?

Some of the criteria that were highlighted in response to this included:

- Past use of premises and demand for accommodation.
- Amberley Parish Council refer to the retention of existing visitor facilities.
- Selborne Parish Council highlight that there should be a demonstrable need, and minimise the number of camping and caravan sites in the countryside and maximise the number of affordable permanent visitor accommodation in built-up areas.
The CLA states that tourism accommodation development is important in some place to support diversification but do not agree that there should be a presumption against the loss of visitor accommodation, particularly if there is support for development of new accommodation.

Midhurst Town Council consider that there is a need for camping, caravanning and motor home sites in the National Park as they will attract visitors who will stay in the Park.

### Issue 45 - How should the Local Plan consider types of tourism development and recreational activity?

**What we propose to do**

To meet the second Purpose to promote opportunities for the understanding and enjoyment of the special qualities by the public, the Local Plan to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the National Park’s first Purpose.

The Local Plan to support the development and maintenance of appropriate recreation and tourism facilities and visitor hubs including a mix of good-quality accommodation, which responds to market demands and supports a sustainable visitor economy.

**Do you agree with any of the following options?**

- **Option 45a - The Local Plan could encourage recreational activity in certain parts or areas of the National Park, such as the larger settlements and/or areas within close proximity of existing visitor attractions (including national trails and routes).**

- **Option 45b - The Local Plan could encourage recreational activity away from certain parts or areas of the National Park, such as less accessible areas.**

- **Option 45c - The Local Plan could take a more flexible approach to recreational development, which is informed by landscape character assessments.**

**Comments made on these options included:**

- Amberley Parish Council considers that there is no place for intrusive tourism development or activities along the South Downs Way or in historic settlements.
Local Plan Options Consultation (February – April 2014) - Summary of Responses

- Hambledon Parish Council make the points that some of the national trail and other routes pass through some of the quietest and most tranquil countryside
- Eastbourne Borough Council believes that restricting tourism and recreational activities to only certain areas will limit the potential for meeting Purpose Two
- Sompting Estate makes the point that there are many different types and scales of recreational activity and this should be recognised
- Hampshire and IOW Wildlife Trust considers that this issue is one of the greatest challenges for the National Park, with too great a reliance on Natura 2000 sites, nature reserves and other vulnerable habitats. Look to the NPA to provide new open spaces as a means to promote Purposes
- National Trust support a policy to encourage development of tourism and recreation facilities in appropriate locations; do not believe that area-based policies are appropriate but would support criteria-based policies.

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

Do you agree with any of the following options?

| Option 46a - The Local Plan could have a presumption against the development of new static caravan parks across the National Park. | 42% (21) |
| Option 46b - The Local Plan could restrict the development of new static caravan sites and support the appropriate redevelopment or relocation of existing sites only. | 22% (11) |
| Option 46c - The Local Plan could allow the development of new static caravan parks that are appropriate in size and can be accommodated where they meet with the National Park Purposes, subject to the approach taken under Issue 42. | 38% (19) |

Comments made on these options include:
- Any new developments should be small and in keeping with the local environment
- Static caravans are visually intrusive
- Winchester City Council states that such development should be close to amenities
• NFU state that static caravans are often of vital importance in housing seasonal farm workers.

Other Issues that the Local Plan should address?

• Amberley Parish Council say that non-fixed accommodation, such as ‘glamping’ are an option, and small purpose built holiday camps can be very good if well designed and in appropriate location
• Selborne Parish Council consider that there should be a presumption against new and extensions to existing golf courses
• Waitrose Ltd state that it is important to emphasize the important and necessary role of town centres
• CLA makes the point that the farming industry has changed significantly in recent years and viticulture has become an important part of the National Park and development associated with it should not be prevented by restrictive policies
• South Downs Land Managers says that the Local Plan should take a proactive approach to the provision of agricultural infrastructure and that it should do more to support the forestry industry by encouraging greater use of wood fuelled heating systems.
Chapter 9 – Community Facilities and Infrastructure

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

What we propose to do

The Local Plan to:

- take a flexible and positive approach to the delivery of new and expanded community facilities to address identified needs.
- provide certainty of where the SDNPA wishes to encourage new facilities and the circumstances in which such development will be supported.

In each of the following options, the acceptability of proposals will be tested against their ability to meet National Park Purposes. The National Park Authority would require evidence of a site-selection process to ensure new and expanded facilities take account of the special qualities of the National Park and other Local Plan policies.

Do you agree with this approach?

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<tr>
<td>Yes</td>
<td>97% (37)</td>
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<td>3% (1)</td>
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Do you agree with the following option?

Option 47a - The Local Plan could support new and expanded facilities and services, primarily in settlement Tiers 1, 2 and 3 where suitable sites can be found. The need for new facilities should be demonstrated through Parish Plans and Neighbourhood Plans or other forms of evidence agreed by the National Park Authority.

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<td>64% (29)</td>
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Comments made on this option included:

- Should focus on the re-use and conversion of existing buildings in the first instance to meet any identified community need.
- Broadband should feature in the local plan - policy should enable the introduction or enhancement of broadband facilities and associated equipment with minimal bureaucracy.
Should encourage new technology and techniques to enable high speed broadband across the NP.

- Clustering of parishes below Tier 3 is supported, if it enables the provision of important community facilities to serve more than one settlement. Clustering of settlements should be clearly explained and these communities made aware of their status regarding provision of community facilities.
- Community Led Plans (CLP) should be used and supported to identify the type of facilities required. Use CLP to evidence need and support the provision of appropriate services and facilities. Clustering could also include the use of CLP to identify where clusters of certain types of facilities are required (identify groups of parishes that need the same facility).
- The National Trust commented that the proposed approach appeared to be unduly complex. They would support the conversion of existing buildings in the first instance to meet community needs. Proposals should otherwise be judged against normal planning criteria.
- CPRE were supportive of the options, but option 47c should be very clear about the community deciding the level of enabling development.
- CLA questioned how the proposal could be flexible and provide certainty of where development will occur. Commented that it seemed more sensible to be flexible given the wide range of settlements across the National Park.

Are there any other options that need to be considered?

- Many respondents commented that all four options were a suitable approach for the local plan to take and suggested a policy which brings in elements of all four options. This would focus on top Tiers of the Settlement Hierarchy, but keep in mind essential facilities in some Tier 4/5 settlements, especially where they perform an important visitor function (such as museum, public toilets etc.) is important. One policy should encourage focus on top tier facilities but not eliminate other tiers protecting or enhancing important facilities.

**Issue 48 – How can the local plan best resist the loss of community infrastructure?**

**What we propose to do**

The Local Plan to support the protection of existing local facilities and services in the areas where they are needed. Communities themselves can use Community Right to Bid powers, providing an opportunity to bid to take over a community asset for sale.

**Do you agree with this approach?**

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<th>Yes</th>
<th>98% (39)</th>
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**Do you agree with the following option?**
Comments made on this option included:

- Option 48a must also take into account accessibility to other existing infrastructure, it may be appropriate not to maintain a facility if there is adequate sustainable transport links to another facility in close proximity. 48a is also restrictive to alternative uses, or partial alternative use of an existing facility to make the existing service viable, this should be encouraged.

- Option 48a and b are quite different and both should be supported via policy in the Local Plan. Policy should enable local communities to effectively defend the loss of important facilities, the community right to bid is not enough alone.

- How do you test demonstratable need for a facility, could be important to one part of community and not another (elderly or young).

- Need to clarify infrastructure. Some people would not describe open spaces as community infrastructure. Does the open space require a separate option/policy?

- Policy about resisting loss of facilities is important, the tools or methods for doing that do not need to be included in policy (i.e. right to bid, right to build, green space etc.)
• Need to set out a range of options (similar to Option 47) that communities can use to protect existing facilities, one of these options could be enabling development (alternative partial use) to make the existing use viable.
• The Theatres Trust suggests a general over-arching policy is necessary together with local criteria and suggest specific wording.
• CPRE commented that Local Green Space (LGS) can only be identified as part of preparation of this Local Plan (or Neighbourhood Plans) (NPPF para 76). Communities need to be alerted to this, and a process for putting forward LGS made available as soon as possible.
• Hampshire County Council commented that the Local Plan to include a policy supporting enhancement of existing walking and cycling routes and where necessary creation of new ones that link to and between local green spaces, in order to establish a coherent and connected network of accessible green infrastructure.
• The NFU, CLA and South Downs Land Managers Group are supportive of protecting important community assets, but express concern about the support for Local Green Space designation, this should be qualified to ensure that private landowners must be notified as part of the process of designation. Must be careful that LGS designation is not used to resist development.

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

What we propose to do

New development in the National Park will be required by the Local Plan to provide new or improve existing infrastructure to mitigate its impact and support future residents or businesses. This infrastructure can be delivered on- or off-site and be secured through section 106 legal obligations, CIL charges, other financial contributions or direct provision. Connectivity to broadband facilities, particularly in rural areas, will be a key requirement of the infrastructure package. The economic viability of development proposals will be considered when determining infrastructure contributions.

Do you agree with this approach?

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<th>Yes</th>
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Comments made on this issue included:
• Should consider adequate private parking, waste water, sewerage and other essential infrastructure provision in all new development.
• Broadband should be funded through existing revenue streams, not CIL. Focus on wireless broadband 4G to compliment Purpose 1.
• Encourage contributions in kind very close to the major development where ever possible, getting better value for money and improved access to some currently inaccessible tracts of private (estate) land (deliver Purpose 2).
• Agree with the approach but economic viability of infrastructure must be subservient to the purposes, so any infrastructure should not conflict with purpose 1 (i.e. broadband service cabinets).
• Must consider viability
• Development should be phased, or encouraged to phase to ensure supporting infrastructure is in place before or immediately after a development is completed.

• CLA commented that the CIL charges are being set in advance of the infrastructure need being formulated and led by the Local Plan. A much greater evidence base is needed before policies can be developed. The SDNP does not appear to have researched this and it is apparent in these muddled proposals and the CIL consultation.

• Southern Water commented that it can provide strategic infrastructure through own budget systems, more local infrastructure requirements need to be negotiated through the planning process. Phasing of development is vital to ensure infrastructure can support.

• Planning policies should explicitly encourage and support infrastructure that will be delivered by service providers.

• Planning policies should recognise that developer contributions may be required that are agreed directly with service providers, supported by the planning authority through planning conditions.

• Planning policies should allow any mismatch in timing to be managed so that development is coordinated with provision of necessary infrastructure.

**Issue 50 – How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/domestic-scale renewable-energy schemes?**

**What we propose to do**

In line with Government guidance, and with the aim of meeting Government climate change targets, the Local Plan will give positive consideration to renewable energy schemes of a size, scale and design and in a location that is appropriate, that is where consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

Do you agree with this approach?

| Yes | 100% (43) |
| No | 0% (0) |

Do you agree with the following option?

Option 50a - The Local Plan could include a policy relating to schemes generating energy from renewable sources where these are of a location, scale and design appropriate to the locality and which contribute towards meeting domestic, community or business energy needs within the National Park.

| | 53% (27) |
Comments made on this issue included:

- Should be an overriding presumption in favour of renewable schemes, which are not found to be inappropriate.
- Need to be careful with community schemes as there will be a mismatch of different technologies and possibility for inappropriate technologies.
- Small scale is likely to be more appropriate in terms of renewable energy so perhaps the policy should set out that this type of micro generation will be supported primarily and the case of larger more strategic schemes will be subject to more rigorous testing.
- Must consider the cumulative effect of lots of small schemes in the same area.
- Should the focus be on resisting visual impact of schemes, and consideration of mitigation is important here
- Needs focus on energy efficiency rather than just focus on renewables, priority given to wood fuel as this contributes to purpose 1.
- The RSPB has carried out a mapping exercise on the sensitivity of bird species to wind farms, and would be very happy to share the results of this with the NPA.
- Hampshire County Council suggest the creation of a renewables options analysis of the SDNP area which indicates which types of renewable – individual and community (Options a and b) – schemes would be best placed. Following on from that they suggest the development of an ambitious renewables policy (including targets) which would contribute towards meeting domestic, community or business energy needs within the National Park and deliver against national targets.
- National Trust do not normally support renewable energy projects, however small scale proposals may be acceptable in exceptional cases depending on impacts, particularly on landscape, natural beauty and the remoteness / wildness of the area.

Option 50a

- Applications should be dealt with on a case by case basis, using option 50a as the basis for the policy (criteria based approach to assessing each application).
Option 50b
- Sompting Estate commented that Option 50b should be rejected as it would not be fair to estates seeking to diversify their businesses into renewable energy to refuse a scheme of theirs but to approve a community scheme.

Option 50c
- Option 50c is potentially dangerous as it may suggest areas which are less sensitive and therefore appropriate for large scale or visually intrusive development. The whole national park should be considered sensitive.
- CPRE commented on this Option has its attractions for protecting landscape areas especially sensitive to change, there is a risk that by identifying such areas as "special" it will open up argument by developers that the rest of the SDNP is ‘less sensitive’ and so large schemes would be acceptable. CPRE Hampshire feels it is better to treat the SDNP as a whole and take account of the sensitivity of the landscape

Issue 51 – How can the Community Infrastructure Levy be best allocated?

What we propose to do
As the CIL Charging Authority, the SDNPA to allocate and spend future Community Infrastructure Levy (CIL) funding in partnership with stakeholders on infrastructure projects to support the growth of communities and to deliver the National Park’s statutory Purposes and Duty.

Do you agree with this approach?

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Do you agree with the following option?

Option 51a - The investment of CIL funds could be prioritised in areas within close proximity to the new development which generated the CIL. This would provide a significant source of additional funding which can then be directed to support community facilities and services in the immediate area.

| Yes | 67% (22) |
Comments made on this issue included:

- CIL receipt could be split between National Park scale projects and local projects depending on the need created through the development (fixed proportion which is contributed to a strategic pot for national park wide projects). Find a balance between the two options with a small proportion going to strategic pot for park wide initiatives, and majority for infrastructure relating directly to the development.

- CIL fund should be restricted to the area where development has occurred, and not spent on a more strategic scale across the NP.

- Need to consider down stream impacts of development. Development in one area could have impact on surrounding settlements so this should be considered in allocation of CIL.

- Consider cross boundary funding for strategic infrastructure, funding should not be restricted to infrastructure needs just inside the National Park.

- A number of comments relate to IDP prioritisation, ensuring that CIL spend contributes to local needs and responds directly to needs created by any development. Need to be specific about what will be funded to ensure no CIL projects damage special qualities

- A test should be devised which ensures that any CIL spend will make a measurable difference to the community

- The Regulation 123 list should allow GI enhancements for site specific aspects to be delivered by 106 still. CIL for wider National Park projects and use 106 and 278 for more local needs resulting from development. Not use CIL to fund work which already has funding steam.

- Adur District Council commented that the Plan needs to address the infrastructure needs of the areas outside but abutting the Park which are linked to and benefit the Park. For example, CIL from development within the park could be used to secure improvements to pedestrian/equestrian and cycle crossings on the A27 as well as to helping to secure green links from the urban areas into the Park.
- CIL should not be allocated to projects that can be completely funded through other sources.
- The National Trust agrees that the NPA should allocate and spend CIL revenue in association with its partners and stakeholders to provide infrastructure to meet National Park purposes. It should be allocated in accordance with the agreed CIL schedule and we do not consider it should be limited to specific areas where the funds were generated or to specific strategic projects.
- The NFU suggest that a test should be devised to ensure that spending allocations make a measurable difference to local communities. Spending should prioritise economic development and flood risk management to rural communities.
- West Sussex County Council commented that the potential allocation of CIL funding to GI projects identified in the SDNPA’s GI strategy may highlight deficiencies in that network that are important to complete but which are not near development. Is there potential for the Regulation 123 list to cover the overall GI network and for site specific aspects still to be delivered under Section 106 agreements?

**Issue 52 – How should the Local Plan deal with proposals for strategic infrastructure?**

**What we propose to do**

The Local Plan will assign great weight to conserving and enhancing the landscape, biodiversity or cultural heritage (first Purpose), and strategic infrastructure development proposals will need to meet the tests for major developments set out in paragraph 116 of the NPPF, including demonstrating that it is in the public interest.

**Do you agree with this approach?**

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<th>No</th>
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<tbody>
<tr>
<td>96% (47)</td>
<td>4% (2)</td>
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</table>

**Do you agree with the following option?**

**Option 52a** – In exceptional circumstances, and where the tests of NPPF, para. 116 are met, the Local Plan could seek to enhance the landscape, biodiversity and cultural heritage by securing maximum benefits from any strategic infrastructure delivery. This could include supporting a limited number of strategic infrastructure proposals to facilitate maximum landscape and community gain in the immediate area or improvements elsewhere in the National Park in pursuit of the National Park’s Purposes.

<table>
<thead>
<tr>
<th>Option</th>
<th>Results</th>
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</thead>
<tbody>
<tr>
<td>Yes</td>
<td>92% (35)</td>
</tr>
<tr>
<td>No</td>
<td>8% (3)</td>
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</table>
Comments made on this issue included:

- Concern about allowing strategic infrastructure which may cause harm in order to enable improvements in other parts of the National Park, the whole park is an important landscape so shouldn’t be willing to accept inappropriate development in one area to improve another.
- Strategic infrastructure should include effective waste water management, bulk supply of water, broadband and extension of the gas mains.
- Difficult to imagine where a nationally significant infrastructure requirement would need to be developed in a National Park, the test needs to be carried out very thoroughly to make sure this type of development must absolutely happen in a National Park.
- Should set out what the major infrastructure proposals are likely to be for the NP, or at least the ones we are aware of, A27 for example
- The RSPB is concerned that the wording of this option seems to open up the Plan to facilitating damaging infrastructure in order to provide gains in other places.
- Adur and Worthing Council comment that there will be at times over the plan period a need for strategic infrastructure, including that related to energy, flood defences and transport to support growth in the urban areas outside of, but abutting, the Park. A reference which provides appropriate support for this needs to be included.
- National Trust believe that the plan should set out a clear policy in relation to the future of the A27 and any other potential major infrastructure proposals of which the authority is at present aware.
- The NFU suggest that strategic infrastructure projects must give consideration to farming as the keystone to the rural economy, and any such proposals brought forward must fully mitigate these effects.
- Thames Water and Southern Water comment that we need to have ongoing dialogue with water companies to ensure that we input into their 5 year Asset Management Plans. Also if development comes earlier than anticipated within the Local Plan, there needs to be planning policies in place to address this (e.g. putting the onus on developers, again ensuring that infrastructure is provided ahead of development). Both would like reference to developers funding required improvements in infrastructure where no improvements are programmed by the water company (e.g. where the water company Asset Management Plan is ‘out of sync’ with the Local Plan or the development has not been identified).

Are there other Community Facilities and Infrastructure issues that the Local Plan should address?

- The majority of responses identify the types of infrastructure that should be encouraged. Flood defence, broadband, power distribution, gas mains, transport infrastructure (Lewes to Uckfield etc.)
- National Park Authority should provide a method for the sharing of best practice to enable communities to protect, enhance or even provide new community facilities and infrastructure.
- Policies needed for telecommunications infrastructure, particularly the removal of obsolete structures.
- A policy for water and waste water management to be included with suggested wording.
- The link between the larger settlements just outside the SDNP, and their associated community facilities should be recognised. Many people who live in the park rely upon
services in Horsham District. The SDNP plan should recognise that expansion of these settlements outside the park may support the SDNP vision.
Chapter 10 – Transport and Accessibility

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

What we propose to do

The Local Plan to identify and protect disused railway line routes which could be critical in efforts to widen sustainable transport choice.

Do you agree with this approach?

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<tbody>
<tr>
<td>Yes</td>
<td>100% (51)</td>
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<tr>
<td>No</td>
<td>0% (0)</td>
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Do you agree with the following option?

<table>
<thead>
<tr>
<th>Option 53a – Safeguard the following routes:</th>
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<tbody>
<tr>
<td>Lewes–Uckfield disused railway line route that lies within the National Park</td>
<td></td>
</tr>
<tr>
<td>Disused Bordon–Bentley light railway line route that lies within the National Park</td>
<td></td>
</tr>
<tr>
<td>Petersfield–Pulborough (via Midhurst) disused railway line route</td>
<td></td>
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<tr>
<td>Chichester–Midhurst (Centurion Way) disused railway line route</td>
<td></td>
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<tr>
<td>Wickham–Alton (Meon Valley Line) disused railway line route, and</td>
<td></td>
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<tr>
<td>Guildford–Shoreham-by-Sea (Downs Link) disused railway line route.</td>
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<thead>
<tr>
<th>Option</th>
<th>Results</th>
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<tbody>
<tr>
<td>Yes</td>
<td>100% (42)</td>
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<tr>
<td>No</td>
<td>0% (0)</td>
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100% of respondents to this question were in favour of Option 53a. Comments made on this option included:

- Suggestions for other routes that should be safeguarded: Midhurst -Haslemere, Berwick Station – South Downs, Alresford – Kingsworthy, Hove – Devil’s Dyke, Monarch’s Way and other PROWs and cycle infrastructure.
- Specific support from Brighton and Hove City Council, Lewes District Council, Eastbourne Borough Council, East Sussex County Council and others for safeguarding and in future reinstating the Lewes-Uckfield line. Some variations on this route were proposed.
- Much of the land is likely to be in agricultural or other use and any specific safeguarding proposals will require consultation/negotiation/flexibility/debate.
- More reference sought to link the proposed routes to the wider cycle network; considerations of traffic on A roads inside and outside the park; extending sustainable transport routes; the importance of multi-user routes, not just for cyclists; and connections between the cycling network and trains/buses.
- Eastbourne Borough Council would like land to be safeguarded for widening the A27 east of Lewes.
Issue 54 – What should be the Local Plan’s approach to car parking?

What we propose to do

The Local Plan to set out a policy identifying what is required for new parking facilities for cars, motorcycles and bicycles in town and village centres and visitor attractions and for new development. New parking provision needs to be convenient, safe and secure. Sufficient provision will need to be made for the amount of parking that is likely to be needed by residents of new residential developments and for commercial developments, with the emphasis on promoting good design. The policy will require Green Travel Plans for all new major development. In line with the NPPF local parking standards for residential and non-residential development will take into account:

- the accessibility of the development
- the type, mix and use of development
- the availability of and opportunities for public transport
- local car ownership levels, and
- an overall need to reduce the use of high-emission vehicles.

Do you agree with this approach?

The clear majority of respondents supported the proposed approach. The comments made on this issue included:

- CPRE Hampshire were opposed. They proposed changing the third sentence so that only enough parking spaces should be provided on new developments to accommodate ‘essential use’, taking into account the appropriateness of sustainable transport modes, rather than ‘likely need’.

Do you agree with the following option?

The majority of the respondents were in favour of Option 54a. Comments made on this option included:

- Support for the option conditional on it being accompanied by improvements to public transport, or on demand reduction measures having been attempted before new parking is permitted.
- Several recommendations for more flexibility on allowing new small public car parks in the countryside, including from some parish councils, although more parish councils supported the option put forward.
- Requests for a policy on coach/cycle/motorcycle parking.
• Interest in the design, materials and screening of new car parks.
• Several respondents were in principle opposed to attempts to discourage car use.

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

**What we propose to do**

The Local Plan to assess the suitability of sites for housing and businesses (including tourist facilities) using the Settlement Hierarchy Study and accessibility mapping for the National Park to ensure that, wherever feasible, new housing and businesses are located at sites with good public transport services and require a travel plan for all major development.

**Do you agree with this approach?**

<table>
<thead>
<tr>
<th>Yes</th>
<th>98% (44)</th>
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<td>No</td>
<td>2% (1)</td>
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44 out of 45 respondents supported the proposed approach to ensuring new developments are accessible. The exception was Callstone Ltd, who thought that re-using previously developed land should be a higher priority than locating development at sites well served by public transport. The National Trust thought this issue should be considered through the Settlement Strategy.

**Do you agree with any of the following options?**

| Option 55a - The Local Plan could define maximum travel times via public transport to/from service centres and use them to guide decisions on whether or not new development should be permitted. | 33% (15) |
| Option 55b - The Local Plan could require all major development proposals to ensure that sustainable transport and accessibility are key components of sustainability assessments. | 64% (29) |
| Option 55c - The Local Plan could encourage consideration of locally funded community transport provision via the neighbourhood planning process. | 49% (22) |
Comments made on these options included:

**Option 55a**
One third (33%) of respondents supported this option of deciding planning applications on the basis of maximum public transport travel times to/from service centres. Some respondents said that it was overly restrictive; others that it would require an improved public transport network, or that the journey times used would need regular reviewing to take account of changes in the public transport network.

**Option 55b**
Just under two thirds (64%) of respondents supported this option of requiring major developments to ensure that sustainable transport and accessibility are key components of sustainability assessments. There was very little comment on this option. CPRE Hampshire suggested this option be reinforced to ensure developer’s public transport commitments are long-term and ring-fenced.

**Option 55c**
Just under half (49%) of respondents supported this option of encouraging the consideration of locally funded community transport provision through the neighbourhood planning process. Suggestions included:
- Broaden the policy from neighbourhood planning to community planning more generally.
- Look into the concept of community transport to take commuters to nearby railway stations.
- Emphasise funding capital infrastructure projects instead, or consider such community transport directly through the local plan.
- Encourage large businesses to fund bus services e.g. Sainsbury’s bus from Midhurst.

**Other Transport and Accessibility issues the Local Plan should address**
Major concerns were rat running, protecting rural lanes, increased detail and emphasis on walking and cycling/PROW, and more on the strategic road network.

Particular requests included:
- More linkages between the LSTF objectives and the proposed LP options
- Work with neighbouring authorities under the Duty to Cooperate to secure better and sustainable access across the downs between areas to the south with unmet housing need and areas to the north where that need may be met. (Adur & Horsham DCs)
- Managing local transport demands through the settlement hierarchy.
- More consideration of the strategic road network and potential future improvements to it, especially the A27.
- Consider the impact of through traffic on the Park, both in terms of level of traffic and inappropriate vehicles.
- Consider the impact of future developments within the Park on the road system beyond it.
- Introduce a presumption against development that would deter from or diminish the recreational experience of using the rights of way network.
- More emphasis on the needs of local and nearby residents, as well as visitors, and recognition that many visitors live nearby.
- Protect and enhance the character of rural lanes, from signage, speeding, HGVs and damage to verges.
- Address the potential of canals for transport.
- Place limits on HGVs.
- Influence the work of highway authorities to avoid detrimental impacts from signage etc.
- Take a holistic approach to limit the cumulative impact of many small developments on the highway network.
- Reduce emphasis on bus services which may be vulnerable to future cuts.