SOUTH DOWNS LOCAL PLAN: PREFERRED OPTIONS

September 2015
When it is completed, this draft Local Plan will be the first ever for the South Downs National Park.

The nationally important and much loved landscapes that were established as a national park in 2010 run as a golden thread throughout this key document. It builds on all the work, community engagement and robust evidence gathering that underpinned the Partnership Management Plan, which sets out the strategic objectives for the National Park, as well as the options consultation version of this Local Plan.

The future development of our communities is vitally important, but so too is the ecology and cultural heritage of this very special place. Development must conserve and enhance them, as well as providing opportunities for all who visit the National Park to enjoy and understand the special qualities that led to its designation. It is also important that the benefits we derive from the National Park’s rich natural resources are protected for future generations and enhanced wherever possible, for the communities living within the National Park as well as for the many communities, large and small around the National Park.

As well as building on all that has gone before, a wealth of new evidence has been collected for this Preferred Options version of the Local Plan, informing the draft policies set out in this document. The comments you make on these draft policies and the text that supports them will inform the next version of the South Downs Local Plan that will be submitted to the Secretary of State next year for Examination in Public.

It is therefore very important to us that we hear your views. We don’t want to know only what you would like changed but also which draft policies you support, so we know we are reflecting what people want. So please, let us have your comments so that we can produce a Local Plan worthy of the South Downs National Park.

Margaret Paren
Chair
HAVE YOUR SAY

The Local Plan Preferred Options consultation will run from 2 September 2015 to 28 October 2015.

There are three ways to input into the consultation:

- Accessing the consultation website: www.southdowns.gov.uk/localplanconsultation
- Filling in an electronic comment form and emailing it to planningpolicy@southdowns.gov.uk
- Completing a paper copy comment form or writing to the SDNPA at the following address:

  Planning Policy  
  South Downs National Park Authority  
  South Downs Centre  
  North Street  
  Midhurst  
  West Sussex  
  GU29 9DH

So that your response can be accurately recorded, please let us know which chapter and/or policy you are commenting on. Please note that all representations will be published on the SDNPA website and anonymous comments cannot be accepted.

Please do not hesitate to contact the Planning Policy team by email at planningpolicy@southdowns.gov.uk or telephone on 01730 814810 if you have any queries about this consultation.

It should be noted that this Local Plan is based on existing legislation, policy and guidance as of July 2015, but may be subject to change as a result of forthcoming legislation, policy or guidance. The South Downs National Park Authority will monitor any changes and will follow legislation, policy and guidance as required.
CONTENTS

1. INTRODUCTION ................................................................................................. 1
2. SPATIAL PORTRAIT – THE NATIONAL PARK TODAY ...................................... 13
3. VISION AND OBJECTIVES ............................................................................. 25
4. CORE POLICIES ................................................................................................. 27
   Core Policy SD1: Sustainable Development in the South Downs National Park ......................................................... 28
   Core Policy SD2: Ecosystems Services .......................................................... 34
   Core Policy SD3: Major Development in the South Downs National Park ........................................................................ 36
   Achieving the Vision for the National Park across the five Broad Areas .......... 37
   Core Policy SD4/CP: The Coastal Plain ......................................................... 43
   Core Policy SD4/ DS: The Dip Slope ............................................................. 45
   Core Policy SD4/ WD: The Western Downs ............................................. 46
   Core Policy SD4/SS: The Scarp Slope ............................................................ 48
   Core Policy SD4/WW: The Western Weald .............................................. 49
5. A THRIVING LIVING LANDSCAPE – STRATEGIC POLICIES .............. 51
   Strategic Policy SD5: Landscape Character................................................... 56
   Strategic Policy SD6 Design ............................................................................. 61
   Strategic Policy SD7: Safeguarding Views ...................................................... 63
   Strategic Policy SD8: Relative Tranquillity ..................................................... 64
   Strategic Policy SD9: Dark Night Skies .......................................................... 70
   Strategic Policy SD10: The Open Coast ........................................................ 76
   Strategic Policy SD11: Historic Environment .............................................. 81
   Strategic Policy SD12: Biodiversity and Geodiversity .................................. 88
   Strategic Policy SD13: International Sites ..................................................... 93
   Strategic Policy SD14: Green Infrastructure ............................................... 96
   Strategic Policy SD15: Aquifers ........................................................................ 97
   Strategic Policy SD16: Rivers and Watercourses ....................................... 103
   Strategic Policy SD17: Flood Risk Management ......................................... 104
6. PEOPLE CONNECTED WITH PLACES – STRATEGIC POLICIES .......... 105
   Strategic Policy SD18: Transport and accessibility .................................... 109
   Strategic Policy SD19: Walking, Cycling and Equestrian Routes ............... 112
   Strategic Policy SD20: Sustainable Tourism and the Visitor Economy ........ 117
   Strategic Policy SD21: Recreation ................................................................. 118
7. TOWARDS A SUSTAINABLE FUTURE – STRATEGIC POLICIES ........ 121
   Strategic Policy SD22: Development Strategy ............................................ 123
   Strategic Policy SD23: Housing ....................................................................... 129
   Strategic Policy SD24: Affordable Housing Provision .................................. 135
   Strategic Policy SD25: Rural Exception Sites .............................................. 137
   Strategic Policy SD26: Gypsies and Travellers and Travelling Showpeople ................................................................. 144
   Strategic Policy SD27: Sustaining the Rural Economy ................................ 150
   Strategic Policy SD28: Employment Land .................................................... 153
   Strategic Policy SD29: Town and Village Centres ...................................... 159
   Strategic Policy SD30: Strategic Infrastructure Provision .......................... 161
   Strategic Policy SD31: Climate Change and Sustainable Construction ........ 167
8. STRATEGIC SITES ............................................................................................ 169
   Strategic Site Policy SD32: Shoreham Cement Works ............................. 179
   Strategic Site Policy SD33: Syngenta, Fernhurst ......................................... 185
9. SITE ALLOCATIONS ........................................................................................... 193
   Policy SD-SS03: Land at Old Malling Farm, Lewes ...................................... 200
   Policy SD-WW03: Land at New Road, Midhurst ...................................... 203
   Policy SD-WW04: Land at Petersfield Road, Midhurst ............................... 204
   Policy SD-WW05: Land at Lamberts Lane, Midhurst ............................... 205
   Policy SD-WW09: Land at Clements Close, Binsted ............................... 207
   Policy SD-SS02: Land at Kiln Lane, Buriton ................................................ 209
   Policy SD-WW11: Land at Brookland Way, Coldwaltham ....................... 211
   Policy SD-WW01: Land east of Cowdray Road, Easebourne ..................... 213
   Policy SD-WW10: Land at Petersfield Road, Greatham ............................. 215
   Policy SD-WD01: Land at Itchen Abbas House, Itchen Abbas ................. 218
   Policy SD-DS01: Land between Church Lane and the A273, Pyecombe .......... 220
   Policy SD-WW02: Land at Farnham Road, Sheet ..................................... 222
   Policy SD-SS01: Land south of Loppers Ash, South Harting ..................... 224
   Policy SD-SS07: Land at Meadow House, West Meon ............................. 226
   Policy SD-SS06: Land at Long Priors, West Meon .................................... 227
   Policy SD-DS03: Land at Hoe Court, Lancing ......................................... 228
   Policy SD-DS02: Land at Normansal Park Avenue, Seaford ..................... 229

10. DEVELOPMENT MANAGEMENT POLICIES ........................................... 231
    Development Management Policy SD35: Provision and Protection of Open Space .......................................................... 232
    Development Management Policy SD36: Local Green Spaces .................. 232
    Development Management Policy SD37: Trees, Woodland and Hedgerows ................................................................. 237
    Development Management Policy SD39: Conservation Areas .................. 239
    Development Management Policy SD40: Enabling Development .............. 240
    Development Management Policy SD41: Archaeology ............................ 242
    Development Management Policy SD42: Sustainable Drainage ................ 246
    People Connected with Places .................................................................. 248
    Development Management Policy SD43: Public Realm and Highway Design ................................................................. 249
    Development Management Policy SD44: Car and Cycle Parking Provision ................................................................. 251
    Towards a Sustainable Future ................................................................... 252
    Development Management Policy SD45: Replacement Dwellings and Extensions ................................................................. 254
    Development Management Policy SD46: Agriculture and Forestry ............ 258
    Development Management Policy SD47: Farm Diversification .................. 260
    Development Management Policy SD48: Agricultural and Forestry Workers’ Dwellings ..................................................... 262
    Development Management Policy SD49: Conversion of Redundant Agricultural Buildings ................................................... 267
    Development Management Policy SD51: Shops Outside Centres .............. 274
    Development Management Policy SD52: Shop Fronts ............................... 276
    Development Management Policy SD53: New and Existing Community Infrastructure .......................................................... 279
    Development Management Policy SD54: Supporting Infrastructure for New Development ..................................................... 281
    Development Management Policy SD55: Advertisements and Signage ....... 284
    Development Management Policy SD56: Renewable Energy ................. 287
Development Management Policy SD57: Telecommunications, Services and Utilities ................................................................. 291
Development Management Policy SD58: Air Quality .................................................. 293
Development Management Policy SD59: Contaminated Land .................................. 296

11. IMPLEMENTATION AND MONITORING .......................................................... 297

INSET MAPS ................................................................................................................ 302

APPENDIX 1: CURRENT DEVELOPMENT PLAN POLICIES OPERATING IN THE NATIONAL PARK ................................................................. 339

APPENDIX 2: THE SPECIAL QUALITIES OF THE NATIONAL PARK ....... 421

APPENDIX 3: NEIGHBOURHOOD DEVELOPMENT PLANS IN THE NATIONAL PARK .................................................................................. 425

APPENDIX 4: EVIDENCE BASE STUDIES .................................................................. 427

APPENDIX 5: VILLAGE DESIGN STATEMENTS, PARISH PLANS AND LOCAL LANDSCAPE ASSESSMENTS ................................................................. 435

APPENDIX 6: CONSERVATION AREAS, REGISTERED PARKS AND GARDENS AND BATTLEFIELDS ................................................................. 443

GLOSSARY .................................................................................................................. 447
LIST OF TABLES AND FIGURES

FIGURE 1.1: THE PURPOSES AND DUTY ............................................................. 2
FIGURE 1.2: SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK ............................................................. 3
FIGURE 1.3: POLICIES AND PLANS LINKED TO THE SDLP ............................................................. 4
FIGURE 1.4: ECOSYSTEM SERVICES DELIVERED IN THE SOUTH DOWNS NATIONAL PARK ............................................................. 5
FIGURE 1.5: ADMINISTRATIVE BOUNDARIES AND THE SOUTH DOWNS NATIONAL PARK ............................................................. 9
TABLE 1.1: TIMELINE FOR LOCAL PLAN PREPARATION ............................................................. 11
FIGURE 2.1: THE SOUTH DOWNS NATIONAL PARK ............................................................. 14
FIGURE 2.2: THE SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK ............................................................. 15
FIGURE 2.3: PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE ............................................................. 17
FIGURE 2.4: A SNAPSHOT OF THE SOUTH DOWNS NATIONAL PARK ............................................................. 21
FIGURE 3.1 A VISION FOR THE NATIONAL PARK ............................................................. 25
FIGURE 3.2 NATIONAL PARK OBJECTIVES ............................................................. 26
FIGURE 4.1: PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE ............................................................. 30
FIGURE 4.2: THE PRINCIPLES OF ECOSYSTEM SERVICES ............................................................. 32
FIGURE 4.3: ECOSYSTEM SERVICES DELIVERED IN THE NATIONAL PARK ............................................................. 33
FIGURE 4.4: BROAD SPATIAL DIAGRAM OF THE SOUTH DOWNS NATIONAL PARK AND SURROUNDING AREAS ............................................................. 41
FIGURE 5.1: HOW THE LANDSCAPE IS FORMED ............................................................. 52
FIGURE 5.2: LANDSCAPE CHARACTER TYPES ............................................................. 54
FIGURE 5.3: TRANQUILLITY SCORES ACROSS THE SOUTH DOWNS NATIONAL PARK ............................................................. 65
FIGURE 5.4: DARK NIGHT SKIES ............................................................. 67
TABLE 5.1: ENVIRONMENTAL ZONES ............................................................. 68
FIGURE 5.5: MAP OF THE SUSSEX HERITAGE COAST AND THE ‘UNDEVELOPED COASTAL ZONE’ ............................................................. 74
TABLE 5.2: NUMBER OF DESIGNATED SITES WITHIN THE NATIONAL PARK ............................................................. 86
FIGURE 5.6: SUMMARY OF DESIGNATED SITES WITHIN THE SOUTH DOWNS NATIONAL PARK ............................................................. 87
FIGURE 5.7: INTERNATIONAL SITES IN AND AROUND THE NATIONAL PARK ............................................................. 91
FIGURE 5.8: MAP OF THE MAIN RIVERS ACROSS THE NATIONAL PARK ............................................................. 99
TABLE 7.1: ELEMENTS OF HOUSING DELIVERY IN THE SOUTH DOWNS NATIONAL PARK ............................................................. 127
FIGURE 7.1: GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT STUDIES COVERING THE NATIONAL PARK ............................................................. 141
TABLE 7.2: PERMANENT AND TRANSIT NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ............................................................. 142
TABLE 7.3: EMPLOYMENT LAND SUPPLY IN THE SOUTH DOWNS NATIONAL PARK ............................................................. 151
TABLE 7.4: ACTIONS TO REDUCE, MITIGATE AND ADAPT TO CLIMATE CHANGE ............................................................. 163
TABLE 7.5: SUSTAINABLE CONSTRUCTION MEASURES WHICH COULD BE INCORPORATED INTO PROPOSALS ............................................................. 166
FIGURE 8.1: SHOREHAM CEMENT WORKS ............................................................. 175
FIGURE 8.2: THE FORMER SYNGENTA SITE, FERNHURST ....................... 180
FIGURE 8.3: NORTH STREET QUARTER AND ADJACENT EASTGATE AREA ............................................................................................................................. 187
FIGURE 9.1: PARISHES IN THE SOUTH DOWNS NATIONAL PARK DESIGNATED AS A NEIGHBOURHOOD AREA (AS AT 2 JULY 2015)... 194
FIGURE 10.1: SUDS TREATMENT TRAIN ......................................................... 244
FIGURE 10.2: COMMON SUDS FEATURES AND THEIR FUNCTION ....244
1. INTRODUCTION

WHAT IS THE LOCAL PLAN?

1.1 The South Downs was established as a National Park in 2010. It contains over 1,600km² of England’s most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east. The South Downs Local Plan is the first local plan to plan for the National Park as a single entity.

1.2 The Local Plan sets out a comprehensive set of planning policies for the National Park focusing on living landscapes, people and places and ensuring a sustainable future within environmental limits. Specific topics range from landscape, conservation, tourism and recreation through to land for development for both employment and housing. It will shape growth and new development up to 2032. On adoption these policies will replace all the saved local plan and core strategy policies inherited by the South Downs National Park Authority (SDNPA) when it became the local planning authority for the National Park in April 2011. It will also replace all joint core strategies relating to the National Park adopted since April 2011. These policies to be replaced are listed in Appendix 1.

1.3 The Preferred Options version of the Local Plan (subsequently referred to as the Local Plan) is being published for public consultation under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. It follows on from the Issues and Options document that was published for public consultation in 2014. The details on how and when to respond to this consultation is set out on page iv of this document under ‘Have Your Say.’

1.4 This Local Plan does not deal with minerals and waste. Instead, policies on minerals and waste are developed through joint minerals and waste plans with the adjoining minerals and waste authorities across the three counties and the one unitary authority covering the National Park.

1.5 On adoption the South Downs Local Plan will become the statutory development plan for the whole National Park, along with the minerals and waste plans and ‘made’ (adopted) neighbourhood development plans. Statute states that decisions on planning applications must be taken in accordance with the Local Plan unless material considerations indicate otherwise. This emerging plan will accordingly be given some weight in the determination of planning applications by the SDNPA and on its behalf from the date of its publication for consultation in September 2015.

1.6 The Local Plan covers the time period 2014 to 2032. This means that it will cover a 15-year time period from its projected time of adoption in 2017.

WHAT DOES THE LOCAL PLAN SEEK TO ACHIEVE?

1.7 The Local Plan sets out how the SDNPA believes the National Park should evolve and manage development over the next 15 years. This is based on the statutory purposes for national parks as specified in the Environment Act 1995:
1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

2. To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public

The SDNPA also has a duty when carrying out the purposes to:

Seek to foster the economic and social well-being of the local communities within the National Park.

In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires the Sandford Principle to be applied and the first purpose of the National Park will be given priority.

The DEFRA Circular on English National Parks and the Broads (2010) provides guidance to national park authorities on how to achieve their purposes and duty. The Local Plan builds on the framework of the South Downs National Park Partnership Management Plan (PMP), which was adopted by the SDNPA in 2013 following extensive consultation and dialogue with many interested parties and groups. The PMP sets out an overarching strategy for the management of the National Park. It is about influencing the nature of future change in ways which will leave the National Park in a better state for future generations to enjoy. It seeks to deliver multiple, interlocking objectives, adding value to what is already being done.

The PMP’s starting point was the State of the South Downs National Park Report, 2012, which provided baseline information against which the success of future action arising from the PMP could be measured. The facts set out in the report form a fundamental part of the Local Plan evidence base.

The seven Special Qualities (figure 1.2) of the South Downs National Park formed the basis for the State of the National Park Report. They are explained in more detail in Chapter 2: Spatial Portrait and are set out in full in Appendix 2.

The Local Plan will establish a strategic policy framework for those communities within the National Park that are preparing neighbourhood development plans. Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The SDNPA is fully supportive of all parish and town councils that have expressed an interest in preparing a neighbourhood development plan for their community. All of the neighbourhood plans currently under preparation in the National Park are listed in Appendix 3. All neighbourhood development plans, both partly and wholly within the National Park, need to be in general conformity with the strategic policies contained in the final adopted version of this Local Plan. Figure 1.3 illustrates the various policies and plans that are linked to the Local Plan.
FIGURE 1.2: SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK

1. Diverse, inspirational landscapes and breathtaking views
2. Tranquil and unspoilt places
3. A rich variety of wildlife and habitats including rare and internationally important species
4. An environment shaped by centuries of farming and embracing new enterprise
5. Great opportunities for recreational activities and learning experiences
6. Well-conserved historical features and a rich cultural heritage
7. Distinctive towns and villages, and communities with real pride in their area
FIGURE 1.3: POLICIES AND PLANS LINKED TO THE SDLP
1.11 The South Downs was designated as a national park in recognition of its landscapes of exceptional beauty and importance, and therefore it is entirely appropriate to take a landscape-led approach to the formulation of its Local Plan. The National Planning Policy Framework (NPPF) states that great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to landscape and scenic beauty along with the Broads and Areas of Outstanding Natural Beauty (AONB).

1.12 The landscapes of the South Downs provide many services – ecosystems services (Figure 1.4). Both the PMP and the Local Plan are based on an ecosystem services approach. There is a core policy on ecosystems services (SD2) and the approach is embedded into the formulation of all Local Plan policies. It has also been used in the Sustainability Appraisal to help guide decision making.

1.13 An ecosystem services approach values and acknowledges the direct and indirect contribution of the environment. It is a powerful tool for planning the sustainable development of a cherished national park that is located in the heavily populated South East of England and is thus under extreme pressures from many types of development.
WHAT IS THE STRUCTURE OF THE LOCAL PLAN?

1.14 The structure of the Local Plan follows the three headings of the PMP, which in turn are based on the purposes and duty of all national parks:
- A thriving living landscape
- People connected with places
- Towards a sustainable future

1.15 The spatial portrait draws a picture of the National Park and surrounding areas today and identifies key opportunities and challenges for the National Park. This is followed by the 2050 Vision for the South Downs taken from the PMP. A set of objectives act as stepping stones between the Vision and the Local Plan’s policies.

1.16 The Local Plan contains a full spectrum of core, strategic, development management and allocation policies. All of these policies will be taken into account in determining planning applications, along with other material considerations. Therefore the policies in this Local Plan do not list or cross-reference to all other policies that may be relevant, but these nevertheless continue to apply. It is vital that all these policies are viewed together and not in isolation in the preparation and consideration of planning applications. The Local Plan includes several sets of policies:
- Core policies deal with the overarching principles of development for the National Park. These core policies relate to purposes and duty, the ecosystem services approach, major development and the Broad Area approach (see paragraphs 4.40 to 4.46).
- Strategic policies are considered fundamental to achieving the overall Vision for the National Park and are linked to its special qualities. There are three chapters of strategic policies, which relate to the three headings of the PMP.
- Strategic site allocations relate to Shoreham Cement Works in Upper Beeding, Syngenta in Fernhurst and the North Street Quarter and Eastergate Area of Lewes.
- Allocation policies allocate sites across the National Park for housing.
- Development management policies provide a detailed policy framework for assessing planning applications and guiding development in the National Park. These policies are set out in the same order as the strategic policies.

In addition:
- Proposed allocations and designations including settlement policy boundaries of this Local Plan are shown on Inset Maps. The final adopted version of the Local Plan will be accompanied by a policies map, which is a spatial interpretation of all the Local Plan policies.
- Appendices including a list of all the saved Local Plan and joint core strategy policies that will be replaced by this Local Plan on adoption.
- A glossary of technical terms used in the Local Plan.

HOW HAVE THE LOCAL PLAN POLICIES BEEN FORMULATED?

1.17 The process for formulating planning policies is complex and involves a wide range of considerations. The most important of these are as set out below.

Landscape

1.18 The policies have been formulated having regard to the requirement to consider landscape first. The Local Plan and its policies seek to ensure that the benefits and services people and wider society get from the natural environment are recognised and enhanced.
Evidence

1.19 All of the Local Plan policies are supported by adequate, up-to-date, relevant and proportionate evidence in accordance with paragraph 158 of the NPPF. In line with the first purpose, the key piece of landscape evidence is the South Downs Integrated Landscape Character Assessment (SDILCA), which was updated in 2011. The State of the South Downs National Park Report (2012) provides facts and figures about the condition of the seven special qualities. Other major evidence studies are the South Downs Tranquility Study, the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), the Employment Land Review (ELR), the Infrastructure Delivery Plan (IDP), the Habitats Regulations Assessment (HRA) and the Water Cycle Study which includes the Strategic Flood Risk Assessment (SFRA). A comprehensive list of evidence-based studies is set out in Appendix 4 of the Local Plan.

Public consultation and engagement with parishes

1.20 Local Plan policies have been formulated in consultation with local communities. The SDNPA values the views of the local community and has undertaken a considerable amount of public engagement, particularly with the town and parish councils. A full round of consultation took place with the town and parish councils in autumn 2014, following on from the Issues and Options consultation. This built on their formal representations and truly helped to form the Local Plan, particularly with regard to the development strategy. The evidence based document ‘Progress from Issues and Options to Preferred Options’ sets out all the issues and options consulted on, the main issues raised and how these main issues were addressed in the formulation of the Preferred Options.

Sustainability Appraisal

1.21 The Local Plan and its preparation meet the requirements of the Strategic Environmental Assessment (SEA) Directive. The policies and sites identified in the Local Plan have been appraised against sustainability objectives on an iterative basis. These iterations identify how emerging policies help to achieve the relevant social, environmental and economic objectives, and recommend how sustainability could be improved. These recommendations have been taken into account in the drafting of this Local Plan. The three tenets of sustainable development are engrained in the plan through the ecosystem services approach.

Duty to Cooperate

1.22 The SDNPA has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in this Local Plan in accordance with paragraphs 178 to 181 of the NPPF. The size of the National Park, and the numerous local authority and other boundaries, has made the duty to cooperate fundamental to the formulation of this Local Plan. Evidence of this is provided in the SDNPA Duty to Cooperate document published at the same time as this Preferred Options Local Plan. This will be updated to accompany each stage of Local Plan preparation.
The positive engagement on cross-boundary issues has involved all the districts, boroughs, city and one unitary authority covered by the National Park – East Hampshire, Chichester, Arun, Adur, Wealden, Lewes, Mid Sussex and Horsham district councils, Eastbourne and Worthing Borough Councils and Winchester City Council, Brighton and Hove City Councils. The SDNPA has also engaged with all neighbouring planning authorities. The SDNPA has worked with the three county councils covered by the National Park – Hampshire, West Sussex and East Sussex and Brighton and Hove City Council, particularly with regard to strategic infrastructure provision including transport. There has been collaborative working with the three Local Enterprise Partnerships (LEPs) covered by the National Park – South East, Coast to Capital and Enterprise M3. The SDNPA has engaged positively with all the strategic planning groupings both at an officer and member level that work across administrative boundaries. Figure 1.5 shows all of the councils and LEPs within and adjoining the National Park.
FIGURE 1.5: ADMINISTRATIVE BOUNDARIES AND THE SOUTH DOWNS NATIONAL PARK

KEY
- Local Enterprise Partnerships
- South East
- Coast to Capital
- Enterprise M3
- Solent

![Map showing administrative boundaries and the South Downs National Park](image-url)
1.24 The SDNPA has also engaged constructively with all the relevant statutory bodies including Natural England, English Heritage, the Environment Agency and the Highways Agency. This constructive dialogue over the course of the plan preparation has led to an improved overall content and policy detail.

WHAT ARE THE STATUTORY REQUIREMENTS OF THE LOCAL PLAN?

1.25 The statutory requirements for preparation of local plans are set out in the Planning and Compulsory Purchase Act 2004 and guidance is contained in the NPPF and the National Planning Practice Guidance (NPPG). The submission version of the Local Plan will be examined by an independent inspector whose role is to assess whether it has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether it is sound. The tests of soundness set out in paragraph 182 of the NPPF are that it is positively prepared, justified, effective and consistent with national policy. The Soundness Self-Assessment Checklist Consultation published at the same time as this Preferred Options Local Plan provides detail on how these tests of soundness have been met. This will be updated to accompany each stage of Local Plan preparation.

HOW WILL THIS LOCAL PLAN BE IMPLEMENTED?

1.26 The SDNPA delivers its planning function uniquely through a partnership with Local Authorities with land inside the National Park boundary. In 2014-15, 87 per cent of the 5,066 planning and related applications that were determined were dealt with by host authorities acting on behalf of the SDNPA.

1.27 At present, planning decisions are based on national policy and the policies contained within the adopted core strategies or local plans of these host authorities or, where applicable, joint core strategies adopted by the host authority and the SDNPA. On adoption, the policies in this Local Plan will supersede all the existing policies for applications within the National Park.

1.28 Any reference in this Plan to ‘the Authority’ relates to the SDNPA or the host Authority determining applications on its behalf. Where the SDNPA is specifically referred to, this means the National Park Authority itself and not any host authority.

WHAT IS THE RELATIONSHIP BETWEEN THE LOCAL PLAN AND NEIGHBOURHOOD DEVELOPMENT PLANS?

1.29 Neighbourhood development plans are being prepared by many communities across the National Park. Some neighbourhood development plans have already been ‘made’ part of the development plan for the National Park.

1.30 All neighbourhood development plans must be in general conformity with the strategic policies of the Local Plan. Neighbourhood development plans can allocate land for development in line with the development requirements set out in this Local Plan. They can also formulate development management policies specific to their parish or town.
1.31 It is important that all of the National Park is planned for. This Local Plan does not allocate any development in any designated Neighbourhood Area other than the three strategic sites and the strategic allocation at Old Malling Farm, Lewes. It is necessary for neighbourhood development plans to proceed in a timely fashion in order to avoid there being any policy gaps. All neighbourhood development plans intending to allocate development sites must have been progressed to a Pre-Submission stage (Regulation 14) at least six months before the consultation on the Publication version (Regulation 19) of the Local Plan. The next stage of the Local Plan will allocate sites as appropriate in those parishes and towns with neighbourhood development plans in an earlier stage of preparation as well as those areas where neighbourhood development plans are not envisaged.

1.32 Other forms of community-led plans, such as parish plans and village design statements, may be more appropriate for some towns and villages than neighbourhood development plans. Although these other plans would not be made part of the development plan for the National Park they would still form material considerations in the determination of planning applications and can become supplementary planning documents (SPD) if they undergo the statutory periods of consultation set out in the regulations. All of the village design statements, parish plans and landscape assessments that have been adopted by, or are currently under preparation, in the National Park are listed in Appendix 5.

WHAT ARE THE NEXT STEPS OF THE LOCAL PLAN?

1.33 All the representations received during this consultation will be collated and analysed by the SDNPA. The responses will be taken into account alongside the evidence base, the sustainability appraisal and the Duty to Cooperate to help formulate the next version of the Local Plan. This will be the Publication version, which will be subject to another, more limited, round of public consultation. All representations made at this stage along with the Publication version will be submitted to the Planning Inspectorate (on behalf of the Secretary of State) for independent examination. The SDNPA aims to adopt the sound Local Plan in 2017.

1.34 Table 1.1 sets out the main stages in the preparation of the Local Plan along with key dates and references to the Town and Country Planning (Local Planning) (England) Regulations 2012.

<table>
<thead>
<tr>
<th>Local Plan stage</th>
<th>Regulation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Options Consultation</td>
<td>18</td>
<td>Spring 2014</td>
</tr>
<tr>
<td>Preferred Options Consultation</td>
<td>18</td>
<td>Autumn 2015</td>
</tr>
<tr>
<td>Publication version Consultation</td>
<td>19</td>
<td>Autumn 2016</td>
</tr>
<tr>
<td>Submission to Secretary of State</td>
<td>22</td>
<td>Autumn 2016</td>
</tr>
<tr>
<td>Examination</td>
<td>24</td>
<td>Early 2017</td>
</tr>
<tr>
<td>Adoption</td>
<td>26</td>
<td>Mid 2017</td>
</tr>
</tbody>
</table>
2. SPATIAL PORTRAIT – THE NATIONAL PARK TODAY

INTRODUCTION

2.1 In order to plan for the future of the South Downs National Park (the National Park) it is necessary first to understand how it is today, and the issues, challenges and opportunities that lie ahead for this very special place. The starting point for this process is the State of the National Park Report (2012) (SNPR) and the South Downs Integrated Landscape Character Assessment (2011) (SDILCA). This is the baseline against which future changes can be measured. Figure 2.1 is a map of the National Park.

2.2 The story of the National Park is one of great diversity. It is a tapestry of landscape, wildlife, culture and heritage, worked and shaped by human hands, looking to the future while representing a quintessentially romantic Englishness of gentle green hills and picture postcard villages. This National Park has the highest population of all the British national parks, at 112,000 people, and 2 million people live within 5 miles. This landscape-led Local Plan seeks to ensure that any proposed development will not detract from the landscape for which it was designated.

2.3 Each national park has a series of special qualities that capture its distinctiveness and the reasons for which it was designated. The seven special qualities of this National Park define sense of place, distinctiveness and the characteristics that make this place special and valued. They capture what has attracted people to this place for centuries: the inherited stocks, which need to be nurtured and enhanced over time. They are the outcome of historical research combined with the views of many hundreds of groups and individuals. This includes residents, visitors, landowners, farmers, businesses, school pupils, parish councils, district and county authorities. The special qualities are illustrated in Figure 2.2 and are set out in full in Appendix 2.
FIGURE 2.1: THE SOUTH DOWNS NATIONAL PARK
FIGURE 2.2: THE SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK

1. Diverse, inspirational landscapes and breathtaking views
2. Tranquil and unspoilt places
3. A rich variety of wildlife and habitats including rare and internationally important species
4. An environment shaped by centuries of farming and embracing new enterprise
5. Great opportunities for recreational activities and learning experiences
6. Well-conserved historical features and a rich cultural heritage
7. Distinctive towns and villages, and communities with real pride in their area
WHY DO NATIONAL PARKS MATTER?

2.4 Public spending on national parks costs less than £1 per person per year across the country. From this investment, national parks not only conserve and ensure access for all to some of the most valuable and breathtaking landscapes and habitats in the UK, they also make a huge contribution to the UK economy. This National Park provides ecosystem services of immense financial and social importance. The fresh water that filters through its chalk aquifers provides drinking water for 1.2 million people, while its fresh air, inspirational views and tranquillity provide the vital chance for millions of people to connect with the natural environment and restore their health and wellbeing.

2.5 This National Park is a living, changing, vital green space in the UK’s busiest region. As the South East continues to grow and develop so will the pressure on the services it provides and on its special qualities. Good planning plays a vital role in ensuring that the National Park can accommodate the future and continue to provide the busy South East and the wider UK with the essentials of life (see Figure 2.3).
FIGURE 2.3: PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE

What we can do for the National Park:

Stewardship

We want everyone who lives, works or visits to enjoy, understand, and then get actively involved in looking after the National Park. For example, considering how they farm or run their business, using the car less, creating a community-led plan or staying and buying locally.

What the National Park does for us:

Ecosystem services

Well looked after, the National Park will continue to provide us with some of the essentials of life, such as clean air and water, food, fuel and raw materials. It helps to regulate our climate, stores flood waters, filters pollution, and provides opportunities for us to improve our health and wellbeing.

Sustainable Economy

Enjoyment, understanding, taking action

Ecosystem services: eg food, timber, water, wellbeing

People

Landsscapes and places
2.6 The structure of the Local Plan follows on from the structure of the Partnership Management Plan (PMP): ‘A Thriving Living Landscape’ is primarily based on Purpose One, ‘People Connected with Places’ is primarily based on Purpose Two and ‘Sustainable Futures’ is primarily based on the SDNPA’s Duty.

A THRIVING LIVING LANDSCAPE

2.7 From rolling hills to bustling market towns, the National Park’s landscapes cover over 1,600km² of breathtaking views and hidden gems. However, the landscapes that can take your breath away are more than just scenery. They are, living, working, ever-changing places shaped by natural factors such as geology, landform, soils and biodiversity and human factors such as farming and trade.

2.8 A Landscape Character Assessment (LCA) is a way of classifying, mapping and describing the characteristics of a landscape. It gives us a framework within which important elements of the landscape can be maintained, change can be managed and positive environmental benefits can be secured. The SDILCA (2011) identifies 18 landscape types and 49 place-specific ‘character areas’.

2.9 To the east the open downland culminates in 17.5km of dramatic coastline and the iconic chalk cliffs at Seven Sisters and Beachy Head, giving stunning panoramic views to the sea and northwards across the weald. The chalk ridge, which is further sculpted by steep coombes and dry valleys and is cut through north to south by four major river valleys, extends westwards with steep north facing escarpments and gentler south facing dip slopes. This more westerly downland is more expansive and wooded, but no less impressive. It merges into the Hampshire downs with their own dramatic east-facing escarpment to the west of Petersfield. Almost a quarter of the National Park consists of the Western Weald, a patchwork of farmland, woodland and heathland. Nearly a quarter of the National Park is covered by woodland, making this the most wooded national park in England; almost half of this woodland is ancient woodland.

2.10 There is a rich mosaic of habitats, home to many rare and internationally important species including wild orchids, Duke of Burgundy and Adonis Blue butterflies, nightjars, larks, natterjack toads, dragonflies, water voles, field crickets and cheese snails. These chalk grassland, farmland, river, coastal, woodland and lowland heath habitats form a living network across the National Park, and provide us with many important ecosystem services such as access and recreation, food, timber and pure clean water. Freshwater arising in the National Park supports a rich and diverse array of wildlife and habitats.

2.11 Many sites are additionally designated for their wildlife value including a RAMSAR site, 13 Special Areas of Conservation, 2 Special Protection Areas, 9 National Nature Reserves, 86 Sites of Special Scientific Interest and 853 locally designated wildlife sites. The Sussex Heritage Coast runs from Seaford to Eastbourne and there is a designated Marine Conservation Zone running along the coast from Brighton to Beachy Head.

2.12 The people who have worked and lived in the area have left a variety of clues to explore from all periods of history, showing continuous settlement from the Mesolithic period. This rich cultural heritage has led to over 660 sites now being protected for their national importance, from Bronze Age barrows to World War II pill boxes. Thousands of other sites include early industrial sites from flint mines to ironworking furnaces, churches and stately homes and gardens. Many more await discovery from stray finds to whole unknown landscapes being discovered in the Secrets of the High Woods project.

1 www.southdowns.gov.uk/discover/heritage/secrets-of-the-high-woods/
2.13 These landscapes have also proved to be a rich vein of inspiration for some of our most beloved and important writers, poets, musicians, artists and scientists, including Virginia Woolf, Jane Austen, Hilaire Belloc, Edward Thomas, Gilbert White, Edward Elgar, Joseph Turner and Eric Ravilious. Virginia Woolf once said, ‘The Downs…too much for one pair of eyes, enough to float a whole population in happiness, if only they would look.’ The inspirational power of the National Park continues today, for writers such as Booker prize winner Graham Swift, who said in a recent interview that he comes here ‘half a dozen times a year, at least – in all weathers.’

2.14 Tranquility is perhaps the hardest special quality to define, but perhaps the most valued and needed. To really enjoy tranquillity to the full, you need to look upwards at night, where you can enjoy some of the few remaining dark night skies in the South East. Our dark night skies not only allow stargazing, they also protect sensitive habitats and species; around 30 per cent of vertebrates and 60 per cent of invertebrates are nocturnal and several species depend on darkness for survival. However, they are under threat. To protect the valuable dark night skies found within the National Park, the SDNPA has set out to create an International Dark Skies Reserve. This has garnered real public support with over 1,000 people signing up to the Dark Skies Pledge within a matter of weeks.

2.15 Easily accessible and with something for everyone, the National Park attracts visitors and locals alike, with people drawn to the area by its outstanding landscapes, cultural heritage, wildlife and opportunities for recreation. There were an estimated 46 million visitor days to the National Park in 2013, generating an income of £464 million and supporting nearly 12,000 jobs. The Visitor Survey also showed that 83 per cent of all visitors had travelled to the National Park by private car, and 63 per cent of the working population travelled to work by car.

2.16 With more than 3,300km of footpaths, bridleways and byways, the National Park has the longest rights of way network of all the UK’s national parks. It is also home to a number of long distance trails, most famously, the South Downs Way, a 160 kilometre (100 mile) long National Trail bridleway stretching along the spine of the South Downs from Winchester to Eastbourne. This is the only National Trail to lie almost entirely within a national park.

2.17 The National Park also benefits from the support of many thousands of volunteers, including those working as part of the South Downs Volunteer Ranger Service (VRS). This includes those involved in community led plans, including neighbourhood plans. These volunteers make an enormous contribution to conserving and enhancing the National Park as well as enabling better access and working in local communities.

2.18 Looking to the future, the Our South Downs project looks to connect young people to their natural environment and to learn outside the classroom. So far it has worked with nearly 74,000 students and 1,700 teachers. Our Travel Grant Scheme enabled over 6,390 students from more deprived urban communities to visit high quality outdoor learning providers within the National Park.
TOWARDS A SUSTAINABLE FUTURE

2.19 This is not a wilderness park. In no other national park is the connection between people and place so evident and so crucial to its future conservation. In line with other rural areas, the number of people aged over 65 is greater than the rest of the South East. As with all national parks the high price of housing makes it difficult for people who work in the National Park to live in it. Access to affordable housing is therefore key for our communities.

2.20 The National Park has four market towns, Lewes, Petersfield, Petworth and Midhurst, which provide vital services to the surrounding rural areas. Adjacent towns and cities provide key services for communities within the National Park.

2.21 The towns and villages of the National Park are one of its special qualities. The character and appearance of these settlements derive in large part from the distinctive local building materials. These settlements are as much a part of the landscape as the open countryside and this Local Plan seeks to conserve and enhance them.

2.22 Economic activity contributes approximately £2.23 billion to the regional economy. There are a range of economic sectors with a higher proportion of businesses, than elsewhere in the South East, in the agriculture, forestry and fishery sectors. Around 90 per cent of businesses employ fewer than 10 people.

2.23 Broadband connectivity and speed is an issue across much of the area, which has either very low broadband speeds or none at all, and businesses and residents in these areas are disadvantaged by slow and unreliable internet connections.

2.24 Figure 2.4 provides a snapshot of key facts about the National Park.
FIGURE 2.4: A SNAPSHOT OF THE SOUTH DOWNS NATIONAL PARK
CHALLENGES AND OPPORTUNITIES FOR THE SOUTH DOWNS NATIONAL PARK

2.25 The National Park faces a number of pressures that, without action, will have a lasting impact on this place and its special qualities. The PMP identified the pressures that without action would have a lasting impact on the special qualities. The Local Plan supports the strategic aims and direction of the PMP.

KEY CHALLENGES FOR THE LOCAL PLAN

2.26 The following issues were identified as the pressures for change in the PMP and are the key challenges for the Local Plan:

**Threatened Habitats and Heritage**
In the South Downs National Park, as across the UK, there has been a gradual loss, fragmentation and degradation of habitats. Planning has a key role to play in ensuring the protection of important species and habitats and in improving the resilience of ecosystems, for example, through improving the connections between habitats.

In the past, conservation effort has often focused on specific species, habitats and sites. However, an independent review of England’s wildlife sites and ecological network (known as the Lawton Review\(^2\)), concluded that England’s collection of wildlife areas (both legally protected areas and others) does not currently represent a coherent and resilient ecological network capable of responding to the challenges of climate change and other pressures. The *Natural Environment White Paper for England* (2011) highlights that nature is often taken for granted and undervalued, but that people cannot do without the benefits and services it provides, and advocates a landscape-scale approach to conservation. There is an opportunity for this Local Plan, which covers such a large area, to take an integrated approach to conservation at a landscape scale.

There is a great depth and variety of cultural heritage in the National Park and it is crucial that heritage assets are actively looked after and maintained in good condition to enable them to be enjoyed by future generations. The Local Plan will need to ensure that heritage assets are effectively protected and that policies enable them to be appropriately maintained.

**Visitor Pressure**
There are a significant number of visitors to the National Park each year, but the level of visitor expenditure compared to level of visitor numbers is lower than other national parks, which tend to attract more overnight visitors. The tourism sector is currently fragmented and sustainable transport options relatively limited. Therefore, the challenge for the Local Plan is to ensure that policies support sustainable tourism, without compromising the National Park purposes.

**Water Resources**
Water is an essential resource for the landscape, biodiversity and people but our water is under pressure both in terms of its quality and quantity. Planning can make a real difference by ensuring that water resources are managed effectively, and that we make the most of the resources we have, by reducing flood risk and by improving water quality.

---
**Economic and Market Trends**
A diverse and sustainable economy strongly linked to our special qualities is vital for the future. Managing these landscapes sustainably needs key industries such as farming and forestry to stay viable. Planning will play a role in supporting the large number of small businesses across the National Park and enabling economic activity which supports the National Park’s purposes. Workers need homes and planning has an important role to play in ensuring that there are affordable homes for people.

**Climate Change**
Climate change is likely to have fundamental impacts on the National Park. By improving the energy efficiency of new homes and encouraging appropriate renewable energy production, planning can play a key role in mitigating against, and adapting to, climate change.

**Changing Values, Behaviours and Lifestyles**
Individual lifestyle choices can have a real impact, both positive and negative. These include the level of car use, the amount of local produce consumed, overall carbon footprint, water use and choices about how to use leisure time.

An older population and a lack of affordable housing for working families all have an impact on the long-term sustainability of settlements.

**Development Pressures**
It goes without saying that the location of the National Park within a heavily populated region creates pressure for development that could harm the special qualities. The Local Plan will be central to the delivery of appropriate development to support communities and businesses without negatively impacting on the special qualities, particularly the landscapes.

2.27 In 2014, the SDNPA published the Local Plan Options Consultation Document. This set out 55 key issues with a range of options for addressing them in the Local Plan. The topics included:

- Landscape and Natural Resources
- Historic Environment
- Design
- Housing
- Economy and Tourism
- Community Facilities and Infrastructure
- Transport and Accessibility

2.28 All of these issues are addressed in policies in this Local Plan. A table has been prepared as part of the evidence base listed in Appendix 4. This provides an audit trail between the Issues and Options and how they have been taken forward in this document. The rest of the Local Plan sets out a vision for the future of the National Park followed by a comprehensive set of planning objectives and policies, which will help to deliver the vision.
3. VISION AND OBJECTIVES

The National Park in the future

A VISION FOR THE SOUTH DOWNS NATIONAL PARK

3.1 The Vision for the South Downs National Park (National Park) is set out in the Partnership Management Plan (PMP). This vision describes where we want to be in 2050 and it is the overarching vision for the South Downs Local Plan. It applies across the whole National Park but the ways in which it could be achieved will vary from area to area based on the characteristics and opportunities in that area.

FIGURE 3.1 A VISION FOR THE NATIONAL PARK

By 2050 in the South Downs National Park:

The iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures.

People will understand, value, and look after the vital natural services that the National Park provides. Large areas of high-quality and well-managed habitat will form a network supporting wildlife throughout the landscape.

Opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities. The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly.

Its special qualities will underpin the economic and social wellbeing of the communities in and around it, which will be more self-sustaining and empowered to shape their own future. Its villages and market towns will be thriving centres for residents, visitors and businesses and supporting the wider rural community.

Successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.

ACHIEVING THE VISION FOR THE NATIONAL PARK

3.2 A number of strategic objectives, based on the National Park purposes and duty (Figure 1.1), outline the direction that the Local Plan will take in order to achieve the vision. These objectives deliver the vision within the remit of the Local Plan and consideration of planning applications. The core, strategic, allocation and development management policies will deliver these objectives.
Objectives to meet the National Park Vision

1. To achieve a sustainable use of ecosystem products and services thus enhancing natural capital across the landscapes of the National Park and contributing to human health, wealth and wellbeing.

2. To conserve and enhance the cultural heritage and large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.

3. To provide and protect opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.

4. To adapt well to and mitigate against the impacts of climate change and other pressures.

5. To maintain and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.

6. To maintain and enhance farming, forestry, tourism and other business activities that are compatible with and relate to the landscape and special qualities of the National Park.
4. CORE POLICIES

4.1 The core policies set out in this chapter provide the overarching framework for evaluating all development proposals in the National Park. These core policies will be used in the assessment of planning applications and avoid the need for duplicating criteria within the strategic, allocation and development management policies of the Local Plan. The core policies apply equally across the National Park. The policies in subsequent chapters are also relevant across the National Park but the ways in which they are interpreted will vary slightly across its different areas.

SUSTAINABLE DEVELOPMENT IN THE SOUTH DOWNS NATIONAL PARK

Introduction

4.2 The DEFRA National Parks Vision and Circular (2010) makes clear the responsibility of national parks to be ‘exemplars in achieving sustainable development’. Sustainable development is about ensuring a better quality of life for everyone, both now and for future generations. The principles of sustainable development include living within environmental limits, achieving a sustainable economy and ensuring a strong healthy and just society.

4.3 The presumption in favour of sustainable development lies at the heart of the National Planning Policy Framework (NPPF). Local plans should contribute to the achievement of sustainable development.

Supporting Text

4.4 Great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to landscape and natural beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas and should be given great weight in national parks. Policy SD1 takes a positive approach in accordance with the presumption in favour of sustainable development set out in the NPPF, whilst taking into account National Park purposes and duty and the special qualities. The NPPF (para 14) states that local plans should meet objectively assessed needs unless specific policies indicate development should be restricted, for example, in a national park or Heritage Coast.

4.5 The SDNPA will work in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes (Figure 1.1). Finally, it is important that the Local Plan should be read as a whole, and that all policies apply in combination to all planning applications made in the National Park.
Core Policy SD1: Sustainable Development in the South Downs National Park

1. When considering development proposals the Authority will take a positive approach that reflects the presumption in favour of sustainable development provided that they:
   a) are consistent with the National Park purposes;
   b) pay due regard to the duty in pursuit of the purposes;
   c) conserve and enhance the special qualities of the National Park; and
   d) comply with all the relevant policies within this Local Plan.

2. If there is a conflict between the purposes, greater weight will be given to the first purpose.

3. The Authority will work with applicants to find solutions to ensure that development proposals that are in accordance with the policies in this Local Plan can be approved without delay, unless material considerations indicate otherwise.

ECOSYSTEMS SERVICES

Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

Outcome 2: Increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

Outcome 4: The condition and status of cultural heritage assets and their settings is significantly enhanced and contribute positively to local distinctiveness and sense of place.

Outcome 6: Widespread understanding of the special qualities of the National Park and the benefits it provides.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

Policy 2: Develop landscape-scale partnerships and initiatives to focus on enhancing the key ecosystem services delivered by the SDNP.

Policy 4: Create more, bigger, better managed and connected areas of habitat, which deliver multiple benefits for people and wildlife.

Policy 5: Conserve and enhance populations of priority species in and around the SDNP.
**Policy 6:** Favour natural functions and processes in and around the SDNP where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

**Policy 19:** Enhance the landscape, habitat connectivity, carbon storage and flood risk management with woodland creation.

**Policy 29:** Enhance the health and wellbeing of residents and visitors by encouraging healthy outdoor recreation and relaxation.

**Policy 32:** Encourage and support creative and cultural activities which connect with and increase appreciation of the special qualities.

**Introduction**

4.6 The appropriate management of landscape provides us with food, fibre, fuel, high-quality drinking water and other essential raw materials. The natural functions of the landscape also help maintain air quality, pollinate crops, cycle nutrients, regulate the climate and alleviate flood risk (Figure 4.1). There is also clear evidence that access to nature improves people’s health and wellbeing. Therefore, maintaining this ‘natural capital’ is important to meeting National Park Purposes and Duty.

4.7 The National Park provides a wide range of societal benefits that are in the national interest to protect, in addition to its nationally important landscapes. The functions the natural world provides are critically important to support human life and prosperity; these benefits are part of ‘ecosystems services.’ **These are the benefits people and society get from the natural environment.**

4.8 Historically, natural capital, ecosystems services and the multiple benefits nature provides have not been properly considered in policy and decision making. This is, in part, due to them being consistently undervalued or neglected in traditional economic analyses. The concept of ecosystem services is not new and with the *National Ecosystem Assessment* (2011) and the *Follow On Project* (2014), the UK has established itself at the forefront of thinking about how to properly value the essential goods and services the natural environment provides. Understanding how best the National Park can contribute to the management and enhancement of ecosystems services is vital in securing sustainable development.

4.9 The SDNPA has already adopted ecosystems services as a principle in developing its vision set out both in this Local Plan and the *Partnership Management Plan* (2013). The SDNPA is the first national park authority to use it as a theme throughout a Local Plan and adopt a specific policy on ecosystems services. A set of maps showing a number of ecosystem service functions across the National Park is under preparation and will form part of the Local Plan evidence base.
FIGURE 4.1: ‘PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE’

What we can do for the National Park:

Stewardship

We want everyone who lives, works or visits to enjoy, understand, and then get actively involved in looking after the National Park. For example, considering how they farm or run their business, using the car less, creating a community-led plan or staying and buying locally.

What the National Park does for us:

Ecosystem services

Well looked after, the National Park will continue to provide us with some of the essentials of life, such as clean air and water, food, fuel and raw materials. It helps to regulate our climate, stores flood waters, filters pollution, and provides opportunities for us to improve our health and wellbeing.

Source: SDNPA (2013) Partnership Management Plan
National Policy Context

4.10 The National Parks Vision and Circular (2010) outlines that to secure a diverse and healthy natural environment and enhance cultural heritage, priority should be given to manage landscape, heritage and quality of place; value, safeguard and enhance biodiversity; protect and enhance soils; adapt and mitigate climate change; improve public understanding of the natural environment and the benefits of outdoor recreation. It also advises the importance to maintain vibrant, healthy and productive living and working communities.

4.11 The NPPF (paragraph 7) outlines that the planning system has an economic, social and environmental role in achieving sustainable development. Paragraph 17 sets out that these overarching roles should be underpinned by 12 core planning principles in plan and decision making. These state that planning should encourage multiple benefits from the use of land in urban and rural areas, including functions such as fuel sources, flood risk mitigation, carbon storage and food production.

4.12 Paragraph 109 recognises the value of ecosystems services and that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, geological conservation interests and soils, and recognising the wider benefits of ecosystems services. Paragraph 114 states that a strategic approach should also be taken in local plans through planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Paragraph 117 also states that planning policies contribute to the promotion of a coherent ecological network.

4.13 The DEFRA White Paper The Natural Choice: Securing the Value of Nature (2011) is Government policy. It outlines that 30 per cent of the services provided by our natural environment are in decline and that many of the benefits we derive from nature are not properly valued. It puts natural capital at the centre of economic thinking and at the heart of how economic progress is measured. It highlights that valuing ecosystems services is not a restraint to the economy; rather it can make it more resilient and sustainable through valuing the resources and ecosystems which it relies on.

Options Considered and Preferred Approach

4.14 The Local Plan Options Consultation Document referred to ecosystems services, but did not raise it as a specific option. Better recognition of the functions the environment performs transforms the traditional way it is seen as a constraint to development and turns it into an asset that is valued for the variety of benefits it provides. Valuing the environment can actually provide commercial opportunities through the development of green businesses.

Supporting Text

4.15 There are four main aspects of ecosystems services, namely, supporting, provisioning, regulating and cultural services (see Figure 4.2 and 4.3). The natural environment is a dynamic system and these four services cannot be viewed in isolation from one another. They are ecologically and functionally interdependent.

4.16 Supporting services offered by flora and fauna and micro-organisms are essential for healthy soils, habitats and nutrient cycling, which underpin the environment’s natural goods and services which benefit people. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality.
4.17 **Provisioning services** relate to the products of the natural environment. Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. Approximately 25 per cent of the National Park is wooded, which contributes renewable fuel like biomass. The chalk hills, which sweep across the National Park, filter and store fresh water, providing us with high-quality drinking water.

4.18 **Regulating services** like rivers help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere support habitats and biodiversity. Enhancing species like bees and other pollinators are vital for food crops as well as other plants and wildflowers. Woodland also prevents soil erosion and is an important resource for carbon storage which helps to mitigate climate change. These services also regulate pollution in the air, water and on land. These include regulating carbon dioxide and air quality from cars and industry, chemicals from the treatment of agricultural fields or viticulture or surface water run off and percolation from the urban environment into rivers and ground water.

**FIGURE 4.2: THE PRINCIPLES OF ECOSYSTEM SERVICES**

Source: SDNPA (2013) Partnership Management Plan
**FIGURE 4.3: ECOSYSTEM SERVICES DELIVERED IN THE NATIONAL PARK**

### Supporting Services
- Functions provided by ecosystems that underpin all of the other services.
- Soil formation
  - Soil is formed by the interaction between plants, micro-organisms, and the underlying geology. We depend on healthy soils for growing food. Soils are slow to form but can be quickly degraded by poor land management, erosion, and the impacts of weather and climate.

### Provisioning Services
- Products of ecosystems such as water, food, and the supply of raw materials.
- Water supply
  - Clean water is essential for life. The chalk aquifers and river catchments of the South Downs provide drinking water, and we rely on the supply for our commercial and domestic use.

### Regulating Services
- The results of natural processes such as water purification and air quality.
- Air quality regulation
  - Plants and trees are central to the cycle of oxygen and carbon dioxide in the atmosphere. They have an important role to play in regulating levels of air pollution.

### Cultural Services
- Non-material benefits that result from our interaction with the natural environment.
- Inspiration/Spiritual values
  - The National Park is renowned for the beauty of its landscapes and its sense of place. The area has provided inspiration for many famous artists and writers. It continues to provide people with the opportunity to understand and enjoy its special qualities. The area enables people to escape, be inspired, and find spiritual renewal.

### Tranquility
- Relative tranquility is recognised as a special quality of the National Park. It provides a resource and a benefit that is greatly valued within the area.

### Recreation and tourism services
- Human influence and settlement can be traced back to Mesolithic hunter-gatherers and early agriculture. The National Park has a rich historic heritage in terms of its art, culture, ancient monuments, and historic buildings. This great social, as well as economic, value.

### Soil quality
- Shallow, lime-rich soils over chalk are free-draining, which helps water infiltration and the recharge of the water aquifer. Soils are low in organic matter where they are under intensive cultivation.

### Water quality
- The soil structure and underlying chalk and greensand geology filter water and helps to regulate water quality in the underlying aquifer.

### Disease and pest regulation
- Natural processes such as predation and climatic conditions help to control the spread of disease and pests.

### Pollination
- The effective pollination of crops by bees and other pollinators is vital to the life cycle of many plants. We rely on this natural service for growing food crops as well as other plants and wildflowers.

---

*Source: SDNPA (2013) Partnership Management Plan*
4.19 **Cultural services** relate to people’s enjoyment of the National Park and its special qualities. The distinctive landscape of the Western Weald, the chalk ridge, scarp and dip slopes and the dramatic Seven Sisters cliffs are of inspirational value through their sense of place and tranquillity, including dark night skies. Embedded in the landscape is important cultural heritage which is rich in arts and literature, archaeological remains, traditional historic towns and villages and architecture. These special qualities and an extensive network of bridleways and footpaths enhance people’s health and wellbeing.

4.20 This policy seeks a holistic approach to managing our natural resources sustainably for the future. Its criteria encapsulate the natural capital and services the natural environment contributes to people, as described. This core policy should not be read in isolation but should be linked to all other Local Plan policies.

4.21 This holistic approach is important because development can have multiple effects across these services. Decisions therefore need to consider the long-term objectives and outcomes of policy, so as more sustainable perspectives can guide more innovative outcomes from development to deliver lasting environmental and socio economic benefits.

**Core Policy SD2: Ecosystems Services**

1. Proposals that deliver sustainable development and comply with other relevant policies will be permitted provided that they do not have an unacceptable adverse impact on the natural environment and its ability to contribute goods and services. Proposals will be expected, as appropriate, to:

   a) provide more and better joined up natural habitats;
   b) conserve water resources;
   c) sustainably manage land and water environments;
   d) improve the National Park’s resilience to, and mitigation of, climate change;
   e) increase the ability to store carbon through new planting or other means;
   f) conserve and improve soils;
   g) reduce pollution;
   h) mitigate the risk of flooding;
   i) improve opportunities for peoples’ health and wellbeing;
   j) stimulate sustainable economic activity; and
   k) deliver high-quality sustainable design.

**Evidence**

- Biodiversity 2020 ‘A strategy for England’s biodiversity and ecosystems services’ (2011)
- South Downs Integrated Landscape Character Assessment (2011)
- UK National Eco-systems Assessment (2011)
MAJOR DEVELOPMENT IN THE SOUTH DOWNS NATIONAL PARK

Introduction

4.22 The NPPF (paragraph 116) sets out the approach local planning authorities should take to development in national parks. The National Planning Practice Guidance (NPPG) states that: “Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context”. The SDNPA has sought legal advice and this is reflected in the definition of major development which is set out in Core Policy SD3.

4.23 For the purposes of this policy, all of the following principles will be applied when determining whether an application constitutes major development:

- A judgement will be made in light of all of the circumstances of the application and the context of the application site.
- The phrase ‘major development’ will be given its common usage and will not be restricted to the definition of major development in the Town and Country Planning (Development Management Procedure) (England) Order 2015 or to proposals that raise issues of national significance.
- The determination as to whether the development is major development will consider whether it has the potential to have a serious adverse impact. It will not include an in-depth consideration of whether the development will in fact have such an impact.
- The application of other criteria may be relevant to the considerations, but will not determine the matter or raise a presumption either way.

Supporting Text

4.24 Core Policy SD3 sets out the two stages of decision making in relation to major development, as defined in paragraph 4.23. An assessment will be made to determine whether development constitutes major development. If the proposal is considered to be major development then the second part of the policy will apply, alongside other policies within this Local Plan. This Local Plan is consistent with paragraphs 115 and 116 of the NPPF.

4.25 It will need to be demonstrated how proposals will deliver sustainable development and ensure that they do not have a significant adverse impact on the natural environment and its ability to contribute goods and services, in accordance with Core Policy SD2 on ecosystem services. It should be clearly demonstrated how the proposals have incorporated the following principles of sustainable development:

a) Zero Carbon
b) Zero Waste
c) Sustainable Transport
d) Sustainable Materials
e) Sustainable Water

---

3 For example, whether it falls within Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 (as amended), whether it is “major development” for the purposes of the Town and Country Planning Development Management Procedure Order 2015, or whether it requires the submission of an appraisal/assessment of the likely traffic, health, retail implications of the proposal.
f) Land Use and Wildlife

g) Culture and Community

h) Health and Wellbeing

4.26 The extent to which mitigation can overcome any detrimental effect on the environment, the landscape and recreational opportunities will be taken into account when considering proposals. The cumulative impact of the development, considering existing development and other proposals will also be taken into account. Where it is demonstrated that there is an overriding national need, any short-term and long-term harm or adverse impact will need to be minimised.

4.27 The potential impact of major development does not just include the development itself. While a proposal may be for a development outside of the National Park, upgrades to, for example, the electricity distribution network or transport network, may have an impact on the National Park. The proposals for this type of development will be assessed under this policy.

4.28 It is also important to consider the impact of cumulative development in the National Park. An individual development viewed in isolation may, in itself, constitute minor development, but when viewed with neighbouring development within the National Park could be considered to form part of a major development. In such cases the SDNPA will apply all of the principles in paragraph 4.23 to assess whether major development is proposed.

Core Policy SD3: Major Development in the South Downs National Park

1. In determining what constitutes major development the SDNPA will consider whether the development, by reason of its scale, character or nature, has the potential to have an unacceptable adverse impact on the natural beauty, wildlife or cultural heritage of, or opportunities for quiet recreation provided by, the National Park. The potential for adverse impact on the National Park will be dependent on the individual characteristics of each proposal and its context.

2. Major Development will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest. In assessing development proposals, consideration will be given to:

   a) the proven need for the development, including in terms of any national considerations;

   b) the impact of permitting it, or refusing it, upon the local economy;

   c) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way;

   d) any detrimental effect on the environment, the landscape and quiet recreation, and the extent to which that could be moderated; and

   e) any detrimental effect on the special qualities of the National Park and whether they can be mitigated.

---

Cumulative impacts can be defined as the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments.
ACHIEVING THE VISION FOR THE NATIONAL PARK ACROSS THE FIVE BROAD AREAS

Introduction

4.29 As the National Park is predominantly rural but well populated, it is important that the Local Plan supports a living and working environment and enables rural communities to be more sustainable. Enabling growth of the right amount and type in villages and towns will help to create better balanced and more sustainable communities.

4.30 The Local Plan provides the overall framework for guiding development across the National Park, by taking into account its characteristics explained in the Spatial Portrait. The SDNPA’s broad approach to planning for the five Broad Areas of the National Park is set out in the following core policies:

- SD4/CP (Coastal Plain)
- SD4/DS (Dip Slope)
- SD4/WD (Western Downs)
- SD4/SS (Scarp Slope)
- SD4/WW (Western Weald)

These policies should be read in conjunction with strategic Policy SD22 (Development Strategy), which sets out the location for development in the National Park. The five Broad Areas are shown in Figure 4.4.

National Policy Context

4.31 The core planning principles of the NPPF set out that planning should contribute to conserving and enhancing the natural environment and reducing pollution, and that the allocation of land for development should prefer land of lesser environmental value. Reusing land that has been previously developed provided that it is not of high environmental value should be encouraged.

4.32 The NPPF also states that planning should actively manage patterns of growth to make the fullest possible use of public transport, and walking and cycling, and focus significant development in locations which are, or can be made, sustainable. Sustainable development in rural areas should be promoted by locating housing where it will enhance or maintain the vitality of rural communities, recognising how settlements relate to each other, the connections between settlements and associated interdependencies.

4.33 The Natural Environment White Paper for England (2011) (NEWP) highlights that nature is often taken for granted and undervalued, but that people cannot do without the benefits and services it provides, and advocates a landscape-scale approach to conservation. The UK National Ecosystem Assessment (NEA) was published in June 2011 and provided a complete assessment of the benefits that nature provides, how they have changed over the past, the prospects for the future and their value to our society. The results of this assessment have informed the NEWP.

Options Considered

4.34 There were a number issues and options considered in the Local Plan Options Consultation Document (February 2014) relating to a spatial strategy. These are explained in detail in the background document South Downs Local Plan: Progress from Issues and Options to Preferred Options.
The Options Consultation applied a settlement strategy which was based primarily on the findings of the Settlement Hierarchy Study. This was published in 2013 and looked at the services and facilities available within the settlements of the South Downs National Park, and used the availability of these services to apply a score to each settlement. The settlements were then ranked by score and divided into five tiers. It is important to recognise that settlements within the National Park are part of a wider hierarchy of settlements, which includes settlements outside of the National Park.

Feedback on the Options Consultation was overwhelmingly against taking such a prescriptive approach to development based primarily on set levels of services and facilities. Instead, the broad approach set out in this Local Plan seeks to take more account of places and their natural services in the National Park. It also recognises the commonalities that exist in some areas by virtue of their landscape and settlement patterns, and groups them into five Broad Areas.

**Reasonable Alternatives**

A sustainability appraisal of the proposals within the Local Plan is required during its preparation. It will help the SDNPA assess how the Local Plan will contribute to the achievement of sustainable development. As part of the sustainability appraisal (SA), a strategic environmental assessment (SEA) will consider the potential environmental effects of a proposal. This assessment should identify, describe and evaluate the likely significant effects of implementing the plan, and reasonable alternatives.

The Development Strategy (Policy SD22) therefore needs to be tested against reasonable alternatives through the SA. It is recognised that the final determination of the Development Strategy may differ from the current wording following the results of the SA. What is considered a reasonable alternative is set within the context of the National Park designation.

Through this process “meaningful options should be developed on such matters as the broad location and balance of development across the authority area, the management of the housing supply, the balance between employment and housing and the delivery of affordable housing.” A discrete set of reasonable alternatives to test through the SA process and the final report will document why the preferred policy informed by SEA findings has been accepted. These will consider the alternatives under the two key elements of the proposals in this Local Plan:

- Levels of growth and how these will be represented spatially (i.e. the land and infrastructure required to meet different levels of growth and the capacity of settlements to deliver this growth).
- Selection of strategic sites and assessment alternatives for settlements.

---

5 As required by European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment”, known as the Strategic Environmental Assessment or SEA Directive.
PREFERRED APPROACH – INTRODUCING THE FIVE BROAD AREAS OF THE SOUTH DOWNS NATIONAL PARK

4.40 Historically, the area now within the National Park has been subdivided in many ways. These divisions were based upon the need for varying types of land on the chalk and in the Weald to provide for the necessities of life – food, shelter and work, as well as kinship. This led to vertical ‘allocations’ based on land apportionment known as ‘rapes’ which explains, for example, the north-south pattern of many parishes.

4.41 This pattern was strongly influenced by geology and, in turn, is reflected in landscape character areas. This vertical division is also evident in the 15 local authority boundaries which cross the National Park; in some river catchments; and the dominance of north-south transport connections, when compared to east-west divisions.

4.42 In the modern world there are many additional factors which need to be overlaid onto this historic pattern when considering planning policies. Travel patterns, visitor behaviour and economic aspects such as supply chains and access to services may well cut across the traditional patterns.

4.43 This concept of overlaying the historic settlement patterns with the landscape and other ‘modern world’ factors has been used to create a Broad Spatial Diagram set out in Figure 4.4, shows the five separate Broad Areas. This division into five areas is very broad brush. It is informed by the characteristics of the different landscapes, as defined in the SDILCA, recognising the historic interactions between natural and cultural processes, but combines this with the current reality of a long, thin protected landscape which is strongly influenced by the areas around it. This approach recognises, for example, that the springline villages along the Scarp Slope from east to west face common challenges and opportunities which are different to those faced by communities on the edge of the Coastal Plain or those more dispersed communities in the Western Weald area.

4.44 The Spatial Portrait and the five Broad Areas are central to the Local Plan. The special qualities of the National Park apply to the whole protected landscape, but the way they are expressed varies from area to area. Similarly, the Vision applies throughout, but the specific opportunities to realise it will vary.

4.45 The spatial portrait extends beyond the National Park boundary and acknowledges the many interdependencies and connections that exist across the boundary. This in turn has informed the National Park’s approach to the Duty to Cooperate.

4.46 It follows that the Local Plan policies will need to be interpreted in slightly different ways in the different areas if they are to operate effectively. For example, opportunities for agricultural diversification exist throughout, but we are likely to see more applications for development related to vineyards across the Dip Slope and more for woodfuel supply chains in the Western Weald.

Supporting text

4.47 The broad spatial approach for this Local Plan is one of dispersing growth throughout the five Broad Areas. This approach is based on feedback from the Local Plan Options Consultation and the evidence base, which indicate that all five Broad Areas need and can accommodate some growth. However, this needs to be compatible with the National Park’s landscape designation and its special qualities.
4.48 The following section sets out the approach for each of the five Broad Areas. These each describe how the special qualities of the National Park are expressed within that area. This is identified by reference to the special quality in bold and goes on to describe the particular challenges and issues, and to identify some of the distinctive opportunities which exist in that area to contribute to the overall vision for the National Park.
THE COASTAL PLAIN

4.49 The northernmost part of the Coastal Plain is located within the National Park and extends eastwards as far as the River Adur. The entire Coastal Plain extends southwards from the South Downs to the Solent and the English Channel and includes large towns and cities such as Southampton, Portsmouth, Chichester and Worthing.

The Coastal Plain Today – Special Qualities

4.50 This narrow area stretching from the western edge of the National Park to the Adur Gap includes elements of many of its landscapes (SQ1) as defined in the SDILCA. As many of our rivers flow north to south, we find Chalk Valley Systems associated with the rivers Itchen, Meon and Lavant, and major river floodplains and major valley sides associated with the rivers Adur and Arun. Between these are found elements of Downland Mosaic, Wooded Estate Downland, Upper Coastal Plain, Open Downland and Major Scarp. The northern side this Broad Area blends almost imperceptibly into the next Broad Area – the Dip Slope.

4.51 Due to the proximity of large urban areas to the south, much of this area is relatively less tranquil (SQ2) than others in the National Park, and light pollution is more prevalent. This makes the parts that are quieter and have darker skies particularly special as they are so close to people.

4.52 In terms of wildlife (SQ3), this Broad Area contains some significant blocks of mixed woodland such as at Binsted Woods and Stansted Park in West Sussex, along with habitats associated with river valley floodplains and valley sides. In terms of farming & new enterprise (SQ4), this Broad Area and the adjacent Dip Slope to the north, include some of the most fertile soils in the National Park, which has led to a larger proportion than elsewhere of intensively farmed Grade 2 agricultural land, which occurs right through to the western boundary.

4.53 The proximity of the coastal towns and the largely gentle topography mean there are particular opportunities to provide access (SQ5), for example, to areas of accessible woodland such as West Walk in the Forest of Bere.

4.54 The part of the Coastal Plain located within the National Park is sparsely populated with small hamlets and valley villages (distinctive towns and villages (SQ7)), such as Lavant. Many of these are relatively well connected to settlements beyond the southern boundary, on which they rely for many essential services.

Contributing to the Vision on the Coastal Plain – Challenges and Opportunities

4.55 There is very significant development pressure on this southernmost Broad Area because of the growth of housing to the north of the coastal towns and along the A27. As the population of the rest of Coastal Plain grows, the thin strip within the National Park is in the frontline for family days out, hiking, cycling, dog walking and other leisure activities. Managing this increased pressure so that visitors can discover, enjoy, understand and value the National Park without damaging its special qualities is a challenge, and as the first point of entry from the south, this area can play a part by providing good facilities at gateway points which orientate visitors, raise awareness of the importance of the landscapes and encourage more sustainable travel choices and behaviour.

4.56 Significant parts of this Broad Area are at a relatively higher risk from coastal, groundwater and/or fluvial flooding. To ensure these areas are adapting well to the impacts of climate change will involve using natural processes such as changes in cultivation and land-use in flood sensitive zones rather than major engineering solutions more suited to urban areas.
4.57 The services and facilities provided in the settlements along the coast and adjacent to the National Park boundary help to support its rural communities. However, in terms of the economic and social wellbeing of communities, a challenge for the Local Plan is ensuring that these settlements are able to access these services and facilities more sustainably and are not, for example, entirely car dependent or cut off by the A27 corridor. At the same time, they can derive economic benefit from becoming gateways as above.

**Core Policy SD4/CP: The Coastal Plain**

1. Development proposals in the Coastal Plain that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.
2. Limited growth is proposed recognising the sensitivity of the predominantly open landscape. Small-scale opportunities for further growth in settlements identified in Policy SD22 (Development Strategy) will be delivered.
3. Any growth in the Coastal Plain should, as appropriate, deliver multiple benefits through ecosystem services. These may include provisioning services such as farming and regulating services such as water management.
4. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environmental Characterisation Study, in compliance with Policy SD5 (Landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.

**THE DIP SLOPE**

4.58 The Dip Slope extends along the entire length of the South Downs ending in the east at the spectacular sheer white cliffs of the Sussex Heritage Coast. This Broad Area includes villages such as Twyford, Singleton, Findon, Alfriston and East Dean, and parts of country estates such as at Uppark, Goodwood, Arundel and Sompting. It includes the downland part of the Brighton and Lewes Downs Biosphere Reserve, one of 5 areas in the United Kingdom recognised by UNESCO.

**THE DIP SLOPE TODAY – SPECIAL QUALITIES**

4.59 In terms of landscapes (SQ1), the south-facing chalk Dip Slopes are intersected by river valleys, until the eastern end where the Dip Slope ends dramatically at the white cliffs. This is an iconic South Downs landscape carved through by the Arun, Adur, Ouse and Cuckmere rivers that curve across the landscape under big skies and provide sweeping views out to the sea.

4.60 The Dip Slope includes parts of the following landscape types defined in the SDILCA – Chalk Valley Systems (associated with the rivers Itchen, Meon and Lavant), Major River Floodplains and Major Valley Sides (associated with the Rivers, Arun, Adur, Ouse and Cuckmere), Downland Mosaic, Wooded Estate Downland, Upper Coastal Plain, Open Downland and Major Scarp. The Dip Slope contains some of the most tranquil (SQ2) areas and darkest night skies in the National Park.
4.61 The area has a rich variety of **wildlife (SQ3)**. Important habitats include the lower reaches of rivers and streams, both chalk streams and tidal rivers such as the Arun and Adur. There are extensive areas of deciduous and coniferous woodland, such as Queen Elizabeth Country Park, Houghton and Friston Forests. Other designated sites and priority habitats include Kingley Vale National Nature Reserve (NNR) and Special Area of Conservation (SAC), one of Europe’s finest yew forests, areas of outstanding south facing Dip Slope chalk grassland such as at Castle Hill NNR/SAC, near Brighton and Lullington Heath NNR.

4.62 At the eastern end there are important coastal, marine and estuarine habitats, including the chalk sea cliffs which are home to breeding colonies of seabirds such as kittiwakes and fulmars. A Marine Conservation Zone (designated in 2013) protects the chalk reef offshore and runs from Brighton Marina to Beachy Head, providing a valuable habitat supporting species such as the Short-snouted Seahorse.

4.63 The majority of the Dip Slope is Grade 3 agricultural land (**farming and new enterprise (SQ4)**). However, there are pockets of Grade 2, some of the most fertile soils in the National Park. The farmed south-facing slopes provide for a range of food and drink production, including arable, grazing, vineyards such as those at Hambledon and Rathfinny, and breweries such as Bowman’s.

4.64 This Broad Area shares with the Coastal Plain Broad Area particular opportunities for **access (SQ5)** to activities based on the special qualities of the National Park. These include a series of Rights of Way (RoW) linking the coast to the crest of the South Downs, long-distance footpaths such as the Monarch’s Way, large areas of accessible woodland and estates open to the public, for example the Seven Sisters Country Park. This Broad Area also has a rich **cultural heritage and historical features (SQ6)**, including West Dean Estate, Weald and Downland Open Air Museum and Goodwood.

**Contributing to the Vision on the Dip Slope – Challenges and Opportunities**

4.65 Along with the Coastal Plain Broad Area described above, the Dip Slope is easily accessible from the densely populated Coastal Plain. Similar challenges and opportunities arise in ensuring that extra visitor pressure does not damage the special qualities but rather that access and recreation can be more sustainable and bring economic benefits to local gateway communities. Improving the RoW network as a whole and providing new off-road multi-user routes can also relieve the pressure on very sensitive sites such as Kingley Vale and Castle Hill.

4.66 Areas of more fertile soil on these warm south-facing slopes, coupled with the short term effects of climate change, mean there are particular opportunities for viticulture and wine production. As this is one of the most productive areas agriculturally, the incentive for more intensive production and related agricultural developments is higher than in other areas, and over time more sustainable ways to farm on the thin chalk soils may be found which provide benefits in terms of carbon sequestration and reducing soil erosion alongside crop production. The potential fragmentation of the remaining Dip Slope chalk grassland habitats are a key challenge within this part of the National Park.

4.67 The undeveloped coast is an important aspect of the National Park landscape. The boundary of the National Park was intentionally drawn to include several narrow locations in addition to the Heritage Coast where settlements do not extend across the coastline. These areas are subject to particular developmental pressure from surrounding urban settlements.
Core Policy SD4/ DS: The Dip Slope

1. Development proposals in the Dip Slope that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.

2. Moderate-scale growth, which is proportionate to the size of settlements and the landscape’s capacity to accommodate further development, will be delivered in settlements identified in Policy SD22 (Development Strategy).

3. Any growth in the Dip Slope should, as appropriate, deliver multiple benefits through ecosystem services. These may include provisioning services such as viticulture and regulating services such as water management.

4. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environment Characterisation Study, in compliance with Policy SD5 (Landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.

THE WESTERN DOWNS

4.68 This Broad Area is located in the north west of the National Park and extends outwards to the north and west. It is close to the historic city of Winchester where the South Downs Way starts.

4.69 The Western Downs are characterised by large-scale open farmland dotted with the remnants of ancient woodland. Picturesque villages, many with literary links, are situated here, such as Chawton, which was home to Jane Austen. In terms of landscapes (SQ1), there is Open Downland to the west. Downland Mosaic covers the central and eastern part of this area, which is intersected by Clay Plateau in places. The Western Downs contain some of the most tranquil (SQ3) areas and darkest night skies in the National Park. However, it also contains some areas of relative low tranquillity, for example, the area surrounding the city of Winchester.

4.70 In terms of its wildlife (SQ3), this area has a rich variety of habitats, which support a variety of rare and internationally important species. These include ancient woodland, chalk grassland fragments, and the river Itchen, within the north-western boundary of the National Park. This is a chalk stream which is designated both as a special area of conservation (SAC) and a site of special scientific interest (SSSI) due to its high-quality habitats, which support a range of protected species including the water vole, otter and white-clawed crayfish.

4.71 In this area, farming and new enterprise (SQ4) may take the form of larger, diversified holdings such as the Rotherfield Estate which include arable, managed woodland, shoots and fisheries. Nationally important watercress production occurs in the Itchen Valley.

4.72 Opportunities for access (SQ5) are more dispersed than in some of the other areas where the National Park is narrower with a larger population close at hand. Winchester is linked to its adjacent downland by the South Downs Way, and there are other hotspots, such as Cheesefoot Head. Elsewhere the rights of way network provides the main method of accessing the National Park’s countryside.
4.73 This broad area also has a rich cultural heritage and historical features (SQ6), including the site of the Battle of Cheriton (English Civil War battle of 1644), the National Trust house and garden at Hinton Ampner and Jane Austen’s house in Chawton.

4.74 The Western Downs have distinctive settlements (SQ7) which tend to be more scattered than in other areas of the National Park as they are less strongly influenced by the drainage pattern and the proximity of rivers or springlines.

Contributing to the Vision on the Western Downs – Challenges and Opportunities

4.75 Parts of the Western Downs are easily accessible from more densely populated areas around the National Park, such as Winchester and Alton, and there are opportunities to create better multi-user routes and circular itineraries based on railway stations.

4.76 A specific challenge in this area lies with the need to safeguard the important habitats and species of the Itchen and to reconcile these with the commercial imperatives of watercress production by finding more sustainable methods of cultivation and processing.

Core Policy SD4/ WD: The Western Downs

1. Development proposals in the Western Downs that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.

2. Limited growth is proposed in the Western Downs recognising the relative tranquillity and sense of isolation in this Broad Area.

3. Any growth in the Western Downs should, as appropriate, deliver multiple benefits through ecosystem services. These may include provisioning services such as aquaculture and cultural services such as tranquillity.

4. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environment Characterisation Study, in compliance with Policy SD5 (Landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.

THE SCARP SLOPE

4.77 The Scarp Slope runs from Old Winchester Hill in the west to Eastbourne in the east. The escarpment turns north near Petersfield to mark the edge of the Hampshire Downs. The historic market town of Lewes is located on the Scarp Slope and there are many picturesque springline settlements at the foot of the chalk Scarp Slope.

THE SCARP SLOPE TODAY – SPECIAL QUALITIES

4.78 The escarpment provides sweeping views north across the Weald. Distinctive sunken lanes link the Western Weald with these scarp slopes emerging on open commons such as Noar Hill, known for its wild flowers and rare butterflies like the Brown Hairstreak.

4.79 This area is made up of a diverse range of inspirational landscapes (SQ1) as defined in the SDILCA. The Major Scarp, Greensand Terraces and Scarp Footslopes run from Petersfield in the west to Eastbourne in the east and north towards Alton. As many of our rivers flow north to south, we find Chalk Valley Systems (associated with the rivers Meon and Lavant), and four major River Floodplains and Major Valley Sides (associated with the rivers Adur, Arun, Ouse and Cuckmere). The Scarp Slope Broad Area contains some of the most tranquil (SQ2) areas and darkest night skies in the National Park. However, areas of relative low tranquillity also occur, for example, along the boundary at the north east corner of the National Park, the areas in and around Lewes, and to the south west of Petersfield.
4.80 This broad area has a rich variety of wildlife (SQ3). To the west, the river Meon is a chalk stream with high-quality habitats which support a range of protected species including the water vole, otter and white-clawed crayfish. Other designated sites and priority habitats include Beacon Hill NNR, Old Winchester Hill NNR, Butser Hill NNR, Ashford Hangers SAC/NNR, East Hampshire Hangers SAC, Rook Clift SAC, Duncton and Bignor Escarpment SAC, the Arun Valley SAC, SPA and Ramsar sites, Lewes Downs (Mount Caburn) NNR and SAC, together with many other fragments of chalk grassland and deciduous woodland.

4.81 In terms of farming and new enterprise (SQ4), the steep topography in much of this area has meant that conversion of grassland to arable has been less prevalent as has wholesale intensive forestry despite the heavily wooded nature of the central downs. However, fewer livestock has meant many important habitats have been under grazed. More intensive arable cultivation is the norm on the clay soils below.

4.82 There are particular opportunities for access (SQ5) strongly linked to the South Downs Way. Along the route there are a number of landmarks and key visitor attractions, including Butser Hill, Chanctonbury Ring, Devil’s Dyke and Ditchling Beacon. This broad area also has a rich cultural heritage and historical features (SQ6), including Glyndebourne and Charleston Farmhouse, Roman villas such as at Bignor, Iron Age hill forts and Parham House and Gardens.

4.83 In terms of its distinctive towns and villages (SQ7), Lewes is considered to be one of the best preserved small market towns in England, with significant artistic and cultural heritage making it a popular tourist destination. Springline settlements lie at the foot of the chalk scarp and there are larger settlements such as Kingston-near-Lewes. At the foot of the chalk hangers is the village of Selborne, which was the home to the 18th century ‘father of ecology’ Gilbert White.

Contributing to the Vision on the Scarp Slope – Challenges and Opportunities

4.84 A key challenge for the town of Lewes is flooding – located as it is on the River Ouse where it flows southwards through a narrow gap in the South Downs. Restoring the natural capacity of the floodplain to the north of the town to absorb floodwater also brings opportunities in terms of wildlife and access.

4.85 There is great potential for the springline communities to benefit from being access points and gateways for visitors coming to the National Park. There is also a need for more good-quality, low-cost accommodation for users of the South Downs Way. The challenge, given the small size of most settlements, the narrow roads and the scarcity of parking, is to provide facilities and routes which encourage more walkers and cyclists and fewer cars. There is also a need to spread visits across a wider area to reduce pressure on hotspots such as the Devil’s Dyke.

4.86 The views out from the Scarp Slope are one of the reasons so many people visit this area. These views of the surrounding landscapes are vulnerable to development, which has the potential to create intrusion and alter the scale of views due to urbanising and incongruous elements.
Core Policy SD4/SS: The Scarp Slope

1. Development proposals in the Scarp Slope that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.

2. The focus of development in this area will be in Lewes, reflecting the scale, accessibility and strategic importance of this market town as a service and employment centre.

3. Small-scale growth, which is sensitively planned to reflect the Scarp Slope setting and important views will be delivered in settlements identified in Policy SD22 (Development Strategy).

4. Any growth on the Scarp Slope should, as appropriate, deliver multiple benefits through ecosystem services. These may include regulating services such as water management and cultural services such as the arts.

5. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environment Characterisation Study, in compliance with Policy SD5 (landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.

The Western Weald Today

4.88 The Western Weald is made up of wooded hills, deep valleys and open heaths linked by sandy sunken lanes. It includes Black Down, which is the highest point in the National Park.

4.89 This area is made up of a diverse range of types of landscapes (SQ1), including the following SDILCA areas – Major River Floodplains (rivers Arun (Upper Arun) and Rother), Scarp Footslopes, Greensand Terrace, Mixed Farmland and Woodland Vale, Wealden Farmland and Heath Mosaic, Sandy Arable Farmland, Greensand Hills, Low Weald and Major Scarp. It has some of the most tranquil (SQ2) areas and darkest night skies in the National Park, such as Ambersham Common. However, it also contains some areas of relatively low tranquillity, for example, along the northern boundary and around the towns of Petersfield, Midhurst and Petworth.

4.90 The area has a rich variety of wildlife (SQ3). This includes the river Rother (and its catchment), which is unusual in that it flows through chalk and greensand, large areas of ancient semi-natural woodland and a chain of lowland heathland sites. Nationally important woodland sites include Ebernoe Common NNR/SAC and The Mens SAC. Heathlands are of considerable international biodiversity importance and home to a large number of rare plants, insects, birds, amphibians and reptiles. Designated sites and priority sites include Woolmer Forest SAC and the Wealden Heaths (Phase II) SPA.

4.91 On thin sandy soils, in the majority of the area, farming and new enterprise (SQ4) has always been very poor agricultural land; hence the large amount of heathland and woodland. However, there are areas of grade 3 and grade 2 agricultural; the most fertile soils being found in the north and alongside the river Rother, where intensive vegetable production occurs. Ancient, species-rich and ecologically important coppice woodlands, traditionally intensively managed for fuel and timber, are a feature, and the area is home to a number of wineries.
4.92 There are particular opportunities for access (SQ5) to activities based on the special qualities of the National Park. These include large areas of open access land, accessible woodland, and cultural heritage. Examples include Alice Holt Forest, Black Down, Iping Common, Woolbeding Common, Pulborough Brooks and the Serpent Trail.

4.93 There is a rich cultural heritage and historical features (SQ6) in the area, including Cowdray Park and Petworth Park, and the historic market towns of Petersfield, Midhurst and Petworth. There are a number of large ponds, representing hammerponds associated with the Wealden iron industry or later mill ponds, and the most significant Bronze Age barrow cemetery in the National Park is on Petersfield Heath.

4.94 In terms of its distinctive towns and villages (SQ7), Petersfield lies in the valley of the Rother, with a historic core and medieval market square. It is well connected, situated on the A3 and a mainline railway line between London and Portsmouth. Midhurst and Petworth are smaller market towns located in the heart of the National Park. The historic town of Midhurst is located on a key junction of the A272 and A286 and on the river Rother, it is located close to Cowdray House and Park and the home to the ruin of the Tudor Cowdray House. Petworth, with its historic market square, is home to the 17th century Petworth House situated on the edge of town, with high walls surrounding the house and Capability Brown designed gardens. The surrounding rural area is characterised by a dispersed settlement pattern of villages, hamlets and scattered farmsteads.

**Contributing to the Vision on the Western Weald – Challenges and Opportunities**

4.95 There are opportunities to improve facilities in the three market towns.

4.96 Heathlands are very vulnerable to rapid loss and degradation, for example, through neglect, and require careful management.

**Core Policy SD4/WW: The Western Weald**

1. Development proposals in the Western Weald that comply with this Policy and the Development Strategy (SD22), will be supported provided that they comply with other relevant policies in this Local Plan.

2. The focus of development in this area will be in the market town of Petersfield, reflecting the scale, accessibility and strategic importance of this settlement as a service and employment centre.

3. Moderate scale growth will be supported in the two smaller market towns of Midhurst and Petworth and the large village of Liss, which provides sustainable development consistent with the scale and function of these settlements and further enables each town to meet its own needs and those of the surrounding areas.

4. Small-scale growth, which is sensitively planned to reflect the Scarp Slope setting and important views will be delivered in settlements identified in Policy SD22 (Development Strategy).

5. Any growth in the Western Weald should, as appropriate, deliver multiple benefits through ecosystem services. These may include supporting services such as biodiversity and provisioning services such as timber.

6. Development will be guided by the South Downs Integrated Landscape Character Assessment and Built Environment Characterisation Study, in compliance with Policy SD5 (Landscape Character) and Policy SD6 (Design), by taking into account the management and development considerations for the landscape types in this area.
Evidence

- Ecosystem Services Mapping
- Employment Land Review
- Habitat Connectivity Study
- Settlement Service Availability Assessment (formerly the Settlement Hierarchy Study)
- Strategic Housing Land Availability Assessment (SHLAA)
- South Downs Tranquillity Study
- South Downs Viewshed Characterisation Study
5. A THRIVING LIVING LANDSCAPE – STRATEGIC POLICIES

5.1 The strategic policies set out in the following three chapters of this Preferred Options Local Plan (the Local Plan) are considered fundamental to achieving the vision for the South Downs National Park (the National Park) and are linked to its special qualities. The theme of A Thriving Living Landscape is taken from the Partnership Management Plan (PMP) and is primarily based on purpose one for national parks, namely, to conserve and enhance their natural beauty, wildlife and cultural heritage.

LANDSCAPE

**Partnership Management Plan Outcomes and Policies**

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

**Policy 3:** Protect and enhance tranquillity and dark night skies.

**Policy 7:** Actively promote more joined up and sustainable management of the coast, including the defined area of the Sussex Heritage Coast through integrated coastal zone management (ICZM).

**Introduction**

5.2 Any development in the National Park has the potential to cause harm to the landscape both individually and cumulatively. These policies will seek to ensure that development avoids having a detrimental impact on the landscape and its special qualities, and wherever possible enhances the landscape.

5.3 Landscape is defined in the European Landscape Convention (ELC) 2004 as:

> “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”

5.4 The ELC refers to the following area types which are all considered to be included within the definition of landscape:

- natural, rural, urban and urban fringe areas;
- land, inland water and marine areas; and
- landscapes that might be considered outstanding as well as everyday or degraded landscapes.

5.5 The settlement pattern in the National Park is deeply connected to the landscape helping to make places locally or regionally distinct. High-quality, well-designed sustainable development is that which respects its context and is shaped by the built and natural landscape and local distinctiveness. Figure 5.1 explains how the landscape is formed.
5.6 Historically, settlements have evolved in response to the natural forms of the landscape; its geology and hydrology. The traditional vernacular reflects local building styles and materials of the area. Maintaining the relationship between settlements and their landscape context is a vital aspect of local character which development should seek to address. Development outside settlements, where it is in accordance with Policy SD22 (Development Strategy), should also respond to the landscape context.

National Policy Context

5.7 The *National Parks Vision and Circular* (2010) recognises that cultural heritage and landscape are fundamental to quality of place and, as they are central to attractiveness, distinctiveness, diversity and quality of place in national parks, should be conserved and enhanced. As the local planning authority for national parks, National Park Authorities (NPAs) are expected to follow and promote with partners and stakeholders the principles of the ELC in all decisions and discussions concerning planning, management, and protection.

5.8 The ELC came into force in the UK in 2007. It is a key policy document in relation to landscape which aims to promote landscape planning, management and protection across Europe. This applies to all landscapes in the UK and aims to ensure that all landscapes are properly valued and looked after. Specific measures promoted by the ELC that are relevant to the Local Plan include:

- recognition of the importance of landscape in law;
- proper assessment and planning for landscape change with the active involvement of local communities;
- the implementation of landscape policies through the establishment of plans and programmes that deliver effective protection, management and planning of landscape;
- improved consideration and integration of landscape within both spatial and sectoral planning; and
- monitoring what is happening in terms of landscape.
5.9 The National Planning Policy Framework (NPPF) (2012) provides the highest status of protection for national parks. Paragraph 115 states that: “great weight should be given to conserving landscape and scenic beauty in National Parks…which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”

5.10 A core planning principle as set out in the NPPF is that planning should recognise the intrinsic character and beauty of the countryside and the need to recognise the character of different areas. Paragraph 109 outlines that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.

5.11 In addition, there are several parts of the NPPF and associated National Planning Policy Guidance (NPPG) which identify the required approach to protecting landscape and its qualities. Protection of the landscape is covered by several different paragraphs, they include:

- Paragraph 114 – requires local planning authorities to maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.
- Paragraph 123 – states that planning policy should identify and protect areas of tranquillity.
- Paragraph 156 – describes how local planning authorities should set out the strategic priorities such as the conservation and enhancement of the natural and historic environment, including landscape.
- Paragraph 170 – refers to the use of landscape character assessment, historic landscape character and landscape sensitivity assessments.
- Paragraph 125 – states that planning policy and decisions should limit impact on intrinsically dark landscapes and nature conservation.

**Options Considered and Preferred Approach**

5.12 The question asked in regard to landscape in the Local Plan Options Consultation Document (February 2014) was how can the Local Plan best help conserve and enhance landscape character? It is proposed that the Local Plan includes a strategic policy on landscape character as set out in draft policy SD5. In addition, the specific issues associated with safeguarding views and protecting tranquillity in the National Park, including dark night skies are dealt with in policies SD7, SD8 and SD9.

**Landscape Character**

5.13 The rich and complex landscape character of the National Park is divided into 18 general landscape types and 49 more place-specific ‘character areas,’ which are defined in the South Downs Integrated Landscape Character Assessment (SDILCA). Landscape character assessments (LCAs) categorise landscapes into a pattern of distinct, recognisable and consistent elements which distinguish one landscape from another. An LCA identifies the features that create local distinctiveness and give landscapes a 'sense of place'. An LCA is an aid to decision making – a tool to help understand what the landscape is like today, and how it may change in the future. Its role is to help ensure:

- that change and development does not undermine the characteristics or value of a landscape; and
- ways of improving the character of a place can be considered.
FIGURE 5.2: LANDSCAPE CHARACTER TYPES
5.14 Policy SD5 sets out how development proposals will be expected to conserve and enhance landscape character in the National Park by ensuring they are informed by a comprehensive understanding of landscape character through the use of SDILCA (2011) and local landscape character assessments.

**Supporting Text**

5.15 In order to demonstrate how landscape character will be conserved and enhanced, proposals should reflect the context and type of landscape in which development is located. The ability of proposals to meet the requirements to enhance landscape character in Policy SD5 will be considered in proportion to the size, scale and likely impacts of the proposals.

5.16 It is important that proposals are based on a meaningful understanding of the context and character of an area and those positive characteristics which define local distinctiveness. The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Poor or inappropriate design solutions, as well as badly scaled or located development, can increase the sense of urbanisation in the countryside and reduce the quality of townscape character and impact on the valued characteristics of the landscape, such as the erosion of tranquillity or the impact on dark night skies by increased light pollution. Therefore, this policy is closely linked to Policy SD6 (Design) and they need to be read together.

5.17 Proposals should be informed by the SDILCA (2011), the Built Environment Characterisation Study (in progress), community-led/local landscape character assessments and appropriate site-based investigations. A Landscape and Visual Impact Assessment may be required. Local landscape character assessments may include community, parish or Village Design Statements and other community planning documents.

5.18 The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many features in the landscape of cultural significance and these contribute to local distinctiveness reflecting the time depth which is present in the landscape. Time-depth is defined as the long-term interaction between human activity and natural processes. It recognises that the long sequence of events and actions that have produced the present environment, and which is visible within the landscape, is the result of human activity as well as natural processes. Natural and historic features such as trees, woodlands, hedgerows, historical water systems, and historic industrial and mineral workings, should be conserved and enhanced through design.

5.19 The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting and, in doing so, conserve and enhance local landscape character. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.
5.20 There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the Historic England Register of Historic Parks and Gardens. For example, Petworth Park, designed by Capability Brown (Grade I, Historic England Register of Historic Parks and Gardens). In addition, there are many other sites which are identified as being designed landscapes, but not included on the Historic England list. These are identified in the Historic Landscape Character Assessments for the National Park and are important cultural heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts6, independent charities engaged in caring for gardens and designed landscapes.

5.21 Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed landscape and ensures that development will enhance the designed character of the landscape.

5.22 The gaps between settlements protect the individual character and identity of towns and villages. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Public rights of way can often provide access to these areas and connections to the open landscape of the National Park beyond. They provide key opportunities for green infrastructure in addition to shaping and maintaining the settlement pattern.

5.23 It may sometimes be the case that the activities outside the boundary may have an impact within it, in such cases the relevant authorities will be required to take account of the National Park’s purposes and duty.

**Strategic Policy SD5: Landscape Character**

1. Development proposals which conserve and enhance the landscape character of the South Downs National Park and comply with other relevant policies, in particular, Policy SD6 (Design) will be permitted. It should be clearly demonstrated that development proposals are informed by:
   - the South Downs Integrated Landscape Character Assessment (SDILCA) (2011);
   - community-led/local landscape character assessments; and
   - appropriate site based investigations.

2. And are, as appropriate, in accordance with the following requirements:
   a) The design, layout and scale of proposals should conserve and enhance existing landscape character features including topography, vegetation, natural drainage, existing trees and hedgerows and safeguard the experiential and amenity qualities of the landscape. The creation of green corridors which extend into settlements will be supported.
   b) The use of planting, having regard to the need for appropriate design and layout, which limits the need for screening planting, in accordance with Policy SD6 (Design). Any appropriate planting should be consistent with local character, enhance biodiversity and be in accordance with Policy SD14 (Green Infrastructure). New planting should be native species unless there are appropriate and justified reasons to select non-native species.
   c) Natural and historic features which contribute to the distinctive character and pattern of the landscape and its evolution are conserved and enhanced, including reference to the South Downs and Pan Sussex Historic Landscape Character Assessments and other appropriate research material.

---

6 More information on County Garden Trusts is available on the Association of Garden Trusts website at [www.gardentrusts.org.uk](http://www.gardentrusts.org.uk)
d) Where proposals are within designed landscapes (including historic parkscapes and those on the Historic England Register of Historic Parks and Gardens) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.

e) The open and undeveloped nature of existing gaps between settlements will be conserved and, where appropriate, enhanced.

3. The restoration of landscapes where either natural or cultural heritage features have been lost or degraded will be sought.

4. Development proposals that would have an unacceptable adverse impact on the character of the immediate and wider landscape or the special qualities of the National Park will be refused.
Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

Outcome 4: The condition and status of cultural heritage assets and their settings is significantly enhanced and contribute positively to local distinctiveness and sense of place.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

Policy 50: Housing and other development in the National Park should be closely matched to the social and economic need of local people and should be of high design and energy efficiency standards, to support balanced communities so people can live and work in the area.

Introduction

The way settlements and individual buildings and their use of materials have developed has been influenced by the landscape and its resources. Future development, whether this is of a traditional or more modern design, will need to complement these connections. This can be achieved through a landscape-led and ecosystems services approach (Policy SD2 Ecosystems Services). Design is a crucial aspect of this for all scales and types of development and proposals need to address the advice in this supporting text and the policy criteria.

It is vital that all new development meets the highest standards of sustainable development. This goes beyond the architecture and form of a development and includes the cultural connections between people and places and the landscape, as well as the social wellbeing of communities. They must be used in order to achieve exceptional design fit for a national park.

The variety of settlement patterns, built forms and land uses within the National Park have all developed in response to the diversity of the underlying geology in the area. Traditional building materials, agriculture and industry have followed on from this response to geology. The way surface and ground water is channelled by the different geologies and soils has also historically had an effect on the settlement pattern and use of the land and should be considered when assessing the context of a site. The elements which define the landscape and built character should inform the design process from an early stage. This should consider both the local environment of a site as well as the character and functions of the wider landscape. Whether proposals are within or on the edge of settlements, or in more isolated rural locations, understanding the context of a site at the local and wider scales is key in deciding how development:

- complements positive local character including architectural appearance, scale, culture, and the context and circumstances of a site;
- fits in with how an area functions; and
- is sustainable in relation to location, construction, materials, minimising the use of resources, any environmental mitigation or enhancements, and creating sustainable communities where people want to live and work.
National Policy Context

5.27 The National Parks Vision and Circular (2010) outlines that the SDNPA should be an exemplar in achieving sustainable development. It sets out that to secure a diverse and healthy natural environment and enhance cultural heritage priority should be given to managing the landscape, heritage and quality of place. It also promotes sustainable design standards for the construction and management of development.

5.28 Achieving high-quality design is a core principle of the NPPF, as outlined in paragraph 17. Paragraph 56 also places ‘great importance’ on the design of the built environment and that it should contribute positively to making places better for people. It also states that good design is indivisible from good planning and is a key aspect of sustainable development. Paragraph 57 states that it’s important to plan positively for the achievement of high-quality and inclusive design for all development.

5.29 Paragraph 59 states that authorities should consider using design codes where they could deliver high-quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

5.30 Paragraphs 60 to 65 state that planning policies and decisions should not attempt to impose architectural styles or particular tastes or stifle innovation, originality or initiative, although it does state that it is still appropriate to promote or reinforce local distinctiveness. Great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. Permission should not, however, be refused for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility within an existing townscape, if those concerns have been mitigated by good design.

Options Considered and Preferred Approach

5.31 The two main questions asked in regard to design in the Local Plan Options Consultation Document were how can the Local Plan best ensure the use of appropriate materials? And how can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?

5.32 The preferred option in this Local Plan is to develop a strategic policy which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used by development management officers and could be cross referenced with other Local Plan policies.

Supporting text

5.33 Design excellence is critical to the delivery of our Vision. The primary purpose to conserve and enhance the landscape must be given priority above all other design considerations. Therefore, this policy is closely linked to Policy SD5 (Landscape Character) and both need to be read together. Proposals should positively:
Integrate with the character, functions of the landscape and its biodiversity

5.34 The principles of a landscape-led approach (see Policies SD2 and SD5) should be adopted in order to conserve and enhance the natural capital and natural processes within the landscape, including flora and fauna. This should be achieved by considering the layout, scale and massing and materials of buildings and access arrangements, along with suitable new landscaping. Existing landscape features such as trees with high amenity value, should be retained. New landscaping should be integral to any scheme and be used to frame good-quality buildings, and provide green infrastructure. New development needs to be of a high quality so that it can ‘stand on its own.’

Contribute to the cultural heritage, character and functions of settlements

5.35 Settlements vary in their location, scale, pattern, character, architecture, history, culture and natural surroundings. A contextual analysis should be used to inform the design. The elements of the landscape and built character which need to be understood include landscape features, geology and the water environment, townscape, quality of the public and private realms, building traditions and materials, scale, massing and heights of surrounding buildings, views, vistas and landmarks. The surrounding mix of uses should also inform proposals. Depending on the scale of development, a comprehensive master plan outlining the principles for a site should address all of these elements and any other site-specific issues, to achieve an exemplary design.

5.36 Development should not be justified in relation to nearby development, which sets a poor or uncharacteristic design precedent. A contemporary approach may be acceptable provided it respects and responds positively to its context.

Contribute to communities

5.37 Settlements should be places where people want to live and work now and in the future, and contribute to a high quality of life. Development should be safe, inclusive, accessible and well integrated into settlements so that occupiers are not isolated from the rest of the community, whilst avoiding harmful impacts on surrounding uses and amenities. Development should also take into account the objectives of the community in neighbourhood development plans and village and town design statements which can define local character and identify important characteristics.

Minimise the use of resources

5.38 Development should maximise sustainable technologies and construction methods, including the performance of materials, and maximise energy and resource efficiency. This should be undertaken in accordance with Policy SD31 (Climate Change and Sustainable Construction). Development should be durable and adaptable to change.
5.39 Information supporting a planning application

Supporting information accompanying planning applications should be proportionate to the location and what is being proposed. The Authority will engage with applicants and agents to advise on what is required. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Further guidance will be provided in the Design Supplementary Planning Document (SPD).

Strategic Policy SD6 Design

1. Development proposals will only be permitted where they comply with other relevant policies, in particular, Policy SD5 (Landscape Character), and are of a high-quality design which, where relevant, clearly demonstrates that it has been informed by:
   a) village and town design statements where available;
   b) the Built Environment Characterisation Study;
   c) Strategic Stone Study (where available);
   d) a robust master plan or all estate plan, where relevant; and
   e) appropriate site-based investigations.

2. Development proposals, where appropriate, will:
   a) make a positive contribution to the character, functions and local distinctiveness of the built environment and landscape through their design, layout, scale and use of locally appropriate materials;
   b) demonstrate a locally appropriate design and layout which takes into account its location and context, reduces the need for screening planting, and respects the setting of settlements, including farmsteads, land at the settlement edge, green corridors and the links to the settlement.
   c) be suitable for their location and use appropriate design and layout and ensure green infrastructure is effectively provided;
   d) create high-quality public and private realms that are clearly defined;
   e) incorporate appropriate hard and soft landscaping which provides a setting for development within the immediate surroundings and a connection to the wider landscape to enhance local landscape character, green infrastructure and biodiversity;
   f) ensure buildings are durable and adaptable over time; and
   g) avoid harmful impact upon neighbouring uses and amenities.

Evidence

- Built Environment Characterisation Study (on going).
- National Character Areas – Natural England (Geology and ecosystem services).
- Strategic Stone Study (on going).
SAFEGUARDING VIEWS

Introduction

5.40 Diverse, inspirational landscapes and breathtaking views are defined as one of the special qualities of the National Park. These views range from expansive, long-distance views from the South Downs, the hangers or the greensand hills to intimate views along the river Rother, the wildness and remote views over the greensand commons and the exquisite springline villages on the greensand terrace, where extensive views along the scarp slope provide a breathtaking backdrop. Views over the sea and the coast both along and beyond the National Park boundary are important features in many views.

5.41 A Viewshed Characterisation Study, carried out for the SDNPA in 2015, provides baseline information about the major viewtypes and possible and likely ranges of visibility within, to and from the National Park. It has identified 80 views which are representative of their type – for example views from/to the scarp slope, views over the open downs and views from the greensand hills- and plotted the area that is theoretically visible from each location (the viewshed, also known as the zone of theoretical visibility) and the height at which objects would become visible within views. The viewshed for each view is based on Ordnance Survey topography information and does not take into account woodland or other above ground features.

5.42 Development has the potential to create intrusion, alter the scale of views, detract from the character and sense of place by introducing urbanising and incongruous elements.

Supporting text

5.43 Development should not harm views or landmarks and should not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

5.44 Proposals should take into account the SDNP Viewshed Characterisation Study (2015). However, reference to the study will not be a substitute for appropriate site based assessment in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd Edition.

5.45 The SDILCA, village design statements, local landscape character assessments, parish plans and neighbourhood plans may provide evidence on views and should also be referred to. This information, together with essential field and desktop study’s which are undertaken at an appropriate level to the application, should be provided at the earliest possible stage in the planning application process and would form part of a Landscape and Visual Impact Analysis (LVIA).

5.46 An LVIA should be carried out in accordance with the Guidelines for Landscape and Visual Impact Analysis (2013) and should be proportionate to the size and likely impacts of the scheme. If the applicant can demonstrate to the satisfaction of the Authority that an LVIA is not required, a simple landscape assessment may be appropriate. Applicants are advised to consult the Authority on proposed viewpoint locations to inform such studies at the earliest opportunity.

5.47 Zone of Theoretical Visibility (ZTV) analysis is the process of determining the visibility of an object in the surrounding landscape and illustrates the potential (or theoretical) visibility of an object in the landscape, based on topography. Appropriate study areas would be determined in discussion with the Authority and will be dependent on the size, height and location of proposals. The use of digital Zone of Theoretical Visibility (ZTV) data is recommended for larger applications in order to identify potential visibility and to demonstrate areas of zero visibility.
In some cases proposals may be visible in views from beyond the boundary of the National Park. In such instances consideration will be given to the impacts on these views of the National Park in determining such applications.

**Strategic Policy SD7: Safeguarding Views**

1. Development proposals that conserve and enhance views and comply with other relevant policies will be permitted where they take into account the following view types and patterns which are identified in the Viewshed Characterisation Study:
   a) landmark views to and from viewpoints and tourism and recreational destinations;
   b) views from publicly accessible areas which are within, to and from settlements which contribute to the viewer's enjoyment of the National Park;
   c) views from public rights of way, open access land and other publicly accessible areas; and
   d) views which include specific features relevant to the National Park and its special qualities, such as cultural heritage and biodiversity features.

2. Sequential views and cumulative features and impacts within views have been appropriately assessed and appropriately mitigated for, where necessary.

3. Development proposals that would have an unacceptable adverse impact on this special quality of the National Park will be refused.

**Relative Tranquillity**

Tranquillity is considered to be a state of calm, quietude and is associated with a feeling of peace; a state of mind that promotes mental wellbeing. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear around them. Tranquil and unspoilt places is one of the special qualities and one of the key characteristics that make this place so valued. The National Park provides a sense of tranquillity within a heavily populated part of the United Kingdom and it is something that visitors and residents greatly value.

**Supporting Text**

In preparing proposals, applicants are advised to take into account the evidence of relative tranquillity in the South Downs National Park Tranquillity Study (2015), which is based on the Council for the Protection of Rural England (CPRE) 2006 National Study (shown in Figure 5.3 below). The assessment of impacts on relative tranquillity is not comparable to a noise assessment and the assessment of zero noise impact for an application will not be taken necessarily as meaning that there would be a similar impact on relative tranquillity. The conservation and enhancement of positive tranquillity factors will be encouraged. This will be determined by an assessment of the impact on relative tranquillity, which is proportionate to the scale and expected impact of the development in relation to the surrounding context. The extent to which proposals will be able to, or are subsequently expected, to conserve and enhance relative tranquillity will vary depending on the context.

In order to assess impacts on relative tranquillity the South Downs Tranquillity Study (2015) should be used as a baseline from which to assess changes in the aural and visual environment which are likely to result from the proposals.
Strategic Policy SD8: Relative Tranquillity

1. Development proposals that conserve and enhance the relative tranquillity of the National Park and comply with other relevant policies will be permitted. It should be clearly demonstrated that development proposals are informed by the South Downs Tranquillity Study and should consider the following impacts on relative tranquillity:
   a) direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;
   b) indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements; and
   c) experience of users of the public right of way network and other publicly accessible locations.

2. Development proposals that are located in areas which are either vulnerable to change, or at the higher range of relative tranquillity (as identified in the South Downs Tranquillity Study) will be subject to the most rigorous scrutiny in order to ensure that relative tranquillity is conserved and enhanced.

3. Development proposals that would have an unacceptable adverse impact on relative tranquillity will be refused.
DARK NIGHT SKIES

Introduction
5.52 There has been a gradual loss of dark skies across the South East of England. The CPRE’s 2007 Night Blight report shows a gradual rise in the light pollution emanating around and within the National Park.

5.53 In order to prevent loss of dark skies for the benefit of both residents, visitors and wildlife, planning policies need to ensure that appropriate lighting is installed for the area. Policy SD9 aims to reduce the unnecessary light spill that is often a result of poor design, and to minimise the overall impact of light.

5.54 The SDNPA is to apply for International Dark Skies Reserve (IDSR) status. There are only a handful of locations in the world that have been granted this status. The SDNPA has been measuring and mapping the quality of the dark night skies to provide evidence for why the National Park has the potential to become an International Dark Sky Reserve.

Mapping of the dark skies across the entire National Park has shown that there are large areas which have skies that can be classified as intrinsically dark*. These areas will be defined within a dark sky core boundary (to be shown on the policies map), which shows the darkest area of the National Park. This is required for the application to the IDSA. It also identifies areas most at threat from light pollution, known as areas vulnerable to change.

---

* To be considered a dark sky of sufficient quality by the International Dark-Sky Association, values of 20 magnitudes per arc second must be achieved.
FIGURE 5.4: DARK NIGHT SKIES
Supporting text

5.55 Policy SD9 applies to any proposal which involves the installation of external lighting and where the design of developments may result in light spill from internal lighting. Policy SD9 will also apply to specific lighting schemes which require planning permission or listed building consent, including installing:

- a lighting scheme of such nature and scale that it would represent an engineering operation (i.e. requiring a separate structure) and typically be undertaken by specialist lighting engineers;
- lighting such as the floodlighting of sports pitches, car parking or menages; and
- a lighting scheme on a listed building that would significantly affect its character.

5.56 The Institute of Lighting Professionals Guidance sets out specific constraints for lighting within environmental zones. Within each zone, targets are applied for sky-glow, light intrusion, glare, luminaire intensity and building luminance. Any proposed lighting should meet the guidance.

TABLE 5.1: ENVIRONMENTAL ZONES

<table>
<thead>
<tr>
<th>Zone</th>
<th>Surrounding Environment</th>
<th>Lighting Environment</th>
<th>Descriptions</th>
</tr>
</thead>
<tbody>
<tr>
<td>E0</td>
<td>Protected</td>
<td>Dark</td>
<td>UNESCO Starlight Reserves, IDA Dark Sky Parks</td>
</tr>
<tr>
<td>E1</td>
<td>Natural</td>
<td>Intrinsically Dark</td>
<td>Areas with intrinsically dark landscapes (roads usually unlit)</td>
</tr>
<tr>
<td>E2</td>
<td>Rural</td>
<td>Low district brightness</td>
<td>Areas of low ambient brightness. Village or relatively dark outer suburban locations</td>
</tr>
<tr>
<td>E3</td>
<td>Suburban</td>
<td>Medium district brightness</td>
<td>Areas of medium ambient brightness. Small town centres of suburban locations.</td>
</tr>
<tr>
<td>E4</td>
<td>Urban</td>
<td>High district brightness</td>
<td>Areas of high ambient brightness. Town/city centres with high levels of night-time activity.</td>
</tr>
</tbody>
</table>

5.57 Much of the rural landscape will be an E1 ‘Intrinsically Dark’ zone, but this should be checked prior to an application. The Authority will encourage further reductions, for example by removing below or near horizontal light paths from fixtures or adopting E1 specifications in an E3 zone, wherever feasible. Often this can be achieved with little further disruption.

---

9 The Institute of Lighting Professionals Report - Guidance Notes on the Reduction of Obtrusive Light
5.58 Proposals should take due consideration of the overall visual impact that the lighting will have on the landscape. This may include ground surface reflectivity, the number of lights, the daytime intrusion and the general overall footprint of the lighting. It is also necessary to consider the visibility of the lights from the surrounding landscape particularly from viewpoints in accordance with Policy SD7 (Safeguarding Views).

5.59 Areas vulnerable to change will be those areas that lie between the larger urban settlements and the surrounding darker skies. Generally this will be where the sky quality changes from poor to the edge of an intrinsic dark sky zone typically with SQM values of 20. Dark sky cores will also be vulnerable to change from any large scale lighting changes in the immediate location.

5.60 In the darkest areas, where control is more important, the overall impact of the lighting should ideally not be visible in any direction or in any form such as glare, skyglow, spill and reflection. It also should not reduce the measured and observed quality of easily visible astronomical features such as the Milky Way and Andromeda Galaxy.

5.61 Key habitats, particularly woodlands, should not be considered as a ‘natural shield’ to lighting, because of the impact on an unlit habitat. Lighting that would spill into sensitive habitats should be shielded or removed particularly if nocturnal species are present. Direct illumination of bat roosts must be avoided.

5.62 In some circumstances it may be possible to reduce the impact of existing lighting by removal in return for new lights.

5.63 Lighting should be subject to control measures to reduce unnecessary light pollution. Examples include:

- ‘curfews’ or automatic timers;
- proximity ‘PIR’ sensors, timers or any additional shielding or coving, including angling the front surface of lights to the horizontal;
- different surface types to reduce the amount of reflectivity;
- appropriate use of glazing to reduce light transmittance; and
- screening or shielding to reduce the impact of reflectivity.

5.64 The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Consequently, it is important to control the lighting coming from these types of developments. The design of buildings should reduce the impact of light spill from internal lighting or suitable mitigation measures should be put in place.

5.65 Where a proposal involves outdoor lighting, a statement will be required to justify why the proposed lighting is required for its intended use and that shows every reasonable effort has been made to mitigate skyglow and light intrusions. This should be accompanied by a computer calculation indicating task luminance, uniformity, horizontal values of overspill beyond the property line and vertical luminance values of light intrusion on adjacent property windows.
**Strategic Policy SD9: Dark Night Skies**

1. Development proposals that conserve and enhance relative tranquillity, in relation to light pollution and dark night skies, and comply with other relevant policies will be permitted, provided it can be demonstrated that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations) for lighting within environmental zones, and have regard to the following hierarchy:
   a) The installation of lighting is avoided;
   b) If lighting is installed it is necessary for its intended purpose or use and any adverse impacts are avoided; and
   c) If it is demonstrated that (a) or (b) is not achievable, then adverse impacts are appropriately mitigated.

2. To be appropriate, lighting for development proposals should ensure that:
   a) The measured and observed sky quality in the surrounding area is not reduced;
   b) Lighting is not unnecessarily visible in nearby designated and key habitats;
   c) The visibility of lighting from the surrounding landscape is avoided; and
   d) Building design that results in increased light spill from internal lighting is avoided, unless suitable mitigation measures are implemented.

3. Development proposals that are located in or unnecessarily visible from the dark sky core boundary, as shown on the Policies Map, with SQM values exceeding 20 mag per arcsecond\(^{10}\) or in areas identified as being vulnerable to change will be subject to the most rigorous scrutiny in order to ensure that relative tranquillity is conserved and enhanced.

**Evidence**

- DEFRA Statutory Nuisance from insects and artificial light (2006)
- Ecoserve Ecosystem Services Mapping for the SDNP
- Hampshire and Sussex Historic Landscape Character Analysis
- Lighting in the Countryside: Towards Good Practice (2007)
- South Coast Seascape Analysis (when published)
- South Downs Integrated Landscape Character Assessment (SDILCA) 2011
- South Downs Tranquillity Study
- South Downs Viewshed Characterisation Study
- The Institute of Lighting Professionals Report: Guidance Notes on the Reduction of Obtrusive Light

5.66 A wide range of other evidence materials is also used by the SDNPA including local landscape character assessments, where they exist, village design statements and parish plans.

\(^{10}\) To be considered a dark sky of sufficient quality by the International Dark Sky Association, values of 20 magnitudes per arc second must be achieved.
THE OPEN COAST

**Partnership Management Plan Outcomes and Policies**

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

**Policy 6:** Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

**Policy 7:** Actively promote more joined up and sustainable management of the coast, including the defined area of the Sussex Heritage coast through integrated coastal zone management (ICZM).

**Introduction**

5.67 The National Park has 17.5km of dramatic and continuously changing, largely undeveloped open coastline incorporating the whole of the Sussex Heritage Coast, the iconic coastline between Eastbourne and Seaford where the South Downs meets the sea. This dominating white chalk cliff landscape with the world famous Seven Sisters, uninterrupted views, natural beauty and sense of tranquility extends west of the Heritage Coast to Brighton, incorporating further sections of undeveloped coastline namely the shingle beach of Tide Mills, Telscombe Cliffs and between Rottingdean and Brighton Marina.

5.68 While estuaries form part of the marine environment, this policy only applies to the open coastline and estuaries are dealt with under Policy SD16 (Rivers and Watercourses).

5.69 The social and economic links between the South Downs and the sea have always been and continue to be of considerable importance. The development of tourism made the beauty of the South Downs and the coastline a popular destination giving rise to the establishment and expansion of coastal resorts from the late 19th century through to the latter part of the 20th century. The Heritage Coast is still one of the most popular visitor destinations in the National Park with a number of tourist ‘hot spots’ including Beachy Head, with over 1 million visitors a year, Birling Gap attracting 300,000 visitors each year and Seven Sisters Country Park, attracting 500,000 visitors each year.

5.70 The coast is subject to environmental pressures, most noticeably associated with climate change and sea level rise that together are accelerating its erosion. Birling Gap, managed by the National Trust, experienced about seven metres of erosion over the winter 2013–2014, resulting in the Visitor Centre café terrace being brought within just 4m of the cliff edge (rates of coastal erosion are normally one metre per year). Footfall of the many visitors annually erodes cliff-top paths and generates traffic and car parking congestion. The sensitivity to offshore development is also an issue as the ‘natural’ seascape changes as a result of offshore activities such as the erection of offshore wind farms.

**National Policy Context**

5.71 The National Parks Vision and Circular (2010) requires NPAs to contribute to integrated coastal zone management. Special qualities of national parks that could be adversely affected by activities and development carried out in adjacent marine areas should be properly identified so that policies to promote their conservation can be included in marine plans (paragraphs 103–4). In relation to coastal access, Natural England may authorise an NPA to exercise any of its functions for determining restrictions and exclusions for coastal access land within the National Park (paragraphs 156–160).
5.72 The National Planning Policy Framework (NPPF) addresses coastal management. Local Planning Authorities are instructed to take account of the UK Marine Policy Statement and marine plans and apply integrated coastal zone management across local authority and land/sea boundaries, ensuring integration of the terrestrial and marine planning regimes (paragraph 105). The South Marine Plan is under development and public consultation on options for the plan took place in early 2015. The South Marine Plan is required to deliver objectives that underpin policy set out in the Marine Policy Statement and the objectives cross-reference to appropriate sections within the Marine Policy Statement.

5.73 Coastal Change Management Areas can be identified by planning authorities for any area(s) likely to be affected by physical changes to the coast, setting out:
- what development will be appropriate in such areas and in what circumstances;
- provision for development and infrastructure that needs to be relocated elsewhere (NPPF paragraph 106).

5.74 This information would form the Shoreline Management Plan. This document should then be used to inform planning in coastal areas (NPPF paragraph 168).

5.75 Paragraph 114 of the NPPF states that planning authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.

5.76 The Marine and Coastal Access Act 2009 provides the framework for a new system of marine planning and streamlined marine licensing regime, including the production of a Marine Policy Statement and a series of marine plans. NPAs, as public authorities, must take authorisation and enforcement decisions in accordance with the Marine Policy Statement and the appropriate marine plan, unless relevant considerations indicate otherwise. When taking other decisions that will or may affect the UK marine area they must have regard to the Marine Policy Statement and marine plans. Similarly, the Marine Management Organisation (MMO) has to take account of terrestrial evidence and policy to ensure the integration of planning across the coastal zone. The Act also makes provision for improved access to the English coastline by amending the 1949 National Parks and Access to the Countryside Act and providing for the Countryside and the Rights of Way Act 2000 to allow for the creation of a series of long-distance routes around the coast of England, together with a coastal margin. Natural England is charged with implementation of the coastal access scheme.

5.77 The UK Marine Policy Statement in paragraph 2.6.5.4 requires, for any development proposed within or relatively close to national parks, that the MMO should have regard to the specific statutory purposes of the designation.

Options Considered and Preferred Approach

5.78 No specific policies were developed for the Options Consultation in 2014 on the coast. The RSPB would welcome consideration in the Local Plan of safeguarding areas for flood storage or set back of coastal defences.
5.79 Defined in 1973, the Sussex Heritage Coast (see Figure 5.5) was the first stretch of national coastline in the country to be so designated. Similar to national parks, the coastline is designated to conserve and enhance the natural beauty, wildlife and cultural heritage of their area, to facilitate and enhance their enjoyment, understanding and appreciation by the public and to take account of the economic and social needs of the communities on these coasts by promoting sustainable development consistent with the designation (with an emphasis on agriculture, forestry and fishing). In addition, there is the objective to maintain, and improve (where necessary) the environmental health of their inshore waters and beaches.
5.80 The character of the undeveloped coast has been, and continues to be, heavily influenced by natural and human pressures. Sensitive design that relates to the relevant seascape and landscape character analysis is required for this iconic location. In particular, reference should be made to both the SDILCA and South Coast Seascape Character Analysis when assessing the impact of potential development on landscape character. A coordinated approach to development is required which takes into account the various pressures outside/adjacent to this vulnerable area including coastal port infrastructure, offshore development and recreational pressures, which have the potential to impact on the coastal area and the seascape. The Inspector for the Public Examination into the South Downs Boundary made specific reference to this in his report stating: “The SDNP may not be a coastal National Park but the limited number of locations where the sweep of downland meets the coast are all places of special importance to me.” In this respect their landscape sensitivity demands equal protection to the Heritage Coast area of the National Park.

5.81 The management of the coast requires a strategic approach due to the scale of the natural processes acting across the coastline. The Open Coast policy seeks to protect the undeveloped nature of the National Park coastline both within and outside the Sussex Heritage Coast and ensure that vulnerability to any new development is minimised. The policy therefore applies to both the ‘Undeveloped Coastal Zone’ and the Sussex Heritage Coast shown in figure 5.5 and the Policies Map. The ‘Undeveloped Coastal Zone’ outside the Heritage Coast, is a zone defined as 1km inland from the National Park coastal boundary extending east and west as far as the SDNP boundary for each section of coastline.

5.82 The NPPF states that the risk from coastal change should be reduced by avoiding inappropriate development in vulnerable areas or adding to the physical changes to the coast. Therefore, Coastal Change Management Areas (CCMAs) could be designated in places likely to be affected to manage what development will be appropriate in such areas.

5.83 Coastal change refers to a physical change to the shoreline including permanent inundation, erosion and coastal accretion. Responsibility for protection against coastal erosion and sea encroachment is vested in the district and borough councils with coastline under their powers as Coastal Protection Authorities. Where development is proposed in a location considered to be at risk of coastal change the applicant must be able to demonstrate that the development will be safe during its lifetime and the impacts of flooding, climate change and sea level rise have been taken into account.

5.84 If the decision is made to designate CCMAs along the Sussex coast within the National Park, in accordance with the principles set out in the NPPF, aside from any landscape character constraints, new residential development will not be suitable in these locations due to the high risk of coastal erosion and flooding. The Authority will work with the Coastal Protection Authorities to ensure that any proposed Coastal Change Management Areas affecting the National Park are aligned in terms of designation and management strategy with this Local Plan and policy.

---

11 Residential development should be considered for a minimum of 100 years, unless there is specific justification for considering a shorter period. For example, the time in which flood risk or coastal change is anticipated to impact on it or where development is controlled by a time limited planning condition.
5.85 Improvements to existing sea defence works are not usually subject to planning control although the SDNPA would expect to be consulted on any proposed changes. Planning permission is, however, required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area as well as coastal access, good design will be essential to ensure proposals conserve or enhance their surroundings visually and enhance coastal access, where possible.

5.86 There is one Marine Conservation Zone situated off the National Park coastline, the intertidal section of which intersects with the Local Plan area, namely Beachy Head West. The purpose of these zones is to protect the biodiversity of our marine environment. Legislation relating to these areas may need to be considered in future development.

**Strategic Policy SD10: The Open Coast**

1. Development proposals within the Sussex Heritage Coast area of the National Park and the undeveloped coastal zone of the National Park as defined on the Policies Map and that comply with other relevant policies will be permitted providing that they:
   a) are appropriate to the coastal location and conserve and enhance the character of the Heritage Coast / undeveloped National Park coastline; or
   b) involve changes of use or alterations or additions to buildings, or improvements that similarly conserve and enhance the character of Heritage Coast /undeveloped coastline; or
   c) are necessary for the operational needs of coastal defence, agriculture, forestry or fishing enterprises or countryside management; and
   d) conserve and enhance coastal access to / from the coast and along the coastline; and
   e) cause no adverse impact to the Beachy Head West Marine Conservation Zone and should ensure its conservation and, where possible, enhancement.

2. Proposals that would have an unacceptable adverse impact on the Heritage Coast area of the National Park and the undeveloped coastal zone or impede access to/from or along the coastline will be refused.

**Evidence**

- Climate Change Act 2008
- DEFRA ‘Marine Environment’ (2015)
- Seascape Assessment for the South Marine Plan Areas (MMO 1037) (2014)
- South Downs Integrated Landscape Character Assessment (2011)
- The National Adaptation Programme: Making the Country Resilient to a Changing Climate (2013)
- The SDNP Boundary Report from the Public Examination in 2006
HISTORIC ENVIRONMENT

**Partnership Management Plan Outcomes and Policies**

Outcome 4: The condition and status of cultural heritage assets and their settings (including monuments, buildings, towns and buried remains) is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.

Policy 9: The significance of the historic environment is protected from harm, new discoveries are sought and opportunities to reveal its significance are exploited.

Policy 10: Improve the management of heritage assets, particularly focusing on those that are ‘at risk’, including from crimes against heritage.

**Introduction**

5.87 The National Park has a rich and varied historic environment to be cherished ranging from archaeological sites of all periods to historic buildings and settlements.

5.88 The historic environment also includes a range of places associated with historic persons such as Jane Austen’s House, Chawton or by an association with near-contemporary artists such as Charleston farmhouse and the Bloomsbury Group. Museums and galleries also house collections associated with the National Park that help to enlighten and interpret the historic environment to residents and visitors. Both heritage sites and museums may have programmes of contemporary arts activities such as festivals, special events based on the heritage and learning and participation activities. The distribution of these facilities, the activities they provide and their future developments were reviewed in a Cultural Heritage Audit undertaken for the SDNPA in 2014.

5.89 The planning system is an important mechanism that underpins the conservation of the historic environment. The planning system refers to physical remains (archaeological remains, historic buildings, conservation areas, historic parks and gardens and battlefields) collectively as ‘heritage assets’ and recognises a distinction between ‘designated’ and ‘undesignated’ heritage assets whilst protecting both types.

5.90 It is critical that the historic environment is not regarded in negative terms as an impediment to development or a constraint. Instead, it should be regarded as a positive and irreplaceable asset, valuable not only in cultural terms, but as a frame and reference point for the creation of attractive places for current and future generations to enjoy.

**National Policy Context**

5.91 The National Parks Vision and Circular (2010) states that cultural heritage and landscape are fundamental to quality of place and should be protected and enhanced. This is also addressed in the Partnership Management Plan (PMP) in line with the Circular.

5.92 This Local Plan sets out a positive strategy for the conservation and enjoyment of the historic environment in line with paragraph 126 of the NPPF. A core principle of the NPPF is that the planning system should conserve heritage assets in a manner appropriate to their significance. Policy SD11 sets out the positive strategy of conserving and enhancing historic assets across the National Park, and policies SD38 to SD41 set out detailed development management policies in regard to the historic environment. The Authority will give great weight to the conservation of cultural heritage in line with paragraph 115 of the NPPF.

**Options Considered and the Preferred Approach**

5.93 The Local Plan Options Consultation set out questions on issues and presented ten options on the historic environment, including:

- What approach should the Local Plan adopt to heritage at risk?
• What approach should the Local Plan adopt in relation to adaptation and new historic buildings and places which have lost their original purpose?
• What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?
• How can the Local Plan best ensure the appropriate management of the climate change impact upon the historic environment?
• How can the Local Plan best protect non-designated heritage assets from loss or incremental change?
• Should the Local Plan include a policy on enabling development to address heritage at risk issues?
• What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?

5.94 “Heritage at Risk” is a national approach to assets in poor condition, championed by Historic England. The SDNPA reviewed the condition of all listed buildings and all other buildings in every conservation area (except Petersfield and Lewes) and now has a large data set of building condition and buildings that are at risk of loss or serious damage.

5.95 The re-use of historic buildings is a particularly problematic policy area. The two options put forward, proposing differing levels of flexibility towards the re-use of historic agricultural buildings, both received support, though a clear preference for greater flexibility was evident in the responses. The appropriate balance is difficult to strike as residential conversions will almost always be more attractive for owners as end values are significantly higher. Imposing a sequential test regarding uses is not compliant with national policy. However, a case against residential use may be made in specific circumstances where the importance of conserving the integrity of built fabric and the retention of open internal volumes central to the character of designated heritage assets are emphasised.

5.96 The Local Plan includes the following policies which deal with the above issues:
• Policy SD11 seeks to protect nationally designated, locally designated and undesignated historic assets. The supporting text to policy SD11 deals with proposals that require mitigation by design or by record so that the resulting information is available in the public domain.
• Policy SD38 (Energy Performance and Historic Buildings) provides guidance on matters to be considered when retrofitting an historic asset.
• Policy SD39 (Conservation Areas) reflects the importance of the setting of conservation areas and sets out a number of matters that will be considered.
• Policy SD40 (Enabling Development) deals with enabling development and states that this will only be permitted in wholly exceptional circumstances which represent the last resort to secure the conservation of designated heritage assets.
• Policy SD41 (Archaeology) deals with archaeological heritage assets.
Supporting Text

5.97 The historic environment comprises all aspects of the environment that have resulted from the interaction between people and places through time. Heritage assets make up the archaeological sites, historic buildings and architectural monuments that form that inheritance. Many of these are nationally designated, such as listed buildings and scheduled ancient monuments. Assets can also comprise larger sites, places, areas, landscapes or seascapes that make a contribution to the historic environment, significant enough to merit consideration when making planning decisions. The historic landscape of the National Park has been assessed to establish its character, in line with European and national guidance in a programme known as Historic Landscape Character Assessment (HLCA). Hampshire was a pilot project for this approach in 2000 and as the methodology has since developed considerably it is now being reviewed and a study in line with the more recent Sussex HLCA is being undertaken.

5.98 The historic settlements within the National Park have been studied to establish their development and character in the Extensive Urban Survey programme, supported by Historic England. Reports are available for Midhurst, Petworth, Ditchling, Alfriston and Lewes within the National Park and for several other towns, parts of which are in the National Park.

5.99 Assets covered by national designations are set out in the National Heritage List and make up part of the data in the local Historic Environment Records (HER). The National Park straddles three counties, each of which maintain separate HERs, and Winchester City Council and Chichester District Council maintain HERs for their areas.

5.100 The HERs contain many entries that do not necessarily relate to national designations. The SDILCA also identifies landscape features which constitute important survivals from the past. In addition, parkland and garden assets, which often survive in a partially preserved or vestigial form, are usually recorded through the work of county garden societies.

5.101 On occasion, however, the significance of a site or building may only become apparent when a development proposal is conceived. These late discoveries at a pre-application or application stage of the development process will constitute 'undesignated heritage assets'. In particular, archaeological assets encountered at this stage may sometimes possess great or even national historical significance. The lack of a previous designation will not necessarily imply a diminished importance. The significance of undesignated heritage assets must be carefully assessed and the desirability of their conservation will be weighed against wider public benefits as planning applications are considered and determined.

5.102 Locally designated heritage assets are identified by the SDNPA as being of local importance. Local lists are currently held for Eastbourne, Brighton & Hove and Arun. The SDNPA will encourage and, where possible, support community groups seeking to complete local lists for their parishes and towns. The Community Planning Toolkit currently being prepared by the SDNPA will include guidance on researching and producing local lists. Other historic buildings, unless they already happen to be located within a conservation area, will constitute undesignated heritage assets.
5.103 Development proposals can affect heritage assets in a range of different ways. They may have an obvious impact such as the demolition of all or part of an old building or the disturbance of buried archaeological remains. Physical impacts can range from minor alterations to the complete loss of the asset. Other impacts may not physically alter the asset but may affect its setting. Carefully considered changes to setting may well prove to be sympathetic and positive, but adverse impacts can create negative perceptions. This can result in long-term decline of the asset or even, in extreme cases, total loss. In determining applications likely to have a bearing on the setting of heritage assets, guidance published by Historic England will be used to assess impact.

5.104 The NPPF states that historic assets should be conserved in a manner appropriate to their significance. In order to assess significance it is essential to have a sound understanding of the original purpose, development, use and history of the historic asset. All planning applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential, must be supported by a Heritage Statement. The Heritage Statement should identify the significance of the asset and set out the impact of the development. It should contain an appropriate level of information and detail to satisfy the requirements set out in paragraphs 128–141 of the NPPF. This includes consulting the relevant Historic Environment Record (HER), as a minimum. The level of detail required to support the application should be proportionate to the significance of the heritage asset and the impact of the development. In all but the most trivial cases, assessment of potential impact on the significance of the asset will require input from conservation professionals with appropriate qualifications and experience.

5.105 The NPPF also distinguishes between potential impacts that are ‘substantial’ and those that are ‘less than substantial.’ Substantial impacts will plainly relate to those which wholly or partially destroy the significance of the heritage asset or impinge upon its setting to an extent which undermines its essential appreciation. However, it should be noted that less than substantial impacts may still prove significant, with some heritage assets being highly sensitive to change. A minor intervention, considered acceptable on one asset might be considered highly damaging on another, depending on its original or evolved purpose, design, age, rarity, state of preservation and significance. In some cases, faint traces of past change enhance understanding of the asset. Even minor interventions can sometimes imperil such palimpsests.

5.106 In cases where impact on significance is assessed to be substantial, but justified by considerations of continued use, re-use or wider public benefits, then mitigation by recording will be required as a condition of consent. Wider public benefit may also be drawn from such mitigation by deposition of the record including artefacts and ecofacts in a publicly accessible museum or record office, as well as the relevant HER. In instances where some degree of harm to heritage assets or their setting is considered justified when balanced against public benefits, these benefits must be compelling, measurable, realistic and capable of assured delivery.
Strategic Policy SD11: Historic Environment

1. Planning permission and, where necessary, listed building consent, will be granted for development proposals that comply with other relevant policies, conserve the cultural heritage of the National Park and realise opportunities to re-use redundant or under-used heritage assets with an optimal viable use which secures its long-term conservation and enhancement, including setting.

2. Development proposals which affect identified heritage assets (whether nationally designated, locally designated or non-designated) or their setting will be determined with proper regard to the National Park’s Purposes and Duty including promoting opportunities for their understanding and enjoyment.

3. Development proposals that would have an unacceptable adverse impact on a designated heritage asset or its setting will only be permitted in wholly exceptional circumstances.

4. Development proposals that would have an unacceptable adverse impact on a non-designated heritage asset will be weighed against assured and substantial public benefits related to the proposed works.

Evidence and Guidance

- Buildings at Risk in the South Downs National Park (Handley Associates, 2013)
- Cultural Heritage Audit of South Downs National Park (Business of Culture, 2014).
- Enabling Development and the Conservation of Significant Places (English Heritage, 2008)
- Heritage in Local Plans: How to Create a Sound Plan under the NPPF (English Heritage, 2012)
- Historic Environment Records (HER) for Hampshire, West Sussex and East Sussex and those for Chichester and Winchester.
- [www.hants.gov.uk/landscape/](http://www.hants.gov.uk/landscape/). The area within the National Park is currently being reviewed to the standard of the Sussex work by Wyvern Consulting – due for publication late 2015
- National Heritage at Risk Register
- National Heritage List for England
**Partnership Management Plan Outcomes and Policies**

**Outcome 2:** There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

**Outcome 3:** A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park.

**Policy 2:** Develop landscape-scale partnerships and initiatives to focus on enhancing the key ecosystem services delivered by the National Park.

**Policy 4:** Create more, bigger, better-managed and connected areas of habitat in and around the National Park, which deliver multiple benefits for people and wildlife.

**Policy 5:** Conserve and enhance populations of priority species in and around the National Park, delivering targeted action where required.

**Policy 6:** Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

**Policy 7:** Actively promote more joined-up and sustainable management of the coast, including the defined area of the Sussex Heritage Coast, through Integrated Coastal Zone Management (ICZM).

**Policy 8:** Focus the prevention, control and eradication of invasive non-native species on those that are most harmful to biodiversity.

---

**Introduction**

5.107 The biodiversity of the National Park underpins many ‘ecosystem services’ such as the provision of clean water, food, fuel, flood alleviation, pollination and pest control. It also provides many benefits to people, for example, recreational, aesthetic and health benefits. The most recent visitor survey for the National Park showed that wildlife is a key attraction for over a quarter of the visitors (26%). This equates to 11.5 million visits per year to see wildlife and habitats.

5.108 Geological processes have played a major role in shaping and defining the landscapes of the National Park. Through the existence of visible exposures on cliffs, foreshore, quarries and cuttings it is possible to see and study the geological record and impact of environmental change over millennia. The combinations of underlying geology and natural processes have produced the wide range of landforms and soil types. In turn, these have influenced the historic land use patterns, habitats, landscape character and settlement distribution. Geology also exerts a strong influence on the built vernacular through the use of local stone and building materials. The underlying geology provides many of the ecosystem services that people depend on. These include soils in which we grow our food, timber and other produce; aggregates and stone for building and other material uses that help maintain economic growth; and the filtering and storage of our water supplies.

5.109 The unique combination of geology and micro-climates in the National Park has created a diverse mosaic of habitats that supports many rare and internationally important wildlife species. In the past, conservation effort has often focused on specific species, habitats and sites. This approach has been partially successful with targeted conservation efforts turning around the fate of many species and extensive new areas of habitat being created. However, the Government’s most recent monitoring report on biodiversity (Biodiversity Indicators in Your Pocket, 2015) showed that priority species and habitats are continuing to decline in the UK. Evidence has been collated on particular pressures...
affecting biodiversity within the National Park. Wildlife habitats are often degraded and fragmented, so a landscape-scale approach is needed to conserve, restore and reconnect habitats across the National Park. By restoring an interconnected network of wildlife sites, species will be more resilient to adapt to pressures such as climate change.

5.110 In 2008, a wide consultation was held in South East England to develop a landscape-scale approach to conservation by identifying ‘Biodiversity Opportunity Areas’ (BOAs). Nearly half (46%) of the National Park is covered by BOAs. There are a large number of other biodiversity-led landscape initiatives being delivered and developed in the National Park. Examples of these are:

- The South Downs Way Ahead Nature Improvement Area (NIA) (chalk grassland)
- Arun and Rother Connections (wetland)
- Heathlands Reunited (heathland)
- West Weald Landscape Partnership (woodland and farmland)
- Local Nature Partnerships (LNPs) for Hampshire and Sussex
- The South Downs Forestry and Woodland Partnership
- The Brighton and Lewes Biosphere Reserve Partnership (chalk downland and water)
- Local Rivers Trusts; and
- Water Framework Directive projects (such as the rivers Adur and Ouse).

5.111 Farming and forestry have shaped the habitats of the area for thousands of years, and have been instrumental in creating and maintaining the area’s special qualities. For example, unimproved chalk downland – perhaps the most iconic habitat of the National Park – owes its existence to centuries of sheep farming.

5.112 Planning and development have also significantly influenced the National Park’s biodiversity and geological features. Many wildlife habitats have been lost or have declined as a direct result of development. As well as causing direct loss of wildlife habitats, development can have a wide range of other negative impacts on biodiversity, for example, housing developments built next to heathland sites can result in disturbance to ground-nesting birds and other wildlife by dogs and cats as well as increased recreational pressure from the local population. However, development can have a positive impact on biodiversity and geological features. If development is planned and delivered with these in mind, it can conserve and even enhance biodiversity and geodiversity.

5.113 Important geological features can be lost through burial or damage by coastal defence schemes, landfill and other development. Features can also be lost through scrub encroachment. The conservation of geological features and landforms is a crucial consideration for mineral extraction and quarrying. The impact on geomorphological features or processes needs to be considered when planning for coastal defences and re-engineering of river catchments. Removal of fossil or mineral specimens through irresponsible or unregulated collecting is also an issue for some designated sites.

---

The National Park has an incredibly rich and diverse array of habitats, many of which are recognised as national and European priorities for wildlife (as demonstrated by the number of statutory sites identified in Table 5.2 below). These include:

- farmland habitats (85% – this includes some woodland, arable, hedgerows and other habitats);
- unimproved chalk grassland (4%);
- lowland heath (1%);
- woodland (24% – approximately half of which is ancient woodland);
- floodplain grazing marsh (1.5%);
- rivers and streams (321km of main river);
- coastal and marine habitats (6.7km², including 17.5km of coastline); and
- urban habitats.

Some wildlife habitats are considered irreplaceable as they are very difficult or impossible to re-create. Examples include ancient woodland, maritime cliffs and slopes, and lowland raised bog.

Sheep-grazed downland is the iconic habitat of the chalk landscape. The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all our native reptile and amphibian species are found. Woodland habitats of particular value for biodiversity include ‘hanger’ woodlands (which cling to steep greensand and chalk slopes), yew forests, ancient wood pasture, wooded heaths, ‘rews and shaws’ (linear strips of ancient woodland along field edges and streams), and veteran trees. The extensive farmland habitats of the National Park are important for many species of wildlife, including nationally declining farmland birds. The river valleys intersecting the South Downs support wetland habitats and a wealth of species. The extensive chalk sea cliffs and shoreline in the east host a wide range of coastal wildlife including breeding colonies of seabirds. Urban areas also play an important role for wildlife; habitats such as gardens, parks, road verges and buildings are home to a wide range of species such as house sparrow and common pipistrelle bat. They can also act as important ‘stepping stones’ and ‘wildlife corridors’ to enable wildlife to move from one place to another. Furthermore, urban habitats such as parks and gardens give people the opportunity to come into close contact with wildlife, providing important opportunities for enjoyment and learning.

### National Policy Context

Paragraph 115 of the NPPF states that: “The conservation of wildlife and cultural heritage are important considerations in all (protected) areas, and should be given great weight in National Parks and the Broads.” Paragraph 117 states that planning policies should plan for biodiversity at a landscape-scale across local authority boundaries and identify and map components of local ecological networks. The NPPF also states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

The Lawton Review concluded that establishing a coherent and resilient ecological network would effectively conserve biodiversity and ecosystem services, delivering many benefits to people, while also making efficient use of scarce land and resources.

---

(Sir John Lawton, 2010)
The review made 24 recommendations, but summarised what needed to be done in just four words: ‘more, bigger, better and joined’ by doing the following:

- Improving the quality of current wildlife sites by better habitat management.
- Increasing the size of existing wildlife sites.
- Enhancing connections between sites, either through physical corridors or through ‘stepping stones’.
- Creating new sites.
- Reducing the pressure on wildlife by improving the wider environment.


A biodiversity strategy for England, published in 2011 (Biodiversity 2020) builds on the NEWP and sets out the strategic direction for policy in the next ten years. The overall mission for this strategy is to halt overall biodiversity loss, support healthy, well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people. The strategy sets out a number of outcomes which are delivered through action in four areas: a more integrated large-scale approach to conservation on land and at sea, putting people at the heart of biodiversity policy, reducing environmental pressures and improving our knowledge.

Since October 2006, all public authorities (under section 40 of the Natural Environment and Rural Communities Act 2006 (NERC)) have a 'duty to have regard to the conservation and biodiversity in exercising their functions'. The NPPF requires planning policy to minimise the impacts of development on biodiversity and geodiversity. It refers to the need to plan for biodiversity at a landscape-scale across local authority boundaries, identifying the local ecological network and promoting the preservation, restoration and re-creation of priority habitats, ecological networks and the recovery of priority species population, linked to national and local targets. Therefore, it is important that the Local Plan enables and ensures that development contributes positively to the conservation and enhancement of biodiversity and geodiversity.

Options Considered and Preferred Approach

The main question asked in regard to biodiversity in the Local Plan Options Consultation Document (2014) was how can the Local Plan best ensure designated and undesignated habitats and protected species are conserved and enhanced? The preferred approach is to include a strategic policy on biodiversity, which will incorporate the proposed approach set out under Issue 3 in the Local Plan Options Document. In addition, it is proposed that the Local Plan includes a policy on international sites. The main question asked in regard to geodiversity was how can the Local Plan best ensure that geodiversity is conserved and enhanced? The preferred approach is to include a strategic policy on geodiversity, which will incorporate the proposed approach set out under Issue 4 in the Local Plan Options Document.

Habitats Regulation Assessment

A Habitats Regulations Assessment (HRA) of this version of the Local Plan has been prepared and its recommendations will be taken into account in the Local Plan.
Supporting Text

5.125 The SDNPA has worked closely with partners to map and identify priority habitats, habitat connectivity, and local ecological networks in and beyond its boundaries. Areas with high connectivity and/or high potential for priority habitat restoration or creation will be given due weight in the planning process. These areas are outlined in the Habitat Connectivity and Habitat Opportunity Mapping Report (Thomson Ecology, 2015). The Biodiversity Opportunity Area maps for Hampshire and Sussex will also be considered by the SDNPA.

5.126 The National Park has a very high density of sites designated for their wildlife and geodiversity value. There are sites of international importance namely, Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites, and nationally important sites namely, National Nature Reserves (NNRs) and Sites of Special Scientific Interest (SSSIs), which are given statutory protection through international conventions and European directives. Newly created Marine Conservation Zones (MCZs), one of which partially falls within the National Park boundary, are also given statutory protection. Locally designated wildlife sites are known as Local Nature Reserves (LNRs), Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINCs) or Sites of Nature Conservation Importance (SNCIs). These form essential components of ‘ecological networks’, helping species to adapt to the impacts of climate change and other pressures. The number of different types of designated sites is set out in Table 5.2 below. It should, however, be noted that these designated areas are not all mutually exclusive and many sites are covered by multiple designations. Figure 5.6 provides a summary of designated sites within and close to the National Park.

### Table 5.2: Number of Designated Sites Within the National Park

<table>
<thead>
<tr>
<th>Designation</th>
<th>No. of sites wholly/partly within National Park</th>
<th>Area within National Park (ha)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>International Sites</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ramsar Sites</td>
<td>1</td>
<td>530.4</td>
</tr>
<tr>
<td>Special Areas of Conservation (SAC)</td>
<td>13</td>
<td>2,782.6</td>
</tr>
<tr>
<td>Special Protection Areas (SPA)</td>
<td>2</td>
<td>1,715.8</td>
</tr>
<tr>
<td><strong>National Sites</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Nature Reserves (NNR)</td>
<td>9</td>
<td>840.1</td>
</tr>
<tr>
<td>Sites of Special Scientific Interest (SSSI)</td>
<td>86</td>
<td>9,945.5</td>
</tr>
<tr>
<td>Marine Conservation Zones (MCZs)</td>
<td>1</td>
<td>179</td>
</tr>
<tr>
<td><strong>Local Sites</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Wildlife Sites (SINC/SNCI and LNRs)</td>
<td>853</td>
<td>14,279.4</td>
</tr>
<tr>
<td>Local Geological Sites (previously known as Regional Important Geological Sites)</td>
<td>50</td>
<td>1103.53</td>
</tr>
</tbody>
</table>
The Arun Valley is designated as a RAMSAR site, a wetland of global importance. This site is of outstanding importance for its wintering waterfowl, breeding waders, rare wetland invertebrates and scarce plants.

There are 13 Special Areas of Conservation (SACs) in the National Park, which are protected by UK and EU legislation. Two of the SACs in the National Park are also designated as European Special Protection Areas (SPAs) for their international importance for birds (the Wealden Heaths SPA and the Arun Valley SPA). In addition to the SPAs within the National Park, a very small area of the National Park is located within the zone of influence of the Solent Special Protection Area (SPAs) (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA) as identified in the Solent Recreation Mitigation Strategy (SRMS).

All the SACs and SPAs in the National Park are also designated as SSSIs.

There are also nine National Nature Reserves (NNRs) within the National Park, which are sites of national importance for their biodiversity value. All of these are also designated as Sites of Special Scientific Interest (SSSIs). Examples of NNRs are Castle Hill NNR near Brighton, an outstanding area of chalk downland, and Kingley Vale NNR, one of Europe’s finest yew forests.

In total, there are 86 SSSIs in the National Park (covering 6% of the area). Beachy Head West is the only Marine Conservation Zone within the National Park. Just over 7% of the total area of the MCZ falls within the National Park.

853 sites (9% of the National Park area) are locally designated wildlife sites described as either SNCIs or SINCs (this figure will change as local wildlife sites are regularly reviewed; some are de-designated and new ones are created). SNCIs and SINCs are also known as Local Wildlife Sites (LWS).

There are 50 RIGS/local sites that have been notified within the National Park. Nationally important geological sites are protected through designations as a Site of Special Scientific Interest (SSSI). In the National Park there are 10 geological SSSIs.

There are other biodiversity assets in the National Park which are not designated or legally protected, but which form an important element of the total nature conservation resource. For example, the Habitats Directive highlights the need for effective management of linear or continuous features essential for species migration, dispersal and genetic exchange. Such features, like rivers, mature trees and hedgerows, extend across designated and non-designated areas. These features, in particular, will provide the building blocks for achieving the Government’s objective to restore and connect wildlife habitats and contribute towards a net gain for biodiversity. They are also important in providing corridors or stepping stones for species and to allow species to adapt to climate change. The maintenance and enhancement of these networks will be encouraged. These undesignated biodiversity assets are important components of green infrastructure.

Lowland heathlands are confined to the western margins of north-west Europe and have suffered dramatic losses in recent decades. There are over 1,500 hectares of lowland heath remaining within the National Park, which represent an important international resource. Lowland heathland supports important populations of ground-nesting birds such as nightjar and woodlark.

Locally designated wildlife sites are valuable as a node or link in the local habitat network. These sites can provide valuable stepping stones as part of a wider green infrastructure network.
5.130 Improvements to biodiversity and geodiversity via the planning process will be undertaken in partnership with various organisations such as Natural England, the Environment Agency, local authorities, Local Nature Partnerships, and others as appropriate. The SDNPA will work in partnership with neighbouring local authorities to contribute to the delivery of biodiversity improvements within the South Downs Way Ahead Nature Improvement Area and the Brighton and Lewes Downs Biosphere Projects, along with other projects and partnerships established during the plan period.

5.131 The National Park supports a wealth of wildlife including iconic species such as burnt orchid, round-headed rampion, otter, skylark, barn owl and brown trout. It is also home to less well-known species such as the barbastelle bat and sundew (a carnivorous plant). Many of the species found in the National Park are rare and localised, for example, the greater mouse-eared bat. Rare species are often restricted to habitats which are also rare, for example, the bearded tooth fungus is a national priority species which is restricted to ancient woodland and wood-pasture.

5.132 Some species have special protection under UK Law. This is usually because of their vulnerable conservation status. All wild birds are protected along with a wide range of other plants and animals, and there is specific legislation for the protection of badgers. Legally protected species which are prominent in the National Park and which could be affected by new developments include (but are not restricted to) all native species of bat, swallow, house martin, swift, starling, barn owl, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel. The National Park is also an important refuge for a number of species that are declining in the rest of the UK and in Europe. Two-hundred-and-sixty-five species identified as being of national priority (listed under Section 41 of the NERC Act) have been recorded in the National Park within the past 5 years, along with 21 European Protected Species (EPS).

5.133 The presence of a protected species and the extent to which it may be affected by development is an important planning consideration. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made.

**Strategic Policy SD12: Biodiversity and Geodiversity**

1. Development proposals that conserve and enhance biodiversity and geodiversity and comply with other relevant policies and European and National Legislation will be permitted, provided that they are in accordance with the requirements and hierarchy of designation set out below.

2. Development proposals should give particular regard to ecological networks and areas with high potential for priority habitat restoration or creation and should:
   - a) retain, protect and enhance features of biodiversity and geological interest and ensure appropriate management of those features; and
   - b) ensure that any adverse impacts (either alone or in-combination) are avoided, or, if unavoidable, minimised through mitigation with any residual impacts being compensated for (having regard to the hierarchy of designation).

3. The following hierarchy of designation will apply:
   - (i) International Sites: Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites, or candidate/formally proposed versions of these designations.
     - If a development proposal is considered likely to have a significant effect on one or more international sites, an Appropriate Assessment (AA) will be required (the need for AA should be assessed at the Habitat Regulations Assessment (HRA) Screening stage).
Development proposals that will result in any adverse effect on the integrity of any international site which cannot be either avoided or adequately mitigated will be refused unless it can be demonstrated that there are:

a) no alternatives to the proposal;

b) imperative reasons of over-riding public interest why the proposal should nonetheless proceed; and

c) adequate compensatory provision secured.

(ii) National Sites: Sites of Special Scientific Interest (SSSI), National Nature Reserves and Marine Conservation Zone.

Development Proposals considered likely to have an adverse effect on national sites will be required to assess the impact by means of an Ecological Impact Assessment.

Development Proposals that will result in any adverse effect on the integrity of any national site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances are clearly demonstrated.

(iii) Irreplaceable Habitats (including ancient woodland and the loss of aged or veteran trees found outside ancient woodland):

Planning permission will be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

(iv) Local Sites: Sites of Nature Conservation Importance (SNCIs) / Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves, Local Geological Sites and ancient woodland not identified within (ii) above.

Development proposals considered likely to have an adverse effect upon local sites will be required to assess the impact by means of an Ecological Impact Assessment.

Development proposals will not be permitted unless they are necessary for biodiversity or geodiversity management work or can demonstrate no adverse impact to the biodiversity or geodiversity interest.

(v) Outside of designated sites (including habitats listed in the Biodiversity 2020 priority species and habitats list):

Development proposals will, where appropriate, be required to contribute to the protection, management and enhancement of biodiversity and geodiversity.

4. Development proposals should retain, protect and enhance the species interest of the site (including commuting routes through the site where appropriate, and taking due account of any use by migratory species) and ensure appropriate management.

5. Development proposals will be encouraged to make a positive contribution to biodiversity, through the restoration/enhancement of existing habitats, the creation of wildlife habitats, where appropriate, and the creation of linkages between sites to create local and regional ecological networks. The Authority will encourage the enhancement of significant features of nature conservation value on development sites.

6. Development proposals should seek to eradicate (if feasible) or control any invasive non-native species present on site, especially those which are significantly damaging to biodiversity and/or geological features.

7. Development proposals that have an adverse impact on biodiversity or geodiversity, which cannot be adequately avoided, mitigated or compensated for, or which harm the special qualities will be refused.
International Sites

5.134 International sites support populations of species that are particularly vulnerable to disturbance. Under the Habitats Regulations, the Authority is required to demonstrate that proposals for new development avoid or adequately mitigate against impacts on these sites. In addition to the criteria set out in Policy SD12 (Biodiversity and Geodiversity), Policy SD13 (International Sites) includes specific requirements relating to the Mens SAC, Ebernoe Common SAC and Duncton to Bignor Escarpment SAC, the Wealden Heaths Phase II SPA, the Arun Valley SPA and the Solent SPAs Zone of Influence.

5.135 The Mens SAC is located a few miles east of Petworth. It is an area of broad-leaved deciduous woodland, including an extensive area of mature beech woodland, and provides an important habitat for barbastelle bats. Ebernoe Common SAC is located a few miles north of Petworth. The site is an area of broad-leaved deciduous woodland, including an extensive area of beech woodland and former wood-pasture. These woods are important for a number of bat species, in particular, barbastelle and Bechstein bats. Duncton to Bignor Escarpment SAC is an area of mature beech woodland, chalk grassland and scrub, located on the steep scarp face of the South Downs.

5.136 There are two SPAs within or partly within the National Park: Arun Valley SPA and Wealden Heaths SPA Phase II. The Arun Valley SPA consists of low-lying grazing marshes and ungrazed fields, which have developed into fen, scrub or woodland, and supports important numbers of wintering birds, which feed in the wetter, low-lying fields and along ditches. The site qualifies under the Birds Directive as an SPA by supporting populations of overwintering Bewick’s swan and regularly supporting at least 20,000 waterfowl. Phase II of the Wealden Heaths SPA is a network of heathland sites located in Surrey, Hampshire and West Sussex. These sites are designated because they provide a habitat for the internationally important bird species of woodlark, nightjar and Dartford warbler.
FIGURE 5.7: INTERNATIONAL SITES IN AND AROUND THE NATIONAL PARK
There are also a number of SPAs in areas surrounding the National Park (Figure 5.7). This includes three SPAs to the south of the National Park boundary on the Solent – Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA. They were designated principally for the protection of internationally significant numbers of over-wintering waterfowl. The Solent supports over 90,000 waders and over 10 per cent of the global population of Brent Geese. Many of these birds travel thousands of miles to over-winter there.

5.137 The substantial amount of house building planned around the Solent is likely to impact on the SPAs. One of these impacts is increased recreational activity at the coast leading to increased disturbance to waders and wildfowl. Such disturbance reduces the birds’ opportunities to feed which can mean they have insufficient energy to survive the winter or to complete their migratory journey to their summer-time habitats. If that occurred, there would be a reduction in the bird population.

5.138 The research into those potential impacts concluded that mitigation measures are required for housing developments several kilometres inland from the SPAs. An interim mitigation strategy has been prepared by the local authorities in collaboration with Natural England and key stakeholders. The document explains the mitigation measures, how they will be funded, and how their implementation will be monitored. The aim is to finalise a definitive mitigation strategy by the end of 2017.

**Supporting Text**

5.139 Policy SD13.1 protects bat populations for which the Mens, Ebernoe Common and Singleton and Cocking Tunnels SACs are designated. In the absence of research detailing both flight lines and distances travelled by bats commuting to and from the hibernation sites at Singleton and Cocking Tunnels SAC, and buffer distances in relation to disturbance of bat for the three SACs, these parameters will need to be determined on a case-by-case basis, informed by bat activity survey work and would need to take account of the species involved and their sensitivity to disturbance/artificial lighting and the natural screening provided by existing surrounding vegetation. Surveys would need to be devised in consultation with the SDNPA (in addition to Natural England, as required).

5.140 A very small area of the National Park is located within the zone of influence of the Solent Special Protection Areas (SPAs) as identified in the Solent Recreation Mitigation Strategy (SRMS). Through work on the SRMS, it has been concluded that any net increase in residential development will give rise to likely significant effects on the Solent SPAs (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA), either ‘alone’ or ‘in combination’ with other development proposals. All new residential development within this zone of influence will be required to mitigate the negative impact. This mitigation can be provided through financial contribution to the strategic measures set out in the emerging SRMS (or as subsequently adopted).
5.141 Consistent with the Habitat Regulations Assessment undertaken for the East Hampshire/SDNPA Joint Core Strategy, the potential cumulative impact of development within 400m of the Wealden Heaths Phase II SPA is recognised. To avoid likely significant effect upon the SPA, SDNPA will monitor all development within the 400m zone in liaison with East Hampshire District Council, Waverley District Council and Natural England.

Strategic Policy SD13: International Sites

1. Development proposals on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat (including mature vegetative linear features such as woodlands, hedgerows riverine and wetland habitats) within 7km of the Mens SAC or 5km of the Ebernoe Common SAC should have due regard to the possibility that barbastelle and Bechstein bats will be utilising the site and will be required to incorporate necessary surveys and ensure that key features (foraging habitat and commuting routes) are retained, in addition to a suitable buffer to safeguard against disturbance.

2. Development proposals on greenfield sites within 5km of the Arun Valley SPA should undertake an appraisal as to whether the land is suitable for wintering Bewick swan. If it is then surveys should be undertaken to determine whether the fields are of importance to the swan population. If so, appropriate alternative habitat would be required before development could proceed.

3. Development proposals resulting in a net increase in residential units within 400m of the boundary of the Wealden Heaths Phase II SPA will be required to undertake a project-specific Habitats Regulations Assessment (HRA). Development proposals resulting in a net increase in residential units within 5km of the boundary of the Wealden Heaths Phase II SPA will be required to submit a screening opinion to the Authority for a project-specific Habitat Regulations Assessment (HRA) which, in consultation with Natural England, will determine whether a likely significant effect on the integrity of the site will result. Likely significant effects will be assessed through the HRA and any requirement for mitigation identified.

4. Development proposals resulting in a net increase in residential units, within the Solent Coast Special Protection Area’s (SPA) (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA) zone of influence shown on the Policies Map, defined as 5.6km from the boundary of these sites, that accord with other relevant policies may be permitted where ‘in combination’ effects of recreation on the Solent Coastal Special Protection Areas are satisfactorily mitigated through the provision of an appropriate financial contribution to the delivery of strategic mitigation. In the absence of a financial contribution toward mitigation, an appropriate assessment may be required to demonstrate that any ‘in combination’ negative effects can be avoided or can be satisfactorily mitigated through a developer-provided package of measures.

The scale of the buffer will need to be determined on a case-by-case basis, informed by bat activity survey work and would take account of the species involved and their sensitivity to disturbance/artificial lighting and the natural screening provided by existing surrounding vegetation. It would need to be devised in consultation with the SDNPA (in addition to Natural England, as required).
**Evidence**

- Access Network and Accessible Natural Greenspace Study  
- Biodiversity Indicators in Your Pocket 2014 (JNCC)
- Biodiversity Offsetting Pilots Technical Paper: the metric for the biodiversity offsetting pilot in England 2012 (Defra)
- Interim Solent Recreation Mitigation Strategy (2014)
- Natural England Monitor of Engagement with the Natural Environment (MENE) Report 2015  
- South Downs Visitor & Tourism Economic Impact Study 2012

---

**GREEN INFRASTRUCTURE**

**Partnership Management Plan Outcomes and Policies**

**Outcome 2:** There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

**Outcome 3:** A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park.

**Policy 13:** Support the financial viability of farm businesses through appropriate infrastructure and diversification developments, in particular, encouraging those that will support sustainable farming.

**Outcome 5:** Outstanding visitor experiences are underpinned by a high-quality access and sustainable transport network supporting improved health and wellbeing.

**Policy 28:** Improve and maintain rights of way and access land, to provide a better connected and accessible network for a range of abilities and users, and to reduce conflict where it occurs.

**Policy 29:** Enhance the health and wellbeing of residents and visitors by encouraging, supporting and developing the use of the National Park as a place for healthy outdoor activity and relaxation.

---

**Introduction**

5.142 Green infrastructure is the network of natural and semi natural features and green spaces, rivers and lakes that intersperse and connect villages, towns and cities.
5.143 When appropriately planned, designed and managed, green infrastructure has the potential to deliver a wide range of benefits – from providing sustainable transport links to mitigating and adapting to the effects of climate change\textsuperscript{16}.

5.144 Green infrastructure can occur at a range of scales from park-wide landscape networks such as lowland heath to site-specific assets such as local allotments. These networks should be managed and designed to support biodiversity and wider quality of life, particularly in areas undergoing large-scale change. There are many types of green infrastructure assets including parks, gardens and cemeteries.

National policy context

5.145 The National Parks Vision and Circular (2010) recognises that national parks provide some of the best-quality green infrastructure, which acts as one of the life-support systems for our towns, cities and rural areas. This helps create a healthy environment for communities and businesses, improving air and water quality and the health and well-being of the population.

5.146 Paragraph 73 of the NPPF recognises the importance of high quality open space that form part of the green infrastructure network and provide opportunities for sport and recreation for the health and wellbeing of communities. The NPPF requires local planning authorities to identify and map components of the local ecological networks and provide robust and up-to-date assessment of the needs for open space, sports and recreational facilities.

Options Considered and Preferred Approach

5.147 The Local Plan Options Consultation explained that a key issue for the National Park is how the Local Plan can provide resilience for people, business and their environment. The SDNPA proposed to include a green infrastructure policy within the Local Plan, which would be supported and informed by a green infrastructure strategy. An additional option suggested in the consultation document, was to not pursue an all embracing green infrastructure strategy, but to seek individual opportunities for green infrastructure arising through development proposals.

5.148 There was very strong support in favour of a green infrastructure policy supported and informed by a green infrastructure strategy. The option to not pursue a strategy was considered inconsistent with the NPPF and would result in a disjointed network that would not be fit for purpose.

Supporting text

5.149 Strategic policy SD14 promotes the provision of new green infrastructure whilst protecting existing assets. Development management policies SD35 and SD36 deal with new and existing open space and Local Green Spaces.

5.150 The green infrastructure resources supported by Policy SD14 need to be planned and managed to deliver the widest range of linked environmental and social benefits. This includes conserving and enhancing biodiversity as well as landscape, recreation and water management. This, in turn, will make the National Park more resilient to the effects of climate change and support the rural economy.

\textsuperscript{16} Definition adapted from Landscape Institute (2013)

*Green Infrastructure: An integrated approach to Land Use.*
Strategic Policy SD14: Green Infrastructure

1. Development proposals that comply with other relevant policies will be permitted where, as appropriate, they:
   a. incorporate, reinforce and link green infrastructure; and
   b. contribute to the delivery of green infrastructure that meets the needs of communities both within and beyond its boundaries, including establishment of new and enhancement of existing green infrastructure.

2. Green infrastructure assets will be identified, enhanced and safeguarded through:
   a. not permitting development that unacceptably compromises the integrity of green infrastructure assets and that of the overall green infrastructure network; and
   b. facilitating improvements to the quality, use and provision of multi-functional green assets and green linkages, either through developer contributions or through integrating them into development design.

3. The SDNPA will support proposals that deliver a strategic cross-boundary green infrastructure resource, which underpins a network of natural and semi-natural spaces and features as set out in the emerging Green Infrastructure Framework.

Evidence:
- SDNP Access Network and Accessible Natural Greenspace Study (January 2014)
- Habitat Connectivity Mapping (May 2015)
- Open Space, Sports and Recreation Study (in progress)

WATER

Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

Outcome 2: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

Policy 6: Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

Policy 23: Improve the sustainability of water resources and wastewater management through partnership working across the water sector.

Policy 24: Support and promote river catchment management approaches that integrate sustainable land management, wildlife conservation, surface and groundwater quality and flood risk management.

Policy 25: Actively promote water efficiency measures and more sustainable patterns of domestic, industrial, farming and leisure water use, to reduce overall water use.

Policy 26: Raise awareness of the importance of chalk streams and rivers and develop a programme of restoration and rehabilitation.
**Introduction**

5.151 Water supply is an essential ecosystem service provided by the National Park and water cycling is crucial for other services. There are three strategic policies relating to water in this Local Plan, which deal with aquifers, rivers and watercourses and flood risk management.

**Aquifers**

5.152 Two aquifers supply people inside and outside of the National Park with high-quality drinking water but they are under stress. Ground water is a key part of the water cycle and needs to be protected. It provides an important source for rivers, such as sustaining flows in dry periods, and for wildlife habitats.

5.153 The quality of ground water is easily polluted directly and indirectly from many daily activities, industry and other types of development, which is difficult to remediate. It is therefore better to prevent or reduce the amount of contamination at source and consideration should be given to the requirements in Policy SD12 ‘Biodiversity and Geodiversity’ and Policy SD31 ‘Climate Change and Sustainable Construction’. The SDNPA has a strategic approach to protecting ground water and Policy SD15 complements the powers and duties of the Environment Agency by using land-based planning powers to assist in protecting ground water as a whole. The Environment Agency may be consulted during the determination of planning applications and conditions directed at preventing deterioration of water quality and quantity may be imposed on any approved development. This may also be achieved through the requirements of Policy SD42 (Sustainable Drainage). Particular attention will be paid to proposals for waste disposal, industrial and chemical processes. Advice should be sought at the earliest opportunity from the Authority on the sensitivity of a location in regard to all aquifers.

5.154 No specific issues and options were developed for the Options Consultation in 2014 on aquifers.

**Strategic Policy SD15: Aquifers**

1. Development proposals that comply with other relevant policies will be permitted provided that they safeguard ground water aquifers from contamination.
RIVERS AND WATERCOURSES

Introduction

5.155 The National Park’s special qualities are significantly influenced by the health of our rivers. They are valuable natural assets and, as well as supporting wildlife habitats, they contribute to:

- Economic prosperity
- Transport infrastructure
- Drainage infrastructure
- Reducing pollution
- Alleviating flooding
- Supplying high-quality drinking water
- Recreational and tourism related activities
- Reducing, mitigating and adapting to climate change
- Health and wellbeing
- Cultural heritage

5.156 There are seven main rivers flowing through the National Park. The Itchen and Meon are fed by the chalk aquifer producing very reliable, stable flows. The Rother, the one river catchment wholly within the National Park, is also fed by groundwater but principally from the lower greensand sandstone aquifer. The Arun, Adur, Ouse and Cuckmere all originate north of the National Park, in the weald. The catchment areas of these rivers are predominantly clay, which produces flows that are particularly susceptible to drought/low flows and flood/high flow events. Winterbourne streams like the Ems and Lavant are also an important part of the river network. They flow predominantly during the winter when ground water is at a high level. These then tend to subside during the summer months. The Cuckmere Estuary is an iconic feature and has an important environmental role. All of these watercourses across the National Park need protecting and enhancing.

5.157 Our rivers are valuable assets which are under stress and tackling those pressures which affect their water quality, ecology and flows will greatly improve them. This can bring about social and economic benefits for people and support healthy and thriving ecosystems. They do not, however, function in isolation and have complex and dynamic interactions with the landscape.

---

17 Main rivers are usually larger streams and rivers but also include smaller watercourses of strategic drainage importance. It is defined as a watercourse as shown on a main river map and whereby the Environment Agency has powers to carry out flood defence works.
FIGURE 5.8: MAP OF THE MAIN RIVERS ACROSS THE NATIONAL PARK.
5.158 Our rivers flow through and support the countryside and our villages and towns. They have had a strong influence on their location and they are attractive focal points and part of our cultural heritage. Historically estuaries provided ports and navigable trade routes through the South Downs with their significance diminishing in the early part of the 20th century following the coming of the railways. In places like Lewes the River Ouse has influenced the way the town has grown in terms of industry, layout, form, architecture and public realm. Whether it is in towns, rural or coastal locations our rivers provide important recreational and learning opportunities. There are also numerous scheduled monuments along rivers such as Stopham Bridge crossing the River Arun and the historic water meadows of the Meon and Itchen Valleys which contribute to their heritage, character and setting. The re-canalisation of parts of the Arun and Ouse can also reinforce their cultural heritage by restoring their history of being navigated by barges which transported goods such as lime, chalk and coal. A balance, however, needs to be struck between any such new works and meeting the European Union Water Framework Directive (WFD) (2000).

5.159 The ecological status of our rivers is predominantly classed as ‘moderate’ or ‘poor’. The SDNPA is seeking to conserve and enhance them through managing development and other initiatives, driven by partnership working, for example, the Local Catchment Partnerships, to deliver the objectives of the WFD. The principle objective of the WFD is to achieve ‘good’ ecological and chemical status in all waters by 2015. It also allows interim targets to be set up to 2021 with full compliance by 2027 in the event, as is the case in the National Park, that the ‘good’ status has not been met. There is clear evidence that improving the status of rivers is cost beneficial to society. For example, an Environment Agency study on the Rother found that for every £1 spent on improving water quality society could expect to receive £2.80s worth of environmental benefits.

5.160 It is predicted that climate change threatens rivers through reduced average rainfall and reduced flows of between 5–30 per cent. The future demands of development from water abstraction poses risks inside and outside of the National Park. There is also future potential pollution pressures from urban and rural surface water run off and waste water treatment works. These pressures will be key challenges in meeting the WFD. Therefore, the SDNPA expects that water efficiency measures and sustainable drainage are incorporated into new development, in accordance with Policies SD31 (Climate Change and Sustainable Construction) and SD42 (Sustainable Drainage).

5.161 The purpose of this policy is therefore to ensure that wherever and whatever scale and type of development is proposed, either individually or cumulatively, it does not cause the deterioration of the quality of our rivers and they are treated as a valuable resource. Equally, development should seek to deliver enhancements to rivers.

National Policy Context

5.162 The National Parks Vision and Circular (2010) requires national park authorities, in delivering their purposes and duty, to secure a diverse and healthy natural environment by managing landscape and heritage value; safeguard and enhance biodiversity; lead the way in adapting to, and mitigating against climate change; and to promote new access and recreational opportunities.
The National Planning Policy Framework (NPPF) outlines that Local Plans should take account of climate change over the long term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to climate change (paragraph 99).

Paragraph 100 of the NPPF outlines that Local Plans should be supported by a Strategic Flood Risk Assessment (SFRA). It advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, not increasing flood risk elsewhere. This is based on the sequential and exception tests outlined in this paragraph and in paragraphs 101 to 102, and in the accompanying technical guidance.

Paragraph 109 of the NPPF outlines that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; recognising the benefits of ecosystems services; minimising impacts on biodiversity. While paragraph 115 states that great weight should be given to conserving landscape and scenic beauty, paragraph 165 outlines that planning policies should be based on up-to-date information about the natural environment and other characteristics of an area, including river basins.

Paragraph 73 of the NPPF also promotes access to high-quality open spaces, which includes rivers, which can make an important contribution to the health and wellbeing of communities.

The WFD is the principal legislation for improving the quality of rivers, groundwaters, lakes, estuaries and coastal waters to meet 'good' status by 2015. If that is not possible, it allows interim targets to be set for 2015 and 2021, with full compliance by 2027. This requires an integrated approach to water management through the development of river basin management plans.

Options Considered and Preferred Approach

No specific issues and options were developed for the Local Plan Options Consultation (2014) on rivers.

Supporting text

There is a need to safeguard rivers, their corridors and other watercourses. River corridors can be defined as the width of the channel in which water flows, as well as a river's extensive influence on its surrounding landscape that is necessary for its natural functioning. This is characterised by many natural interactions between topography, hydrology, flooding hazards, geology, soils, climate, flora and fauna. These factors will determine whether a site is within a river corridor and any consequential requirements of this policy. Rivers and watercourses are characterised by cultural influences of historic and current land use, the location and scale of settlements, public access and other human interventions. Where appropriate their environmental and cultural attributes will be conserved and enhanced.

Changes to our rivers and watercourses to meet the demands of development over many years have affected their quality. Typical problems include poor drainage, development within the floodplain, changes to river profiles, demand for water supplies, and pollution. Erosion and increased amounts of sediment also affect their ecology and ability to function. They can also move and change in character and quality over time without human interference.
5.171 Protecting aquifers (Policy SD15) is important because ground water influences water quality in ‘baseflow fed rivers’ – i.e. those which are fed by chalk and/or lower greensand aquifers. Avoiding surface water run off and storm discharge from the waste water network are also two key areas to reduce pollution. Much of the infrastructure for waste water is a combined network for surface and foul water, which is an issue for water quality. At times when the network is overloaded both are discharged untreated into rivers. This is likely to be exacerbated by future development and pressures on the network. On site sustainable drainage (Policy SD42) can minimise this impact. Better water efficiency in new and existing development can also reduce pressures on this infrastructure and reduce the amount of overflow discharge entering rivers and watercourses. Managing waste water surface water run off rates through sustainable drainage systems can also minimise pollution and the frequency of overflow discharges and reduce run off rates from new development.

5.172 Renewable technologies can also influence the quality of our rivers. Innovative heating and cooling systems for new dwellings or other buildings can affect the chemistry and ecology of a river. These types of systems can need significant volumes of water, affect wildlife and discharge warmer water into rivers which can de-oxygenate the water. These types of processes will require separate consent from the Environment Agency. However, their impacts will also be assessed in planning proposals overall when considering their environmental and sustainability performance.

5.173 The above issues, and development in its entirety, should incorporate an ecosystems services approach (Policy SD2). The objectives of this policy are to ensure that development close to river corridors protects them and make the most of opportunities to enhance the river environment, including public access. Its location and design must positively respond to their character and appearance, setting and functions. Any enhancements and mitigation should inform the earliest stages of the design process. Enhancements can include:

- enhancing biodiversity;
- improving water quality;
- reducing flood risk;
- increasing opportunities for recreation and education; and
- complying with any adopted River Basin Management Plans.

5.174 A balanced and coordinated approach to development is needed in terms of environmental protection and enhancement, flood risk, housing supply, economic growth and other development pressures and recreation needs and demands. River restoration could also be funded through the Community Infrastructure Levy to ensure that development contributes to enhancements.

5.175 Opportunities to access and enjoy rivers are important to the National Park meeting its second purpose. They can be a specific draw for residents and visitors who are looking for quiet enjoyment of them, with sports like canoeing, fishing, walking or observing their wildlife. Where development occurs near a river, any risks associated with conserving and enhancing recreational public access will be taken into consideration, where appropriate.
**Strategic Policy SD16: Rivers and Watercourses**

1. Development proposals that affect rivers, river corridors, estuaries and other watercourses will only be permitted provided they comply with other relevant policies and conserve and enhance their:
   a) water quality and biodiversity;
   b) cultural heritage and public access for recreational opportunities as appropriate;
   c) character, appearance, and setting;
   d) ability to function within the immediate vicinity and both upstream and downstream of the site of the proposal; and
   e) incorporate measures to prevent pollution risks to rivers, river corridors, estuaries and other watercourses which harm their ecological and/or chemical status, caused by the harmful discharge of foul water, surface water, and other processes which are part of proposals.

2. Development proposals that would have an unacceptable adverse impact on rivers and watercourses will be refused.

**Evidence**

- Flood and Water Management Act (2010).
- The National Adaptation Programme (2013) ‘*Making the Country Resilient to a Changing Climate.*’

**FLOOD RISK MANAGEMENT**

5.176 Flooding is a significant issue within the National Park, particularly in areas like Petersfield, Liss and Lewes, where there is a higher concentration of development and people. A Strategic Flood Risk Assessment (SFRA) has been undertaken for the whole of the National Park. This should be used to inform a site specific Flood Risk Assessment (FRA) when required. An FRA will be needed for development (except minor development) within Flood Zones 2 or 3 (see Glossary). For sites within Flood Zone 1 and larger than 1 hectare, an FRA is likely to be required where there are known flood risks and critical drainage problems. It is important to also stress the Environment Agency’s advice that FRAs should be undertaken if the site is in an area known to have flooding problems from any particular source, or is within 20m of a watercourse irrespective of the land’s Flood Zone classification. Therefore, advice from the Authority should be sought before submitting an application.

5.177 Development in areas at risk from flooding should be avoided. Proposed development within a flood zone will be assessed using the sequential and exception tests in national policy. The sequential test aims to steer different types of new development away from areas with the highest risks of flooding, which includes considering reasonably available alternative sites where it is proposed in areas at highest risk of flooding. The exception test is used to demonstrate whether flood risk to people and property will be managed satisfactorily, while allowing necessary development to be permitted in circumstances where suitable sites in areas with a lower risk of flooding are not available. It must be demonstrated that there are wider sustainability benefits which outweigh the flood risk, it will be safe for its lifetime, and does not increase flood risk elsewhere. The NPPF and its accompanying guidance provide more detailed information.
5.178 The NPPF states that planning policies and decisions should ensure that sites are suitable for its new use based on adequate information and take account of any impacts on the natural environment. The SDNPA encourages the careful planning, design and management of land to minimise impacts from flooding.

5.179 If, having applied the sequential and exception tests, development proceeds in an area of flood risk, the risk should be managed appropriately through flood resilience or resistance measures within the development. Sustainable Urban Drainage Systems (SuDS) may also provide a degree of flood attenuation which must accord with Policy SD42 (Sustainable Drainage). These should not, however, be used to justify development in inappropriate locations. The design must be appropriate to the degree of flood risk identified. Where permission is granted, developer contributions towards providing the necessary flood defences will be sought, which adopt the principles of ecosystems services.

### Strategic Policy SD17: Flood Risk Management

1. Development proposals will be permitted that comply with other relevant policies and where:
   a) the sequential and exception tests demonstrate that the development is acceptable;
   b) the risk of flooding is not increased elsewhere and, wherever possible, is reduced;
   c) the integrity of existing coastal and river defences are not undermined; and
   d) a site specific Flood Risk Assessment, where required, demonstrates an acceptable flood risk and/or suitable flood protection mitigation measures are incorporated into the proposals, where necessary, which can be satisfactorily implemented. The site specific flood risk assessment will need to demonstrate:
      i.) safe access and egress from the site; and
      ii.) management and maintenance plans for flood protection/mitigation measures, including arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
   e) it would not negatively impact on water quality of surface water and ground water.

2. Development proposals that would have an unacceptable adverse impact on flood risk management will be refused.

---

19 SFRAs are required as follows:
 a. Development proposals over 1ha in size;
 b. Any other development proposals in flood zones 2 and 3 as defined on the SDNLP Proposals Map;
 c. Any other development proposals in flood zone 1 where evidence, in particular the Strategic Flood Risk Assessment or Surface Water Management Plans, indicates there are records of historic flooding or other sources of flooding, and/or a need for more detailed analysis.
6. PEOPLE CONNECTED WITH PLACES – STRATEGIC POLICIES

6.1 This chapter of the Preferred Options Local Plan (the Local Plan) contains strategic policies linked to the Partnership Management Plan’s (PMP) second theme namely, People Connected with Places. This is primarily based on purpose two for national parks – to promote opportunities for the understanding and enjoyment of the special qualities of national parks by the public.

TRANSACT

6.2 Effective planning policies on transport are essential for the South Downs National Park Authority (SDNPA) in fulfilling the National Park purposes and duty, and delivering sustainable development, in cooperation with the local transport authorities. In the first instance, the policies will be used to facilitate developments that make it easier for visitors, residents and workers to travel to and around the National Park by sustainable means. Secondly, transport policies can help support the SDNPA’s duty to communities, by ensuring that growth takes place in the most sustainable locations, so it best meets the needs of residents and businesses while protecting the special qualities. Thirdly, for most visitors, their experience of the special qualities is received mainly whilst travelling, whether along the rights of way network or roads and railways. Therefore, it is essential to the National Park’s second purpose that the relationship between those transport routes and the broader environment be protected and enhanced.

6.3 There are a number of transport challenges and opportunities that the SDNPA and local transport authorities can tackle, including:

- Public transport provision varies greatly across the National Park. Although there are some areas with good public transport accessibility, most of the National Park is not well served by public transport. This results in greater use of the private car and restricts the ability of residents, workers and potential visitors to choose more sustainable transport methods. Railway stations in or just outside the boundary have the potential for improved functionality as gateways to the National Park for visitors and locals alike.

**Introduction**

**Partnership Management Plan Outcomes and Policies**

**Outcome 5:** Outstanding visitor experiences are underpinned by a high-quality access and sustainable transport network, supporting improved health and wellbeing.

**Policy 35:** Promote and enhance integrated travel provision from rail stations located at gateways and within the National Park for pedestrians, cyclists and bus travel.

**Policy 36:** Improve existing public transport provision for visitors and local communities, especially by increasing the availability of Sunday and evening bus and train services.

**Policy 37:** Encourage cycling for both commuting and leisure purposes through the development and promotion of a seamless and safer network and by protecting the potential opportunities for future offroad cycling infrastructure.

**Policy 38:** Work in partnership with key partners, business and organisations to reduce car travel across the National Park.

**Policy 39:** Manage vehicle parking to improve visitor experiences and reduce the impact of traffic and parking on the local area.

**Policy 40:** Manage the highway network and its infrastructure to integrate it more effectively into the landscape and reduce the impact of traffic on communities and visitors.
• In some places the tranquillity, safety and condition of rural lanes is adversely affected by traffic movements, with the frequency, speed and size of vehicles being common issues.
• There are opportunities to improve non-motorised routes in close proximity to and across key strategic transport routes.
• Obtrusive car parking provision, roadside clutter and standardised approaches to highways design risk eroding the special qualities.
• There is an air quality management area designated in Lewes town centre and others in most of the larger towns immediately adjoining the National Park. Pollution can be reduced by identifying and delivering measures that encourage more people to choose walking, cycling and public transport to access and to travel around the National Park.

6.4 The Partnership Management Plan (PMP) states that there needs to be a significant long-term shift towards more sustainable transport if the special qualities of the National Park are to be protected, visitor enjoyment maintained and more choice provided for those without a car or the ability to drive. A number of PMP policies seek to deliver this long-term shift, which in turn is carried forward in Local Plan policies. However, it needs to be recognised that the desired modal shift will be delivered through a variety of other mechanisms and in partnership with other bodies. The SDNPA is not a transport authority or a highway authority and the Local Plan is not a local transport plan.

6.5 The SDNPA will seek to emulate best practice from other national parks in working with local transport authorities, community rail partnerships and other stakeholders to deliver innovative transport measures while protecting and enhancing the local environment. This will include, for example, the use of disused railway lines as sustainable transport routes, appropriate traffic management and design and the potential for new development to fund new routes linking into the public rights of way network.

6.6 Transport modelling was done to support the Joint Core Strategies produced by the SDNPA with Lewes District Council (2015), East Hampshire District Council (2014), Winchester City Council (2013) and Wealden District Council (2013). The NPA will continue to work proactively with the local transport authorities and the Highways Agency to ensure the necessary transport modelling is done to support the quantum of development proposed in this Local Plan.

**National Policy Context**

6.7 The National Parks Vision and Circular 2010 states that there needs to be close liaison between the national park authorities and the transport authorities in order to help promote sustainable travel choices. Where there is additional demand for travel in national parks, transport authorities are expected to have considered firstly demand management measures before new infrastructure. Where new transport capacity is considered necessary within national parks, low-carbon initiatives, such as enhancements to public transport, car club and sharing schemes, improved cycling and walking connections (particularly between train stations and other nodes) need to be considered. It also includes a strong presumption against significant road widening or new road building, and a requirement to limit traffic speeds in a landscape-sensitive way.

6.8 The National Planning Policy Framework (NPPF) states that local plans should support a pattern of development and a balance of land uses which, when reasonable to do so, facilitates the use of sustainable modes of transport and encourages people to minimise journey lengths. It requires the SDNPA to work with neighbouring authorities and transport providers to develop strategies for infrastructure provision.
Paragraph 32 of the NPPF states that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. It also contains guidance on the design of developments and on local parking standards. Paragraph 75 states that planning authorities should seek opportunities to add links to existing rights of way networks, and to protect and enhance public rights of way and access.

Issues and Options and Preferred Approach

The main issues raised in regard to transport in the Local Plan Options Consultation Document (2014) were the safeguarding of sustainable transport routes, parking standards and sustainable location of new development. The preferred option put forward in this Local Plan is that strategic Policy SD18 incorporates the proposed routes identified in Issue 53a as well as some further routes and points proposed by respondents to the consultation. The development management Policy SD44 incorporates elements on car parking proposed in the Options document and through consultation. Finally, the assessment of sustainable transport and accessibility for major developments is required by a general statement in Policy SD14. It should also be noted that the accessibility of settlements was taken into account during the formulation of reasonable alternatives for the Sustainability Appraisal.

Supporting Text

Reducing the need to travel

The SDNPA will work with local transport authorities, public transport operators and other relevant agencies to:

- encourage the use of sustainable transport methods into, out of and around the National Park;
- limit the environmental impact of traffic movements;
- improve the strategic road network in a way consistent with the purposes and duty of the National Park and the National Parks Vision and Circular;
- reduce other traffic movements in the National Park; and
- create safer roads and enhance the environment for pedestrians, cyclists and horse riders.

The SDNPA recognises that travel by private motor vehicle is an essential part of life for residents and workers in rural communities across the National Park. However, the SDNPA will work to prevent the strengthening of this dependency, and aim to reduce it where possible by reducing the need to travel, for example, by supporting community facilities and making alternative means of travel easier.

The Development Strategy (Policy SD22) provides a framework for delivering development and promotes sustainable development. This policy directs development to the most sustainable locations and all new development will be expected to be located and designed so as to minimise the need to travel.

Provision of Public Transport

In order to meet the objectives of the PMP, an improved and sustainable public transport network is essential but there are limited opportunities to contribute to this through Local Plan policies. This could include providing an increased number of sympathetically designed and located bus shelters. There is potential to improve the role of railway stations as gateways to the National Park by improving bus interchanges, cycle parking and other infrastructure at railway stations. Freight transport by railway will also be encouraged, including through allocation of land for such uses, where appropriate, since any reduction in the movement of freight via the road network would be beneficial to the environment.
6.15 Improvements to transport is the responsibility of local transport authorities. Other opportunities to carry out these improvements will be taken as they arise, including through contributions from new development and through any funding that may become available in the future.

6.16 There is also the possibility that the short sections of the former Lewes–Uckfield railway line and the former Wey and Arun Canal which lie within the National Park could be restored to their previous use. The SDNPA would support this expansion of sustainable transport and leisure routes and will continue the policy of previous Local Plans of safeguarding these routes from development that would prevent such restoration. At the same time, proposals for such restoration should provide suitable routes for non-motorised travel in parallel to the new railway or canal, wherever feasible.

**Historic Rural Roads**

6.17 The rural road network of the National Park is a heritage asset, predominantly dating back to before 1840, that is used and enjoyed by hundreds of thousands of visitors, residents and workers every year. Rural roads and, in particular, sunken lanes, were identified by many respondents to the Options Consultation as a key feature of the National Park that the Local Plan needs to protect. This is supported by the guidance document Roads in the South Downs, which identified them as one of the most important types of space from which the special qualities are experienced. Increases in traffic on sunken lanes can have a particularly severe impact on erosion to their distinctive deep sides. It also reduces their safety and attractiveness for walkers, cyclists and equestrians, given the limited opportunities to avoid passing vehicles by moving off the highway. Similar problems apply to other rural roads in many parts of the highway network. Therefore, where access routes to a development lie along historic rural roads, there may be an unacceptable traffic impact on environmental grounds, even though there may not necessarily be a severe impact on transport grounds when judged against the capacity of the road as assessed by standard means.

6.18 Development will not be permitted where it would reduce the ecological, landscape and recreational value of historic rural roads – defined as those roads outside towns shown on the second edition of the Ordnance Survey – or their safety and convenience for their users. As well as traffic considerations, this will include resisting inappropriately designed or located new access points, road widening and the introduction of urban features such as kerbs.

6.19 Even relatively small developments that generate additional traffic movements in especially sensitive locations can be harmful to the value of rural roads. To ensure that the special qualities of the historic rural road network are protected and enhanced, all development proposals outside the settlement boundaries of the towns of Lewes and Petersfield that are equivalent to or greater than one net additional dwelling or 100m² of new floorspace must be accompanied by a design and access statement detailing how negative impacts on historic rural roads will be avoided. The length and detail of the statement will be in proportion to the scale of any potential impact.

6.20 On major developments (as defined in Policy SD3), wherever they are located within the National Park, a full-scale transport assessment will be required, together with appropriate mitigation measures to prevent harm to the special qualities, secured by a travel plan.

---


21 Roads in the South Downs, Hamilton-Baillie Associates Ltd (June 2015)
6.21 This policy applies equally to agricultural and forestry operations where planning permission is required, although there may be circumstances where gains to the special qualities of the National Park from specific agricultural or forestry operations outweigh a negative impact of traffic increases arising from those operations that would otherwise be unacceptable. In such circumstances, traffic increases should be minimised as far as possible, physical harm to historic rural roads avoided and any planning permission will be temporary, where possible. Current levels of agricultural and forestry traffic are part of the rural character of the National Park and as such will not constitute a precedent for increases in non-agricultural or forestry traffic that would otherwise be unacceptable.

Town and Village Centres

6.22 The centres of the National Park’s towns and villages provide opportunities for developments to take advantage of better public transport connectivity and encourage walking and cycling, and in several of them vehicle traffic has been identified as having a major negative impact on the environment. The SDNPA will work with partners to reduce this negative impact and give priority to the safe movement of walkers and cyclists, including through planning decisions.

Strategic Roads

6.23 There are several strategic roads under the control of the Highways Authority and other dual carriageways crossing the National Park. Proposals relating to any expansion of these roads will be dealt with in accordance with Policy SD30 on strategic infrastructure provision and the DEFRA National Parks Vision and Circular. The SDNPA position on the A27 is set out in a position statement adopted in 2014 and reference should also be made to the principles contained in this in dealing with proposals for other major roads.

Strategic Policy SD18: Transport and accessibility

1. New development should be located and designed to reduce the need to travel. Development proposals that are likely to generate a significant number of vehicle movements will be required to be located near existing centres and supportive infrastructure, including main roads. Development proposals will be required to include measures, to be funded by the developer, that address the impact of the new development and set out the principles set out in the draft document Roads in the South Downs, and ensure the continued safe and efficient operation of the strategic and local road networks.

2. The following public transport improvements will be permitted provided they comply with other relevant policies:
   a) Public transport facilities, including reliable and accessible information and attractive, well-designed public transport infrastructure, including bus shelters, throughout the National Park.
   b) Existing rail services and new or enhanced connections, including the transfer of freight from road to rail; improvements to walking, cycling and bus connectivity at railway stations (in particular, connectivity and signage to walking routes into the countryside), and improvements to the quality and provision of cycle parking at railway stations.

3. The former Lewes-Uckfield railway line, where extant, and the Wey and Arun Canal are safeguarded for future restoration to railway and canal use respectively. Development proposals will not be permitted where it would adversely affect their future potential for such restoration. Proposals for their restoration to such use will be supported, provided it complies with other relevant policies and that they are accompanied wherever feasible by a suitable route for non-motorised travel running in parallel.

4. Historic rural roads, including within villages, will be protected for their intrinsic value, so that their convenience and safety are
conserved for their users, and their ecological, landscape and recreational value are conserved and enhanced wherever possible:

a) Any development proposals outside Lewes and Petersfield which comprise at least one net additional dwelling or the addition or change of use of 100m² floorspace must demonstrate through a Design and Access Statement that they do not cause harm to the convenience, safety, ecological, landscape or recreational value of historic rural roads. Any major development proposals as defined in Policy SD2 (Major Development in the South Downs National Park) must also be accompanied by a transport assessment and travel plan to be agreed with the SDNPA.

b) Any new access points to the rural road network must not detract from the character and appearance of the locality. Particular attention should be given to the need to retain banks, hedges, walls and roadside trees.

WALKING, CYCLING AND EQUESTRIAN ROUTES

The rights of way network and connectivity

6.24 The National Park has many footpaths and long-distance routes most notably, the South Downs Way National Trail, but also others such as the Hangers Way and the Serpent Trail. The Access Network and Accessible Natural Greenspace Study (2013) found that the National Park is generally well endowed with public rights of way, with a density of 0.5 km of rights of way per km² over the great majority of the area, and densities of 2.5km/km² over large parts. In terms of bridleways, the National Park is much better served than the coastal plain to its south. Open access land is dispersed with a few concentrations on areas of open common and downland.

6.25 The rights of way network is available for many types of user, including cyclists, walkers and horseriders, and the National Park is a destination for those who wish to enjoy the nationally significant landscape. Being so close to many urban areas the National Park should be easily accessible from those areas by walking, cycling or on horseback, for both residents and visitors. The SDNPA will work to increase the accessibility by public rights of way and other non-motorised routes, and also take opportunities, where possible, to increase connectivity between the rights of way network and public transport, while avoiding harm to wildlife and tranquillity.
Disused railway lines and canals

6.26 There are a number of former railway lines running through the National Park which present outstanding opportunities for new routes for non-motorised travel both for leisure and commuting. Some of these routes are already partly converted to non-motorised routes and development to extend the network is underway. The safeguarding of these routes will protect them from any development that would prevent future proposals which may come forward (in cooperation with landowners) to convert them to non-motorised routes.

Crossing major roads and railways

6.27 Major roads and railways cross and adjoin the National Park in numerous locations. This can often create breaks in the network of public rights of way and other non-motorised routes, or obliges users of that network to cross busy dual carriageways. The result is that some leisure users may be discouraged from accessing the National Park. The SDNPA will generally support all proposals for developments to reduce the isolating effect of major roads and railways, provided they are in conformity with other policies in this plan, including those on landscape and the protection of wildlife.

Connections from new development

6.28 Where new development takes place, it can provide opportunities for new connections for pedestrians, cyclists and horse riders. Wherever possible, development proposals for residential development should always link routes on site to the nearby public rights of way network. Particular care will be taken where nearby wildlife would be sensitive to increased use of public rights of way.

Protecting the amenity of public rights of way, other non-motorised routes and access land

6.29 The rights of way network, together with access land and other non-motorised routes such as converted railway lines and permissive paths, is one of the National Park’s most important assets in attracting visitors, and the Authority will protect the quality of experience enjoyed by its users. Development which harms views from or is otherwise detrimental to the amenity value and tranquillity of public rights of way and other non-motorised routes will not be permitted. This includes development that would increase vehicular traffic on the network to the detriment of its enjoyment by walkers, cyclists and horse riders.
**Strategic Policy SD19: Walking, Cycling and Equestrian Routes**

1. The SDNPA supports the development of a network of high-quality, multiuser non-motorised routes with appropriate signage throughout the National Park where consistent with the special qualities.

2. The following disused railway line routes (where they lie within the National Park) are safeguarded for future use as non-motorised transport corridors. Development proposals for such use will be permitted provided they comply with other relevant policies. Development proposals will not be permitted where it would adversely affect their future potential as routes for non-motorised travel:
   a) Bordon-Bentley disused railway line,
   b) Petersfield-Pulborough disused railway lines (via Midhurst),
   c) Chichester-Midhurst disused railway line (Centurion Way),
   d) Wickham-Alton disused railway line (Meon Valley Line),
   e) Guildford-Shoreham-by-Sea disused railway line (Downs Link),
   and
   f) New Alresford–Kingsworthy disused railway line.

3. Access points across major roads and railways for the public rights of way network and other strategic non-motorised routes will be protected, and proposals for new crossings will generally be supported.

4. Residential development should, wherever possible, incorporate attractive links, accessible to all, to the nearest point on the public right of way network and local footway networks.

5. Development proposals that would have an unacceptable adverse impact on the amenity value of public rights of way, other public non-motorised routes and access land will be refused.

---

**SUSTAINABLE TOURISM AND THE VISITOR ECONOMY**

**Partnership Management Plan Outcomes and Policies**

**Outcome 5:** Outstanding visitor experiences are underpinned by a high-quality access and sustainable transport network providing benefits such as improved health and wellbeing.

**Outcome 6:** There is widespread understanding of the special qualities of the National Park and the benefits it provides.

**Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

**Policy 32:** Encourage and support creative and cultural activities which connect with, and increase appreciation of, the National Park’s special qualities.

**Policy 41:** Maintain visitor enjoyment and influence visitor behaviour in order to reduce impacts on the special qualities and increase visitor spend in and around the National Park.

**Policy 42:** Develop a consistent and coordinated approach to the promotion and marketing of the South Downs National Park as a sustainable visitor destination.

**Policy 43:** Support the development and maintenance of appropriate recreation and tourism facilities and visitor hubs in and around the National Park, including a mix of quality accommodation, which responds to market demands and supports a sustainable visitor economy.

**Policy 44:** Encourage and support tourism providers to develop sustainable business practices and increase knowledge about the National Park’s special qualities to provide a distinctive and high-quality visitor experience.
Introduction

6.30 The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. By supporting and promoting sustainable tourism and recreation, there is an opportunity to contribute to economic growth within the area and contribute to meeting the second purpose.

6.31 The National Park is a popular visitor destination with a number of visitor attractions. A significant proportion of visits are day trips from those living in or close to the National Park.

6.32 Visitor accommodation includes bed and breakfasts, guest houses, camping and touring caravans, hotels and youth hostels, and non-serviced accommodation including self-catering accommodation and other holiday lets such as ecopods, lodges and cabins.

6.33 The South Downs Visitor and Tourism Economic Impact Study (2013) summarises a series of research studies commissioned by the SDNPA. This included a study of visitor-related businesses in the National Park, visitor and resident surveys and a value and volume modelling exercise to calculate the economic impact of tourism on the National Park. Some of the key findings of this study include:

- The audit identified 386 accommodation businesses with 8,888 bedspaces. Two-thirds of businesses were in guest accommodation, but caravan and camping sites dominated bedspace capacity with 55 per cent of bedspaces.
- 40 per cent of tourism businesses indicated they had plans for growth, often because they were operating at full capacity.
- Just over three-quarters of visitors to the National Park were day visitors from home and 17 per cent were people visiting for the day while staying on holiday in another location. Only 5 per cent of visitors were staying overnight. However, staying visitors spent 4 times as much per day as day visitors.
- 46 million visitor days were spent in 2011/12, generating over £464m of expenditure and supporting 8,194 jobs.

6.34 The South Downs Visitor Accommodation Review (2014) provides more detailed evidence on the visitor accommodation sector. Some of the key findings of this study include:

- a sector that is performing very strongly at weekends and during the week in the peak summer months, with frequent shortages of all types of accommodation at these times;
- strong demand for high-quality accommodation, which generally trades at the highest levels of occupancy and price;
- clear prospects for future growth in the demand for all types of visitor accommodation;
- some gaps in current accommodation provision, including, most notably, hotel accommodation in Petersfield (the largest town in the Western Weald with fast road and rail links to London) and gaps in accommodation supply along the South Downs Way;
- strong interest from national, regional and local visitor accommodation developers, operators and investors, as well as from land and property owners interested in visitor accommodation development;
- a largely leisure driven and seasonal market for visitor accommodation, suggesting a need for incremental supply growth in order to avoid overly diluting winter trade; and
- good potential to expand on many of the current and emerging rural visitor accommodation development trends.
By enabling the provision of appropriate accommodation, it may be possible to increase the number of visitors who stay within the National Park, rather than travelling to and from accommodation elsewhere. However, it is important that tourism and recreation within the National Park is not seen in isolation from the surrounding areas, which play an important role as gateways and in the provision of visitor accommodation. The Visitor Accommodation Review has identified that there is a significant supply of visitor accommodation, both in immediate areas bordering the National Park, and also in the surrounding cities, towns and resorts. The SDNPA will work with local authorities to enable opportunities to support the visitor economy in and around the National Park (for example, through the Duty to Cooperate).

The SDNPA’s Sustainable Tourism Strategy establishes core objectives for tourism, and explains the delivery tools that are needed to shape tourism with partners and the themes that will engage the visiting public. The strategy provides a single reference point on tourism. Key issues highlighted are:

- an overall reliance on day visitors who spend much less than overnight stayers – creating substantial seasonality for tourism in the South Downs;
- an almost complete dependence on use of private car;
- a reliance on a number of key tourism sites;
- visitors not being sufficiently aware that they are experiencing a national park or that they are in a special place; and
- the problem of keeping up with fast emerging trends in visitor expectations.

The solution in the Sustainable Tourism Strategy is to form distinct themes that visitors can easily recognise in order to build their knowledge and patronage. It also identifies the delivery tools that will govern our working relationships with partners. In practical terms these themes: working land, cultural land, adventure land and natural land, provide a succinct basis upon which to build future projects and ensure the National Park has something to offer everyone, both for visitors and residents alike. The strategy provides the basis for tourism to be promoted responsibly, and fully in accordance with the SDNPA duty, ideally focusing on the understanding and enjoyment of the special qualities. A Sustainable Tourism Strategy will guide the tourism activities of the SDNPA in our work with partners.

National Policy Context

The National Park Vision and Circular (2010) states that properly managed tourism can bring a range of benefits and help sustain communities, environments and ways of life but inappropriate tourism development or poorly managed visitor pressure can be damaging. It acknowledges that while the promotion of sustainable tourism is not a specific duty of national park authorities, sustainable tourism can contribute to national park purposes and is a key contributor to the local economy. Therefore, national park authorities should enable the positive contribution that sustainable tourism can make to the environment and wellbeing of communities within a national park.

The National Park Vision and Circular also recognises that not all forms of outdoor recreation are appropriate in each National Park and that activities which would have an adverse impact on the National Parks’ special qualities and other people’s enjoyment of them may need to be excluded in order to meet the requirements of the National Parks and Access to the Countryside Act 1949.
6.40 The NPPF identifies tourism development (including hotels) as a main town centre use (paragraph 23). The NPPF focuses on a town centre first approach, with sequential testing to be applied should these uses wish to locate elsewhere and not be in accordance with an up-to-date Local Plan. This means proving that no alternative suitable sites in or closer to the town centre are available or viable. However, it also indicates that the sequential approach need not apply to applications for small-scale rural development (paragraph 25). This is particularly important in a national park where a town centre first approach may not accord with the rural nature of the area and the type of overnight accommodation required. Therefore, the NPPF is of limited relevance in this respect to a national park.

6.41 The NPPF supports tourism in the countryside as part of a prosperous rural economy (paragraph 28). Sustainable rural tourism development that can benefit rural businesses, visitors and communities and which respects the character of the countryside should be supported. This includes the provision and expansion of tourist and visitor facilities in appropriate locations.

6.42 The Planning Practice Guidance refers to the need for local planning authorities to engage with the tourist industry, considering their locational and operational needs, analysing the opportunities for tourism to support local services and the environment, and paying regard to non-planning guidance. Other guidance is available on the VisitEngland website. This addresses the following issues:

- How should tourism developers maximise the economic benefits of tourism for their areas?
- How should tourism be accommodated in urban areas?
- How should tourism be accommodated in rural areas?
- What are the key locational considerations in choosing the best site for tourism development?
- How can tourist accommodation be maintained as a tourism use?
- What about applications for permanent staff accommodation?

Options Considered and Preferred Approach

6.43 The Local Plan Options Consultation Document (February 2014) raised three issues in regard to tourism. Firstly, how should the Local Plan consider visitor accommodation? The preferred approach in this Local Plan is for a strategic policy which takes a positive, flexible and enabling approach to tourism related development which applies to the whole National Park, provided that development is in accordance with national park purposes and other relevant policies in the Local Plan, and does not harm the special qualities. The second issue raised was how should the Local Plan consider types of tourism developments and recreational activities? The preferred approach is again for a strategic policy which takes a positive, flexible and enabling approach to tourism-related development which applies to the whole National Park, provided that development is in accordance with national park purposes and other relevant policies in the Local Plan, and does not harm the special qualities. The policy acknowledges that some recreational activities in some locations may be inappropriate in the National Park. Therefore, development must not, on its own or cumulatively with other development and uses, prejudice or disadvantage peoples’ enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park. The final question raised was what approach should the Local Plan take to static holiday caravan sites? The preferred approach in this Local Plan is to have a general policy by which proposals for any

---

type of visitor accommodation be judged subject to the context of that site and other relevant policies.

**Supporting Text**

6.44 In order to promote sustainable development and in accordance with the Development Strategy (Policy SD22), proposals for visitor accommodation, visitor attractions, recreational activities, environmental education and interpretation should, where appropriate, be located in sustainable or gateway locations. Train stations both within and on the edge of the National Park act as visitor gateways and points of access to other modes of sustainable transport. However, given the nature of some tourism-related and recreational activities, a more rural location or proximity to geographically specific feature, such as the coast or a river, may be required. Where development is proposed outside settlement policy boundaries, it will need to be demonstrated that there are exceptional circumstances, in accordance with Policy SD22 and that proposals will meet the requirements set in Policy SD20 (Sustainable Tourism and the Visitor Economy). This is to ensure that the proposals are in accordance with National Park purposes and do not harm the special qualities.

6.45 While the SDNPA will support growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or ‘hot-spots’, for example, by impacting on tranquillity and causing physical erosion. Visitors travelling throughout the National Park can increase congestion on certain routes and car parking can impact on the environment, residents and the experiences of visitors. The Authority will support proposals for sustainable visitor attractions and recreational activities, which, by reducing or mitigating against any undesirable impacts, will appropriately balance the needs of visitors, provide benefits to the economy and will not adversely impact the environment.

6.46 The Authority will support proposals which are consistent with the second purpose. However, where proposals appear to conflict with the first purpose, then the Sandford Principle will be applied and greater weight will be given to the first purpose.

6.47 The Authority will seek to retain visitor accommodation. This is supported by existing evidence in the Visitor Accommodation Review (2014), which indicates a need to increase capacity and potential for growth in demand for visitor accommodation. This study also identifies that due to the availability of sites for new development, any loss of visitor accommodation can be difficult to replace. Proposals that would result in the loss of visitor accommodation will be required to demonstrate that it is financially unviable, by providing the following:

- Evidence of adequate marketing for sale for the existing use, with a reputable speciality agent, at a realistic price that reflects the value of the business either as a whole or in parts and for a period of at least 12 months. Where the accommodation is located close to a geographically specific feature such as a river or a long distance footpath such as the South Downs Way and outside of settlement policy boundaries, as defined on the Policies Map, the marketing period should be for a period of at least 24 months.
- Evidence of non-viability, including poor performance, lack of market demand and that the business has been well-managed and marketed and all reasonable efforts have been made to find a viable future for the business.

6.48 In order to support a year-round visitor economy, the Authority will seek the relaxation or removal of seasonal planning restrictions, where appropriate. Instead, conditions will be used to prevent the occupation of accommodation as a permanent dwelling and restrict continuous periods of stays by occupiers (for example, for a maximum of 28 days), ensuring the facility remains for visitor use.
Strategic Policy SD20: Sustainable Tourism and the Visitor Economy

1. Development proposals for visitor accommodation and visitor attractions will be permitted provided that they comply with other relevant policies and they are in accordance with the following requirements:

   (a) It should be clearly demonstrated and evidenced that:

      i) the facilities proposed will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;

      ii) the design and location of the development reduces the need for travel by private car and encourages access by sustainable means;

      iii) development proposals will not generate an increased level of activity which would detract from the experience of visitors or adversely affect the character, appearance and amenity of the area;

      iv) development proposals make use of existing buildings, where appropriate; and

      v) it is demonstrated that any proposed on-site facilities or ancillary buildings are necessary and that on-site facilities will not have an unacceptable adverse impact on the vitality and viability of town or village centres or assets of community value.

   b) In addition, where proposals are located in the countryside as defined on the Policies Map, it should be clearly demonstrated and evidenced that it is in accordance with Policy SD22 (Development Strategy) and:

      i) there is a need for development in that location;

      ii) the scale, intensity of use or activity is appropriate in that location;

      iii) it can be satisfactorily accessed by sustainable means, including public transport, walking, cycling or horse riding; and

      iv) it is closely associated with other attractions/established tourism uses, including the public rights of way network.

2. Visitor accommodation will be controlled and retained as such, unless it can be demonstrated that it is financially unviable or that any net loss of accommodation is necessary to allow appropriate relocation or redevelopment. Evidence of a robust marketing campaign of at least 12 months, for accommodation located within settlement boundaries, or of at least 24 months for accommodation located close to a geographically specific feature or a long distance footpath or outside of settlement boundaries, will be required that clearly demonstrates that there is no market demand for the premises.

3. Opportunities for appropriate relocation or redevelopment of existing visitor accommodation or related development which is currently resulting in harm to the special qualities will be encouraged.

4. The Authority will support a year-round visitor economy, through the relaxation or removal of seasonal planning restrictions, where appropriate, while ensuring the facility remains for visitor use.

5. Development proposals for visitor accommodation and visitor attractions that would have an unacceptable adverse impact on the National Park’s special qualities or that do not provide adequate opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities will be refused.
RECREATION

6.49 The National Parks Vision and Circular (2010) recognises that not all forms of outdoor recreation are appropriate in each national park and that activities which would have an adverse impact on the national parks’ special qualities and other people’s enjoyment of them, may need to be excluded. This recognises that in meeting the second purpose – to promote opportunities for the understanding and enjoyment of the special qualities of the national park for the public – the Sandford Principle should be applied.

Supporting Text

6.50 The Authority will normally support proposals which are consistent with the second purpose. Developments should provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities, for example, by reflecting the valued characteristics of the National Park’s natural beauty, wildlife and cultural heritage.

6.51 ‘Tranquil and unspoilt places’ is one of the special qualities. The National Park provides a valuable sense of tranquillity within a heavily populated part of the United Kingdom and it is something that visitors and residents greatly value. The quiet enjoyment of the countryside can be vulnerable to disturbance from other recreational activities. It will need to be demonstrated, in accordance with Policy SD8 (Relative Tranquillity), that proposals will not generate an increased level of activity by creating or exacerbating a ‘tourist hotspot’ which would detract from the experience of other visitors or affect the character, appearance and amenity of the area.

Strategic Policy SD21: Recreation

1. Development proposals for recreational activities, environmental education and interpretation will be permitted provided that they comply with other relevant policies and they are in compliance with the Development Strategy (SD22) and located in sustainable or gateway locations.

2. It should be clearly demonstrated and evidenced that:
   a) the facilities proposed will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;
   b) the design and location of the development reduces the need for travel by private car and encourages access by sustainable means;
   c) development proposals make use of existing buildings, where possible; and
   d) it is demonstrated that any proposed on-site facilities or ancillary buildings are necessary and that on-site facilities will not undermine the vitality and viability of town or village centres or assets of community value.

3. In addition, where proposals are located in the countryside as defined on the Policies Map, it should be clearly demonstrated and evidenced that it is in accordance with Policy SD22 (Development Strategy) and:
   a) there is a need for development in that location;
   b) the scale, intensity of use or activity is appropriate in that location;
   c) it can be satisfactorily accessed by sustainable means, including public transport, walking, cycling or horse riding; and
   d) it is closely associated with other attractions/established tourism uses, including the public rights of way network.
4. Development proposals must not, on their own or cumulatively with other development and uses, prejudice or disadvantage people’s enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park.

5. Development proposals for recreational activities, environmental education and interpretation that would have an unacceptable adverse impact on the National Park’s special qualities or that do not provide adequate opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities will be refused.

6. Development proposals that involve the loss of existing recreational facilities which serve the Purposes of the National Park, will be refused except where provision is made for an equivalent or improved replacement of the existing facilities on site or in another equally accessible and suitable location.

Evidence
• South Downs Visitor Accommodation Review (2014)
• South Downs Visitor and Tourism Economic Impact Study (2013)
7. TOWARDS A SUSTAINABLE FUTURE – STRATEGIC POLICIES

7.1 This chapter of the Preferred Options Local Plan (the Local Plan) contains strategic policies linked to the Partnership Management Plan’s (PMP) third theme namely Towards a Sustainable Future. This is primarily based on the socio economic Duty for national park authorities. This chapter begins with the development strategy for the National Park and is followed by the strategic development policies relating to housing, sustainable economic development and town and village centres.

DEVELOPMENT STRATEGY

Introduction
7.2 The development strategy provides the overall framework for guiding development across the South Downs National Park (SDNP), by taking into account its characteristics as set out in the Spatial Portrait. In doing this, Policy SD22 reflects the vision and objectives of the Local Plan and promotes sustainable development. It should be read in conjunction with the core policies relating to the five Broad Areas namely SD4/CP (Coastal Plain), SD4/DS (Dip Slope), SD4/WD (Western Downs), SD4/SS (Scarp Slope) and SD4/WW (Western Weald).

National Policy Context
7.3 The National Parks Vision and Circular (DEFRA 2010) sets out that, whilst delivering the two statutory purposes, the NPA should be an exemplar in achieving sustainable development, helping rural communities in particular to thrive.

7.4 The core planning principles of the National Planning Policy Framework (NPPF) set out that planning should contribute to conserving and enhancing the natural environment and reducing pollution and that allocation of land for development should prefer land of lesser environmental value. Reusing land that has been previously developed provided that it is not of high environmental value should be encouraged.

7.5 The NPPF also states that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable. Sustainable development in rural areas should be promoted by locating housing where it will enhance or maintain the vitality of rural communities, recognising how settlements relate to each other, the connections between settlements and associated interdependencies.

Options Considered and Reasonable Alternatives
7.6 The evolution of the development strategy for the SDNP is explained in full in chapter 4 of this document. Further detail is provided in the background document South Downs Local Plan: Progress from Issues and Options to Preferred Options. The formulation and consideration of reasonable alternative through the sustainability appraisal process is also discussed in chapter 4 of this document.
Preferred Approach

7.7 The spatial division of the National Park into five Broad Areas lies at the heart of this Local Plan. The special qualities apply to the whole protected landscape, but the way they are expressed varies in each area. Similarly, the Vision applies throughout but the specific opportunities to realise it will vary across the areas.

Supporting text

7.8 Policy SD22 identifies towns and villages across the five Broad Areas of the National Park that are able to accommodate some growth. This acknowledges that it is appropriate to accommodate growth, which is of a scale and nature appropriate to the character and function of each settlement. The identification of these settlements has been a complex process using information from a wide number of studies. The main evidence based study on facilities and services found in these settlements is the Settlement Service Availability Assessment, which forms part of the evidence base for the Local Plan.

7.9 Settlement policy boundaries are defined on the inset maps, which will form part of the Policies Map on adoption. All the settlement boundaries have been comprehensively reviewed as part of the Local Plan process apart from in neighbourhood planning areas. The methodology for the review of boundaries through the Local Plan is set out in the Settlement Boundary Methodology Paper, which forms part of the evidence base. The South Downs National Park Authority (SDNPA) will work with all the neighbourhood planning groups on reviewing their settlement policy boundary.

7.10 As set out in chapter 4, some settlements are more scattered or diffuse in their form and settlement policy boundaries are not appropriate in these cases. These settlements will be treated as open countryside for the purposes of Policy SD22.

7.11 Policy SD22 sets out a series of exceptional circumstances whereby development outside settlements may be acceptable. These exceptional circumstances are in turn linked to a number of other Local Plan policies. Robust evidence will need to be provided to support applications for such developments and the advice of the Authority should be sought at the earliest opportunity on the level of detail required. It is of paramount importance in such applications that the proposed development does not have a potential adverse effect on the special qualities particularly in regard to the landscape. The introduction of urbanising forms of development into the countryside either directly or indirectly as a result of development will be strongly resisted.

7.12 Estates and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD22 recognises the importance of estate and farm plans and offers a degree of flexibility in the consideration of development proposals. In the absence of a plan for an estate, farm or group of farms which demonstrates clear benefits to the purposes and duty and special qualities of the National Park and ecosystem services, it is not possible to assess proposals using the exceptional criteria provided by Policy SD22.

7.13 Policy SD47 is a development management policy that deals with farm diversification. This should be considered in conjunction with Policy SD22.

7.14 There are a certain number of small sites with potential for development that are located within the National Park and on the edge of settlements outside of the National Park. These are not linked to settlements identified in Policy SD23. These are allocated in chapter 9.
7.15 The reuse of previously developed land will be encouraged, where appropriate, and subject to its location, in relation to the settlements listed in Policy SD22. This will consider the availability of, and/or access to, sustainable means of transport and other transport considerations, in accordance with Policy SD18 (Transport and Accessibility). The NPPF encourages the reuse of previously developed land, provided it is not of high environmental value, and outlines that opportunities to incorporate biodiversity in and around developments should be encouraged. These sites are not devoid of biodiversity and valuable features should be retained and enhanced.

Strategic Policy SD22: Development Strategy

1. The following settlements within the five Broad Areas of the National Park will have defined settlement boundaries:

- Alfriston (Scarp Slope)
- Amberley (Scarp Slope)
- Binsted (Western Weald)
- Buriton (Scarp Slope)
- Bury (Scarp Slope)
- Chawton (Western Downs)
- Cheriton (Western Downs)
- Cocking (Scarp Slope)
- Coldwaltham (Western Weald)
- Compton (Dip Slope)
- Ditchling (Scarp Slope)
- Droxford (Dip Slope)
- Easebourne (Western Weald)
- East Dean and Friston (Dip Slope)
- East Meon (Scarp Slope)
- Fernhurst (Western Weald)
- Findon (Dip Slope)
- Fittleworth (Western Weald)
- Funtington (Coastal Plain)
- Graffham (Scarp Slope)
- Greatham (Western Weald)
- Hambledon (Coastal Plain)
- Itchen Abbas (Western Downs)
- Kingston Near Lewes (Scarp Slope)
- Lavant (including East Lavant and Mid Lavant) (Coastal Plain)
- Lewes (Scarp Slope)
- Liss (including Liss Forest and West Liss) (Western Weald)
- Lodsworth (Western Weald)
- Lower and Upper Farringdon (Western Downs)
- Corhampton and Meonstoke (Dip Slope)
- Midhurst (Western Weald)
- Milland (Western Weald)
- Northchapel (Western Weald)
- Petersfield (Western Weald)
- Petworth (Western Weald)
- Poyning (Scarp Slope)
- Pyecombe (Dip Slope)
- Rodmell (Scarp Slope)
- Rogate (Western Weald)
- Selborne (Scarp Slope)
- Sheet (Western Weald)
- Singleton (Dip Slope)
• South Harting (West Sussex)
• Steedham (Western Weald)
• Steep (Scarp Slope)
• Stroud (Western Downs)
• Twyford (Dip Slope)
• Washington (Scarp Slope)
• Watersfield (Western Weald)
• West Ashling (Coastal Plain)
• West Meon (Scarp Slope)

2. The principle of development within the settlement policy boundaries as defined on the Policies Map will be supported provided that it complies with the other relevant policies, is of a scale and nature appropriate to the character and function of the settlement and is in compliance with the policy for the relevant Broad Area (policies SD4/CP Coastal Plain, SD4/DS Dip Slope, SD4/WD Western Downs, SD4/SS Scarp Slope and SD4/WW Western Weald).

3. Development proposals will not normally be permitted outside of settlement boundaries and the countryside will be protected in accordance with relevant policies in the Local Plan and national policy. In exceptional circumstances, development in the open countryside will be permitted, where it is demonstrated to the satisfaction of the Authority that it is in accordance with the policy for the relevant Broad Area (policies SD4/CP Coastal Plain, SD4/DS Dip Slope, SD4/WD Western Downs, SD4/SS Scarp Slope and SD4/WW Western Weald), and:
   a) It is in accordance with Policy SD25 on rural exception sites, or
   b) It is in accordance with Policy SD27 on Sustaining the rural economy, or
   c) There is an essential need for a countryside location, or
   d) It is an appropriate reuse or redevelopment of an existing building(s).

4. Development proposals within estates and large farms that support appropriate diversification, which may not otherwise be considered acceptable outside of settlement boundaries, may be exceptionally considered suitable providing that they clearly meet the following criteria to the satisfaction of the Authority:
   a) The development proposals comply with other relevant policies and are part of a comprehensive Estate or Farm Plan that conserves and enhances the landscape; and
   b) The development proposals as part of an estate or farm plan deliver multiple benefits in line with the Purposes and Duty and the special qualities of the National Park and in regard to ecosystem services.

5. Small sites with the potential for development that are located within the National Park, but on the edge of settlements which are outside of the National Park, will only be allocated for development where they comply with other relevant policies.

6. The efficient and effective re-use of previously developed land will be encouraged, where appropriate, and in compliance with other relevant policies.
Introduction

7.16 The appropriate provision of housing to meet local needs is crucial to ensuring the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to maintain and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.

7.17 The Local Plan must determine the level of housing provision and types of homes to be delivered, which is appropriate for the National Park. Policy SD23 sets out the housing requirement for the National Park along with the market towns and a number of villages. A number of housing sites that will contribute to meeting these requirements are allocated in Chapter 9.

7.18 The Local Plan will incorporate, as far as possible, the levels of housing proposed within the adopted and emerging Joint Core Strategies. These existing requirements will be considered against up-to-date evidence being prepared to inform the Local Plan and neighbourhood plans, and incorporated as appropriate.

National Policy Context

7.19 The National Parks Vision and Circular (2010) states that national parks are not suitable locations for unrestricted housing. It does state, however, that NPAs have important roles to play as planning authorities in the delivery of affordable housing. The expectation is that new housing will be focused on meeting affordable housing requirements and NPAs should work with local authorities and others to ensure that the needs of local communities are met and affordable housing remains so in the longer term.

7.20 NPPF states that local plans should meet: ‘objectively assessed needs’, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole; or
- specific policies in the NPPF indicate development should be restricted (including National Parks) (paragraph 14).

---

The Lewes Joint Core Strategy was submitted for Examination to the Secretary of State in September 2014. The draft numbers set out in the Policy below are subject to change following the outcome of this Examination.
7.21 The NPPF states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups. Local plans should also identify the size, type, tenure and range of housing required. This can include ‘low cost market housing’. This tenure type is not defined as affordable housing in the NPPF but has precedence in CIL Regulation 49A which states anyone can provide this type of home, as long as measures are in place to ensure that if sold, they will continue to be affordable for future purchasers at a maximum of 80% of market price. This should be informed by a Strategic Housing Market Assessment (SHMA), which is a key piece of evidence used to determine housing needs.

7.22 Local planning authorities are required to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts. For a local plan to be considered ‘sound’ at examination, the plan should be positively prepared and based on a strategy which seeks to meet objectively assessed needs in the housing market areas, including unmet needs from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. In preparing this Local Plan, the SDNPA will need to identify the extent to which ‘objectively assessed need’ within the National Park can be reasonably met given paragraphs 115 and 116 of the NPPF (through the Strategic Environmental Assessment (SEA) which is explained further in paragraph 1.15 and 1.16 below). Where it is demonstrated that it cannot be sustainably accommodated, the SDNPA will need to work with adjoining authorities to consider whether any unmet need can be met elsewhere within each housing market area.

**Options Considered and Preferred Approach**

7.23 The *Local Plan Options Consultation Document* (February 2014) raised a single issue relating to the level of housing provision in the National Park. There are related issues regarding the location of housing, which are considered under Policy SD22 (Development Strategy).

7.24 In order to maintain the focus of the policy on the delivery of affordable housing, in accordance with the *National Parks Vision and Circular (2010)*, Policy SD23 (Housing) sets a target for the provision of affordable homes. The policy then sets an overall level of provision of housing (affordable and market combined). The policy sets out how this will be delivered and specifies a number of settlements which will accommodate approximate levels of housing.

7.25 The *Local Plan Options Consultation Document* raised the issue of how best to address housing mix, including specialist housing and housing for the elderly. It set out five options with regard to retaining the existing stock of smaller dwellings, requiring a mix of sizes and tenures of dwelling on larger developments and restricting the size of extensions to dwellings. Many of these issues are dealt with under Policy SD45 (Replacement dwellings and extensions). The issue of ‘self-build’ was listed under the section “Other issues that can be considered by the Local Plan”.

**The Amount of Housing**

7.26 In order to maintain the focus of the policy on the delivery of affordable housing, in accordance with the *National Parks Vision and Circular (2010)*, Policy SD24 sets a target for the provision of affordable homes. However, in line with Government policy, the process for determining the amount of housing to be delivered in the National Park starts with the identification of the ‘objectively assessed need’ for housing. This is followed by consideration of the extent to which meeting need within the National Park can be reasonably met. As is appropriate for a
national park, this Local Plan takes a landscape-led approach, which is capacity based. This takes into account the aspirations of local communities and the duty of the SDNPA to seek to foster the economic and social wellbeing of local communities in pursuit of the purposes.

7.27 Policy SD23 sets a level of new (combined affordable and market) housing provision for the National Park, which is informed by the evidence from the Strategic Housing Market Assessment (SHMA), evidence on constraints and takes into account paragraphs 115 and 116 of the NPPF. This follows the proposed approach set out in the Local Plan Options Consultation Document, which the majority of respondents supported.

7.28 Additional options in the Option Consultation, set out alternative approaches to setting specific level of housing provision and whether this should be done for the whole National Park, or whether levels should be set by local authority boundaries, housing market areas or individual targets for major settlements. The preferred approach is to set a level of housing provision for the National Park as a whole while setting individual requirements for the allocation of land within settlements. This is considered to provide clarity to local communities on the amount of development to be provided in individual settlements, which will be of particular use in designated neighbourhood plan areas.

The Location of Housing

7.29 Policy SD23 specifies a number of settlements that will accommodate approximate levels of housing. The distribution of this development is in accordance with Policy SD22 that directs development to the most sustainable locations, taking into account the availability of suitable land (based on detailed landscape assessment), the services that land and the surrounding area currently provides (ecosystem services), the need to sustain balanced communities, and taking into account the function of, and relationship between, settlements.

7.30 The Policy SD23 and associated Development Strategy (Policy SD22) will be tested against reasonable alternatives, relating to the location and amount of development, through the SA. It is recognised that the final requirements set out in this policy may change following the results of the SA. What is considered a reasonable alternative is set within the context of the National Park designation, where such alternatives in relation to housing are limited.

Type of Housing

7.31 The SHMA showed that the population within the National Park is skewed towards older age groups when compared with the national average. The issues this raises must be taken into account when considering the mix of housing in future development proposals within the SDNP.

7.32 The Government have established a Custom Build programme which seeks to increase the level of self-build or custom-build schemes coming forward across the country. Local planning authorities have been asked to champion to encourage greater levels of self-build development within the sector.

Supporting text

7.33 The components of supply to deliver the requirement set in Policy SD23 are set out in Table 7.1.

| TABLE 7.1: ELEMENTS OF HOUSING DELIVERY IN THE SOUTH DOWNS NATIONAL PARK |
|-----------------------------|-----------------|
| Element of Delivery         | Dwellings       |
|                             |                 |
7.34 Further evidence will be required to support the Local Plan and neighbourhood plans to demonstrate that the levels of growth, proposed in Policy SD23, are deliverable and in accordance with the Spatial Strategy and National Park purposes.

7.35 Every opportunity will be explored to maximise the delivery of affordable homes. Policy SD23 sets a target for the number of affordable homes to be delivered during the Local Plan period. This is in accordance with Policy SD24, which sets a rate of 40 per cent of all net residential units (C3 use class) to be provided as affordable homes in perpetuity to meet local needs on each site. The policy states that proposals for new residential development that maximises the delivery of affordable housing and provides for the size, type and tenure of homes to meet local needs as set out in this policy will be permitted. The use of the word “perpetuity” is the subject of current Government debate and may be the subject of further changes in legislation. SDNPA will monitor this issue and modify the Local Plan as necessary.

7.36 The development of land previously unallocated or identified (known as ‘windfall sites’) will count towards the requirement. This is known as a ‘windfall allowance’. Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment (SHLAA), historic windfall delivery rates and expected future trends, and should not include residential gardens.

7.37 A review of past planning permission implementation (using dwelling completion records) has provided strong evidence that there has been consistent delivery on windfall sites as a proportion of total dwellings built. The evidence to support this, along with the methodology for calculating a windfall allowance is set out in the evidence-based document, The Calculation of the Windfall Allowance in the SDNP.

7.38 The allocation of land in a neighbourhood plan which will deliver more homes within a settlement will be supported, where it meets an identified local housing need in that settlement or locality and is in accordance with Policy SD22 and other relevant policies in this Local Plan. The development of land located outside of the settlement boundary and in the countryside, will need to be in accordance with Policy SD25 (Rural Exception Sites) and SD22 (Development Strategy).

<table>
<thead>
<tr>
<th></th>
<th>The development of strategic sites and the allocation of land for housing in the South Downs Local Plan and neighbourhood development plans</th>
<th>2578</th>
</tr>
</thead>
<tbody>
<tr>
<td>b</td>
<td>The implementation of planning permissions (all dwellings completed from 1 April 2014, being counted towards the requirement)</td>
<td>1,253</td>
</tr>
<tr>
<td>c</td>
<td>The development of land previously unallocated or identified in accordance with Policy SD22 (Development Strategy) and subject to relevant policies in this Local Plan (windfalls)</td>
<td>765</td>
</tr>
<tr>
<td></td>
<td><strong>Total</strong></td>
<td><strong>4,596</strong></td>
</tr>
</tbody>
</table>

---

24 This includes a non-implementation discount.

25 Detail on the methodology is currently set out in the Strategic Housing Land Availability Assessment (SHLAA) (1 April 2014). The application of this methodology has identified a trend-based figure, which has then been discounted.
7.39 The draft SHMA identifies a need for a mix of house sizes across the National Park, with most need (95 per cent) for smaller homes (1, 2 and 3 bed) and limited need (5 per cent) for larger houses (4 bed or larger). The size of homes within each proposal should be informed by the latest evidence of local needs, including the SHMA. Based on the assessment of affordable housing needs, the draft SHMA indicates a target mix of 33 per cent intermediate housing and 66 per cent social or affordable rent. However, as the policy states the mix of housing on each proposal will be based on up-to-date evidence of local needs. This will be determined through liaison with parish or town councils, housing authorities and rural housing enablers, where applicable.

7.40 The delivery of each element of supply will be subject to ongoing monitoring.

**Strategic Policy SD23: Housing**

1. In accordance with Policy SD24 (Affordable Housing), the SDNPA will aim to deliver approximately 1,840 affordable homes between 2014 and 2032.

2. The SDNPA will make overall provision for approximately 4,596 net additional homes between 2014 and 2032.

3. These will be delivered through:
   (i) the development of strategic sites and the allocation of land for housing in the Local Plan and neighbourhood plans;
   (ii) the implementation of planning permissions; and
   (iii) the development of land previously unallocated or identified (windfall), in accordance with Policy SD22 (Development Strategy) and subject to relevant policies in this Local Plan.

4. The allocation of sites to accommodate approximately the following levels of housing in addition to extant planning permissions and windfalls:
   - Alfriston – 6*
   - Amberley – 6*
   - Binsted – 12
   - Buriton – 7
   - Bury – 6*
   - Chawton – 6*
   - Cheriton – 6*
   - Coldwaltham – 20
   - Corhampton and Meonstoke – 11*
   - Compton – 6*
   - Ditchling – 15
   - Droxford – 11*
   - Easebourne – 20*
   - East Dean and Friston (East Sussex) – 11*
   - East Meon – 15
   - Fernhurst – 211 (including Syngenta)
   - Findon – 20
   - Fittleworth – 6
   - Greatham (Hampshire) – 30
   - Hambledon – 6*
   - Itchen Abbas – 8
   - Kingston Near Lewes – 11*
   - Lavant (including Mid Lavant and East Lavant) – 20*
   - Lewes – 835 (including North Street Quarter)
   - Liss (including West Liss and Liss Forest) – 150
   - Midhurst – 150*
   - Northchapel – 6*
   - Petersfield – 700
   - Petworth – 150
   - Pyecombe – 8
   - Rodmell – 11*
   - Rogate – 11
   - Selborne – 6*
   - Sheet – 20*
   - South Harting – 8
• Stedham – 6*
• Stroud –11*
• Twyford – 20*
• West Meon – 16

5. Development that meets an identified local housing need in settlements, in addition to the requirements set out above, is identified in neighbourhood plans and is in compliance with Policy SD22 (Development Strategy) and other relevant policies in this Local Plan will be supported.

6. The size and type of homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with parish or town councils, housing authorities and rural housing enablers where applicable.

* Sufficient capacity has yet to be identified in these settlements for all the new homes identified.

AFFORDABLE HOUSING

Partnership Management Plan Outcomes:

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

The following affordable housing policy and supporting text is based on government policy as of July 2015. It will be updated in light of changes to government policy in the publication version of the Local Plan.

Introduction

7.41 Policy SD24, Affordable Housing, relates to the proportion of affordable housing to be delivered from development schemes. Provision should be on-site as required by the NPPF (paragraph 50) unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.

7.42 The SDNPA supports the principle of rural exception sites, which provide 100 per cent affordable housing delivery on sites which may not be suitable for market housing. Policy SD25 sets out the basis for this type of development which is particularly relevant to a national park.

7.43 The provision of affordable housing is a major issue for the National Park with house prices above the national and regional averages. Evidence shows there are also significant differences in prices between the towns and surrounding rural areas although this is partly a reflection of the different types of properties that are found in the rural areas compared to the towns.

7.44 With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of affordable homes, it can be difficult for people working in the National Park to afford to live within it. This adds to the high level of traffic movements. Access to affordable housing is a key issue facing many local communities. Evidence of housing need for both market and affordable housing is provided in the SHMA which is one part of the evidence base supporting these policies. Young people and young families, in particular, struggle to find low-cost housing which creates a significant local housing need.

26 SDNPA CIL & Affordable Housing Viability Assessment (DSP, 2014) Figure 6.
7.45 The Local Plan must balance a proactive response to meeting these local housing needs with the economic viability of development. In planning terms, “viability” refers to whether a development scheme can be completed and make a competitive return, as required by the NPPF, based on deducting costs from the scheme value. Viability should be assessed with all policies and costs taken into account – including affordable housing requirements. Therefore, Local Plan requirements and Community Infrastructure Levy (CIL) charges should not be of such a scale or burden as to threaten the overall delivery of viable schemes across the National Park. A comprehensive CIL & Affordable Housing Viability Assessment was completed in 2014 which provides part of the evidence base for these policies, alongside evidence of housing need and housing land availability.

7.46 Partnership Management Plan Policy 50 states that housing and other development in the National Park should be closely matched to the social and economic needs of local people and should be of high design and energy efficiency standards, to support balanced communities so people can live and work in the area.

7.47 Community Land Trusts (CLT) are supported as one mechanism for delivering affordable housing. They facilitate community ownership of land, homes and other assets to deliver long-term community benefits such as affordable housing, low cost workspace and local services. Any increases in land value captured or profits from development can be reinvested in the land or community. Partnership working between Housing Authorities, CLTs and other community-led and legally constituted organisations is essential to maximise the delivery of affordable homes.

National Policy Context

7.48 The DEFRA Vision and Circular for English National Parks (paragraphs 78 and 79) states that national parks have an important role to play in the delivery of affordable housing and the Local Plan should include policies that proactively respond to local housing needs. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services, and that national parks are not suitable locations for unrestricted market housing.

7.49 The NPPF (paragraph 54) states that the Local Plan should meet the full, objectively assessed needs for market and affordable housing to deliver mixed and balanced communities unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, and subject to restrictions for national parks. Further, in rural areas, planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing including through rural exception sites, where appropriate.

7.50 Recent Government changes to the National Planning Practice Guidance (NPPG) have introduced a mandatory minimum size threshold for affordable housing requirements from residential development sites, below which no affordable housing can be secured through Section 106 obligations. The threshold is described as “10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm” and excludes rural exception sites. This change is effective immediately and, in practice, means affordable housing can only be secured on sites of 11 units or more as part of normal planning applications.
7.51 NPPG\textsuperscript{27} allows NPAs to choose to apply a lower threshold of 5 units or less, with no maximum floorspace. If this lower threshold is applied, “local planning authorities should only seek affordable housing contributions from developments of between 6 and 10 units as financial contributions and not affordable housing units on site”.

7.52 The SDNPA chose to implement the lower threshold of 5 units on 3 February 2015 due to the significant contribution of small sites to affordable housing delivery, the risk that the higher threshold causes to the delivery of affordable homes in smaller settlements where larger sites over 10 units are inappropriate in terms of local need and landscape impacts, and the evidence of positive viability.

**Options Considered and Preferred Approach**

7.53 There were two issues included in the Local Plan Options Consultation which considered affordable housing:

- How can the Local Plan best address housing mix in the National Park?
- What approach should the Local Plan adopt to best meet local need?

7.54 The Options Consultation Document considered eight issues in the Housing Chapter (Issues 30 to 37). Of these, Issues 31 (housing mix), 32 (meeting local affordable housing needs) and 33 (rural exception sites) related to affordable housing matters and are taken forward in this policy paper. The other issues relating to the overall housing strategy, meeting the needs of agricultural and forestry workers, elderly people, gypsies and travellers and Community Land Trusts (CLTs) are addressed in other draft policies.

7.55 There were key responses to the Options Consultation Issues 31 and 32 (housing mix and meeting local affordable housing needs) which informed this preferred options Policy SD25.

- There should be a good mix of sizes for market and affordable housing, especially smaller units, to meet local needs which may vary across areas.
- There was support for determining tenure and size mix site-by-site to ensure it responds to local needs.
- Securing maximum affordable housing from market-led sites was strongly supported.
- Strong support for a local connections policy for affordable homes, and also market housing if possible.
- Affordable housing provision should be proportionate to settlement size.
- Affordable housing proportions should be viability-led rather than target-led.

7.56 A combination of options from Issues 31 and 32 in the Local Plan Options Consultation Document were considered to deliver a range of complementary benefits and have been taken forward into one preferred options policy, Policy SD25 (Affordable Housing Provision). The recent Government changes to the NPPG relating to site-size threshold, similar to Option 32c, have had to be taken into account in setting this policy. Options 31b, 31d and 31e from the Options Consultation, related to protecting small dwellings from excessive enlargement or replacement, will be taken forward through a development management policy, Policy SD45 (Replacement Dwellings and Extensions).

\textsuperscript{27} National Planning Policy Guidance (amended 28 November 2014) paragraphs 12 to 17.
7.57 Affordable housing policies should be set as targets, rather than absolute requirements, because the NPPF (paragraph 50) instructs policies to be “sufficiently flexible to take account of changing market conditions over time”. The Local Plan policies on housing must not be so rigid as to render development sites unviable. Where viability is raised as a concern by a developer, a robust viability assessment will be required at the cost of the developer and agreed by the Authority. If proven, the Authority will need to be satisfied that the development would still contribute to mixed and balanced communities and a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions if market conditions improve before the completion of development.

7.58 Affordable housing targets are generally expressed as proportions (percentages) either on-site or as a financial contribution in lieu, particularly where the percentage does not equate to a whole unit on-site.

7.59 Policy SD25 includes a target proportion of affordable housing to be secured on housing developments and other requirements including appropriate tenure and size mix on site. The SDNPA is not the housing authority and issues such as tenure mix are proposed to be negotiated in liaison with the relevant housing authorities on a site-by-site basis to ensure local needs are met based on local understanding and expertise. Occupancy conditions are important to ensure affordable housing is providing for a local need, but some flexibility is proposed in the application of local connection criteria to ensure all opportunities for use of affordable housing are explored with the service of local needs as a priority.

**Supporting Text**

7.60 All development falling within Use Class C3 is subject to Policy SD24, including any retirement or assisted living accommodation within this use class. Viability evidence underpinning Policy SD24 demonstrates that the affordable housing target is deliverable for proposals across the National Park. Applications proposing a lower proportion of affordable homes should present robust evidence, for consideration by the Authority, to demonstrate constrained viability or other exceptional circumstances bearing in mind the primacy of delivering affordable homes. If sufficient justification is provided, the nearest achievable target to 40 per cent will be considered, taking into account economic viability and local need. Neighbourhood plans may set a higher affordable housing target if they have sufficient evidence to support such a policy.

7.61 Amendments to the NPPG in 2014 exempt development of 1 to 5 net dwellings from affordable housing requirements. Policy SD24 relates to the development of 6 or more net dwellings. Should Government policy change, this policy will be immediately reviewed to secure affordable housing provision from small sites.

7.62 “New residential development” includes the conversion of buildings into residential use. Conversions will therefore need to provide affordable housing to the proportion set out in the policy including contributions where necessary. Affordable housing provision is sought as a proportion of net new residential units and so any existing residential units replaced or converted are excluded from this requirement.
The interpretation of “local needs” for affordable housing as well as local connections criteria should not be restricted to a specific settlement but be focused on community connection and cohesion and allow for a wider interpretation within a national park context. It will be assessed in a cascade manner; to include the needs of the host community or communities; then the parish; and then the wider area including nearby parishes in the National Park, as necessary.

Local needs should be determined by the SDNPA, parish council and relevant housing authority on a case-by-case basis to allow maximum flexibility. Evidence can include, but is not limited to, local housing needs surveys, SHMAs and housing registers (waiting lists) and the Government encourages the use of secondary data and objectively assessed needs.

NPPF paragraph 50 states that affordable housing need should be met on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. In Policy SD24 “Exceptional circumstances”, assessed in the context of satisfying the Authority that on-site provision is not possible in whole or in part, could include a lack of registered provider support due to management or financial constraints or severe viability constraints. If accepted by the Authority, the “cascade of methods” for equivalent provision off-site is as follows:

- **First preference**: Provide the affordable housing units on an alternative site.
- **Second preference**: Provide land in lieu with planning consent and at nil cost. Land will be serviced, or with commuted funds to enable service connection and installation, and be without significant constraints. Land in lieu will be provided to the SDNPA, the relevant housing authority or registered provider.
- **Third preference**: Financial contribution to provide affordable housing off-site on third-party land.

Where viability is raised as a constraint to development, the Authority will expect applicants to demonstrate how the proposals still contribute to mixed and balanced communities and an open book viability assessment must be undertaken and independently verified at the cost of the developer. Where a lower proportion of affordable housing is accepted by the Authority as an exception, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions (up to the requirement in Policy SD24) if market conditions improve before the completion of development.

Standards of design, minimum floorspace and sustainability for affordable housing are considered under other development management policies in the Local Plan alongside all other types of housing. Any specific requirements which need to remain responsive to changes in policy requirements or technology can be set out in a supplementary planning document.

The SDNPA supports the involvement of CLTs as one delivery mechanism for affordable housing, subject to normal planning policies on each proposal. CLTs provide an opportunity for local community ownership of land for long-term affordable housing provision and other sustainable local development, and can be provided with land directly by a developer.
Affordable housing provision will be secured at the granting of planning permission by a Section 106 legal obligation. If the proposal is subdivided after planning permission has been granted, the Authority will ensure that the overall affordable housing provision is secured either by each phase proportionally, or as a whole. Developers and landowners are expected to consider the overall cost of development, including the required planning obligations, CIL, any abnormal costs and phasing implications, prior to negotiating the sale or purchase of land or the acquisition or sale of an option. Affordable housing provision and other obligations should therefore be provided through private subsidy and the renegotiation of options where necessary. The SDNPA is not responsible for subsidising affordable housing requirements.

Strategic Policy SD24: Affordable Housing Provision

1. Development proposals for new residential development that maximise the delivery of affordable housing in the National Park and provide for the size, type and tenure of homes to meet local needs as set out in this policy will be permitted, provided they comply with other relevant policies. The application of this policy will maintain a focus on affordable housing, but will be sufficiently flexible to take account of viability and changing market conditions over time.

2. A target of at least 40 per cent of all net dwellings (C3 use class) on schemes of 6 or more units will be provided as affordable homes in perpetuity to meet local needs.

3. Development proposals of 11 or more net dwellings will provide affordable housing on-site unless in exceptional circumstances when the Authority, at its discretion, may accept an alternative form of delivery in a cascade of forms with first preference for provision on an alternative site, then the provision of serviced land in lieu and then a financial contribution in lieu.

4. Development proposals of 6 to 10 net dwellings will provide affordable housing on-site where possible. Where on-site provision is not possible in whole or in part, commuted financial payments in lieu will be accepted.

5. The layout and design of affordable housing will be appropriately integrated into each development to assist the management by registered providers where necessary.

6. The size (number of bedrooms), type (flat, house) and tenure (social and affordable rented, intermediate, shared ownership or other) of affordable homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with the applicant, parish council, relevant housing authority and rural housing enablers where applicable.

7. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Selection will be managed through a partnership approach with the housing authority and established community-led and legally constituted organisations where applicable.

8. Development proposals that do not comply with all the criteria of this policy and do not provide affordable housing on suitable schemes will be refused.

RURAL EXCEPTION SITES

Options Considered and Preferred Approach

There was a single issue considered relating rural exception sites in the Local Plan Options Consultation Document. Key responses to the Options Consultation Issue 33 (rural exception sites) which informed the preferred options Policy SD25 (Rural Exception Sites) include the following:

- Strong support for the principle of rural exception sites immediately adjacent to or related to existing rural settlements.
- Support for an element of self-build to be allowed but also questions about the affordability of this housing product.
• Mixed opinion on the allowance of market housing to increase the viability of rural exception sites.

• Several recommendations to make policies as flexible as possible as rural exception sites are difficult to bring forward.

7.71 There was strong support for a policy supporting rural exception sites and so the principal option in the Local Plan Options Consultation Document Issue 33 has been taken forward in Policy SD25. Option 33a (size threshold for rural exception sites), however, was not supported as it is considered that the policy should be as flexible as possible. Option 33b proposed that ‘self-build’ housing could be allowed on rural exception sites. However, there is concern that this type of housing product does not comply with the NPPF definition of affordable housing and would be unlikely to remain affordable to meet local needs in perpetuity. Self-build housing will therefore be supported in another policy in the Local Plan but not as part of rural exception sites.

Supporting Text

7.72 Rural exception sites provide a significantly higher proportion of affordable housing than market-led developments. They provide a critical source of affordable housing in perpetuity to meet local needs which are not served by the market, on land that would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

7.73 The NPPF (paragraph 54) encourages an element of market housing to be allowed on rural exception sites where this would facilitate the provision of significant additional affordable housing to meet local needs. The NPPF (Annex 2) clarifies that small numbers of market homes may be allowed at the SDNPA’s discretion, for example, essential to enable the delivery of the site without grant funding. However, the SDNPA believes that the emphasis on the delivery of affordable housing in national parks is best met by a policy of 100 per cent affordable housing on exception sites.

7.74 Occupation of affordable housing brought forward on both rural exception sites and market-led sites is subject to conditions to ensure the needs of local people are being met. The interpretation of ‘local needs’ for affordable housing as well as and a ‘local connections criteria’ should not be restricted to a specific settlement but be focused on community connection and cohesion, and allowing for a wider interpretation within a National Park context. It will be assessed in a cascade manner; to include the needs of the host community or communities; then the parish; and then the wider area including nearby parishes in the National Park as necessary.

7.75 Local needs should be determined by the SDNPA, parish council and relevant housing authority on a case-by-case basis to allow maximum flexibility. Evidence can include, but is not limited to, local housing needs surveys, SHMAs and housing registers (waiting lists), and the Government encourages the use of secondary data and objectively assessed needs.
7.76 The relevant housing authority will be asked to covenant in the Section 106 Agreement on behalf of the SDNPA, that affordable housing contributions will be spent whenever possible in the part of the National Park where they arose but the SDNPA has authorised the pooling of contributions for the delivery of affordable housing within any part of the National Park if necessary to maximise opportunities when and where they arise.

7.77 “Effective community engagement” should be demonstrated by the applicant in both the site selection and application design processes. This can include liaison with the relevant parish council(s), community groups and neighbours.

7.78 The design of rural exception sites will be assessed in accordance with other policies in the Local Plan relating to design and landscape conservation and enhancement. The type and tenure of dwellings on rural exception sites will need to balance the provision of local needs with the character of the existing settlement and the landscape within which it is located.

**Strategic Policy SD25: Rural Exception Sites**

1. Proposals for new residential development of 100 per cent affordable housing outside of settlement boundaries as shown on the Policies Map will be permitted, provided they comply with other relevant policies and the following tests are all met:
   a) affordable housing is provided in perpetuity;
   b) the site has been selected through a site-specific sustainability appraisal process;
   c) the scale and location relates well to the existing settlement; and
   d) effective community engagement has been undertaken.

2. The size (number of bedrooms), type (flat, house, extra care etc.) and tenure (social and affordable rented, intermediate, shared ownership or other) of affordable homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with the applicant, parish council, relevant housing authority and rural housing enablers, where applicable.

3. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Selection will be managed through a partnership approach with the relevant housing authority and established community-led and legally constituted organisations or CLTs where applicable.

**Evidence**

- CIL & Affordable Housing Viability Assessment (Dixon Searle Partnership, January 2014)
- Coastal West Sussex Duty to Co-Operate Housing Report (GL Hearn, 2013)
- Coastal West Sussex Strategic Housing Market Assessment (GL Hearn, 2012)
- East Hampshire Strategic Housing Market Assessment (NLP, 2013)
- Housing Authorities Officer Group
- Housing Registers (housing authority waiting lists).
- Housing Requirement Study (DTZ, 2011)
- Review of affordable housing policies within the Joint Core Strategies for best practice (Lewes, EHDC, Winchester, Wealden). Elmbridge policy for the land acquisitions element.
- Rural Affordable Housing Experts Forum
- Strategic Housing Market Assessment: South Downs National Park Authority (GL Hearn, 2015)
- Winchester Housing Market and Housing Need Assessment Update (DTZ, 2012).
GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

Partnership Management Plan Outcomes and Policies

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Policy 49: Maintain and improve access to a range of essential community services and facilities for communities in the National Park.

Policy 50: Housing and other development in the National Park should be closely matched to the social and economic needs of local people and should be of high design and energy efficiency standards, to support balanced communities so people can live and work in the area.

Introduction

7.79 To achieve inclusive and sustainable communities it is important to address the needs and aspirations of all people through an appropriate mix, type and amount of accommodation. This includes the needs of Gypsies and Travellers and Travelling Showpeople. The National Park has resident and transient communities of each group who, while sharing a travelling way of life, have different cultures and site needs. For these reasons, they are also recognised as separate communities in planning legislation (see Glossary).

7.80 The traditional travelling and working patterns of both groups have largely changed, but the ability to travel remains an important part of their cultures. Although their work is often of a mobile nature, Gypsies and Travellers now tend to live fairly settled lives, often alongside other residents both on authorised caravan sites, many of them privately owned, and in housing. Travelling Showpeople also require secure, permanent, bases for the storage of their equipment and for residential purposes, particularly during the winter.

7.81 There is still a need for transit sites to be provided for the more transient people. These are sites where formal pitches with facilities are provided and people can stay for set periods of time. The need for these sites is identified in a Gypsy and Traveller Assessment (GTAA) in conjunction with establishing the need for permanent residential pitches. In comparison, as per option 36a in the Local Plan Options Consultation Document, identifying sites as ‘temporary stopping places’ may be an option available in order to prevent unauthorised encampments from people travelling through an area. However, they are only used on a temporary ‘ad hoc’ basis in instances where there is no capacity on existing transit sites to move people to. These are also sites which are licensed but are not formalised with hardstanding and permanent facilities, for example, and do not require planning permission unless land is being used for more than 28 days a year. It is not, therefore, the intention for these types of sites to be identified in the Local Plan.

7.82 An historic shortage of sites nationally and within the National Park makes it difficult for an already socially excluded part of the community to access and benefit from employment, health care, education and other services. Gypsy and Traveller Accommodation Assessments (GTAA) covering the whole of the National Park will be used to understand and address the needs of both groups, as part of the SDNPA’s housing strategy. This aims to reduce the number of unauthorised encampments and development which can result in conflict with settled communities and landowners, and result in enforcement action by authorities.
National Policy Context

7.83 The National Parks Vision and Circular (2010) sets out that in delivering the two statutory purposes of national parks, NPAs should be an exemplar in achieving sustainable development. It outlines the importance to maintain vibrant, healthy and productive living and working communities. It also states that to secure a diverse and healthy natural environment and enhance cultural heritage, priority should be given to managing the landscape, heritage and quality of place.

Planning Policy for Traveller Sites (PPFTS) (2012)

7.84 The PPFTS 2012 outlines the Government’s policy for Gypsies and Travellers. It was published at the same time as the NPPF (2012) and should be read in conjunction with it. The policy outlines an overarching aim to ensure the fair and equal treatment of Gypsies and Travellers in a way that facilitates their traditional and nomadic way of life, while respecting the interests of the settled community. It also outlines that local amenity and the environment need to be protected.

7.85 Paragraphs 4 to 6 of the PPFTS state that local planning authorities need to make their own assessment of need using robust evidence. They should develop fair and effective strategies to meet need through identifying land for sites; plan for sites over a reasonable timescale; promote more private traveller site provision while recognising that there will be Travellers who cannot provide their own sites. This is in order to address any historical under provision and reduce the number of unauthorised developments and encampments. This need should address the likely permanent and transit needs over the development plan period. It also states that planning policies should be fair, realistic and inclusive to enable suitable accommodation from which travellers can access services.

7.86 Paragraphs 8 and 9 of the PPFTS state that local planning authorities, in preparing local plans, should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople28 which address likely permanent and transit site accommodation. This should also involve collaborative working with neighbouring local authorities.

7.87 Planning authorities should also identify and update annually a supply of specific deliverable sites to provide five years’ worth of sites against locally set targets; identify a supply of specific developable sites or broad locations for growth for years 6–10 and, where possible, years 11–15; potentially set targets on a cross-authority basis to provide more flexibility in identifying sites and relate the number of pitches or plots to local circumstances like the location of the site and the surrounding populations size and density, as well as protecting local amenities and the environment.

---

28 Pitch means a pitch on a Gypsy and Traveller site. Plot means a pitch on a Travelling Showpeople site (often referred to as a yard). This terminology differentiates between residential pitches for Gypsies and Travellers and mixed use plots for Travelling Showpeople, which may need to incorporate space for storage.
In considering planning applications, paragraph 23 of the PPFTS outlines that planning authorities should strictly limit new traveller site development in open countryside away from existing settlements and that sites in rural areas respect the scale of, and do not dominate, the nearest settled community, and avoid placing undue pressure on the local infrastructure. Paragraph 24 of the PPFTS also outlines that further considerations in proposals, such as sites being well planned including soft landscaping and avoiding features which give the impression that the site and its occupants are isolated from the rest of the community.


Paragraph 4 of the National Planning Policy Framework (NPPF) outlines that its policies, so far as relevant, should be read in conjunction with the PPFTS. Paragraph 7 of the NPPF outlines that the planning system has economic, social and environmental roles to achieve sustainable development. This includes supporting healthy communities with accessible local services. Paragraph 17 of the NPPF outlines 12 core planning principles which expand upon these three roles. These include securing a good standard of amenity for existing and future occupants of land, supporting local communities, recognising the intrinsic character and beauty of the countryside, and enhancing and conserving the natural environment.

Options Considered and Preferred Approach

There was a single issue considered relating to the housing needs of Gypsies, Travellers and Travelling Showpeople in the Local Plan Options Consultation.

Policy SD26 recognises the accommodation needs of both groups strategically, has a set of criteria for assessing planning applications on specific sites and safeguards existing lawful sites.

Supporting Text

The SDNPA is working with local and county authorities to identify the permanent and transit accommodation needs across the National Park through Gypsy and Traveller Accommodation Assessments (GTAA). This is derived from primary and secondary information such as interviews with people from the communities, waiting lists, records of unauthorised encampments and other stakeholders like the Showmen’s Guild.

There are inherent difficulties in obtaining accurate data given, in particular, the transient activities of some groups. Notwithstanding this, a proportionate and robust approach has been taken in the assessments. Various joint and individual studies, identified in Figure 7.1, have been undertaken across the National Park. A summary of their findings on the level of need for permanent and transit sites is presented in Table 7.2. Importantly, these figures do not take into account any planning permissions since their completion, which will be used in future assessments.

The four studies covering Hampshire (blue), Coastal West Sussex area (green), Brighton and Hove (red) and East Sussex (dark yellow) have been undertaken jointly with the local authorities and liaising with the county councils. The studies in Horsham and Mid Sussex assessed need in the whole of each district, including the areas of Horsham and Mid-Sussex districts within the SDNP. The Brighton and Hove and East Sussex studies were completed in December 2014 and January 2015 respectively. The earliest remaining study is 2012 (see evidence section below).
FIGURE 7.1: GYPSY AND TRAVELLER ACCOMMODATION ASSESSMENT STUDIES COVERING THE NATIONAL PARK.
### TABLE 7.2: PERMANENT AND TRANSIT NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

<table>
<thead>
<tr>
<th>Study area</th>
<th>Permanent Pitch Need</th>
<th>Transit Pitch Need</th>
<th>Showpersons’ Plot Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Sussex</td>
<td>8</td>
<td>8 across the study area (not disaggregated)</td>
<td>0</td>
</tr>
<tr>
<td>Coastal West Sussex</td>
<td>6</td>
<td>10 across the study area (not disaggregated)</td>
<td>0</td>
</tr>
<tr>
<td>Horsham</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>1</td>
<td>No specific analysis included in GTAA</td>
<td>0</td>
</tr>
<tr>
<td>Brighton &amp; Hove</td>
<td>13</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Hampshire</td>
<td>7</td>
<td>13 in Winchester and 2 in East Hampshire districts (not disaggregated with SDNP)</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>35</strong></td>
<td><strong>TBC</strong></td>
<td><strong>1</strong></td>
</tr>
</tbody>
</table>

7.95 These studies and future site assessment work will inform how future need is addressed, in accordance with paragraphs 8 and 9 of the PPFTS. The SDNPA may decide to allocate sites where appropriate, such as in the Brighton area where there is a high need. A joint study is already being undertaken with East Hampshire and Winchester for the Hampshire area of the National Park. Discussions are being held with other local authorities regarding joint site assessment studies through the Duty to Cooperate. However, prior to any further studies, the SDNPA considers it wise, as part of this consultation, to use this opportunity as a ‘call for sites’ exercise to find any potentially suitable sites for Gypsies and Travellers. These should be submitted to the Authority with supporting evidence along with any other representations on the Local Plan. The assessment of these sites by the SDNPA will adopt a landscape led approach.

7.96 National policy makes clear that, as with any other form of development, planning permission for sites should only be granted in the National Park where it is demonstrated that the objectives of the designation will not be compromised by the development. Therefore, through the Duty to Cooperate and future site assessment work, the SDNPA will assess how all or a proportion of this need could be accommodated in the National Park. This assessment will be landscape led and will seek to accommodate sites where they are needed and in the most sustainable locations.
Transit sites serve wider areas and operate on a countywide basis. There are two existing large transit sites within the National Park, one outside the town of Lewes (Bridies Tan) and a second north of the A27 outside Brighton (Horsdean). There is also a site at Westhampnett, which is outside the National Park. However, it and the two sites in the National Park, serve a need for transit pitches at a strategic county level. The current studies identify a need for new transit pitches (Table 7.2), which will be carried forward through future site assessment work and joint working with local authorities.

The SDNPA also considers that it is important to safeguard all existing, lawful permanent and transit sites, in accordance with any planning conditions to maintain existing provision. Existing sites are identified on the Local Plan Policies Map. Where proposals involve the loss of a pitch or plot, applicants will need to identify a suitable alternative site, unless it could be established that the existing site was no longer required. This would be assessed against the relevant Gypsy and Traveller Accommodation Assessment. Alternative sites should not be any less sustainable than the existing pitch or plot proposed to be lost, providing the existing site has legal status.

The criteria of Policy SD26 are fair, reasonable and realistic, and seek to address all relevant considerations for assessing proposals, whether they are in isolated rural countryside or within or on the outskirts of settlements. New sites should respect the scale of, and not dominate, the nearest settled community. Either one new large site or the cumulative impact of a number of smaller sites could lead to an over concentration or disproportionate number of pitches in this respect. Avoiding this situation can also help with social cohesion and will need to be assessed on a site-by-site basis. Avoiding placing undue stress on local infrastructure or adversely affect surrounding amenities of existing properties will also be assessed. Conversely, any site should be appropriate for occupants in respect of any impacts from neighbouring uses. Where proposals are considered to be major development, they will need to accord with Policy SD3 (Major Development).

Any planning permission will include a planning condition or obligation to ensure that occupancy of the site is limited to persons able to demonstrate an essential need for the accommodation. When any temporary permission is granted, a planning condition will be attached or an obligation secured to ensure that the permission is for a limited time period, after which time the use shall cease and the land must restored to its former condition, within a specified period. In the case of existing residential caravans, applications to renew temporary permissions will be assessed against the policy criteria.

Where any retrospective applications for sites do not satisfy Policy SD26, enforcement action may be undertaken. The Authority will, however, work with the relevant local housing authority to investigate alternative suitable accommodation in the locality. A temporary permission may be granted to enable the applicant to remain on site during this process.
Implementation

7.102 To address the recognised need, Policy SD26 will be implemented through future site assessment work, which includes the current call for sites exercise. Gypsy and Traveller sites may be allocated in the Publication version of this Local Plan on private or publicly owned sites, to deliver the need. The potential distribution of the overall need across the National Park will be considered through partnership working with local and county authorities and other stakeholders. Existing sites will also be safeguarded in order to retain the level of accommodation already provided. The policy criteria and other relevant local plan policies will be used to assess planning applications, in conjunction with national policy.

Monitoring and Review

7.103 Understanding the level of need is based on having available evidence to make a robust assessment. Studies will continue to be undertaken in the future either solely by the SDNPA or in partnership with other local authorities.

Strategic Policy SD26: Gypsies and Travellers and Travelling Showpeople

1. Existing lawful permanent sites for Gypsies and Travellers and Travelling Showpeople that are required to meet the identified needs of these communities will be safeguarded, unless it can be established that the site is no longer necessary based on identified local need.

2. Development proposals for the provision of permanent or transit accommodation, or temporary stopping places, to meet the needs of Gypsies and Travellers and Travelling Showpeople will be supported where they meet a proven need, as identified by a Gypsy and Traveller Accommodation Assessment.

3. In addition to proving a need for either permanent or transit accommodation, development proposals for both types of sites will only be permitted where they comply with other relevant policies and they:

   a) are well related to existing settlements and do not harm the character and appearance of the area;
   b) avoid sites being over-concentrated in any one location or disproportionate in size to nearby communities;
   c) are capable of being provided with adequate infrastructure such as power, water supply, foul water drainage and recycling/waste management;
   d) are accessible to education and healthcare facilities;
   e) have clearly defined physical boundaries and, where appropriate, include suitable additional landscaping and any surfacing or boundary treatments;
   f) provide sufficient amenity space for residents;
   g) do not cause unacceptable harm to the amenities of neighbouring uses and occupiers;
   h) have a safe vehicular access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site;
   i) restrict any permanent built structures in rural locations to essential facilities;
   j) demonstrate there is no alternative empty lawful pitch which could be used and confirmed by the local housing authority; and
   k) demonstrate that occupiers of the site satisfy either the definition of a Gypsy and Traveller or Travelling Showpeople as outlined in Planning Policy for Traveller Sites (2012) or any subsequent policy.

4. Development proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused.
Evidence
- Brighton and Hove Joint GTAA (2014).
- Coastal West Sussex GTAA (2012).
- Horsham District GTAA (2012).
- Mid Sussex GTAA (2013).

SUSTAINABLE ECONOMIC DEVELOPMENT

Partnership Management Plan Outcomes and Policies

Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities many of which are positively linked with the special qualities of the National Park.

Outcome 11: Local people have access to skilled employment and training opportunities.

Policy 48: Support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.

Policy 51: Increase the availability and speed of broadband and the coverage of the mobile phone network, to facilitate business growth, encourage home working and improve quality of life.

Policy 52: Enhance local production by developing local economic supply chains and enabling businesses in the National Park to gain added value by linking their marketing activities to the special qualities of the area.

Policy 53: Improve access to business advice and funding that supports the creation and expansion of small and medium sized enterprises, in particular, those that help sustain communities and enhance the special qualities.

Policy 54: Support training schemes and employment opportunities to ensure balanced communities in the National Park.

Policy 55: Promote opportunities for diversified economic activity in the National Park, in particular, where it enhances the special qualities.
Introduction 7.104 Within the National Park the challenge is to encourage sustainable development within the limits of the environment and to ensure the National Park’s purposes are not compromised in meeting the duty. This Local Plan seeks to find new and different ways in which economic activity can help to conserve and enhance the special qualities of the National Park, making best use of natural capital to drive the local economy without long-term harm to the natural environment in line with the PMP. A Local Plan objective derived from the Vision is to maintain and protect farming, forestry, tourism and other business activities that are compatible with the landscape and special qualities of the National Park.

7.105 The South Downs National Park is home to about 10,000 businesses and generates £19,450 GVA per head. The main centres of employment are the market towns of Lewes, Petersfield, Midhurst and Petworth, but there are also a significant number of rural businesses and people working from home. The PMP identifies two main issues relating to sustainable economic development—the need to provide a range of employment sites to enable businesses to thrive and the need to enable access to high-speed broadband.

7.106 The Employment Land Review (ELR) is the main evidence-based study supporting the Local Plan policies on sustainable economic development. It was produced in 2015 by GL Hearn on behalf of the SDNPA. The ELR identifies a number of economic and labour market dynamics specific to the National Park. The National Park’s business base is focused on small businesses. Although the main centres of employment are within the market towns, the National Park’s economy is mainly rural. There is a high level of self-employment, which, in turn, is linked to the large number of micro and small businesses. There is a significant proportion of employment provided by agriculture, fishing and forestry in comparison to the rest of the region and the country.

The working age population of the National Park is lower than both the regional and national averages. Unemployment is much lower than the rest of the South East. There is significant out-commuting to areas outside the National Park to work, particularly Brighton, London, Chichester and Gatwick Airport. This evidence on the socio profile of the National Park has been used to inform SD27 on Sustaining the Rural Economy and Policy SD28 on Employment Land.

National Policy Context 7.107 The NPPF states that the Government is committed to securing sustainable economic growth in order to create jobs and prosperity. Section 3 of the document requires local and neighbourhood plans to promote a strong rural economy. The National Parks Vision and Circular goes into more detail about what this means for a national park. It states that NPAs must ensure that in their work furthering the National Park purposes that they give sufficient weight to socioeconomic interests in order to fulfil their duty to sustain strong communities. The duty has been given further weight by the Taylor and Rural Advocacy Reports, which both pointed to the need to accommodate growth, development and investment in rural areas at an appropriate scale and form. Valuing England’s National Parks (2013) recognises the valuable contribution national park economies make at a local, regional and national level. This Local Plan seeks to support appropriate development and to foster economic activity that will strengthen the sustainability of the National Park’s communities and businesses.
National Parks England published an Offer \(^{29}\) (*Open for Business*) this year to the Local Enterprise Partnerships (LEP) to unlock the potential of national parks to deliver sustainable economic growth. This offer focused on three main areas:

- Create more high-quality jobs in some of the most remote rural areas.
- Make national parks even better places to do business in through improved infrastructure like broadband and skills development.
- Use the national parks’ superb landscapes to enhance people’s quality of life and attract new businesses.

The Offer emphasised the need to support small and micro businesses in order to create sustainable rural communities that are grounded in the inspirational landscapes they rely on.

**Options Considered and Preferred Approach**

The *Local Plan Options Consultation Document* included four issues relating to economic development:

- What strategic goals should the Local Plan set for the local economy?
- Should the Local Plan safeguard existing employment sites?
- What approach should the Local Plan take to the allocation of additional employment land?
- How can the Local Plan support new businesses, small local enterprises and the rural economy?

The preferred approach to employment land is set out in Policy SD28 (Employment Land) and safeguards existing employment sites with varying degrees of flexibility. Criterion 1 of Policy SD28 (Employment Land) sets out a requirement for up to 8 hectares of new employment land. The preferred approach to supporting the rural economy is set out in Policy SD27 (Sustaining the Rural Economy). Criterion d encourages and supports small businesses. Criterion e facilitates flexible working practices and encourages home working. Criterion f promotes superfast broadband.

**Supporting text**

**Key sectors**

Following on from the *State of the Park Report* the Local Plan identifies three key sectors or clusters of economic activity within the National Park including tourism and the visitor economy, forestry and wood related activities, and local food and beverages. These sectors are all rooted in the National Park purposes and are linked to ecosystem services, particularly, provisioning and cultural services. This Local Plan supports these existing business sectors where they are compatible with the landscape and special qualities.

The 2011/12, comprehensive Visitor Survey demonstrated that the area is a major resource for recreation (local visitors) and tourism (those from further afield). Recreation and tourism therefore play a significant role in the economy. Tourism and the visitor economy are addressed in Policy SD20.

\(^{29}\) National Parks – Open for Business: An Offer to the Local Enterprise Partnerships from National Park Authorities in England (National Parks England, January 2015)
As is to be expected in England’s most wooded national park there is growing activity related to wood products. Wood-related activities are located primarily in the central and western part of the National Park. Most sawed and planed wood is used by the construction industry, while pallets, packaging and fencing are other important end uses. The key employment sites based in this sector are identified on the Policies Map and are protected under Policy SD28. The specific development requirements for agriculture and forestry are set out in Policy SD46.

Food and beverages form an important economic sector. The SDNPA launched a food and drink portal in June 2015 to bring together producers with potential market opportunities, reflecting the increasing and strong interest in local and organic produce. The State of the Park Report states that around 85 per cent of land within the National Park is farmed. Vineyards and wineries are an expanding part of this sector with the soils and weather patterns on the south facing slopes of the chalk downland being ideal for grape production. Climate change and market forces will continue to influence the landscape leading to new enterprises, and increasing opportunities for producing alternative energy, for example, wood fuel. The provision of ancillary facilities such as bottling plants will need to be compatible with and not harm the special qualities of the National Park, particularly the landscapes.

DEFRA awarded funding to the SDNPA to establish a pilot Food Enterprise Zone (FEZ) in February 2015. This will support new dairy production on existing dairy farms by re-using redundant buildings and brownfield sites. It will also allow for more farm shops to be set up enabling direct sales to consumers. This will encourage closer ties between food and farming businesses thus simplifying rural supply chains.

Green businesses

The SDNPA will encourage green business proposals particularly when they are linked to the special qualities of the National Park. A green business is defined as an enterprise that has a positive impact on the local and/or global environment. Green businesses are linked to ecosystem services, for example, a cycle hire business would provide non-material cultural services resulting from the customers’ interaction with the natural environment and a coppice business would provide provisioning services with a renewable source of wood. Renewable energy schemes are a type of green business and Policy SD56 deals with renewable energy.

Rural supply chains

Rural supply chains link products, services, finance and information from the producer to the customer. Policy SD27 seeks to encourage rural supply chains within and across the National Park in order to nurture and grow rural businesses. This is particularly important for the local food network and will form an integral part of the FEZ. Rural supply chains are not, however, linked exclusively to food and drink, for example, the use of local building materials contributes positively to sustainable landscape management and local employment. The market towns of the National Park have both a traditional and future role as hubs for rural supply chains including traditional markets but also networking, training and services.
7.119 The National Park’s business base is focused on small businesses. There are thousands of small and micro businesses in the National Park providing employment for over 50,000 people. Although the main centres of employment are within the market towns, there are a significant number of rural business units. The ELR found that 88 per cent of workplaces within the National Park employ fewer than 10 people and 98 per cent of enterprises employ fewer than 50 people. These proportions are significantly higher than national and regional levels. It indicates a strong entrepreneurial employment base reliant on small companies and start ups.

7.120 Policy SD27 seeks to promote and protect small businesses. This could be through the provision of affordable ‘move on space’ for expanding home-based businesses and flexible ‘move in/move on’ accommodation for start-up companies. The small businesses could be based in the countryside or the market towns in accordance with the Development Strategy. Policy SD47 deals with small businesses as part of farm diversification.

7.121 Provision of workspace is only one part of encouraging new business start-ups and developing existing businesses. The availability of advice and training, and on-going business support is also important in ensuring the survival and development of small businesses. This requirement provides an opportunity for the creation of integrated business centres or ‘incubator’ units, perhaps as social enterprises or cooperatives.

7.122 Many small businesses are home based and rural. A significant number of these home-based businesses are too small to be registered for VAT or PAYE and are not included in official statistics. Collectively, they are likely to make a significant contribution to the local economy. Home working provides a cost-effective solution to finding accommodation for new and micro businesses, and reduces the need to travel from home to the workplace. It also forms a vital part of rural supply chains. Policy SD27 seeks to facilitate flexible working practices including home working, providing that robust evidence is submitted and approved by the Authority that it will not cause unacceptable harm to the amenity of neighbours in terms of traffic, smell, loss of privacy, outlook, noise and overlooking.

7.123 Significant areas of the National Park are severely disadvantaged by slow and unreliable internet connections, with rural areas the most disadvantaged. The proliferation of ‘not spots’ is a major barrier to sustainable economic growth particularly for home-based businesses. The SDNPA is seeking to improve access to superfast broadband in partnership with the county councils and the LEPs.
Strategic Policy SD27: Sustaining the Rural Economy

1. Development proposals for rural businesses will be permitted provided that they comply with other relevant policies and they, as appropriate:
   a) promote and protect the National Park’s key sectors such as tourism and the visitor economy, forestry and wood-related activities, and local food and beverages;
   b) promote and protect green businesses linked to ecosystem services;
   c) support rural supply chains across the National Park and encourage closer ties between rural businesses;
   d) encourage and support small businesses through the provision of small, flexible, start-up and move-on business units;
   e) facilitate flexible working practices and promote home working, providing this does not cause unacceptable harm to the amenity of neighbours, and
   f) encourage smart economic growth and promote advances in information and communications technologies, particularly, superfast broadband.

2. Business proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused.

Supporting text

Employment land requirements

7.124 Policy SD28 sets out the employment land requirements, which meet the objectively assessed need for employment land identified in the ELR. The SDNPA believes that it is possible to accommodate this amount of development on sites across the National Park and, particularly in the market towns, without harming the special qualities, and that development should, as far as possible, utilise these special qualities to drive the economy forward.

7.125 The requirements have been calculated using two distinct methods – labour demand based projections and historic trends in employment floorspace delivery. The two methodologies are explained in full in the ELR along with the use of the Wider South Downs Area (WSDA). The requirements set out in Policy SD28 also builds upon the evidence supporting the employment policies in the East Hampshire, Winchester and Lewes Joint Core Strategies. Due to the difficulties of doing economic forecasts in a national park, the need figures should be treated with a certain level of caution and will be kept under review. It is important to take a flexible approach to the allocation and designation of employment land to ensure that the National Park’s purposes are not compromised in order to meet its socioeconomic duty.

7.126 The requirements for new employment land as set out in Policy SD28 below, are based on employment growth in B class employment sectors–offices (B1), manufacturing (B2) and warehousing (B8). The employment growth projections for B class employment were converted into need for new employment floorspace. This was done by multiplying the employment forecast for the three sectors by the relevant employment density set out in Government guidance. The next step was to translate the floorspace need into a land requirement for the WSDA, disaggregated by use class. Finally, the employment need for the National Park itself was disaggregated from the WSDA figure assuming that 30 per cent of demand for additional floorspace would be supplied.

30 Home and Communities Agency (2012) Employment Densities Guide,
A sufficient supply of employment sites is available to meet the requirements set out in Policy SD27. The new employment provision is focused in Petersfield, Lewes and the smaller market towns of Midhurst and Petworth. These sites fall within the Functional Economic Market Areas (FEMA) of Central Hampshire, Brighton and Chichester/Bognor respectively.

There are three tranches of future employment land supply, which make up the core supply. These are set out in Table 7.3. In addition, there is limited potential supply on the key sites of Shoreham Cement Works and the former Syngenta site. These are allocated for exceptional mixed-use redevelopment under Policies SD32 and SD33 respectively and could deliver some additional employment land during the plan period. The redevelopment of North Street Quarter in Lewes is allocated for mixed use redevelopment under Policy SD34. Although it will deliver higher-quality business premises it is unlikely to deliver a net gain in employment floorspace.

### Table 7.3: EmploymentLand Supply in the South Downs National Park

<table>
<thead>
<tr>
<th>Source of employment land</th>
<th>Amount (hectares)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sites with extant planning permission for employment development (excluding NDP allocations)</td>
<td>3.8 ha</td>
</tr>
<tr>
<td>Sites to be allocated in NDPS</td>
<td>4.63 ha</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>8.43 ha</strong></td>
</tr>
</tbody>
</table>

The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories known as ‘Use Classes’.

**Flexible approach to change-of-use applications**

The ELR forecasts a growth in demand for both office (use class B1) and small-scale warehouse accommodation (use class B8). Business support services, head office and management consultancy and other professional services are the major growth sectors underpinning the demand for office floorspace. A growth in warehousing and the postal sector along with a smaller growth in wholesale trade underlies the forecast need for warehouse floorspace.

In contrast, the ELR forecasts that there will be a continued and significant decline in employment in manufacturing, although manufacturing may contribute to growth in economic output linked to productivity improvements. This, in turn, will lead to a decline in demand for B2 floorspace although some manufacturing businesses may see a decline in jobs which does not translate directly through to floorspace.

It is a pragmatic solution to maximise the opportunities to re-use existing but vacant manufacturing premises for other forms of employment for which there is a demand. This will make an efficient use of brownfield land and will reduce the impact of new development on the landscape. Some of the predicted losses in B2 accommodation could be converted into meeting the need for small-scale B8 uses. Both uses broadly require similar premises in locational terms – out of centre with strategic road access. The Authority will therefore take a flexible approach to change-of-use applications for redundant manufacturing premises to warehousing providing that robust evidence is submitted and approved by the Authority, that there will be no adverse effect on the landscape and other special qualities including traffic, noise or pollution. Advice on these matters will be sought from other statutory bodies, particularly the county councils and the Highways Agency on.
the amount and type of traffic generation and the impact on the National Park’s rural roads.

**Safeguarding**

7.132 It is important to safeguard premises for local businesses both within the National Park’s towns and the wider rural area. This will help to support the long-term future of communities providing local employment opportunities for local residents and reducing out commuting to employment centres outside the National Park.

7.133 The ELR provides a robust portfolio of existing employment sites. This identifies a number of key employment sites, which are occupied, good-quality employment sites and include sites within the key sector of forestry and wood-related activities. The ELR recommends that the Local Plan supports the continued use of these sites for B class employment and resists development proposals for alternative uses. These are identified on the Policies Map and safeguarded under Policy SD28.

7.134 The ELR also identifies a number of general employment sites. The ELR recommends that these should also be identified in the Local Plan, but that a more flexible approach should be taken by allowing other forms of economic development such as trade counters and car showrooms on the sites. Proposals for alternative uses should be fully justified providing evidence that there is a lack of demand for B class employment and proof that the proposed uses will not adversely impact on the existing and future B class uses. Any proposals for main town centre uses will need to comply with Policy SD22 on town and village centres. The general employment sites are identified on the Policies Map and safeguarded under Policy SD28.

7.135 Because the National Park’s economic base is focused on small businesses it is not practicable to identify all these sites on the Policies Map. It is, nevertheless, important to protect existing business premises unless it can be proved that the site and the premises are redundant and incapable of meeting the needs of modern businesses. Proposals that would result in a loss of employment floorspace will need to provide evidence to the satisfaction of the Authority that the premises have been marketed for employment uses at a realistic cost and for a minimum of 12 months.
Strategic Policy SD28: Employment Land

1. The SDNPA will seek to accommodate the following amounts of new employment land between 2014 and 2032 provided that development proposals comply with other relevant policies:
   - Office (B1a/b): approximately 2 to 3 hectares.
   - Industrial (B1c/B2) and small-scale warehousing (B8): approximately 5 hectares.

2. The Authority will take a flexible approach to the change of use of redundant B2 premises and land to accommodate the need for new offices and/or warehousing providing that there would not be a potentially adverse impact on the landscape and other special qualities of the National Park including traffic, noise or pollution.

3. The Authority will safeguard all existing employment sites and allocations that are fit for purpose from development proposals for non-employment uses. Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the business premises. The key employment sites safeguarded by the SDNPA are shown on the Policies Map.

Evidence

- South Downs National Park Employment Land Review (2015) GL Hearn on behalf of the SDNPA

TOWN AND VILLAGE CENTRES

Partnership Management Plan Outcomes and Policies

Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities, many of which are positively linked with the special qualities of the National Park.

Policy 48: Support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.

Policy 49: Maintain and improve access to a range of essential community services and facilities for communities in the National Park.

Policy 52: Enhance local production by developing local economic supply chains and enabling businesses in the National Park to gain added value by linking their marketing activities to the special qualities of the area.

Policy 55: Promote opportunities for diversified economic activity in the National Park, in particular, where it enhances the special qualities.

Introduction

7.136 The town centres in the market towns of Petersfield, Midhurst, Petworth and Lewes are the principal retail and service centres. They serve the largest communities with essential services and facilities as well as those from the surrounding rural areas. They contain a high proportion and mix of independent retailers adding a distinctive character to the town centres with particular clusters of high-end clothes shops and antiques traders. Shop vacancy levels are very low across the National Park. However, the National Park does not function in isolation and there are many towns and villages on or near its boundaries, such as Winchester, Havant, Chichester, Worthing, Brighton, Eastbourne, Burgess Hill, Storrington, Haslemere and Alton that also act as service centres for residents in the National Park.
With the wealth of historic properties, beautiful surroundings, considerable numbers of independent shops, markets and events these town and local centres are attractions in themselves visited for leisure, cultural and tourism purposes.

The potential for town centre floorspace development is highly constrained with all centres containing significant numbers of listed buildings and an already tightly packed street scene. There are few areas of derelict land of any significant size, nor are there opportunities for larger-scale redevelopment.

Larger village centres such as Liss contain a good range and number of shops capable of meeting most of the day-to-day needs of residents. These centres are of more than purely neighbourhood significance and draw in some shoppers from outside of the immediate community.

Across the National Park there are a number of smaller village centres such as Fernhurst and Ditchling. These centres contain a small collection of shops. There is often a post office and/or small convenience store which provides top up shopping but they are generally not sufficient to meet the day-to-day needs of the community. These small village centres are often at the heart of the communities and many also contain a community building and pub.

The smaller and more isolated villages and hamlets are renowned for their individual character and appearance, but like many rural areas it is these settlements where accessing services and facilities is more problematic or threatened. Individual shops are dotted throughout these communities, some of which open for merely a few hours a week and others that are run by the community.

The town and village centre policies within the Local Plan seek to support the distinctive towns and villages, one of the special qualities. The Local Plan will incorporate, as far as possible, the policies within the adopted and emerging Joint Core Strategies. This will include levels of retail development proposed. These existing requirements will be considered against up-to-date evidence being prepared to inform the Local Plan and incorporated, as appropriate.

Detailed policies on Shops Outside Centres (SD51) and Shop Fronts (SD52) are contained in the Chapter 10.

National Policy Context

The National Park Vision & Circular (2010) does not contain specific guidance on town and village centres, but does recognise that the communities of our national parks are an absolutely critical ingredient to the sustainability of the parks themselves, and that NPAs must give significant weight to socioeconomic interests.

The National Planning Policy Framework (NPPF) states that planning policies should positively promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. The NPPF sets out a series of tasks that local planning authorities should complete in preparing a Local Plan. Of particular importance is the need to:

- define a hierarchy of centres;
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages, and set policies that make clear which uses will be permitted in such locations; and
- allocate a range of suitable sites to meet the scale and type of retail development needed in the town.
Paragraph 28 of the NPPF states that to promote a strong rural economy, local plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

**Options Considered and Preferred Approach**

The planning issues relating to town and village centres were not specifically considered as part of the Issues and Options consultation. However, they did form part of the consideration of the roles of settlements in various ‘tiers’. In the largest communities it was proposed that there should be 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. There would also be 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.

In smaller communities it was proposed that there would be a presumption in favour of small-scale retail and against the loss of such facilities, in order to meet local needs.

**Supporting text**

In relation to town and village centres, the objective of the Local Plan is to maintain and enhance the villages and market towns as thriving centres for residents, visitors and businesses. These policies work in conjunction with those on sustainable economic development, community facilities and services and tourism.

**Market Towns**

Our market towns have historic town centres and there are, in reality, few opportunities for major expansion of retail floorspace. Therefore, these planning policies will aim to ensure that the best use is made of the available floorspace and the loss of retail floorspace in key locations will be resisted.

Recognising that these market towns are also attractions in themselves and that visitors play an important part in the local economy, there will be a presumption in favour of tourism, cultural and leisure, and other town centre uses (of an appropriate scale and type) and facilities so long as these support the vitality and viability of the retail function of the town centre.

**Lewes**

The county town of Lewes is set against the backdrop of the South Downs and offers an attractive shopping environment, with many shops and services occupying listed buildings and lying in Lewes Conservation Area.

Initially a Saxon village, the Normans built a castle to protect the town. This sense of history remains strong and the historic town centre properties and shops have generally been retained and there are few modern, purpose-built retail units. This has facilitated the established character in the town centre of smaller, independent and niche retailers, and may have discouraged larger multiple chain stores from locating in the town. The independent shops are intrinsic to the town’s character and benefit the local economy by attracting tourists. In addition there are an array of deli’s, cafes and restaurants as well as B&Bs and hotels to meet the needs of visitors.
7.154 However, the evidence shows that there is also some qualitative need for additional purpose-built retail units in order to claw back expenditure that is currently being leaked to bigger centres outside the district, such as Brighton and Eastbourne. This is primarily for comparison goods, but there is also a limited, largely qualitative, need for convenience floorspace. An improved retail offer should attract additional shopping visits to the town, to the benefit of both the new and existing facilities. Appropriate linkages to/from new retail and leisure development will be required to ensure good accessibility between the established town centre facilities and any new facilities.

7.155 Through the Local Plan, the role of Lewes town as a principal leisure, cultural and visitor destination will be maintained and enhanced. This will include through appropriate development that seeks to reinforce and enhance the distinctive and diverse character and eclectic mix of independent specialist / niche retailers and service providers.

7.156 The Local Plan will incorporate, as far as possible, the policies within the adopted Lewes/SDNPA Joint Core Strategy. It should be noted that North Street Quarter, which is located in the north west part of the town centre, is allocated as a strategic site in this Local Plan. Detailed planning policies on Lewes town centre will be contained in the Lewes Neighbourhood Plan.

Petersfield

7.157 The retail heart of the town is the High Street and The Square extending to Dragon Street, Chapel Street and Lavant Street. The profile of the shops has changed over the years reflecting the general upheavals in high streets across the country, increased use of the internet for day-to-day items and shopping as a leisure activity. Petersfield has weathered this well by offering increased numbers of specialist shops that appeal to leisure shoppers at weekends and leisure-based services such as beauty, hairdressing and cafés, whilst at the same time retaining the larger chains. This process is likely to continue with standard shops being replaced with quality, niche retail outlets.

7.158 Many people visit Petersfield for leisure activities and to enjoy its cultural and built heritage (estimated 3.5m day trips to the area annually). As a result, the demand for retail space is currently extremely buoyant with agents reporting a shortage of small units for rent.

7.159 Petersfield is well supplied with supermarkets. The majority of visitors to the town centre shops come 2–5 times per week. The main competition is from Chichester, Portsmouth/Southsea and Southampton.

7.160 Petersfield’s historic centre attracts visitors to enjoy food and drink in attractive and pleasant surroundings. The town is well equipped with pubs, restaurants and cafes, many of which now offer outdoor seating around the Market Square. Festivals, events and specialist markets have helped to promote the concept and the Market Square has proved a great asset to the town which has assisted and improved its retail offer. The night-time economy is important with an increased number of restaurants and the popularity of town centre pubs. There is no evidence to suggest that there is an unfulfilled need at present.

7.161 Detailed planning policies for Petersfield town centre are contained within the draft Petersfield Neighbourhood Plan.
Midhurst

7.162 Midhurst has been shaped by its trading activities over the centuries. Originally a Saxon manor with a market that served the surrounding agricultural settlements, it developed in medieval times into a prosperous trading centre. Stalls in the market turned into more permanent shops and trade was further increased through the town’s role as a place of pilgrimage and its position straddling routes to shrines in Chichester and Winchester. As it does now, Cowdray House and grounds also drew significant numbers of visitors.

7.163 Like many market towns, Midhurst has seen its retail economy struggle against the larger towns of Chichester and Guildford, easily reached by car. About three-quarters of the town’s trade comes from local residents and this is predominately for ‘top up’ shopping.

7.164 The town has few vacant premises and, in most cases, high-quality shop fronts. However, it suffers from heavy traffic in areas such as Rumbolds Hill and North Street which creates a poor and sometimes intimidating environment for pedestrians. There is also a need to continue to encourage people to explore the streets of specialist and independent retailers in the West Street and Market Square area of the town.

7.165 The challenge is to lift Midhurst to become a market town that more effectively services its hinterland by improving the quality of its retail offer and thereby also increase its retail spend. Its location within the National Park also presents opportunities for walking, wildlife and business related to other outdoor activities to emerge within the town centre.

7.166 Land next to the Grange within the Midhurst town centre boundary has been purchased for a potential new medium sized supermarket development. It is anticipated that an application will be received in 2015. The SDNPA has agreed with the potential applicant that any application for a supermarket will be accompanied by a retail impact assessment. Should permission be granted, it would be accompanied by a range of measures to ensure there is improved connectivity between the site and the historic town centre. This is in recognition of the location of the site on one side of the town centre. There will also be a need to consider parking provision and landscaping as well as the more day-to-day development management issues such as design, noise and amenity.

7.167 As a neighbourhood plan is not being prepared for Midhurst, this Local Plan defines the town centre boundary and primary shopping area for the town. These are shown on the Midhurst Inset Map. A masterplanning exercise is being carried out by the SDNPA in collaboration with the Town Council to ensure that the town and its town centre are being comprehensively planned for.

Petworth

7.168 Petworth is an attractive, historic market town with an international reputation as a centre for antiques dealers. It is perhaps best known for Petworth House and Gardens, a National Trust property that draws thousands of tourists to the area.
7.169 The town centre is positioned at the cross roads of the A272 and A283 which has both positive and negative issues associated with it. Heavy traffic and large vehicles travelling through the tight central streets of the town damage the environment and impact on the enjoyment of the town by residents and visitors but, conversely, the roads also provide significant passing trade that might otherwise not be aware of the presence of the various shops and services. The town centre itself contains a small supermarket, DIY store, bank and a range of restaurants, pubs and community buildings. There are also a large number of independent shops with particular concentrations of antiques dealers and high-end clothes shops. Petworth has a relatively small retail catchment area due to the fairly limited and specialist retail offer available. Shopping is either top-up or specialist, one off purchases. Most residents shop elsewhere for their day-to-day needs.

7.170 Detailed planning policies for Petworth town centre will be contained within the Petworth Neighbourhood Development Plan.

Liss

7.171 Liss village centre has grown from the arrival of the railway in 1859. Its centre contains a mix of Victorian and modern premises. A good range of shops and other services exist, including a very small supermarket, although like many other communities it has seen a general decline in the number of shops both within the village centre and across the parish as a whole. The village centre now provides for the day-to-day retail needs of both Liss and the surrounding communities at West Liss, Liss Forest, Hill Brow and Rake.

7.172 The modern development in the centre of the village has not been sympathetic to the character of the village and detracts from the Conservation Area and more historic properties. The Parish Council, through the Village Design Statement and Parish Plan, have sought to address those issues it can and wish to see the village centre as a thriving location which supports the immediate and surrounding communities.

7.173 Detailed planning policies for Liss village centre will be contained within the Liss Neighbourhood Plan.

Smaller Village Centres

7.174 It is important that all residents within the National Park have access to a range of essential services and facilities, where possible, and these smaller village centres have a vital role to play. Proposals that would result in the loss of these services and facilities will not be supported unless there is evidence of marketing and that alternative uses have been sought in the first instance.

Farmers’ Markets

7.175 The aim of the farmers’ market is to put the consumer in contact with the producer and to provide local, fresh, quality produce. All the products on sale should have been grown, reared, caught, brewed, pickled, baked, smoked or processed by the stallholder. The South Downs National Park ‘identity’ provides an opportunity to support and promote local farmers enabling them to sell more produce to local people and visitors.

7.176 Farmers’ Markets are also attractions in themselves, adding character and vitality on a market day and can draw in people to the market towns and villages across the National Park.
Retail Impact Assessments

7.177 The purpose of this test is to assess whether the impact of a proposal for retail, office or leisure development outside or on the edge of a town centre would have an adverse impact on an existing town centre. Paragraph 26 of the NPPF allows local planning authorities to define a locally set floorspace threshold for impact assessments that are lower than the default threshold of 2,500 sqm. The SDNPA considers it is appropriate to set lower thresholds in the Local Plan due to the rural nature of the National Park and the small-scale nature of the existing retail offer.

7.178 The SDNPA considers that it would be highly unlikely that proposals for large-scale, out of town retail parks/supermarkets would ever be appropriate in the context of this highly protected landscape, even if a need was identified.

Strategic Policy SD29: Town and Village Centres

1. Development proposals for town centre development that comply with other relevant policies will be permitted where they promote and protect the following hierarchy of identified centres as shown on the Policies Map:
   - Market Town Centres: Lewes, Midhurst, Petersfield and Petworth.
   - Larger Village Centre: Liss.
   - Smaller Village Centres: Alfriston, Ditchling, Fernhurst and Findon.

Development proposals will be supported where they retain and enhance:
   a) local markets, including farmers’ markets; and
   b) independent retailers, particularly those linked to supply chains across the National Park.

2. The Market Towns and Larger Village Centres
   a) Within these defined town and village centre areas as shown on the Policies Map, development proposals for retail and town centre uses will be supported providing that they are compatible with the size, scale and historic nature of the town or village centres, and comply with other relevant policies.
   b) Within the defined primary shopping frontage, as shown on the Policies Map, the loss of units in use Class A (including retail, financial and professional services, restaurants and cafes) will not be supported.
   c) Other appropriate uses within the town and village centres including tourism, cultural and leisure facilities will be supported so long as these do not harm the retail function of the town centre. There will be a presumption in favour of such uses within the secondary shopping frontage as shown on the Policies Map.
   d) Development that supports the evening economy, particularly for visitors/tourists will, in principle, be supported, provided the use would not result in adverse impacts on the amenity of town centre residents.
3. Smaller village centres
   a) Development proposals for retail development will be supported providing they are of a size and scale appropriate to the community they sit within and comply with other relevant policies. Such development should be well related to any existing shops and services within the village centre unless it can be demonstrated that this is not possible.
   b) The Authority will safeguard existing retail units (A1, A2, A3) that are fit for purpose from development proposals for non-retail uses. Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises.

4. Retail Impact Assessments
In order to promote and protect the town and village centres, a retail impact assessment will be required for development outside of the defined Market Town and Larger Village Centre boundary, where the proposal exceeds the following thresholds for retail floorspace:
   - Market Town: 750 sqm
   - Larger Village: 500 sqm
   - All other locations (including farm shops and garden centres): 150 sqm

5. Development proposals that fail the sequential test or would have an unacceptable adverse impact on the vitality and viability of the market or village centres will be refused.

Evidence Base
- Lewes District Shopping and Town Centres Study (2012)
- Midhurst: Strategy and Sustainable Opportunities, CACI (2007)
- Petersfield Retail Study (2012)
- Petworth: Market Summary, CACI (2013)

STRATEGIC INFRASTRUCTURE PROPOSALS

7.179 Key responses to the Local Plan Options Consultation Document Issue 52 (relating to proposals for strategic infrastructure provision) which informed the preferred options Policy CF3 include:
   - Concern about allowing damaging strategic infrastructure in one location to enable improvements in other parts of the National Park.
   - A sequential test must be carried out to ensure it is absolutely necessary to be in the National Park and not possible elsewhere.

Preferred Approach
7.180 The preferred approach combines the proposed approach and Option 52a in the Options Consultation Document. It is broad enough to be flexible and cover all possibilities.

7.181 There were no alternative policy options suggested through the consultation.

Supporting text
7.182 Strategic infrastructure can include energy provision and transfer, flood management, transportation, wastewater management and telecommunications infrastructure.
7.183 Growth often requires strategic infrastructure upgrades and provision which have a positive social impact and can reduce or resolve infrastructure capacity limitations across wide areas. However, they can be harmful to the natural environment and landscape and are, therefore, contrary to the first purpose. The major development test of NPPF paragraph 116, including the public benefit test, seeks to strike this balance and is reflected in Policy SD30. The individual and cumulative impacts will be considered. Design of such infrastructure is also critical and will need to be of exemplary quality.

7.184 Strategic infrastructure projects are often planned beyond local administrative boundaries at a sub-regional or larger scale. The Local Plan should seek to reconcile the wider benefits and public interest of strategic infrastructure with the statutory purposes and duty through the major development test. Consideration will be applied to proposals outside of the National Park boundary in liaison with partner authorities and consultation processes.

**Strategic Policy SD30: Strategic Infrastructure Provision**

1. Strategic infrastructure proposals will be accepted only in exceptional circumstances and where it can be demonstrated they are in the public interest. If these tests are met, the highest level of design, mitigation and improvements to the natural beauty, wildlife and cultural heritage of the National Park will be sought.

2. The design of infrastructure through partnership working with developers and infrastructure providers should reflect the high-quality landscape and ensure, where possible, benefits to the economic and social wellbeing of the local community.

**Evidence**

- Infrastructure Act (2015)
- Infrastructure Delivery Plan (SDNPA, 2015)
- South Downs Integrated Landscape Character Assessment (2011)
- South Downs Viewshed Characterisation Study
CLIMATE CHANGE AND SUSTAINABLE CONSTRUCTION

Partnership Management Plan Outcomes and Policies

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

**Outcome 2:** There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

**Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

**Policy 25:** Actively promote water efficiency measures and more sustainable patterns of domestic, industrial, farming and leisure water use, to reduce overall water use.

**Policy 50:** Housing and other development in the National Park should be closely matched to the social and economic need of local people and should be of high design and energy efficiency standards, to support balanced communities so people can live and work in the area.

**Policy 56:** Support appropriate renewable energy schemes, sustainable resource management and energy efficiency in communities and businesses in the National Park, with the aim of meeting Government climate change targets.

**Introduction**

7.185 Mitigating against and adapting to climate change is an international and national priority. In response to anticipated long-term changes in our planet’s average temperatures, weather and seasonal patterns and sea level rises, the UK has committed to reducing carbon dioxide emissions by 80 per cent of 1990 levels by 2050. Currently, the built environment nationally is responsible for approximately 50 per cent of carbon dioxide emissions including waste from demolition and construction. Also, over 50 per cent of water consumption is attributable to households. Our use of resources is not sustainable and the design and construction of new development with improved environmental performance is a critical part of delivering sustainable development. Even without climate change, there is still an imperative to promote more environmentally friendly development which minimises the use of finite resources.

7.186 The Government recognises that national parks have a role to play in tackling climate change and that they must place it as central to their objectives. Development should minimise the National Park’s vulnerability to climate change through reducing and mitigating the factors which are causing it, and become more resilient by being able to adapt to its effects.

7.187 Actions to reduce and mitigate the greenhouse gas emissions which contribute to climate change are listed in Table 7.4. Adapting to climate change is also important and involves minimising the negative impacts of climate change and making development more resilient. Aspects of both of these are summarised in the Table 7.4.
### TABLE 7.4: ACTIONS TO REDUCE, MITIGATE AND ADAPT TO CLIMATE CHANGE

<table>
<thead>
<tr>
<th>Reducing and mitigating for climate change</th>
<th>Adapting to climate change</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Retrofitting buildings for energy efficiency.</td>
<td>• Bigger, better connected and managed habitats to conserve and enhance biodiversity.</td>
</tr>
<tr>
<td>• Reducing carbon emissions from transport.</td>
<td>• Reducing water and energy demands.</td>
</tr>
<tr>
<td>• Increasing the appropriate use of renewable energy.</td>
<td>• Flood resilient development and locating development outside of functioning floodplains.</td>
</tr>
<tr>
<td>• Use responsibly and, where possible, locally sourced materials and re-use materials wherever possible.</td>
<td>• Sustainable drainage systems.</td>
</tr>
<tr>
<td></td>
<td>• Locating development where it is not threatened by coastal erosion.</td>
</tr>
<tr>
<td></td>
<td>• Appropriate new landscaping in new development.</td>
</tr>
</tbody>
</table>

7.188 The existing building stock also makes a large contribution to carbon emissions. Where possible, retaining and re-using quality buildings and retrofitting them with new technologies is encouraged. However, where demolition is necessary, valuable materials should be saved and re-used. This can also contribute to local identity and cultural heritage as outlined in Policy SD11.

### National Policy Context

7.189 The *National Parks Vision and Circular* (2010) states that while delivering the two statutory purposes, NPAs must place climate change as central to their objectives. It also states that NPAs need to work with local communities to reach a position where renewable energy is the norm in all national parks, whilst not compromising the overriding purposes and duty. They also have a role to play in reducing emissions from a variety of sectors. The Circular promotes sustainable design standards for the construction and management of development.

7.190 The core planning principles outlined in paragraph 17 of the NPPF support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources including the conversion of existing buildings, and encourage the use of renewable resources.

7.191 Paragraph 94 of the NPPF states that authorities should adopt proactive strategies to mitigate against and adapt to climate change. Paragraphs 95 and 96 go further by specifically stating that new development should be planned in locations and ways to reduce greenhouse gas emissions. Paragraph 96 also outlines the need to increase the use and supply of renewable and low carbon energy whilst ensuring that adverse impacts including landscape impacts are satisfactorily addressed. This paragraph also highlights that communities have a responsibility to contribute to energy generation from renewable or low carbon sources, such as community-led initiatives through neighbourhood planning. It recognises that renewable energy at all scales helps to cut greenhouse gas emissions.
7.192 The Climate Change Act 2008 commits the UK to set a long-term binding framework to cut our emissions by at least 80 per cent by 2050 and by at least 35 per cent by 2020 against 1990 levels. It also places a duty on authorities to report to Government on the current and future predicted impacts of climate change on their organisation; proposals and policies for adapting to climate change; and an assessment of progress towards implementing the policies and proposals set out in previous reports. This is in the context of the national climate change risk assessment and adaptation programme that has been devised to address the Act’s requirements.

7.193 The DEFRA White Paper The Natural Choice: Securing the Value of Nature (2011) is Government policy. It outlines that tackling climate change is essential for maintaining a healthy, resilient, natural environment and perhaps the greatest challenge for the economy. It states that a healthy environment is essential to long-term growth and enabling it to adapt to climate change is a central theme of the document.

7.194 A Ministerial Statement, published in March 2015, outlines the Government’s new national planning policy on the setting of technical standards for new dwellings and Local Plan making. It states that the statement should be taken into account in applying the NPPF. It outlines new optional national technical standards for new dwellings relating to water efficiency, access and internal space standards. It outlines that these can only be adopted in Local Plan policies if they address a clearly evidenced need and their impact on the viability of development is considered. They only apply to 10 dwellings or less. It also sets out that local planning authorities should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. Furthermore, that from October 2015, existing local plan, neighbourhood development plans or supplementary planning documents should be interpreted using the nearest equivalent national technical standards for water efficiency, access and internal space standards.

**Options Considered and Preferred Approach**

7.195 A number of issues relating to climate change were considered in the Local Plan Options Consultation Document, including the following:

- How can the Local Plan best ensure the appropriate management of climate change impact on the historic environment?
- How can the Local Plan best ensure the use of appropriate materials?
- How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?
- How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?
- How can the Local Plan address carbon reduction targets through energy-efficiency schemes?

7.196 The preferred approach is to include a strategic policy in the Local Plan which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies. A specific development management policy on Energy Performance and Historic Buildings (Policy SD38) is also proposed.
7.197 The environmental performance of a building can be markedly improved through its design, and these aspects should be integral to development from the start, rather than improvements ‘bolted on’ at the end of this process. While sustainability improvements can be made at any stage, there could be a financial disbenefit if incorporated later in the process. The construction process can also have a significant environmental impact which its design could help to mitigate.

7.198 Over its lifetime, a sustainable building will have had a much smaller impact on the environment than a standard building. The environmental performance of materials and renewable technologies can also conserve energy used in both heating and power consumption.

7.199 Efficient and sustainable energy use in new development is a particular area that can help in achieving reductions in carbon dioxide. The maximum allowable technical standards for residential development, or any subsequent future standards, above Building Regulations will be encouraged. This includes the national Zero Carbon Buildings Policy for new homes being introduced in 2016 and for non-domestic buildings in 2019. The standards of the Building Research Establishment Assessment Methodology (BREEAM) for non-residential buildings will also be used in the assessment of proposals.

7.200 The Building Research Establishment’s (BRE) standards are internationally recognised and relate to measures of improving a building’s environmental performance. Its standards include aspects of location, energy and water efficiency, use of materials, waste, ecology and the internal environment (health and wellbeing). They are based on a scoring system to demonstrate the environmental credentials of a building whilst addressing wide-ranging environmental and sustainability issues. Any development which is defined as major development will be required to meet the ‘Excellent’ standard. This less stringent approach for smaller schemes is because the higher requirement may result in small schemes like a new village shop not being viable, if it complies with all other relevant policies.

7.201 Applicants are strongly encouraged to consider what measures could be incorporated into their proposals. This includes development which is allowed under Permitted Development Rights. Table 7.5 outlines what aspects of sustainable design and construction could be incorporated into proposals. Developers, other businesses and homeowners are encouraged to consider these aspects to achieve the highest possible environmental standards in their proposals. Major developments will have the ability to achieve more of these aspects given their scale of development and greater opportunities to implement long-term sustainable measures than smaller developments. The SDNPA will be assessing these in light of paragraph 116 of the NPPF. Early advice should be sought from the SDNPA to address these considerations.

7.202 There may be occasions where off-site provision/contributions are a more viable option. This may help to fund decentralised energy networks, or connection to existing combined heat and power (CHP) or heating/cooling networks or contribute to their future development. The viability of residential proposals above ten dwellings will need to be assessed in relation to the Zero Carbon Homes policy.

7.203 There may be instances where particular circumstances of a development where it may not be practical or feasible to incorporate some of the requirements in Policy SD31, such as in conservation areas, in or in the setting of listed buildings (see historic environment policies) or sensitive locations in the landscape. Policy SD38 deals with energy performance and historic buildings.
### TABLE 7.5: SUSTAINABLE CONSTRUCTION MEASURES WHICH COULD BE INCORPORATED INTO PROPOSALS

<table>
<thead>
<tr>
<th>Energy Efficiency and consumption</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Passive solar gain and maximising natural daylight: The siting, orientation and internal layout to provide light and heat can significantly affect energy demand, and reduce energy bills and create attractive living/working environments such as reducing overshadowing. The proposed layout can also increase opportunities for solar panels (for example, south facing roofs). Internal layouts can be designed so as to maximise solar gain to the most used rooms.</td>
</tr>
<tr>
<td>• Thermal mass: Materials with a high thermal mass can regulate heat fluctuations in buildings.</td>
</tr>
<tr>
<td>• Heat loss: Heat loss should be minimised to maximise efficiency. This can be achieved through insulation and glazing.</td>
</tr>
<tr>
<td>• Natural ventilation: Anticipated summer temperatures may require greater protection from overheating. Natural ventilation should be used in favour of mechanical systems which can have a high energy demand.</td>
</tr>
<tr>
<td>• Green and brown roofs: These can help to regulate the temperature of a building, remove CO₂ and other pollutants from the atmosphere, and reduce any heat island effect.</td>
</tr>
<tr>
<td>• Renewable technologies: These can include solar power, solar water heating, wind turbines, biomass, combined heat power networks, ground source heat pumps, air source heat pumps and hydroelectric power. These can be applied in varying ways to development depending on the scale and nature of the proposals and site characteristics.</td>
</tr>
</tbody>
</table>

### Water Efficiency

- Rain water harvesting: This can be as simple as a water butt to systems supplying toilets and outside taps.
- Grey water recycling.
- Black water recycling (more feasible on larger schemes)
- New landscaping which is less water dependant and more resilient to climate change.
- Efficient fixtures and fittings.

### Landscaping

As well as providing a green corridor and connectivity to the landscape to enhance biodiversity, this can regulate climate around a development (for example, heat island effect), provide shelter from the wind and so reduce heat loss. It can also provide shade to avoid over heating and the need for artificial cooling.

### Drainage

Sustainable Urban Drainage can reduce the risks of flooding and can be used in all types and scales of development. Providing more permeable surfaces in development can also reduce surface water run off or the need for drainage works to carry water off site.
Flood resilience and resistance measures

Buildings can become more resilient to reduce the consequences of flooding and facilitate a recovery from any effects. This can be achieved through floor levels, appropriate materials, the layout of buildings, siting fixtures and electrical controls higher than normal.

Storage facilities

The use of composting bins and convenient cycle storage.

Noise, air and light pollution

These can be addressed through, site layout, travel planning, internal layouts, level of car parking, landscaping, energy efficiency and lighting only, where necessary.

Materials

Using responsibly sourced and recycled materials can make a major contribution to sustainable development by slowing down the demand for non-renewable resources. This can also limit site waste.

Strategic Policy SD31: Climate Change and Sustainable Construction

1. Development proposals that incorporate high standards of sustainable construction and comply with other relevant planning policies will be permitted provided, where appropriate, they:
   - reduce;
   - mitigate against; and/or
   - adapt to the impacts of climate change.

2. Major non-residential development must meet at least BREEAM ‘excellent’ standard.

Evidence

- EU Renewable Energy Targets.
- Planning and Energy Act 2008.
- The Infrastructure Act (2015).
- The National Adaptation Programme ‘Making the country resilient to a changing climate’ (2013).
8. STRATEGIC SITES

INTRODUCTION

8.1 This Preferred Options version of the Local Plan sets out strategic policies for three large brownfield sites, all previously in employment use, but now vacant or underused. Two sites are in countryside locations and one within an urban area. The sites represent one-off opportunities for developments of exceptional quality which warrant waiting for the right proposal to come forward. They have the potential to make a substantial contribution towards sustainable growth, but also to accommodate innovative development which promotes national park purposes and conserves and enhances the natural environment’s ability to contribute goods and services. This may include provision of other types of land use, such as recreation and leisure, visitors’ accommodation and community uses. The sites are:

- Shoreham Cement Works, Upper Beeding
- The former Syngenta site, Fernhurst
- North Street Quarter and adjacent Eastgate area, Lewes (a strategic allocation in the Lewes Joint Core Strategy).

8.2 There is also one large site in Lewes town which is likely to be a strategic allocation in the Lewes Joint Core Strategy (LJCS). This is the greenfield housing site at Old Malling Farm. The reason for defining it as a strategic allocation in the LJCS is that it is available to make significant contribution towards meeting the 5 year land supply target, which is different from the type of site regarded as strategic in this Local Plan. It differs from the above strategic sites in that it is not previously developed land and is not proposed for mixed development. Instead, it is allocated as a housing site by Policy SD-SS03.

8.3 The Local Plan also sets out five Broad Areas of the National Park (Chapter 4). North Street Quarter is located within the ‘Scarp Slope’ Broad Area (Policy SD4/SS); the Syngenta site in Fernhurst is located within the ‘Western Weald’ Broad Area (SD4/WW); and Shoreham Cement Works is located within the ‘Dip Slope’ Broad Area (SD4/DS). The Development Strategy (Policy SD22) states that development will not normally be permitted outside settlement boundaries. However, in exceptional circumstances development may be permitted. This may include the appropriate reuse or redevelopment of existing buildings and previously developed land where it is demonstrated that it is in accordance with the Spatial Strategy for the relevant Broad Area and other relevant national and local policy. This chapter identifies how these three strategic sites can collectively and individually contribute to meeting development needs and National Park objectives and purposes, and how their development can be justified by exceptional circumstances in the public interest.
8.4 The three sites are at different stages of progress and therefore of
details in terms of proposed land uses, quantum of development and
detailed development criteria. The North Street Quarter/Eastgate site is
the most advanced with an application for the majority of it made in
March 2015, based on the policy in the LJCS which is reproduced in a
slightly amended form here. A further application for redevelopment of
the Waitrose part of the site may come forward in 2015. The Syngenta
site has been subject to discussion with the developer and to a proposal
in the neighbourhood development plan. However, neither process has
resulted in agreement on a solution for the site. The developer has
instead carried out consultation on a residential development as a pre-
cursor to a planning application. The Shoreham Cement Works site is
at a much earlier stage with proposals from at least three interested
parties emerging through developer/owner initiative and the
neighbourhood development plan. In both cases it will be important for
the proponents to demonstrate that their schemes are truly exceptional
in terms of concept, quality and sustainability.

OPTIONS CONSIDERED AND PREFERRED APPROACH

8.5 There was a single issue included in the Local Plan Options Consultation
Document which asked respondents for views on the approach the Local
Plan should take to the redevelopment of major brownfield sites. The
three sites included in this chapter were introduced in this document,
but no specific options were proposed.

8.6 Respondents to the Options Consultation expressed views in support
of the redevelopment opportunities of the three sites providing that
they cater for local needs, retain employment land, where relevant, and
support the national park purposes.

8.7 The preferred approach is to allocate the three key sites for strategic
redevelopment opportunities, in a coordinated approach to deliver
national park purposes.

NATIONAL PLANNING CONTEXT

8.8 Before allocating these strategic sites, the South Downs National Park
Authority (SDNPA) must be reasonably satisfied that their development
would constitute exceptional circumstances and be in the public
interest in accordance with paragraph 116 of the National Planning
Policy Framework (NPPF), as translated into Core Policy SD3 of this
Local Plan.

8.9 Although these matters were taken into account in allocating the North
Street Quarter/Eastgate site through the LJCS, it is important to check
explicitly that the exceptional circumstance and public interest tests do
apply to all the strategic sites.

NEED FOR THE DEVELOPMENT

8.10 There are two types of need for development on these sites. Firstly,
there is a need to restore and regenerate underused sites that are
having an adverse impact on the landscape and scenic beauty of the
National Park. This need is self-evident from the site descriptions
below, although it may be argued that the level of need varies between
the sites, with the greatest need being at Shoreham Cement Works as a
result of its prominent location at the narrowest point of the National
Park. Secondly, there is a need for development to take place to meet
growth needs, as far as compatible with the overarching ecosystem
services led approach, the NPPF and national park purposes and duty.
Housing Need

8.11 The DEFRA Vision and Circular for English National Parks 2010 (paragraphs 78 and 79) states that the national park authorities (NPAs) have an important role to play in the delivery of affordable housing and the Local Plan should include policies that pro-actively respond to local housing needs. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. The SDNPA should maintain a focus on affordable housing to ensure the needs of local communities are met and affordable housing remains so in the longer term.

8.12 There is a substantial need for affordable housing in the South Downs National Park (SDNP). This should be at least at the level of 40 per cent specified as a target in Policy SD24 (Affordable Housing Provision); but it could be argued that these strategic sites (if they are considered suitable for housing development) should demonstrate exceptional circumstances by making a greater contribution than this.

8.13 The NPPF (paragraphs 47, 54 and 55) states that local planning authorities should meet the full, objectively assessed needs for market and affordable housing to deliver mixed and balanced communities as far as is consistent with other policies of the NPPF, in particular, the restrictions on major development and the highest status of protection in relation to landscape and scenic beauty in national parks. Further, in rural areas, planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, which should remain affordable in perpetuity.

8.14 There is an objectively assessed need for housing development in the National Park as described in Chapter 7 and set out in the Strategic Housing Market Assessment (SHMA), but this is only required to be met in as far as is consistent with the policies in the NPPF. Moreover, the objectively assessed needs of the National Park vary between different market areas. Two of the strategic sites are within the Coastal West Sussex Housing Market Area, while the Shoreham Cement Works site is mostly located on the edge of the North-West Sussex HMA. This part of the National Park has relatively limited needs arising from its local communities.

Employment Need

8.15 The Employment Land Review (ELR) identified a limited need for further development, namely 2.0 to 3.0 hectares gross of offices (B1a/b) and up to 5.0 hectares gross of industrial and warehousing (B1c/B2/B8). It suggests some qualitative need for office floorspace in Lewes. It also identifies the potential for the Syngenta and Shoreham Cement Works sites to provide about 5 hectares each of employment (B1, 2 and 8) uses as ‘secondary supply’. Development of larger-scale employment land presents a challenge in a sensitive environment such as the SDNP, and should relate to the local area and make a positive contribution to ecosystems services.

Tourism Need

8.16 The 2014 Visitor Accommodation Review shows potential for tourist accommodation development across all parts of the National Park. The evidence shows the following:

- There is good potential for the National Park to expand on many of the current and emerging rural visitor accommodation development trends.
• There are some clear gaps in current accommodation provision, including gaps in accommodation supply along the South Downs Way.
• There is strong interest from national, regional and local visitor accommodation developers, operators and investors, as well as from land and property owners interested in visitor accommodation development.

8.17 The research shows potential for woodland or lakeside holiday lodge parks with lodges for ownership and/or rental and for eco lodge parks and fishing lodges associated with new lakes, but commented that it is likely to be difficult to find sites where large-scale holiday lodge parks could be acceptably developed in planning terms.

8.18 The review advocates that the allocation of sites for visitor accommodation uses requires a very strong case to be made. However, there may be circumstances where this could be justified. These include where:
• hotel/visitor accommodation developments might be priced out of the market by higher value competing uses e.g. residential uses;
• the delivery of a hotel or other form of visitor accommodation is critical to a wider scheme of strategic interest;
• there is a known requirement for the particular site/location and little alternative in terms of other suitable sites;
• the hotel or visitor accommodation is a preferred use/better fit with destination objectives for a particular location, building or site;
• the market requires certainty, for example, to progress/work up a scheme requiring significant cost and time; or
• there is potential for a scheme to deliver significant economic benefit, few suitable or available sites, and/or an opportunity for site improvement/remediation.

8.19 The review concludes that market potential has been identified for a number of visitor accommodation offers of a scale which clearly presents a challenge in a sensitive environment such as the National Park. Given the benefits they can bring, however, there is merit in a proactive approach to identifying suitable sites where larger-scale visitor accommodation development projects would be acceptable in planning terms. There is a role for the SDNPA and its partners to play in identifying sites that could accommodate these types of development – holiday lodge parks, golf and fishing lodge developments, activity holiday centres, caravan and camping sites – where there are opportunities to minimise impacts.

CONCLUSIONS ON NEED

8.20 There is therefore a need for some development for which these sites may be appropriate in principle. However, the need for employment space is limited, as shown above, and the 2010 Circular makes it clear that national parks are not suitable locations for unrestricted housing and should focus on the affordable needs of its communities. The need to find sites for large-scale tourist accommodation may be an exceptional need to justify appropriate development on at least two of the strategic sites.

IMPACT ON THE LOCAL ECONOMY

8.21 The development of the sites for employment uses would clearly have a beneficial impact on the economy of the National Park and of the wider sub-region, while development for visitors’ accommodation would create employment opportunities directly as well as bringing additional expenditure into the local area. Housing development will generate construction jobs, while retaining expenditure by local people occupying the dwellings and providing a local labour force for existing and new businesses.
MEETING THE NEED OUTSIDE THE DESIGNATED AREA OR IN SOME OTHER WAY

8.22 With regard to the first type of need, that is to restore and regenerate currently underused sites and improve their impact on the landscape, by definition, this can only take place on these sites. Suitable development must achieve an acceptable level of restoration which enhances the landscape, scenic beauty, wildlife and cultural heritage of the National Park at these locations.

8.23 In relation to visitor accommodation and employment development, it would not be sustainable to expect all provision to be made outside the National Park, increasing commuter flows and day trippers. Some use should be made of already underused hotel and guest house accommodation in the coastal towns, but it is also important to add to the amount of accommodation within the National Park in order to increase the currently low levels of average visitor expenditure. Moreover, it is the National Park itself which creates the need and demand for tourist accommodation. Developing outside the designated area would only partly meet these needs.

8.24 With regard to housing, a large amount of development to meet objectively assessed need in each of the four housing market areas will need to take place outside the National Park, using the Duty to Cooperate. This is already taking place, for instance in East Hampshire where the JCS makes provision for some of the National Park’s needs in Whitehill and Bordon. In Lewes and Chichester there are more limited opportunities to do this and these strategic sites, if acceptable in other respects, can help reduce the extent to which these and other authorities need to make provision over and above their own share of the objectively assessed need in the relevant housing market area.

EFFECT ON ENVIRONMENT, LANDSCAPE AND RECREATION

8.25 These are considered in more detail under each site, but all three have the potential to have positive impact on these matters through their regeneration and restoration, through recreational opportunities which could be part of the proposed mix of uses and through sustainable travel links with the rest of the National Park.

SHOREHAM CEMENT WORKS

Introduction

8.26 This is the most prominent brownfield site in the National Park, in a key location where the National Park is at its narrowest. Despite being a key part of the social and industrial heritage of the area, the site has been described by a Planning Inspector as ‘a major visual intrusion at a strategic point within the South Downs’. The site has a negative visual impact on the National Park, particularly from public rights of way running in the vicinity of the site (including the South Downs Way and the Downs Link cycle route), and is sensitive to urban influence. It therefore needs to be restored, with unsightly buildings demolished or renovated and suitable treatment of prominent quarry faces. Area D would have to be restored in accordance with the Review of Minerals Planning Permission (ROMP) (1998). Major development may also provide an opportunity for the other parts of the site to be restored by...
enabling the demolition or renovation of buildings and other landscaping improvements.

8.27 The site has the potential to provide for sustainable visitor accommodation, employment and leisure uses, all of which can be served by green travel measures; but it is in an unsustainable location for major housing development. There is no local need for large-scale market housing in this part of the National Park. No request has been received under the Duty to Cooperate to meet the housing needs of adjoining local planning authorities on this site and meeting the needs of communities outside the National Park would run contrary to the guidance in the 2010 Circular.

8.28 Local concerns about its future have resulted in it being included in the area for the Upper Beeding Neighbourhood Development Plan, but its strategic and exceptional nature mean that it is appropriate to support those proposals with a Local Plan policy.

**Site Description**

8.29 The 48 hectare site includes an inactive chalk quarry and semi-derelict works owned by a developer, but partly leased to a waste and minerals operator who has the option to purchase the whole site. The site is located about 5km to the north of Shoreham and 2km south of Upper Beeding village, on each side of the A283. It is bounded to the west by the River Adur and farmland in the floodplain, to the north by chalk grassland, and to the south and east by farmland. Immediately to the north on the A283 are about 40 Edwardian terraced houses (Dacre Gardens) which were built to house workers at the cement works, together with an infill development of 10 flats.

8.30 A map of the site can be divided into 4 main sub-areas (Figure 8.1):

- **Area A** – west of the A283, containing the former offices for the cement works and now occupied by a variety of temporary industrial and storage uses. These uses are unsightly although largely screened by trees. The area has a frontage onto the River Adur. It is linked by a tunnel under the A283 to Area B.
- **Area B** – immediately east of the A283, containing the former cement works buildings. These are very large unsightly structures, highly prominent from close viewpoints, including the main road, the towpaths on both sides of the river, the South Downs Way, the Downs Link and the road to Coombes and Botolphs.
- **Area C** – the exhausted chalk quarry area which is partly used, under an expired permission, for the importation, storage and treatment of inert material to produce recycled/secondary aggregates and this use is currently under review. Much of the area is screened from views by the cliff faces of the original quarry.
- **Area D** – the rear, elevated portion of chalk available for extraction. It has been described as ‘a substantial scar’ and a ‘large gash in the rolling landscape of the Downs’, visible over a wide area and from a large number of viewpoints, including much of the South Downs Way to the west. The area has biodiversity and geodiversity interest and immediately adjoins a Site of Special Scientific Interest (SSSI) and a Scheduled Monument.
8.31 Large-scale cement production began on the site at the end of the 19th Century. The buildings were completed in 1948-50, permission having first been granted for chalk extraction in 1946, and extended in 1950 and 1969. Chalk extraction and cement production ceased in 1991, but the permission (for area ‘C’) was kept alive by an application for registration of the old mining permission in 1992. This extant permission for the extraction of chalk runs to 2042, when a basic restoration scheme would have to be implemented. The chalk permission in Area ‘D’ which also allows for chalk extraction until 2042, was last reviewed in 1998 and is currently in the process of being reviewed.

8.32 An application for redevelopment comprising 84 houses, office industrial storage/distribution hotel and other uses, landscaping, and open space was dismissed on appeal in 2003. The Appeal Inspector stated that the benefits of the scheme “are insufficient to overcome the strong objection to housing on the scale proposed.” He also noted that public sector funding had not been pursued and such funding for an employment-led scheme may come forward if a revised private sector scheme is proved to be unviable.

8.33 Existing use rights exist for B2 industry within existing buildings and for associated uses (such as storage) taking place in the open air. Areas A and B can be classed as brownfield land, but not Areas C and D, since the NPPF excludes minerals sites from the definition of previously developed land.

Constraints
8.34 Constraints affecting the site include:
- cost of extensive restoration needed to deal with both the short- and long-distance views;
- cost of demolition or renovation of the cement works buildings;
- uncertainty with regard to the significance of the heritage asset represented by the buildings and plant and the measures required to either retain or record this;
- protected bird species nesting within Area D;
- Regionally Important Geological Site at Area D;
- ecological designations near the site – surrounding area is rich in unimproved chalk grassland, a unique habitat for a number of notable flora and fauna species;
- Scheduled Monument (prehistoric cross-ridge dyke) outside the site but near the northern edge of Area D;
- a principal aquifer below the site;
• parts of the site are likely to be contaminated – ground remediation works required;
• proximity to Shoreham airport for any development that would increase the number of birds or involve tall structures or telecommunications interference;
• improvements needed to the two site accesses but without an increase in the visual impact of highway infrastructure, including hard-surfacing, signage and traffic signals; and
• unsustainable location and poor access to shops, schools and other services and facilities, making the site unsuitable for general market and family housing.

Opportunities

8.35 The site offers the following opportunities to:

• enhance the landscape and scenic beauty of the National Park, restoring the site to an appearance which is acceptable within a National Park. This involves:
  • removal of the unsightly uses and buildings on Area A which impinge on the largely undeveloped river corridor and replacement by development which takes advantage of the river frontage;
  • demolition or renovation of the existing cement works buildings on Area B;
  • creation of a landscaped bund or alternative enhancement of the road frontage as a gateway to Areas B and C;
  • re-modelling and planting of Area D; and
  • accepting enabling development as required, which is limited to the amount necessary to secure the satisfactory restoration of the site.
• create an exemplar of sustainable development as a model for other schemes;
  • enhance the site’s contribution to ecosystem services;
  • contribute towards the green infrastructure network;
  • develop previously developed land in Areas A and B without using green fields;
  • maximise and enhance levels of biodiversity on the site in order to augment the adjacent Anchor Bottom SSSI, while preserving the Scheduled Monument;
  • explore the potential for biodiversity off-setting;
  • enable geo-conservation, given the scientific and educational value of the strata;
  • develop renewable energy generation, such as solar panels and small scale combined heat and power plant;
  • explore a wider environmental enhancement programme to address issues such as the removal of overhead power lines nearby;
  • enhance bus services and make use of the existing buses operating in Area A to improve public transport provision to the site;
  • introduce other green travel initiatives as part of a travel plan for employment and tourism uses; measures such as dedicated or enhanced bus services and car-sharing are more difficult to provide for residential use.
  • improve cycle and walking routes in the vicinity, enhancing the Downs Link recreational route between Upper Beeding and Shoreham, including a southern loop from the South Downs Way;
develop sustainable tourism opportunities appropriate to a National Park, including promoting the understanding and enjoyment of its special qualities; and
deliver an innovative, exciting and imaginative solution which treats the site as an asset rather than a problem, and which meets the second purpose of national parks.

Development Principles

8.36 The SDNPA will ensure major development proposals are sustainable and in the public interest by measuring them against the following principles, as established in Core Policy SD3 (Major Development):

- **Zero Carbon**: An on-site renewable energy strategy will be required to ensure sustainable zero carbon development is delivered. There is scope for maximising solar energy through panels on the roofs of new or refurbished buildings. Other possibilities include hydro-electricity generation making use of the differences in levels within the site.

- **Zero Waste**: A strategy will be required to demonstrate how the development will be self-contained with regard to waste, through measures to re-use and recycle waste, and potentially including a small-scale combined heat and power plant powered by waste produced by uses on the site.

- **Sustainable Transport**: The remote and geographically unsustainable location of this site must be mitigated by an integrated sustainable transport solution. Existing public transport provision should be significantly enhanced to provide a reliable and accessible service. Tourists should be encouraged to leave their cars and make use of sustainable modes both within the site and for experiencing the National Park.

- **Sustainable Materials**: As far as possible, materials stored or in buildings on the site should be recycled on-site to provide aggregates and other materials for the redevelopment. Maximum use should be made of local materials.

- **Sustainable Water**: Proposals could include the creation of new ponds for recreational and sustainable drainage use. Sustainable drainage systems (SuDS) must be incorporated and the area of impermeable surfaces minimised. A strategy for the disposal of foul water will be required including upgrading the sewer network, if necessary.

- **Land Use and Wildlife**: Development of the site will need to be undertaken in the context of the wider management objective for the landscape character area, including potential for enhancement and extension of the adjacent chalk grassland and for protection, relocation or mitigation of harm to the habitat of the protected bird species on site.

- **Culture and Community**: Provision of visitor facilities should be explored for both accommodation and transient users. The development must support/improve accessibility and connection to high-speed broadband.

- **Health and Wellbeing**: There should be good links to the rights of way network, the riverside towpath and the wider landscape. Modern, sustainable buildings should achieve high environmental standards and enhance the wellbeing of occupants.
A Vision for the Site

8.37 With regard to the last bullet point of paragraph 8.35, a specific scheme has been put forward by the Upper Beeding Neighbourhood Plan Group. This involves up to 600 units of self-catering accommodation, a hotel, indoor and outdoor performance venues, conference facilities, two natural swimming pools, ‘green industries’, a small-scale anaerobic digestion and other renewable energy plant, some retail and food and drink uses, and a limited amount of affordable housing to accommodate those who work on the site. The SDNPA would support and encourage such a scheme in principle. However, this is subject to it demonstrating how it will overcome the above constraints, particularly those relating to biodiversity and geodiversity, that the impacts on traffic congestion and tranquillity are acceptable, that adequate links are provided by public transport and that the scheme is viable and deliverable.

8.38 If such a scheme proves undeliverable, an alternative scheme for appropriate employment uses, hotel, public house/restaurant, renewable energy plant and outdoor recreation facilities, may be acceptable, subject to constraints being addressed and restoration being achieved. This may include a limited amount of affordable housing to accommodate those who work on the site.

8.39 Such a scheme must deliver the main objective of restoring the cement works site in a way that is compatible with the special qualities and statutory purposes of the National Park, taking into account the Sandford principle that any recreational use must not be at the expense of the purpose one. The development must also meet the duty of fostering social and economic needs in pursuit of purpose one. This includes ensuring that the amount of development required to achieve this is no more than required to achieve the restoration of the site, and the SDNPA will require prospective developers to demonstrate this through an ‘open book’ approach to viability assessment.

Supporting Text

8.40 Within the strategic policy set out here, the development of detailed proposals for the site should be led by a masterplan which establishes a phased redevelopment programme for the site. This will enable a comprehensive, appropriate and commercially viable scheme to be delivered over a number of years, possibly with some partnership funding to bridge the gap between revenue from development and the investment needed to make it viable. It is suggested that this detail be worked out in collaboration with the developers and landowners and with the community through the Upper Beeding Neighbourhood Plan. This will include phasing proposals, evidence requirements (including environmental impact, transport and flood risk assessments), a viability assessment and design considerations.
Strategic Site Policy SD32: Shoreham Cement Works

1. Development proposals for the sustainable mixed use development of land at the Shoreham Cement Works site, as shown on the Policies Map, will be permitted provided they comply with Core Policies SD1 (Sustainable Development), SD2 (Ecosystem Services), SD3 (Major Development) and other relevant policies of this Local Plan, and the criteria below.

2. The SDNPA will work collaboratively with the landowners, relevant public bodies and the local community to bring forward proposals for the redevelopment of Shoreham Cement Works which deliver the principle objective of securing the environmentally-led restoration of the cement works site, with significant landscape improvements compatible with its sensitive location within the National Park and uses which meet the second National Park purpose. The development mix should be based on the following uses:

   a) self-catering visitor accommodation restricted to holiday use;
   b) B1 and B2 business uses with a focus on environmentally sustainable activity related to sustainable travel, local food and drink, and 'green industries' with key worker homes sufficient to serve that employment use
   c) appropriate leisure and/or tourism uses (including hotel(s), a hostel, public house, restaurant and cafés, small shops, and services related to the National Park);
   d) sustainable transport uses, including park and ride facilities and cycle/electric vehicle hire; and
   e) renewable energy generation.

3. In addition to complying with Policy SD3 (Major Development) any development proposal should:

   a) achieve the principle objective of enhancing the landscape of the area by a significant improvement to adverse visual impact from both the nearby and distant public viewpoints, including the re-modelling of the most prominent quarry faces, the removal or remodelling of unsightly uses and buildings, and natural landscape screening of development from the main road and towpath;
   b) conserve, enhance and provide opportunities for understanding the biodiversity, geodiversity and cultural heritage of the site;
   c) provide opportunities for visitors to enjoy this part of the National Park and its special qualities, including improved walking and cycling links from urban areas, to the South Downs Way and along the River Adur towpath, and outdoor recreational facilities compatible with the special qualities;
   d) be a comprehensive scheme for the whole site;
   e) conform with a masterplan to be approved in advance of a planning application addressing the site’s characteristics and relationship to the wider area;
   f) include no more development than is necessary to secure the satisfactory restoration of the site;
   g) make realistic proposals for the relocation of existing employment and storage uses that are not appropriate to a national park setting; and
   h) provide the necessary transport and infrastructure improvements, including the provision of sustainable transport facilities, while minimising the intrusiveness of hard surfacing, signage and lighting.
THE FORMER SYNGENTA SITE, FERNHURST

Introduction

8.41 This largely unused strategic brownfield site is located within the Western Weald Broad Area as identified in Chapter 4. This Broad Area is made up of wooded hills, deep valleys and open heaths linked by sandy sunken lanes. It includes Black Down, the highest point in the National Park, to the north east of this site.

8.42 The site itself sits in a relatively well screened location providing an opportunity for an exemplar sustainable development of a strategic scale making a significant positive contribution to ecosystems services and natural capital to deliver Local Plan objectives. Exceptional circumstances to justify major development will be assessed against the core principles of sustainable development as set out in the Core Policy SD3(Major Development). High-level issues relating to these principles are set out below.

8.43 The location is remote from existing settlements and is not easily accessible from the nearest settlement, Fernhurst, except by car. Proposals will therefore need to focus on an integrated sustainable transport solution which could enhance arrangements for sustainable travel at the nearby development of the former King Edward VII hospital site, linking to Midhurst, Fernhurst and Haslemere.

8.44 Community concerns about the site’s future have resulted in the preparation of a policy within the Fernhurst Neighbourhood Plan submission draft. The strategic and exceptional nature of the site and the currently unadopted status of the Neighbourhood Plan mean that it is appropriate to progress a Local Plan policy at this time. The SDNPA will continue to work proactively with the neighbourhood planning group to progress the formulation of the most appropriate planning policy for this strategic site.

Site Description

8.45 The site is located approximately 2km south of the village of Fernhurst, adjacent to the A286 Midhurst Road between Haslemere and Midhurst (Figure 8.2). It measures about 11.3 hectares and was the former administrative research establishment for a major chemicals manufacturer until around 2000.

8.46 The site is set in a bowl of land surrounded by mature woods. At the southern boundary, existing deciduous and coniferous tree planting reach approximately 15 metres and, due to rising ground, provide additional screening from the south. Along the northern boundary tree belts also reach up to approximately 15 metres, with several specimen trees to the north-eastern area of the site reaching over 20 metres in height, providing a substantial screen and distinct green framework.

FIGURE 8.2: THE FORMER SYNGENTA SITE, FERNHURST
8.47 The northern boundary of the site lies adjacent to a belt of mainly coniferous tree planting followed by open pastureland, which forms part of the Cooksbridge Meadow Local Nature Reserve. A public footpath runs east to west along the southern boundary of the Nature Reserve, just outside the northern boundary of the site. Courts Farm and associated pasture land lie adjacent to the site’s eastern boundary with Ash Reeds Copse and Dawes Highfield Copse (designated as an Ancient and Replanted Woodland) to the southeast.

8.48 The whole site is currently owned by a developer and is mostly disused. Most of the land is covered by former car-park hardstanding and includes a culverted watercourse running south west to north east under the Highfield building.

8.49 The site contains a number of permanent and temporary buildings including the very large brick-built three storey Highfield office complex which stands empty. There is a four storey conference centre (known as the ‘pagoda’ or ‘ziggurat’) which is connected to Highfield by a covered walkway and has some local architectural merit. The pagoda is occupied by a commercial operator with retail, wholesale and assembly functions and is considered by the Neighbourhood Plan to be worthy of retention as a building in its own right.

8.50 The site is allocated in the Chichester Local Plan for employment use. A planning application for 440 dwellings on the site including 288 flats through the conversion of Highfield was withdrawn in 2008. Several Lawful Development Certificates establish the extant use as business. Highfield currently benefits from Prior Approval for conversion to 214 residential units as allowed under the government’s Permitted Development Order, which will expire in 2016. The draft Fernhurst Neighbourhood Plan includes a mixed-use allocation for 150 dwellings and 2,000sqm employment uses, and encourages other uses.

8.51 The ELR finds that it is not reasonable for this site to be protected solely for employment use. A more flexible policy approach which supports mixed-use development is recommended, with new development options expected to include some employment-generating uses.

Constraints

8.52 Constraints affecting the site include the following:

- The site has a relatively unsustainable location, remote from Fernhurst as the nearest settlement. Any residential development would need to accord with the direction of the 2010 Circular to focus on affordable housing for the local communities of the National Park and unrestricted market housing will not be acceptable.
- The site is unlikely to be large enough to sustain a new community and associated facilities in its own right.
- There are concerns about delivering a dormitory settlement for commuters using Haslemere Station.
- Existing buildings are very large with a significant amount of embodied carbon. However, re-use of these buildings is considered to be challenging given their construction type and layout.

Opportunities

8.53 The site offers the following opportunities:

- It is a large brownfield site within a relatively well screened part of the National Park which would benefit from a sustainable redevelopment and make a significant positive contribution to ecosystems services and natural capital.
- The existing layout of the site including large homogenous areas of concrete with minimal natural landscaping provides significant scope
to improve biodiversity and natural habitats, reverse previous impacts and improve visual amenity.

- The culverted watercourse running beneath the site could be opened up to improve habitats and provide a sustainable drainage solution.
- The wooded nature of the Western Weald can be used to enable business development supporting the wood fuel economy as referred to in the Partnership Management Plan (PMP).
- It could be a gateway site for tourism accommodation including overnight accommodation such as self catering units or a hotel and facilities for the visitor economy.
- It could provide public realm and open space, leading to opportunities for social interaction and recreation by any residents.
- Some residential development could focus on meeting local affordable housing need within the National Park.
- It is suitable for further land uses such as extra care/sheltered housing scheme, allotments, and a community building which may also be used as a visitor centre or a day nursery.

Development Principles

8.54 The SDNPA will ensure major development proposals are sustainable and in the public interest by measuring them against the following principles, as established in Core Policy SD3 (Major Development):

- **Zero Carbon**: An on-site renewable energy strategy will be required to ensure sustainable zero carbon development is delivered. The scope for wood fuelled combined heat and power (CHP) is high given the location of the site within a heavily wooded area of the National Park. This would enhance the rural economy and could encourage payment for ecosystems services, particularly, if combined with on-site business in this sector. Any residual emissions would need to be off-set by other activities, such as new planting for food or fuel.
- **Zero Waste**: Evidence of embodied carbon contained within existing buildings on site indicates most of the current buildings materials can be recycled to provide aggregates and other uses for the redevelopment. Future schemes to encourage minimising use and recycling of residential and commercial waste will be encouraged.
- **Sustainable Transport**: The remote and geographically unsustainable location of this site must be mitigated by an integrated sustainable transport solution. Existing public transport provision should be significantly enhanced to provide a reliable and accessible service between the site and Fernhurst, the King Edward VII site and Haslemere, which reduces or removes future reliance on private car transport.
- **Sustainable Materials**: There are significant opportunities to re-use construction materials on-site and exploit the surrounding area of dense and varied woodland to provide sustainable and locally sourced building materials.
- **Sustainable Water**: The existing culverted watercourse should be opened and returned to a natural waterbody providing new habitats and a beneficial space for users and wildlife. A strategy for the disposal of foul water will be required including upgrading the sewer network and Fernhurst Waste Water Treatment Works if necessary. Sustainable drainage systems (SuDS) and swales must be incorporated and reduce the area of impermeable surfaces, so reducing the flow rate of surface water run off to adjacent water courses.
- **Land Use and Wildlife**: Development of the site will need to be undertaken in the context of the wider management objective for the Low Weald Landscape Character Area as defined by the South
Downs Integrated Landscape Character Assessment (SDILCA) (2011). The overall management objective for the Low Weald should be to conserve the rural tranquil, ‘medieval’ character of the landscape created by historic fields, hedgerows, shaws and ancient woodland, and dispersed settlement. It will be important to consider how the important views into the site can best be preserved. Of these the view from Blackdown Hill is vital and is subject to a covenant in favour of the National Trust.

- **Culture and Community**: Community and social links to Fernhurst and the King Edward VII site should be provided and enhanced. The Neighbourhood Plan envisages the site becoming an extended part of the village with community use and benefit to existing and future residents. Provision of visitor facilities should be explored for both accommodation and transient users. The development must support/improve accessibility and connection to high-speed broadband.

- **Health and Wellbeing**: There should be good links to the rights of way network and the wider landscape and the area must remain tranquil. Public realm and open space provision will contribute to a sense of place and provide opportunities for outdoor recreation and modern sustainable buildings should achieve high environmental standards and enhance the wellbeing of occupants.

### A Vision for the Site

8.55 The site would benefit from sustainable redevelopment and could deliver a significant positive contribution to ecosystems services and natural capital. All development should cater for local needs and support the purposes and duty of the National Park.

8.56 Major development will be acceptable if it complies with Core Policies SD1 (Sustainable Development), SD2 (Ecosystem Services) and SD3 (Major Development) and Policy SD28 (Employment Land), and delivers the substantial environmental improvements and remediation of the existing brownfield site and expansive areas of built form and ground cover. New land uses should cater for local needs and support the purposes and duty.

8.57 The timing of the development will be in the later part of the Local Plan period from 2025. This later timing will allow time for the completion and integration of 400 homes at King Edward VII over the first 10 years of the plan period, allow opportunities for an exceptional scheme to come forward and spread the housing supply trajectory evenly over the plan period.

8.58 The design approach should be progressed through a detailed masterplan and should respond to local distinctiveness and the site’s natural setting. Proposals should demonstrate a masterplanned approach to the wider area including considering its relationship to Fernhurst and the King Edward VII site which may provide a local workforce for future businesses on this site.

8.59 The Prior Approval for 214 dwellings provides an approximate benchmark for the scale of residential development which may be considered acceptable on the site. However, any residential element must focus on affordable housing provision to meet local needs as required by the 2010 National Parks Vision and Circular.

8.60 All residential use should contribute to a healthy, diverse, integrated and sustainable community, which has a balanced range and mix of tenures and dwelling sizes, including provision for young families, key workers, older people and first time buyers. Consideration should be given to making land available for an extra care development for older people.
Unrestricted market housing will not be acceptable. Housing not needed to meet local family housing needs should be limited to an amount that can be demonstrated to be necessary to ensure the viability of the scheme and an appropriate social mix. An element of market housing is therefore acceptable but the creation of a commuter settlement must be avoided in order to ensure sustainability and to accord with the requirements of the 2010 Circular and to meet the SDNPA duty of seeking to foster social and economic wellbeing.

Business development supporting the wood fuel economy as referred to in the PMP and other commerce suitable for a National Park will be promoted. Business development will be expected to take an ecosystems services approach in accordance with the principles of sustainable economic development policies. Existing business retention and new floorspace for smaller operators providing local employment will be encouraged.

Tourism accommodation, including overnight accommodation such as self catering units or a hotel, and facilities for the visitor economy such as bike hire and a visitor centre, will be provided. Further requirements are provided in Policy SD20 (Sustainable Tourism and the Visitor Economy).

A high quality public realm will be provided with opportunities for social interaction and recreation by residents. Consideration should be given to the provision of a community hall. However, the nature and extent of community facilities must take into account the need to encourage integration with Fernhurst, with a contribution towards the improvement of facilities there rather than competition. Children’s play facilities will need to be provided. The provision of allotments would assist with biodiversity enhancement and sustainability.

Biodiversity will be re-introduced and enhanced, reversing environmental impacts as required by Policy SD12 (Biodiversity and Geodiversity). An assessment of the biodiversity of the site and its ecological importance needs to be integral to the scheme. Relationships with the surrounding and adjoining natural environment will need careful consideration in order not to result in conflicts. Wildlife corridors and areas will be required within and across the site.

Development must include the creation of high-quality habitats, particularly UK Biodiversity Action Plan Habitats, referring to the adjoining Cooksbridge Meadow Local Nature Reserve and to Snapes Copse and Verdley Wood Biodiversity Opportunity Area, with the addition of buffer areas adjacent to existing woods. The ponds, indigenous trees and water features must be enhanced and integrated into the design of the site. There must be no negative impact on woods surrounding the site.

An integrated sustainable transport solution should be provided given the currently unsustainable location of the site in relation to services and facilities. Public transport facilities need to be improved and promoted and a travel plan must be implemented showing how reliance on the private car will be reduced and the sustainability of the site can be further enhanced. A travel plan coordinator must be appointed and an electric car club or car-sharing scheme could be beneficial. Electric vehicle charging points must be provided. The site must meet the further requirements of Policy SD18 (Transport and Accessibility).

Supporting Text

A detailed masterplan is required in advance of a formal planning application to demonstrate how the proposal will achieve the core principles of sustainable development and indicate the broad quantum of development and mix of uses. Potentially conflicting land uses should be planned and positioned to avoid disturbance to sensitive uses such as...
residential. The masterplan will be produced in consultation with the SDNPA, the parish council, residents, businesses and community groups on site and in the local area.

**Strategic Site Policy SD33: Syngenta, Fernhurst**

1. Development proposals for the sustainable mixed use development of approximately 11 hectares of land at the former Syngenta site, as shown on the Policies Map, will be permitted from 2025, provided they comply with Core Policies SD1 (Sustainable Development), SD2 (Major Development), SD3 (Ecosystem Services) and other relevant policies of this Local Plan, and the criteria below. The development should deliver a significant positive contribution to ecosystems services and natural capital, and provide for local needs. Land uses should include:
   a) approximately 200 homes with the focus on affordable housing to meet local needs and comprising approximately 50 per cent of all housing on site, including an appropriate balance of tenure types. The new homes will provide a balanced mix of dwelling types and sizes and at a scale to meet the local needs of young families, key workers, older people and first time buyers. Housing not needed to meet local needs should be limited to that necessary to ensure the viability of the scheme and an appropriate social mix;
   b) business use that supports the National Park including the wood fuel economy, retention of existing business, new floorspace for smaller businesses and live-work units;
   c) tourism uses including self-catering accommodation and provision for the visitor economy;
   d) social and leisure facilities which complement and do not compete with existing facilities in Fernhurst; and
   e) other land uses which meet the policy objectives of the Local Plan, cater for local needs and support the purposes and duty of the National Park, which may include allotments, an extra care development for older people, a hotel and a community building/visitor centre.

2. In addition to complying with Policy SD3 (Major Development) any development proposal should:
   a) comply with a development brief and masterplan to be approved in advance of a planning application addressing the site's characteristics and relationship to the wider area;
   b) deliver high-quality public realm and substantial environmental improvements including remediation of the existing expansive areas of hard ground cover;
   c) provide and enhance biodiversity and natural habitats on site and improve the relationship with the surrounding natural environment;
   d) include an integrated sustainable transport solution incorporating: links to Fernhurst, Haslemere and the King Edward VII site; enhancement and promotion of existing bus services; submission and approval of a travel plan; appointment of a travel plan coordinator; an electric car club or car-sharing scheme; provision of electric vehicle charging points; and meeting the further requirements of policies SD18 (Transport and Accessibility), SD19 (Walking, Cycling and Equestrian Routes), SD43 (Public Realm and Highway Design) and SD44 (Car and Cycle Parking Provision);
   e) Restore the culverted watercourse to a surface flow feature as part of a site-wide sustainable drainage scheme;
   f) Respond in terms of design to local distinctiveness and the site’s natural setting within the National Park;
   g) Ensure that all development contributes to a healthy, diverse, integrated and sustainable community, which has a balanced range and mix of tenures and dwelling sizes, including provision for young families, key workers, older people and first time.
NORTH STREET QUARTER AND ADJACENT EASTGATE AREA, LEWES

Introduction
8.69 This site is allocated in the submission version Lewes Joint Core Strategy (LJCS) for mixed use development and a planning application for the North Street Quarter, which makes up the majority of the site, was made in March 2015. The LJCS policy, and that set out below, reflect that application but are sufficiently flexible to allow other proposals to come forward to achieve LJCS and Local Plan objectives, should the submitted scheme not proceed.

Site Description
8.70 The site is located immediately to the north-west of Lewes town centre and has an extensive river frontage stretching from just south of Phoenix Causeway up to Willey’s Bridge. The site is in two distinct parts, but its redevelopment needs to be considered as one area in order for a comprehensive approach to be taken to this part of the town. The two parts are the North Street Quarter, which lies to the north of Phoenix Causeway (this area is wholly outside, but adjoins the Lewes Conservation Area), and the northern part of the Eastgate area, which is within the Conservation Area (Figure 8.3).

8.71 The North Street Quarter contains a range of industrial and warehouse buildings dating from the 1950s and 1960s, together with some vestiges of earlier industrial buildings including the Phoenix Ironworks. Among other uses it includes a fire station, a recycling centre and surface level car parking.

8.72 The northern part of the Eastgate area consists of a Waitrose store and associated parking area, the adjacent former Wenban Smith buildings and the bus interchange. This was identified in the Local Plan (Policy LW7) as a potential area for redevelopment with the priority being for the retention of a major foodstore and the introduction of a replacement bus interchange. Although no such proposals have been subsequently put forward, there is still interest in redeveloping this site for a mixed use development that would incorporate an enhanced foodstore. At the same time, there are still concerns over the long-term viability of operating the bus station in its current location.

8.73 While the bus station performs a vital transport role and is well located in relation to many important parts of the town centre, it is not a vital asset. The bus station and garage are unattractive utilitarian features at an important entrance to the historic core of the town. It is the interchange function which it is essential to retain in the area rather than the longer term bus storage. Therefore, the principle of redevelopment is acceptable, providing that attractive, operationally satisfactory interchange facilities for passengers are provided on a site elsewhere of equal convenience in this sector of the town.
Constraints
8.74 Constraints affecting the site include:

- in October 2000 much of the site was badly flooded and in the interim period no improved flood defences for the site have been provided;
- this has impeded investment in the area resulting in many of the units becoming run down and less able to meet the needs of modern businesses;
- limited quantitative need for additional convenience floorspace during the plan period – redevelopment should not result in a significant increase in floorspace when compared to the existing foodstore; and
- need to retain car-parking – the site contains some areas of surface level parking and the town has an under provision of parking spaces.

Opportunities
8.75 Opportunities for the outward expansion of Lewes town are extremely limited, predominantly due to the sensitive and high-quality landscape, and the extensive floodplain of the River Ouse. This is the only site suitable for strategic level growth and redevelopment within Lewes town and can deliver:

- enough housing to help significantly to meet the affordable and market housing needs in the town, including accommodation for the elderly;
- some more modern retail floorspace meeting a qualitative need that cannot be satisfied within the historic centre and helping to reduce leakage of retail spending to other centres;
- business floorspace in order to meet a qualitative need to provide greater choice for existing and prospective businesses, particularly modern offices;
- retention of the creative essence that has developed in the North Street Quarter, where this is economically viable, including small flexible, low-cost work units (‘box spaces’), a large flexible work space (‘creative industry hub’) and assembly and leisure space (‘performance hub’);
- community facilities, including a health centre and leisure uses;
- restaurants cafes and bars, small-scale retail and other uses which will introduce vibrancy without undermining the vitality and viability of the main town centre;
- relocation of existing businesses to the Malling Brooks East employment allocation, which has been acquired by the majority landowner for the North Street Quarter;
- a hotel, if viable, in addition to one already proposed on the former magistrate’s court site (planning permission granted in Feb 2015 – SDNP/14/01650/FUL).

- The following infrastructure:
  - a flood defence system to meet Environment Agency conditions;
  - a new gateway access point from Phoenix Causeway;
  - associated new highway, cycle and footpath routes;
  - on-site parking at ground level for residents and town visitors;
  - a new public square beside the River Ouse;
  - a new footbridge connecting the south and north banks of the river;
  - a new riverside footpath along the full length of the site, of a width that will add to the enjoyment, amenity and experience of users;
  - formal and informal public open spaces; and
  - landscaping and widespread planting including sustainable surface water management.

**Development Principles**

8.76 The SDNPA will ensure major development proposals are sustainable and in the public interest by measuring them against the following principles, as established in Core Policy SD3 (Major Development), based upon the independent sustainability gap analysis undertaken in March 2014:

- **Zero Carbon**: An on-site renewable energy strategy will be required to ensure sustainable zero carbon development is delivered.
- **Zero Waste**: An overarching waste strategy aspiring to eliminate waste through optimising re-use and recycling.
- **Sustainable Transport**: Follows the principles of a ‘walkable neighbourhood’ aimed at encouraging residents to walk and cycle. Other measures include the establishing of a car club and electric vehicle charging points.
- **Sustainable Materials**: Measures to minimise the impact (particularly embodied carbon) of all goods and materials used in the construction, maintenance and occupation of the community; a key focus for design and procurement.
- **Sustainable Water**: Water is used much more efficiently in buildings, through installation of water efficient fittings and appliances, and is managed to support healthy land-use, avoid flooding and pollution to watercourses.
- **Land Use and Wildlife**: Aims for a net increase in biodiversity across the site through reinforcing existing wildlife corridors, creation of new corridors including the main swale and incorporation of green roofs.
- **Culture and Community**: Creation of a sense of place that builds on the local cultural heritage and nurtures a culture of sustainability and community. Measures include building to principles of lifetime homes and buildings for life.
• **Health and Wellbeing**: Linked to the sustainable transport principle of a walkable neighbourhood this will seek to engender healthy lifestyles, incorporating play areas and a health centre.

8.77 The aim is for the sustainability gap analysis to be a living document that is updated at submission and at reserved matters applications, allowing performance to be monitored against the above principles and undertakings by the applicant.

**Strategic Site Policy SD34: North Street Quarter and adjacent Eastgate area, Lewes**

1. Development proposals for the sustainable mixed-use development of land amounting to approximately 9 hectares at North Street and the neighbouring part of Eastgate, as shown on the Policies Map, will be permitted provided they comply with Core Policies SD1 (Sustainable Development), SD2 (Ecosystem Services), SD3 (Major Development) and other relevant policies of this Local Plan, and the criteria below. The development would create a new neighbourhood for the town of Lewes. The development mix should be based on the following uses and broad quantum of development:

   a) approximately 415 residential units, predominantly focused towards the northern part of the site, of which 40 per cent should be affordable;

   b) at least 5,000 square metres of B1a office and / or B1c light industrial floorspace, subject to market needs and general viability;

   c) the redevelopment or relocation of the existing A1 food supermarket;

   d) other uses that are deemed to aid in the successful delivery of a new neighbourhood, whilst not undermining the wider function of the town (this could include A1 Shops, A2 Financial and Professional Services, A3 Restaurants and Cafes, A4 Drinking Establishments, A5 Hot Food Takeaways, C1 hotel, D2 Assembly and Leisure uses and community floorspace);

   e) C2 nursing/ care home (self-contained units will be counted as residential within the above figure);

   f) D1 non-residential institutions such as medical and health services, crèches, exhibition and training space; and

   g) other cultural, artistic and artisanal floorspace not covered by the above uses.

2. The redevelopment should comply with the following criteria:

   a) It incorporates the early provision of flood defences to an appropriate standard and to the approval of the Environment Agency,

   b) It facilitates improved linkages across Phoenix Causeway and Eastgate Street and a better balance between the car and other modes of transport, in order to enable the safe flow of pedestrians and the improved integration of the area to the north of Phoenix Causeway with the wider town centre,

   c) It delivers enhancements to vehicular access and off-site highway improvements, arising from and related to the development and its phasing,

   d) It respects and enhances the character of the town and achieves a high standard of design, recognising the high quality built environment, on and within the vicinity of the site, and the site’s setting within the South Downs National Park and adjacent to a Conservation Area,

   e) It is subject to an analysis and appropriate recognition of the site’s cultural heritage and a programme of archaeological work, including, where applicable, desk-based assessment, geophysical survey, geo-archaeological survey and trial trenching to inform design and appropriate mitigation,

   f) A riverside shared foot/cycle route along the western bank of the River Ouse is incorporated to extend the town’s riverside focus and contribute to its character and quality, and additional pedestrian and cycling routes are incorporated to aid in linking the site to the rest of the town, in improving permeability within the site and in providing views out of the site,

   g) It results in no net loss of public parking provision,
h) The retail element is incorporated into the designated town centre boundary as far as possible and the amount of retail provision is informed by a Retail Impact Assessment, if necessary.

i) Alternative uses on the bus station site are subject to the facility being replaced by an operationally satisfactory and accessible site elsewhere.

j) It makes contributions towards off-site infrastructure improvements arising from, and related to, the development, and

k) It provides a connection to the sewerage and water supply systems at the nearest point of adequate capacity, as advised by Southern Water, and ensures future access to the existing sewerage and water supply infrastructure for maintenance and up-sizing purposes.

---

**EVIDENCE**

**General Evidence**

- CIL & Affordable Housing Viability Assessment (Dixon Searle Partnership – January 2014)
- Coastal West Sussex Duty to Co-Operate Housing Report (GL Hearn, 2013)
- Coastal West Sussex Strategic Housing Market Assessment (GL Hearn, 2012)
- East Hampshire Strategic Housing Market Assessment (NLP, 2013)
- Employment Land Review May 2012
- Employment Land Review Update (GL Hearn, due 2015)
- National Park-wide Strategic Housing Market Assessment due in 2015, which builds on existing work covering parts of the area to date:
  - SDNP Visitor Accommodation Review 2014 – Technical Appendices
  - SDNP Visitor Accommodation Review 2014 – Main Report
- South Downs Integrated Landscape Character Assessment (2011)
- South Downs National Park Visitor Survey 2012
- South Downs Viewshed Characterisation Study
- Winchester Housing Market and Housing Need Assessment Update (DTZ, 2012).

**Shoreham Cement Works Evidence**

- Off-Grid- A proposal for the regeneration of Shoreham Cement works and Chalk Quarry, by Zed Factory in conjunction with Upper Beeding Neighbourhood Plan Group.
- Report to the First Secretary of State by Inspector Geoff Salter BA MRTP, dated 14 July 2003 (refs APP/Y3805/V/02/1100397 and APP/Z3825/A/02/1095343)
- Response Statement to South Downs National Park – Local Plan Options Consultation, April 2014, on behalf of Callstone Ltd., by Rapleys LLP.
- Ron Martin 'The History of Shoreham cement Works' in Sussex Industrial History, Issue 34, 2004
- Shoreham Cement Works, Collaborative planning project, Preliminary Workshop, 8 October 2013: Report
- West Sussex County Council Minerals and Waste Landscape Sensitivity Study (2010) (LUC)
- West Sussex Strategic Flood Risk Assessment (Capita Symonds 2010)

**Former Syngenta Site Evidence**

- BioRegional Carbon Study for former Syngenta site (2014)
- Fernhurst Neighbourhood Plan Submission Version
• Syngenta Viability Assessment (DSP) 2014

**North Street Quarter / Eastgate Evidence**
• Lewes Employment and Economic Land Assessment (NSQ)
• Lewes Shopping and Town Centres Study
• Survey of Lewes Car Parks
9. SITE ALLOCATIONS

INTRODUCTION

9.1 This chapter of the Local Plan allocates sites for development in villages and towns across the South Downs National Park. The selection of these sites has been done in line with the Development Strategy set out in Policy SD22 and the policies for the Broad Areas namely SD4/CP Coastal Plain, SD4/DS Dip Slope, SD4/WD Western Downs, SD4/SS Scarp Slope and SD4/WW Western Weald. These, in turn, have been informed by the Vision and Spatial Portrait.

9.2 The allocation of these sites has been informed by a considerable number of evidence-based studies, which are listed in Appendix 4. The main evidence-based document for housing is the Strategic Housing Land Availability Assessment (SHLAA). The Settlement Service Availability Assessment provides information on the availability of services and facilities within settlements of the National Park. This has been used to inform the allocations process and is a live document that will be updated regularly by the South Downs National Park Authority (SDNPA).

9.3 The policies set out in this chapter allocate land to help deliver the development requirements for housing as set out in Policy SD23. The requirements for employment land are set out in Policy SD28. These requirements can be met through sites with extant planning permission for employment, sites to be allocated in neighbourhood plans and intensification of existing sites. There is no need to allocate any employment sites in this Local Plan. Chapter 8 allocates three strategic sites for mixed-use development.

9.4 A number of local communities are preparing neighbourhood development plans. This Preferred Options version of the Local Plan (the Local Plan) does not allocate sites in designated neighbourhood areas that intend to allocate sites in their own neighbourhood development plans. It is, however, necessary to ensure that there are no policy gaps in the Local Plan. Therefore, the Publication version of this Local Plan will allocate sites in neighbourhood areas where the neighbourhood development plan has not reached the pre-submission consultation stage of plan preparation. Neighbourhood planning groups are encouraged to actively liaise with the SDNPA on this matter. Figure 9.1 is a map of the National Park, which identifies designated neighbourhood areas. Where a neighbourhood plan group is actively pursuing allocations in a neighbourhood development plan this Local Plan does not allocate sites for development.

There are a certain number of sites with potential for development that are located within the National Park, but on the edge of settlements which are outside of the National Park. These are not linked to settlements identified in strategic Policy SD22. They are allocated under Policy SD–DS02 and SD–DS03 at the end of this chapter.
FIGURE 9.1: PARISHES IN THE SOUTH DOWNS NATIONAL PARK DESIGNATED AS A NEIGHBOURHOOD AREA (AS AT 2 JULY 2015)
NATIONAL POLICY CONTEXT

9.5 The National Parks Vision and Circular 2010 states that the Government recognises that national parks are not suitable locations for unrestricted housing. The expectation being that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services. As a local planning authority, the SDNPA is required by the National Planning Policy Framework (NPPF) to use an evidence base to ensure that the Local Plan identifies available, achievable and deliverable sites to deliver housing over the Local Plan period. However, it is important to refer to the great weight given to conserving landscape and scenic beauty in National Parks, as outlined in Paragraphs 115–116 of the NPPF.

9.6 A Strategic Housing Land Availability Assessment (SHLAA) is an essential piece of evidence for local plans which identifies land and assesses the availability, suitability and deliverability of potential housing sites. This evidence has helped to inform the potential sites for allocation in this Local Plan. The National Planning Practice Guidance (NPPG) suggests a standard process for undertaking a SHLAA. The SHLAA was prepared in compliance with this guidance. The study has a base date of the 1 April 2014 and the findings are a snapshot of information held at this time. Therefore, some of the information held within the SHLAA will have changed.

PREFERRED APPROACH AND REASONABLE ALTERNATIVES

9.7 Policy SD23 (Housing) sets a proposed level of new (combined affordable and market) housing provision for the National Park, which is informed by the evidence from the Strategic Housing Market Assessment (SHMA), evidence on constraints and taking into account paragraphs 115 and 116 of the NPPF. The policy also sets out how this will be delivered, through:

(i) the development of strategic sites and the allocation of land for housing in the Local Plan and neighbourhood development plans;
(ii) the implementation of planning permissions; and
(iii) the development of land previously unallocated or identified (windfall), in compliance with Policy SD22 (Development Strategy) and subject to relevant policies in this Local Plan.

9.8 The proposed allocations included in this policy will assist in delivering (i) above. It does not include allocations for all of the settlements named in Policy SD23 (Housing), because either the allocations will be included in the neighbourhood development plan or because sufficient capacity has yet to be identified and further evidence is required.

9.9 A sustainability appraisal (SA) of the proposals within the Local Plan is required during the preparation of a Local Plan. It will help the SDNPA assess how the Local Plan will contribute to the achievement of sustainable development. As part of the SA, a strategic environmental assessment (SEA) will consider the potential environmental effects of proposals. This assessment should identify, describe and evaluate the likely significant effects of implementing the Local Plan, and reasonable alternatives.

9.10 The proposed site allocations, Policy SD23 (Housing) and associated Policy SD22 (Development Strategy) therefore need to be tested against reasonable alternatives, relating to the location and quantum of development, through the SA. It is recognised that the final requirements set out in these policies may change following the results of the SA. What is considered a reasonable alternative is set within the context of the National Park designation, where such alternatives in relation to housing are limited.
9.11 In addition, there is a documented audit of the environmental constraints, suitability, availability and achievability of housing development that preceded the site allocations work which can be found in the SHLAA (2015).

9.12 In addition to the initial environmental constraints assessment that formed part of the SHLAA, the Habitats Regulations Assessment (HRA) has specifically assessed the implications of the development strategy and housing allocations for the Local Plan upon the European Site designations throughout the National Park.

MAJOR DEVELOPMENT TEST AND POLICY SD3

9.13 The NPPF (para 116) sets out the approach local planning authorities should take to development in national parks. The National Planning Practice Guidance (NPPG) states that: “Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the NPPF applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context”. The SDNPA has sought legal advice and this is reflected in Core Policy SD3.

9.14 Core Policy SD3 sets out the two stages of decision making in relation to major development. An assessment will be made to determine whether development constitutes major development. If the proposal is considered to be major development then the second part of the policy will apply, alongside other policies within this Local Plan.

INFRASTRUCTURE

9.15 Infrastructure planning helps to ensure the SDNPA, local communities, service providers and developers understand what infrastructure is needed to deliver the Local Plan, and that it is properly planned for, funded and delivered.

9.16 The Infrastructure Delivery Plan (IDP) provides details of all the infrastructure necessary to deliver the Local Plan in support of residents, communities, businesses and visitors of the National Park. The IDP will identify as far as possible the type and location of necessary infrastructure, how much it will cost, who is responsible for delivering it and when it needs to be delivered. It plays an important role in the introduction and operation of the Community Infrastructure Levy (CIL) by providing evidence of infrastructure needs and funding opportunities for future CIL revenues.

9.17 It is has been developed collaboratively with local communities, stakeholders and strategic infrastructure providers (including county councils). It sets out infrastructure projects identified by local communities in the National Park which are necessary to meet the needs created by new development. Infrastructure projects identified in the Local Plan are those costing over £20,000.

9.18 The SDNPA will add value to infrastructure projects listed on the IDP and delivered through CIL funding or other mechanisms by qualitative improvements to the design, multifunctionality of use, landscape integration and interpretation, and the overarching incorporation of ecosystems services enhancement.

9.19 The infrastructure projects that have been identified for particular settlements in the emerging IDP to date are listed below.
The following site allocation is currently being considered as part of the modifications to the Lewes Joint Core Strategy as part of the ongoing Examination in Public. The policy wording is therefore subject to change.

**Supporting Text**

9.20 The site subject to Policy SDSS-03 below is a greenfield site situated on the northern side of the town in a ‘green finger’ between the 1970s part of the Malling Estate to the east and the River Ouse, mainline railway and Landport Estate to the west. The site lies wholly within the South Downs National Park and is currently in agricultural use. There is an existing access bridge over the disused railway cutting (a Site of Nature Conservation Importance SNCI), providing single track access to Old Malling Farm from Old Malling Way. A further double width access point onto Monks Way, which is at grade and currently used for agricultural vehicles, is situated at the northern end of the site. Monks Way would form the principal access to the site, with the railway bridge providing secondary access for pedestrians, cyclists and emergency use, as well as access to the former farm buildings. To the south of the site lies the Malling Deanery Conservation Area, including the Grade II* St Michaels Church.

9.21 Much of the site is Agricultural Land Classification Grade 2, with some Sub-grade 3a, and therefore constitutes best and most versatile agricultural land. There is also ecological interest in the area, including the Offham Marshes SSSI on the opposite side of the River Ouse and the SNCI along the adjacent disused railway cutting on the east of the site. The site also lies within an area of high archaeological potential being in the vicinity of a medieval settlement and the ruins of a college of Benedictine Canons.

9.22 While current information would suggest that these interests do not override the principle of development on the site, further survey work will be required and appropriate mitigation measures implemented. The loss of best and most versatile land is to be avoided where possible. However in this case the few alternative options for strategic level residential development around Lewes town have been ruled out for other reasons, such as being of even greater great landscape sensitivity within the National Park.

9.23 Development of the site could adversely impact the special qualities of the National Park, for instance on landscape and views, on recreational activities (the Ouse Valley Way), on tranquillity (including dark night skies), on historical features and cultural heritage (including the Conservation Area, Listed Building and archaeological remains), and on nearby wildlife and habitats. Nevertheless a sensitively designed scheme could be accommodated at Old Malling Farm, which takes into account the range of significant constraints and impacts on the SDNP and its special qualities and incorporates an appropriate range of mitigation measures.

9.24 Landscape mitigation measures must address the following sensitivities (as identified by the SDNPA’s landscape consultant):

- Views from the site to local landmark features including chalk hills, church towers and Lewes Castle give this site a strong sense of place.
- The strong rural, tranquil and natural character of the Ouse Valley with no development apparent on its eastern banks, save for

---

33 Landscape and Visual Assessment: Old Malling Farm, Lewes, Allison Farmer Associates, May 2012
The visually sensitive western edge of the site above the Ouse Valley floor where development would intrude into the valley.

The site is seen in the context of the wider Ouse Valley floodplain when the site is viewed from elevated locations to the east and west.

From elevated locations to the west the entire site is clearly visible and visually separates the historic settlement of Old Malling Farm and Lewes Malling Deanery.

From elevated locations to the east the northern field of the site is visually prominent and is seen as part of the wider Ouse Valley corridor.

The Ouse corridor to the north of Lewes was included in the South Downs National Park as providing a high quality setting to Lewes town for reasons of its intrinsic scenic attraction, cultural heritage and nature conservation.

Various measures are suggested by the landscape consultant to address these, including development on parts of the site only and at a lower density, and pulling development back and away from the western, southern and northern parts of the site. Other suggestions include: providing only limited night lighting on the site and the use of low level lighting where required, ensuring the use of dark colours for roofs, retaining views out of the site to surrounding landmarks, retaining some areas of floodplain with no access, and ensuring that any improved access to the floodplain does not unduly extend urbanising influences, including that signage and surfaces, gates and fencing are low key.

These various measures will be reviewed and considered for inclusion in a Design Brief to be undertaken for the site either by the SDNPA or by the applicant and subject to the SDNPA’s approval. This will be informed by a detailed site appraisal, which shall include as 3D computer modelling of the site and its context; appropriate Verified Photomontages; and Zone of Theoretical Visibility plots from appropriate locations within the site.

With regard to the other fields in the same ownership but outside the developable area, this land may not be viable for agricultural purposes once the development goes ahead. There is a significant risk that the land would be vulnerable to alternative peri-urban activities as a result of the development, being sold off for alternative uses such as equine grazing/small holding, or other recreational activities. This would significantly affect its character and have impacts on the wider Ouse Valley and the Ouse Valley Way. It is therefore proposed that, in the event of it no longer being used for farming, it should be designated as a Local Nature Reserve (LNR) or Local Green Space as appropriate. This would be done through the Lewes Neighbourhood Plan or, failing that, through the South Downs National Park Local Plan. Public access within this area shall be subject to control through design measures which are based on preserving the most ecologically valuable areas, as identified through the ecological survey. This should apply even if the land is retained for farming under the Higher Level Stewardship (HLS) scheme. The maintenance of the LNR shall be subject to an agreed Land Management Plan, to be funded from the development through a section 106 agreement.
9.28 Transport evidence shows that significant development of this site should be contingent on highway improvement works at the Earwig corner junction of the A26 with the B2192 on the edge of the town to the east of the site. This is a junction that already experiences congestion, particularly at peak times, and therefore the further strain from new development (including from other development in Lewes town and at Ringmer) will need to be mitigated. Development consistent with this policy, as well as other development in the area will enable this mitigation to occur, possibly through a traffic light system to improve the flow of traffic through the junction. In addition, mitigation measures associated with the impact of development at Old Malling Farm will be required at the critical junction of Church Lane/Malling Hill and at the Brooks Road/Phoenix Causeway roundabout, in agreement with the local highway authority. Traffic calming measures are also required to reduce the amount of existing traffic using the access roads to the site so that they can accommodate the additional traffic movements that will be generated by the development.

9.29 Contributions to infrastructure, including green infrastructure and equipped play space, will be sought initially through a Section 106 agreement and would be specified further as part of that agreement. However, depending on the date of permission being granted, some of these contributions would be made through the Community Infrastructure Levy, once introduced.

9.30 The Old Malling Farm site has not been acquired by a developer and so is not subject to an unrealistically high hope value. It is a greenfield site with no abnormal development costs. It also represents the only strategic level greenfield site that can deliver a significant level of housing, which includes affordable housing, in and around Lewes town. In line with the National Parks Vision and Circular (2010), the delivery of affordable housing within a National Park is seen as a priority. It is therefore considered that 50 per cent affordable housing could be delivered on this site without unduly affecting the viability of the development. Viability evidence has been prepared indicating that this is the case. Due to the high number of affordable houses that will be delivered on this site it will be important to consider the mix of these houses, particularly in terms of type and tenure. With this being the case, the National Park Authority and Lewes District Council (as the Housing Authority) may seek/accept a tenure split for the affordable housing that delivers a greater proportion of intermediate housing than 25 per cent.
Policy SD-SS03: Land at Old Malling Farm, Lewes

| Quantum of development: | Approx. 200 dwellings | Site area: | Approx. 10 ha (6.6 hectares net developable area) |

Land at Old Malling Farm, Lewes as shown on the Policies Map, is allocated for the development of approximately 200 dwellings. Detailed proposals that comply with other relevant policies, meet the following site-specific development requirements and with a Design Brief to be approved by the local planning authority in advance of an application will be permitted:

- 50 per cent of dwelling units are affordable;
- Development is restricted to the parts of the site above the 10 metre contour in the northern field and further than 20 metres from the western and southern boundary in the southern field, or in such other way as is agreed by the SDNPA through a detailed site appraisal and included in the Design Brief;
- Development on the western edge of the southern field is lower density than other parts of the site with gardens bounded by hedges rather than walls or fences;
- Development and appropriately designed equipped play space integrates into a multi-functional network of green infrastructure;
- The design, layout, built form, spatial arrangements, landscaping and materials, including the pattern, scale and colour of roofs, respect and reflect the National Park location;
- Views from elevated chalk hills to the east and west, from Hamsey to the north, and from Lewes itself are protected and enhanced. The design shall incorporate views within, to and from the site to surrounding landmarks and features;
- Development is consistent with positive local character and local distinctiveness and respects the character, amenity and setting of the adjacent Malling Deanery Conservation Area and the listed Church of St Michael;

- Impacts on tranquillity, dark night skies and biodiversity are minimised by restricting access to some areas of floodplain outside the site and by providing only limited night lighting and the use of low level lighting where required;
- An ecological survey is undertaken and appropriate measures are implemented to mitigate adverse impacts on the South Malling Disused Railway SNIC and Offham Marshes SSSI;
- Fields which are in the same ownership but are outside the developable area shall be retained as a designated Local Nature Reserve and/or Local Green Space and be subject to an agreed Land Management Plan, funded through a section 106 agreement; public access within this area shall be controlled to protect the most ecologically valuable areas;
- The primary access point is to be off Monks Way at a point opposite Mantell Close the design of which should minimise impacts on views from the north; the existing former railway bridge forms a secondary access point for emergency use and an access for pedestrians and cyclists and to the existing farm buildings;
- Development respects the amenity of the existing dwellings adjoining the site;
- A site specific flood risk assessment is undertaken and an appropriate surface water drainage strategy is agreed by the appropriate body and implemented as agreed;
- A survey is undertaken of existing trees and hedgerows and appropriate measures are implemented for their protection in accordance with a schedule to be agreed with the local planning authority;
- Development is subject to a geophysical survey and trial trench evaluation of the high archaeological potential in the area and any resulting measures are implemented;
- Contributions are made towards other off-site infrastructure improvements arising from and related to the development, including complementary measures in keeping with the landscape setting to reduce the attractiveness to existing traffic of Church Lane/Mayhew Way/Brooks Road as an alternative to Malling Hill and to improve the...
capacity of the junctions at the A26/B2192 Earwig Corner, Church Lane/Malling Hill, and the Brooks Road/Phoenix Causeway roundabout;

- Measures are put in place to improve access from the site to the town centre by non-car modes; and
- The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

**Site description:**
The site subject to the above policy is a greenfield site situated on the northern side of the town in a ‘green finger’ between the 1970s part of the Malling Estate to the east and the River Ouse, mainline railway and Landport Estate to the west. The site lies wholly within the South Downs National Park and is currently in agricultural use.

**Constraints:**
- There is a Site of Special Scientific Interest (SSSI) adjacent to the site and is it within a SSSI Impact Risk Zone (requiring further advice from Natural England).
- There is an SNCI along the adjacent disused railway cutting on the east of the site.
- The site also lies within an area of high archaeological potential being in the vicinity of a medieval settlement and the ruins of a college of Benedictine Canons.
- Much of the site is very good-quality agricultural land (Agricultural Land Classification Grade 2, with some Sub-grade 3a) and therefore constitutes best and most versatile agricultural land.
SITE ALLOCATIONS BY SETTLEMENT

MIDHURST, WEST SUSSEX

9.31 Located at a key junction of the A272 and A286, on the River Rother and with a population of just under 5,000 people, Midhurst is one of the largest towns in the National Park. However, Midhurst is also the location of many important historical buildings and noticeable is the distinctive yellow paintwork on many buildings which identifies them as belonging to the Cowdray Estate. There is a large Conservation Area and over 100 Listed Buildings. The town has excellent access to large areas of open and unspoilt countryside.

9.32 The busy area of North Street and surrounding lanes contain a mix of both multiple retailers and many independent stores, restaurants and cafes. The town contains a good mix of services and facilities including primary schools and the Midhurst Rother College which serves a large area stretching well beyond the school to some of the most rural communities in the National Park.

9.33 As a neighbourhood development plan is not being prepared for Midhurst, this Local Plan defines the town centre boundary and primary shopping area for the town. A masterplanning exercise is being carried out by the SDNPA in collaboration with the Town Council to ensure that the town and its town centre are being comprehensively planned for.

Infrastructure Delivery Plan (IDP)

9.34 There have not been any specific infrastructure projects identified for Midhurst in the emerging IDP to date.
### Policy SD-WW03: Land at New Road, Midhurst

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 5 dwellings</th>
<th>Site area:</th>
<th>Approx. 0.1 hectares</th>
</tr>
</thead>
</table>

Land at New Road, Midhurst, as shown on the Policies Map, is allocated for the development of approximately 5 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- Further investigations into potential contamination should be carried out.
- A Transport Statement will be required to support a planning application and appropriate access arrangements on to New Road to be agreed and to the satisfaction of the highway authority.

**Site description:**
The site is currently in use as residential garages located off New Road in Midhurst. The site is located wholly within the settlement boundary.

**Opportunities:**
- The site could be considered for 100% affordable housing.
- The efficient use of land within the settlement boundary.

**Constraints:**
- Loss of car parking spaces - may require provision of parking elsewhere.
- The site is within 250 metres of a Historic Landfill Site.
- Archaeological investigation may be required prior to development or during construction.

---

**Map of site**

![Map of site](image)
### Policy SD-WW04: Land at Petersfield Road, Midhurst

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Site Area:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approx. 40 dwellings</td>
<td>Approx. 1.3 hectares</td>
</tr>
</tbody>
</table>

Land at Petersfield Road, Midhurst, as shown on the Policies Map, is allocated for the development of approximately 40 dwellings. Detailed proposals that comply with other relevant policies and meet the following site specific development requirements will be permitted:

- A Transport Statement will be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority, including review as part of a Stage One Road Safety Audit.
- The retention of existing mature trees and appropriate buffering of protected trees.
- Careful consideration to be given to boundary treatment of the site.
- A Landscape and Visual Impact Assessment will be required and should inform the design and layout of the site proposals.
- Appropriate ecological survey will be required.

### Site description:
The site consists of two large residential plots. The site is located wholly within the settlement boundary.

### Opportunities:
- Provision of residential development in a sustainable location in close proximity to the town centre.
- The efficient use of land within the settlement boundary.

### Constraints:
- Tree Preservation Order adjacent to the site and mature trees of value to local amenity.
- Access may require the existing signalised pedestrian crossing to be moved.

---

![Map of site](image)
**Policy SD-WW05: Land at Lamberts Lane, Midhurst**

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 15 dwellings</th>
<th>Site Area:</th>
<th>Approx. 0.4 hectares</th>
</tr>
</thead>
</table>

Land at Lamberts Lane, Midhurst, as shown on the Policies Map, is allocated for the development of approximately 15 dwellings. Detailed proposals that comply with other relevant policies and meet the following site specific development requirements will be permitted.

- A Transport Statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- A Landscape and Visual Impact Assessment will be required and should inform the design and layout of the site proposals.
- Careful consideration to be given to the street frontage on Lamberts Lane and the boundary treatment of the site.
- A Heritage Statement, of an appropriate level of detail, will be required to demonstrate how proposed development will preserve and enhance the conservation area and the setting of the listed building.
- Demonstrated that there is no loss in community facilities.
- Appropriate ecological survey will be required.

**Site description:**
The site consists of a hard surface of tennis/netball courts, two single storey buildings (previously in use as a youth club and Women’s Institute) and south of the tennis courts, an overgrown and treed area west of the tennis courts. The site is located wholly within the settlement boundary.

**Opportunities:**
- Provision of residential development in a sustainable location in close proximity to the town centre.
- The efficient use of land within the settlement boundary.

**Constraints:**
- Adjacent to the conservation area.
- A grade II listed building located in close proximity (to the east).
- Existing community facilities.
BINSTED, HAMPSHIRE

9.35 Binsted is a village sitting high on the East Hampshire Greensand terrace, not far from the edge of the scarp slope, at the far northern tip of the National Park. The village has developed in an L shape along the old road from Alton eastwards to Alice Holt, and a minor lane which runs southwards towards Kingsley. The part of the village running down towards Kingsley is covered by a conservation area and centred on the large, Grade I listed church, with the village hall adjacent and the primary school at its northern end. The larger part along the main road is linear in form, with old houses and farmsteads interspersed with some more modern housing including a few cul-de-sac developments, and a public house. Traditional building materials reflect the location on the edge of the Weald with brick, hung tiles, some malmstone and many half-timbered buildings.

Infrastructure Delivery Plan

9.36 There have not been any specific infrastructure projects identified for Binsted in the emerging IDP to date.
**Policy SD-WW09: Land at Clements Close, Binsted**

| Quantum of development: | Approx. 12 dwellings | Site Area: | Approx. 0.5 hectares |

Land at Clements Close, Binsted, as shown on the Policies Map, is allocated for the development of approximately 12 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted.

- A pre-application archaeological assessment will be required.
- An appropriate ecological survey will be required.
- Development will be required to take into account and contribute to the aims of the East Hampshire Hangers Biodiversity Opportunity Area.
- Existing mature trees and hedgerows around the site to be retained.
- Development to be consistent in density and character with the neighbouring development.

**Site description:**
The site consists of agricultural land, adjacent residential development and the settlement boundary to the north. There is a thick belt of trees and hedgerow on the south and east boundary.

**Opportunities:**
- Within East Hampshire Hangers Biodiversity Opportunity Area

**Constraints:**
- Within 5km of a special protection area and special area of conservation.
- Power cables cross the site.
BURITON, HAMPSHIRE

9.37 Buriton is a nucleated spring line village located on the Greensand Terrace right at the foot of the chalk ridge. The spring line contributes a lot to its character. The historic centre of the village is dominated by a large pond, from which a stream flows northwards, carving a deep and dramatic grassy valley through the terrace. The core of the village is at the point where the lane that forms the main village street bends sharply around the head of that valley. At the village core around the pond are the church and manor house, backing directly onto the foot of the chalk scarp. The South Downs Way runs just south of the village. The Hangers Way begins at Queen Elizabeth Country Park two kilometres to the south west, and runs through Buriton, following the stream.

9.38 The great majority of the village has been developed in a north-westerly direction along the High Street and Petersfield Road. Further out is a sizeable area of late twentieth-century housing. North east of the core and separated from the main part of the village by the steep valley, there is a further cluster of houses of various ages located a short distance up North Lane. Building materials are diverse, reflecting the position under the chalk scarp, with much use of malmstone.

Infrastructure Delivery Plan

9.39 The following specific infrastructure projects have been identified for Buriton in the emerging IDP to date:

- Improve Village Hall (i.e. energy efficiency, new lighting, solar panels and insulation).
- Allotment/Community Orchard provision (not including land purchase)
- Community minibus (capital purchase of bus, not running costs)
**Policy SD-SS02: Land at Kiln Lane, Buriton**

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 7 dwellings</th>
<th>Site Area:</th>
<th>Approx. 0.2 hectares</th>
</tr>
</thead>
</table>

Land at Kiln Lane, Buriton, as shown on the Policies Map, is allocated for the development of approximately 7 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- A transport statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- Careful consideration to be given to boundary treatment of the site.
- Careful consideration to be given to the access and frontage onto Kiln Lane and retention of existing hedgerows.
- Suitable noise attenuation measures may be required.
- Further investigations into potential contamination should be carried out.
- Appropriate ecological survey will be required.
- A pre-application archaeological assessment will be required.
- Development will be required to take into account and contribute to the aims of the East Hampshire Hangers Biodiversity Opportunity Area.

**Site description:**
The site is agricultural land adjacent to the settlement boundary and part of a larger field.

**Opportunities:**
- Within East Hampshire Hangers Biodiversity Opportunity Area

**Constraints:**
- Within 250m of an historic landfill site
- Within 70m of a site of importance for nature conservation and an ancient woodland site (across railway)
- Within 5km of a special area of conservation

- Likelihood identified for archaeological remains to exist within site.

**Map of site**

![Map of site](image_url)
COLDWALTHAM, WEST SUSSEX

9.40 Located alongside the A29 between Pulborough and Arundel, Coldwaltham has a population (when combined with Watersfield) of about 1,000 and is located within the Wealden farmland and heath mosaic in the Western Weald. The majority of the village is contained between the railway line and the River Arun (plus its associated flood plain, the Waltham Brooks) to the east and the wooded area of Lodge Hill to the west. Typical of much of the A29, the route through Coldwaltham follows that of the Roman Road of Stane Street. There are extensive views from the village across the river valley towards the scarp slopes of the Downs to the south.

9.41 The historic core of the village is to the west of the A29 centred around St Giles Church. To the west is more modern development.

Infrastructure Delivery Plan

9.42 There have not been any specific infrastructure projects identified for Coldwaltham in the emerging IDP to date.
Policy SD-WW11: Land at Brookland Way, Coldwaltham

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 20 dwellings</th>
<th>Site Area:</th>
<th>Approx. 1 hectare</th>
</tr>
</thead>
</table>

Land at Brookland Way, Coldwaltham as shown on the Policies Map is allocated for the development of approximately 20 dwellings. Detailed proposals that comply with other relevant policies, meet the following site-specific development requirements and with a Design Brief to be approved by the local planning authority in advance of an application will be permitted:

- A transport statement may be required to support planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- Careful consideration to be given to boundary treatment of the site.
- Appropriate ecological survey will be required.
- Further investigations into potential contamination should be carried out.

Site description:
The site is agricultural land adjacent to the settlement boundary and part of a larger field.

Constraints:
- There is a site of special scientific interest (SSSI) adjacent to the site and is within an SSSI Impact Risk Zone (requiring further advice from Natural England). The site is within 100m of a Ramsar site and a special protection area.
EASEBOURNE, WEST SUSSEX

9.43 Easebourne is one of the National Park’s larger villages with a population of just under 2500. It is an historic estate village in the sandy arable farmland of the Western Weald. The original village street follows and intertwines with a minor stream that runs down a gentle valley from the fir-clad slopes of Bexleyhill Common in the north down to the ancient bridge over the River Rother which separates the village from Midhurst. The numerous old sandstone buildings along this lane are within the conservation area. Near its centre point, this lane is crossed by the old main road along the north bank of the Rother, part of which is now the A272. This is the centre of the village, with a cluster of Grade I listed buildings including the church and former medieval convent, the village shop, community centre, and primary school close by, as well as the Cowdray Estate farm shop. On the south west side of the centre, towards Midhurst and the A286, are a number of quiet nineteenth and twentieth century residential streets.

9.44 Easebourne is dominated and, in large part owned, by the Cowdray Estate. The western edge of the village is the boundary of Cowdray Park, a listed parkland that surrounds the magnificent, ruined Tudor palace of Cowdray, polo fields that host international championships and the Victorian mansion of Cowdray House.

Infrastructure Delivery Plan

9.45 There have not been any specific infrastructure projects identified for Easebourne in the emerging IDP to date.
### Policy SD-WW01: Land east of Cowdray Road, Easebourne

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 14 dwellings</th>
<th>Site Area:</th>
<th>Approx. 0.7 hectares</th>
</tr>
</thead>
</table>

Land east of Cowdray Road, Easebourne, as shown on the Policies Map, is allocated for the development of approximately 14 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- A transport statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- Careful consideration to be given to the street frontage on Egmont Road and the boundary treatment of the site.
- A Heritage Statement, of an appropriate level of detail, will be required to demonstrate how proposed development will preserve and enhance the adjacent conservation area and the setting of the listed buildings to the west.
- Appropriate ecological survey will be required.
- Existing hedgerows across the site should be retained and, where appropriate, enhanced.

### Site description:
The site consists of grazing land and car parks adjacent to the settlement boundary.

### Opportunities:
- Provision of residential development in a relatively sustainable location close to village facilities and within walking distance of the town centre of Midhurst.

### Constraints:
- Adjacent to the conservation area.
- Two Grade II listed buildings adjacent (to the east).
- Loss of car parking spaces – may require provision of parking elsewhere.
GREATHAM, HAMPSHIRE

9.46 Greatham is a linear village of the Western Weald which runs along the old main Petersfield to Farnham road, straddling two distinct landscape areas. The older part of the village to the west, much of which is covered by a conservation area, lies among the gently rolling fields of the Mixed Farmland and Woodland Vale landscape area, with many mature trees and distant views of the Hangers. Traditional building materials here include much use of sandstone. The village hall, primary school and Victorian church with its tall spire are all in this area, as well as the ruins of the old church, designated as a local wildlife site. Further north east, beyond the valley of a tributary of the Rother, the housing along the road becomes newer and denser as the land rises to sandy oak, birch and pine woods in the Wealden Farmland and Heath Mosaic landscape area, part of which are designated local wildlife sites. A road forks off eastwards towards Longmoor, accommodating further housing. The eastern end of the village is in close proximity to land used by military, in particular the large DSDA facility next to Longmoor Road, and beyond it the army base at Longmoor Camp. On the northern and eastern edge of the settlement is the Woolmer Forest Special Area of Conservation and the Wealden Heaths Phase II Special Protection Area.

Infrastructure Delivery Plan

9.47 The following specific infrastructure projects have been identified for Greatham in the emerging IDP to date:
- Junction improvements, traffic calming and routing
**Policy SD-WW10: Land at Petersfield Road, Greatham**

| Quantum of development: | Approx. 30 dwellings | Site Area: | Approx. 2.4 hectares |

Land at Petersfield Road, Greatham as shown on the Policies Map is allocated for the development of approximately 30 dwellings. Detailed proposals that accord with other relevant policies and meet the following site specific development requirements will be permitted:

- A Transport Statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- Development must be supported by a Landscape and Visual Impact Assessment.
- The retention of existing hedgerows and careful consideration to be given to the boundary treatment of the site.
- A Heritage Statement, of an appropriate level of detail, will be required to demonstrate how proposed development will preserve and enhance the adjacent Conservation Area and the setting of the listed buildings to the west.
- The site is approximately 600m from the Wealden Heaths Phase II Special Protection Area (SPA). Advice from Natural England will be required on appropriate measures to mitigate the impacts of recreational disturbance.
- A pre-application archaeological assessment will be required
- Development will be required to take into account and contribute to the aims of the Rother Valley Biodiversity Opportunity Area.
- Discussion should take place with the SDNPA prior to any specific development proposal to develop the site, to establish what mineral resource information (and the level of information) is required by the Mineral Planning Authority. It is recommended that if the proposal overlays a safeguarded minerals resource that a Minerals Assessment Report is produced for the Mineral Planning Authority, submitted prior to the submission of an application to allow for early discussions to take plan. The report should broadly address key issues including:

- Site setting – Location, access, site description, geology and constraints;
- Planning status in respect of minerals safeguarding
- Policy context (both national and local), Mineral safeguarding Area;
- Constraints upon prior extraction – inter alia previous mineral working, hydrology of area, utilities and market issues (viability and/or quantity of resource present).

**Site description:**
The site is a disused plant nursery adjacent to the settlement boundary of Greatham. The site is surrounded by residential properties to the north-east of the site, agricultural land to the south a village hall and school to the west.

**Opportunities:**
- Adjacent to Rother Valley Biodiversity Opportunity Area
- The efficient use of previously developed land.

**Constraints:**
- Identified in the SHLAA as having some archaeology interest
- Adjacent to (across road from) Grade II Listed Building
- Approximately 600m of a Special Protection Area
- Existing glasshouses on site – require removal and any associated remedial works.
- Site is within a Mineral Consultation Area.
ITCHEN ABBAS, HAMPSHIRE

9.48 Itchen Abbas is an originally linear village that has developed along the northern edge of the secluded Itchen chalk valley system, where the land begins to rise up to the open country of the Mid Hampshire Downs beyond the National Park boundary. Three strong parallel east-west linear features define Itchen Abbas – it lies between the River Itchen to the south and the former line of the Winchester–Alton railway to the north (which also forms the boundary of the National Park). Most of the community buildings are located around the junction between this road and a north–south lane which crosses the River Itchen and then runs northwards up a minor dry valley.

9.49 The older houses of the village are mainly scattered in a linear fashion along the main road. There is 20th Century residential infill development northwards between the main road and the disused railway line. Further to the west, the main road is lined with 20th Century houses built at a very low density. Just east of the village there is a trout fishery on the river. The village is crossed by several long-distance footpath routes including the Itchen Way, King’s Way, St Swithun’s Way and Three Castles path, which make use of the attractive riverside footpaths. Characteristic building materials in the older houses are brick, sometimes mixed with flints, reflecting the chalky surroundings but also proximity to a former railway line.

Infrastructure Delivery Plan

9.50 The following specific infrastructure projects have been identified for Itchen Abbas in the emerging IDP to date:

- Complete off-road walking and cycling route along the Itchen Valley between Kings Worthy and Alresford, avoiding the B3047 and A31 (10km)
Policy SD-WD01: Land at Itchen Abbas House, Itchen Abbas

| Quantum of development | Approx. 8 dwellings | Site Area | Approx. 0.7 hectares |

Land at Itchen Abbas House as shown on the Policies Map is allocated for the development of approximately 8 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- Development will be required to take into account and contribute to the aims of the Itchen Valley Biodiversity Opportunity Area.
- Appropriate ecological survey required.
- Development should not harm the amenity of the public footpath adjacent to the site.
- Further investigations into potential contamination should be carried out.

Site description:
The site consists of a grassed area adjacent to the settlement boundary of Itchen Abbas.

Opportunities:
- Adjacent (across road from) the Itchen Valley Biodiversity Opportunity Area

Constraints:
- There is a site of special scientific interest (SSSI) and special area of conservation (SAC) in close proximity to the site and it is within an SSSI Impact Risk Zone (requiring further advice from Natural England).
- The site is within 250 metres of an historic landfill site.
Pyecombe is a village which is in two parts known as Pyecombe and Pyecombe Street, which are close to one another but separated by fields. They are in the open downland approximately seven miles north of Brighton and five miles south of Burgess Hill. It is close to the natural landmarks of Wolstonbury Hill to the north and Devils Dyke to the south. They also are adjacent to the northern side of the A23. Both parts of the village have separate conservation areas, which include a 13th Century grade 1 listed church. Pyecombe Street has the earliest properties. There is a mix of styles and ages of properties from shepherd cottages to larger detached properties. These range from 16th and 17th century cottages with white and black timber facades to more modern barn conversions. There is a predominance of flint and brick and clay, and slate clad roofs.

Infrastructure Delivery Plan

9.52 The following specific infrastructure projects have been identified for Pyecombe in the emerging IDP to date:

- Refurbish pond at Wolstonbury Hill
**Policy SD-DS01: Land between Church Lane and the A273, Pyecombe**

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 8 dwellings</th>
<th>Site Area:</th>
<th>Approx. 1 hectare</th>
</tr>
</thead>
</table>

Land between Church Lane and the A273, Pyecombe, as shown on the Policies Map is allocated for the development of approximately 8 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- The retention of hedgerows on and around the site will be required.
- Suitable noise attenuation measures will be required.
- A Landscape and Visual Impact Assessment will be required and should inform the design and layout of the site proposals.
- Development will be required to take into account and contribute to the aims of the Stanmer and Ditchling Downs Biodiversity Opportunity Area.

**Site description:**
The site consists of agricultural land within the settlement boundary.

**Opportunities:**
- Within Stanmer and Ditchling Downs Biodiversity Opportunity Area

**Constraints:**
- Location adjacent to A273 and within close proximity to A23.

---

**Map of site**
Sheet, Hampshire

9.53 Sheet is a riverside village at a bridge across the River Rother, at the junction of historic roads to Petersfield, Portsmouth, Chichester, Midhurst and London. In the past it prospered as a result of its riverside location, with a fulling mill and smithy making use of the natural resources of the area. Later, the coming of the turnpikes and railways brought more development to Sheet and its southern edges are now contiguous with Petersfield. However, the village centre retains a rural atmosphere with rows of small cottages and the tall spire of the Victorian church dominating views along the narrow and sometimes sunken lanes.

Infrastructure Delivery Plan

9.54 The following specific infrastructure projects have been identified for Sheet in the emerging IDP to date:

- Refurbish and extend Scout Hut
Policy SD-WW02: Land at Farnham Road, Sheet

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Site Area:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approx. 15 dwellings</td>
<td>Approx. 0.9 hectares</td>
</tr>
</tbody>
</table>

Land at Farnham Road, Sheet, as shown on the Policies Map, is allocated for the development of approximately 15 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- Suitable noise attenuation measures will be required.
- The retention of existing mature trees and appropriate buffering of protected trees.
- Development will be required to take into account and contribute to the aims of the Rother Valley Biodiversity Opportunity Area.
- An adequate buffer to the stream along the northern boundary.
- Re-provision of existing open space in close proximity to the existing open space and the residents it serves.

Site description:
The site consists of agricultural/grazing land adjacent to the settlement boundary of Sheet.

Opportunities:
- Adjacent to Rother Valley Biodiversity Opportunity Area

Constraints:
- Trees on site are protected by tree preservation orders
- The site has a sloping topography.
- Land along the northern boundary is in Flood Zones 2 and 3
- Adjacent to a railway line.
SOUTH HARTING, WEST SUSSEX

9.55 South Harting is a springline village on the greensand terrace, dominated by the chalk ridge immediately to the south, from which the South Downs Way overlooks the village. Torberry Hill, with its ancient hillfort, also closes off the north-western horizon, giving the village a secluded air. The original main village street (much of which is now the main Chichester to Petersfield road) leads northwards away from the foot of the Downs, which gives a linear form to the older part of the village. A stream that rises in ornamental ponds at the springline runs behind and intertwines with the village streets, adding to their character. The main street (which changes its name along its length) is covered by a conservation area, dominated by the large Grade I listed church in its centre. The older buildings in South Harting are notable for their rich variety of materials derived from the varied geology of the parish, including flint, malmstone, sandstone and clay.

9.56 Two streets run eastwards from the main village street, eventually converging and running on as part of the Underhill Lane towards Cocking and Midhurst. The more southerly, Tipper Lane, is the largest residential area of the village with a significant quantity and range of 20th Century housing built up on both sides. A primary school is also located here. The more northerly lane contains the post office and a mixture of older and newer dwellings, and is partly covered by the conservation area. Therefore, the built up area of the village is now triangular in form. In the centre of this triangle an area of pasture remains, run through by the stream and by two footpaths. In the Downs just south of the village are Harting Down (one of the largest areas of chalk grassland in West Sussex) and the stately home of Uppark.

Infrastructure Delivery Plan

9.57 There have not been any specific infrastructure projects identified for South Harting in the emerging IDP to date.
Policy SD-SS01: Land south of Loppers Ash, South Harting

| Site name: |  
|---|---|
| Quantum of development: | Approx. 8 dwellings |
| Site Area: | Approx. 0.4 hectares |

Land south of Loppers Ash, South Harting, as shown on the Policies Map is allocated for the development of approximately 8 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- A pre-application archaeological assessment will be required
- The form of development must continue the pattern of development found to the north and south, of low/medium density dwellings in a single line parallel to the road frontage.
- Careful consideration to be given to the boundary treatment of the site.

Site description:
The site consists of agricultural/grazing land adjacent to the settlement boundary of South Harting.

Constraints:
- The site is subject to archaeological constraints
WEST MEON, HAMPSHIRE

9.58 West Meon is an historic village on the major valley slopes of the upper Meon chalk valley system. Its hilly relief gives views across the surrounding countryside to and from the village, especially of the striking Victorian church on its hill spur. The nucleus of the village is at a crossroads where the main road between Fareham and Alton (the current A32) rises up northwards out of the Meon Valley, separating from the road that continues along the valley to East Meon and Petersfield.

9.59 The River Meon, with its tranquil wooded banks runs immediately to the south of the old core. Beyond this area the village has a complex form, with a belt of cottages and later development running eastwards along the East Meon road and further clusters of houses separated from the main part of the village by the River Meon to the south, by the churchyard to the north-west and by the old railway embankment to the east. Traditional building materials in the village include brick, flint and render, and there are a notable number of thatched houses. West Meon sits at the head of the Meon Valley Trail and the South Downs Way passes nearby to the south, across the hill fort of Old Winchester Hill.

Infrastructure Delivery Plan

9.60 The following specific infrastructure projects have been identified for West Meon in the emerging IDP to date:

- New cycle route between Alton and West Meon (using on- and off-road routes) as alternative to A32 (20km).
**Policy SD-SS07: Land at Meadow House, West Meon**

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 6 dwellings</th>
<th>Site Area:</th>
<th>Approx. 0.2 hectares</th>
</tr>
</thead>
</table>

Land at Meadow House, West Meon, as shown on the Policies Map is allocated for the development of approximately 6 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- A transport statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- Careful consideration to be given to the boundary treatment of the site.
- A heritage statement, of an appropriate level of detail, will be required to demonstrate how proposed development will preserve and enhance the setting of the adjacent conservation area.
- Development will be required to take into account and contribute to the aims of the Meon Valley Biodiversity Opportunity Area.
- The amenity of the adjacent public right of way must be protected.
- Appropriate ecological survey required.

**Site description:**
The site consists of part of a large residential garden within the settlement boundary.

**Opportunities:**
- Efficient use of land within settlement boundary.
- Adjacent to Meon Valley Biodiversity Opportunity Area.

**Constraints:**
- River Meon SINC in close proximity to the south of the site.
- Protected species recorded in vicinity.
Policy SD-SS06: Land at Long Priors, West Meon

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Approx. 10 dwellings</th>
<th>Site Area:</th>
<th>Approx. 0.3 hectares</th>
</tr>
</thead>
</table>

Land at Long Priors, West Meon as shown on the Policies Map is allocated for the development of approximately 10 dwellings. Detailed proposals that comply with other relevant policies and meet the following site-specific development requirements will be permitted:

- A transport statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- The retention of existing mature trees.
- No harm to be caused to groundwater given location in Source Protection Zone 2.
- Careful consideration to be given to the boundary treatment of the site.

Site description:
The site is part of a larger agricultural field situated between residential development to the west and a recreation ground to the east.

Constraints:
- Site covered by Source Protection Zone 2
SITES WITHIN THE NATIONAL PARK BOUNDARY
ADJACENT TO SETTLEMENTS OUTSIDE THE
NATIONAL PARK

Policy SD-DS03: Land at Hoe Court, Lancing

| Quantum of development: | Approx. 15 dwellings | Site Area: | Approx. 1 hectare |

Land at Hoe Court, Lancing as shown on the Policies Map is allocated for the development of approximately 15 dwellings. Detailed proposals that comply with other relevant policies, meet the following site-specific development requirements and with a Design Brief to be approved by the local planning authority in advance of an application will be permitted:

- A landscape and visual impact assessment will be required and should inform the design and layout of the site proposals.
- A transport statement may be required to support a planning application and appropriate access arrangements to be agreed and to the satisfaction of the highway authority.
- Careful consideration to be given to the boundary treatment of the site.
- Suitable noise attenuation measures may be required.
- Appropriate ecological survey will be required.

Site description:
The site consists of agricultural land adjacent to the settlement boundary of Lancing on the boundary of the National Park.

Constraints:
- Adjacent to a local nature reserve (east).
### Policy SD-DS02: Land at Normansal Park Avenue, Seaford

<table>
<thead>
<tr>
<th>Quantum of development:</th>
<th>Site Area:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Approx. 20 dwellings</td>
<td>Approx. 1 hectare</td>
</tr>
</tbody>
</table>

Land at Normansal Park Avenue, Seaford as shown on the Policies Map is allocated for the development of approximately 20 dwellings. Detailed proposals that comply with other relevant policies, meet the following site-specific development requirements and with a Design Brief to be approved by the local planning authority in advance of an application will be permitted:

- Improvement, enhancement or replacement of existing open/recreation space.
- A Landscape and Visual Impact Assessment will be required and should inform the design and layout of the site proposals.
- Careful consideration to be given to the boundary treatment of the site.
- The retention of existing mature trees and appropriate buffering of protected trees.
- Re-provision of existing open space in close proximity to the existing open space and the residents it serves.

**Site description:**
A greenfield site partly within the National Park, currently in use as open space and recreation ground.

**Constraints:**
- Tree preservation order area along western boundary.
- The site is within an SSSI Impact Risk Zone (further advice from Natural England required).
10. DEVELOPMENT MANAGEMENT POLICIES

10.1 This chapter of the Preferred Options version of the Local Plan (Local Plan) contains all of the development management policies relating to the three themes of the Partnership Management Plan (PMP). These policies provide a detailed framework for guiding development. For ease of reference they are set out in the same order as the strategic policies – A Thriving Living Landscape, People Connected with Places and Towards a Sustainable Future, and should be read in conjunction with these policies.

10.2 Enforcement is an important and necessary part of the development management system. Enforcement action is discretionary and should always be commensurate with the breach to which it relates. Every effort will be made to resolve minor breaches through mediation and retrospective applications. However, compliance and respect for the planning process are not only essential but are expected. The Authority will not hesitate to respond in a robust and direct manner where it is appropriate to do so.

A THRIVING LIVING LANDSCAPE

PROVISION AND PROTECTION OF OPEN SPACES AND BURIAL GROUNDS

10.3 Policy SD35 seeks to ensure that connected networks of open spaces around any new residential environments are integral to a planning and design process. New residential development should demonstrate how it contributes to wider green infrastructure networks.

Supporting Text

10.4 The New Horizons strategy\(^\text{34}\) states that: “the increasing availability of urban green spaces, views of and access to safe green spaces and greater engagement with the Natural Environment has been found to have multiple benefits for mental and physical health.” Policy SD35 will help to deliver health and wellbeing benefits but the policy has been worded so that open-space provision is not viewed in isolation but as part of design to make optimum use of land.

10.5 Given the scale of future housing development, it is likely that on-site open space provision will not be practicable in many instances. In these circumstances, the Authority’s recourse is to seek a contribution towards open space enhancements in the locality in line with strategic policy SD14 (Green Infrastructure).

10.6 Cemeteries and burial grounds are a much valued and sensitive type of green infrastructure asset. All proposals for new cemeteries and burial grounds should be in a sustainable location with good links to suitable access networks. The development proposals should have due regard to the character of the surrounding area especially those relating to the special qualities and retain any existing landscape features such as hedges and trees. Any opportunities to improve and/or create new biodiversity, habitats and green infrastructure should also be taken. It will be necessary to demonstrate that the proposed cemetery will not have an adverse impact on ground or surface water.

\(^{34}\) Department of Health, division for Mental Health (2009) New Horizons, A Shared Vision for Mental Health
Development Management Policy SD35: Provision and Protection of Open Space

1. Development proposals for new residential development that comply with other relevant policies will be permitted where they:
   a) improve the multi-functional environmental and social benefits and accessibility of existing open spaces by conserving and enhancing biodiversity, landscape, recreation, water management, social and cultural benefits to underpin the health, enjoyment and wellbeing of the community and, where appropriate, achieve a national standard such as a Green Flag Award;
   b) retain open spaces, including children’s play space and sports facilities, which are valued by local communities unless a suitable alternative can be provided; or
   c) create new open spaces that are located within or close to housing developments, that are safe and accessible for all members of the community; and
   d) support increased non-motorised access, through the design of the development, and create and improve connectivity with the wider rights of way network.

2. Planning permission will not be granted for development proposals that would result in the loss of open space unless like-for-like provision of a similar quantity, quality and accessibility is made in close proximity to the existing open space. Robust evidence will also have to be provided of the following criteria:
   a) alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need; and
   b) it has been demonstrated that the land cannot reasonably be converted to another form of open space provision for which the SDNPA has identified a deficit.

3. Development proposals for new cemeteries and burial grounds that comply with other relevant policies will be permitted where they are:
   a) appropriately sited in a sustainable location.

b) designed to make the most of opportunities to improve and/or create new biodiversity, habitats and green infrastructure; and

c) will have no adverse impact on controlled waters including groundwater and surface water.

LOCAL GREEN SPACES

10.7 Local green spaces are green spaces that are demonstrably special to a local community. The preparation of local and neighbourhood development plans offers the opportunity to designate local green spaces and provide extra protection to them that rules out new development other than in very special circumstances.

10.8 In recognition of the importance that the SDNPA attaches to local people being involved in the planning process, the SDNPA is inviting proposals for the designation of Local Green Spaces as part of the consultation on the Local Plan. A brief guide has been published to advise on the designation of local green spaces. The SDNPA will assess these nominations in line with the criteria set out in paragraph 77 of the National Planning Policy Framework (NPPF). Suitable sites will then be identified in the Pre-Submission version of the Local Plan. Upon adoption, these will become local green spaces to which Policy SD36 will apply.

10.9 Policy SD36 is a draft policy that will only apply to Local Green Spaces once they are designated through the Local Plan process.

Development Management Policy SD36: Local Green Spaces

1. Development proposals that protect or enhance Local Green Spaces and which comply with other relevant policies will be permitted.

2. Development proposals that would have an unacceptable adverse impact on these Local Green Spaces will not be permitted other than in very special circumstances.
TREES, WOODLANDS AND HEDGEROWS

Partnership Management Plan Outcomes and Policies

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

**Outcome 2:** There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

**Outcome 3:** A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

**Policy 4:** Create more, bigger, better-managed and connected areas of habitat in and around the National Park, which deliver multiple benefits for people and wildlife.

**Policy 6:** Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

**Policy 19:** Enhance the landscape, habitat connectivity, carbon storage and flood risk management with woodland creation by natural regeneration or tree planting with appropriate species, on an appropriate scale and in suitable locations.

---

**Introduction**

10.10 Trees, woodland and hedgerows are distinctive features of the National Park. Non-woodland trees, including those in hedgerows and street trees, make an important contribution to the landscape character and ecosystems of the National Park. Hedgerows, in particular, have an important role, by providing connections between habitats, albeit that they also have to be managed to enable highway safety matters to be addressed, which can also provide glimpses of long distance views.

10.11 Trees and woodland are important for adapting the National Park to the impacts of climate change. For example, trees in urban areas moderate summer temperatures, hedgerows and field trees provide shading for livestock and new tree planting in well-chosen locations can stabilise slopes and reduce the impacts of flooding. But they are also under threat from the impacts of climate change. For example, diseases and pests that affect trees are likely to proliferate in a warmer climate.

**National Policy Context**

10.12 The National Parks Vision and Circular states that woodlands should be managed to increase their contribution to climate change mitigation through carbon sequestration or the production of wood fuel and construction timber, and that the NPA should work in partnership to improve woodland management and increase woodland cover, contributing to a step change in planting rates in England. It requires recognition of environmental trends resulting from climate change and provision for natural systems, habitats and species to adjust to this; and a strategic framework for the protection, restoration and creation of priority habitats.
10.13 The National Planning Policy Framework (NPPF) states in paragraph 117 that local planning authorities should plan for biodiversity at a landscape scale across local authority boundaries, identify and map components of local ecological networks, and promote the preservation, restoration and re-creation of priority habitats and ecological networks. Deciduous woodland is a priority habitat, which forms part of a wider ecological network within the National Park and beyond its boundaries.

10.14 Paragraph 118 states that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for and benefits of the development in that location clearly outweigh the loss.

10.15 Biodiversity 2020, the Government strategy for ecosystem services, commits to a priority action of establishing more coherent and resilient ecological networks that safeguard ecosystem services for the benefit of wildlife and people. It provides detail on how this should be accomplished which is cited by the National Planning Practice Guidance. Another priority action in Biodiversity 2020 is to bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England. Recognition of the value and importance of our woodland assets, including urban trees, has been emphasised in government policy on trees and forestry.

10.16 Natural England’s Climate Change Adaptation Manual (2014) recommends increased protection for veteran trees, the retention of buffer zones around woodland and hedgerows, and new tree and hedge planting to improve size, diversity and connections between woodlands.

10.17 The Issues and Options Consultation proposed that the Local Plan should specify clear criteria to ensure the protection and protective buffering of certain trees and woodland covered by Tree Preservation Orders and Conservation Areas, and suggested options for extending similar provisions to ancient woodland and veteran trees or to trees and woodland more generally. The main proposal received almost unanimous support from consultees and a more general trees and woodland policy also received majority support. Issues raised in responses included a concern that the policy should not duplicate existing protections, support for woodland creation and tree planting, and for the protection of ancient woodland.

10.18 The preferred approach to include a draft Trees, Woodlands and Hedgerows policy which requires that proposals conserve and enhance trees, hedgerows and woodland, and comply with other relevant policies and legislation. The other relevant policies and legislation relating to trees and woodland are referenced before the policy wording and supporting text. The policy then sets out a number of requirements.

Protection of Trees and Woodland

10.19 Trees, groups of trees or woodlands may already be legally protected by a Tree Preservation Order (TPO), Conservation Area status, conditions attached to planning permission or by nature conservation designations. Therefore the policy on Trees, Woodland and Hedgerows does not duplicate or repeat existing protections.

---

35 DEFRA (2013) Government Forestry and Woodlands Policy Statement
**Tree Preservation Orders**

10.20 A Tree Preservation Order is an order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity. An Order prohibits the cutting down, topping, lopping, uprooting, wilful damage, wilful destruction of trees without the local planning authority’s written consent. In the Secretary of State’s view, cutting roots is also a prohibited activity and requires the authority’s consent. If consent is given, it can be subject to conditions which have to be followed. The law on Tree Preservation Orders is in Part VIII of the Town and Country Planning Act 1990 as amended and in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

**Trees in Conservation Areas**

10.21 Where an application relates to trees in a conservation area, the Authority will pay special attention to the desirability of preserving or enhancing the character or appearance of that area, in accordance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

10.22 Trees in a conservation area that are already protected by a Tree Preservation Order are subject to the normal procedures and controls for any tree covered by such an Order. Trees in a conservation area that are not protected by an Order are protected by the provisions in section 211 of the Town and Country Planning Act 1990. These provisions require people to notify the local planning authority, using a ‘section 211 notice’, six weeks before carrying out work that may affect such trees, unless an exception applies. The work may go ahead before the end of the six week period if the local planning authority gives consent. This notice period gives the authority an opportunity to consider whether to make an Order on the tree.

10.23 Policy SD38 deals with development proposals in conservation areas.

**Countryside Hedgerows**

10.24 The removal of countryside hedgerows is regulated under the Hedgerows Regulations 1997.

**Ancient Woodland and Veteran Trees**

10.25 The NPPF states that local planning authorities should refuse planning permission for developments that would lead to loss or deterioration of irreplaceable habitats unless the need for, and benefits of, the development in that location clearly outweigh the loss. Some ancient woodland and veteran trees will be within an area internationally or nationally designated, for example a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) or a Ramsar site.

10.26 Policy SD12 (Biodiversity and Geodiversity) deals specifically with development proposals which may affect ancient woodland as an irreplaceable habitat and designated areas which may include ancient woodland or veteran trees.

**Supporting Text**

10.27 Where there are trees that could affect, or be affected by, a planning application, the Authority may require a tree survey to be carried out and submitted in support of the application. The British Standard BS 5837:2012 (or subsequently updated) Trees in relation to design, demolition and construction - Recommendations was reviewed and updated in April 2012 and is the benchmark document for how to successfully take account of and retain suitable trees in proximity to development. Further detailed recommendations on planting and establishment of young trees is contained in BS8545:2014 Trees: from nursery to independence in the landscape – Recommendations.
10.28 Any changes will have some effect therefore it is essential that a detailed tree survey that complies with the British Standard is undertaken and used to inform the design process before a scheme is submitted. This will schedule the trees according to their suitability for retention and identify the extent of land required to ensure that they have the best chance of survival. Older trees are more vulnerable and they are often the most desirable to retain for both their amenity and conservation value.

10.29 It should be clearly demonstrated how development proposals will avoid any potential adverse impact on trees, woodland and hedgerows. Where development is permitted, mitigation measures may be sought and secured through condition. Mitigation of impacts may include the use of a buffer zone.

10.30 Buffer zones can provide protection for trees and woodlands from a number of risks. These are in addition to the Root Protection Areas set out above. They can provide a number of benefits, including preventing indirect damage from domestic chemicals, provide adequate light and space for trees to grow and avoid foundation damage or overshadowing. An appropriate buffer zone of semi-natural habitat will normally be established between any significant development and an area of woodland with amenity or biodiversity value. A minimum buffer of 15 metres will normally be required between the development and ancient woodland or veteran trees. The appropriate buffer will depend on the local circumstances, the species and size of trees, the form and nature of the trees or woodland and type of development. This buffer zone should not normally include residential gardens and will require appropriate management after the completion of the development. The height of development should allow adequate sunlight to reach the buffer zone.

10.31 The felling of protected trees will only permitted in exceptional circumstances and in accordance with the relevant legislation. Under section 206 of the Town and Country Planning Act 1990 landowners have a duty to replace a tree removed, uprooted or destroyed in contravention of the Town and Country Planning (Tree Preservation) (England) Regulations 2012. This duty also applies under section 206 if a tree (except a tree protected as part of a woodland) is removed, uprooted or destroyed because it is dead or presents an immediate risk of serious harm.
Development Management Policy SD37: Trees, Woodland and Hedgerows

1. Development proposals that affect trees, hedgerows and woodland should clearly demonstrate that:
   a) Development proposals have been informed by a full site survey, including an arboricultural survey, and
   b) Appropriate protection measures are in place throughout the development process.

2. An appropriate buffer zone, where applicable of semi-natural habitat, should be established between any development and an area of woodland. A minimum buffer of 15 metres will normally be required between the development and ancient woodland or veteran trees.

3. Development proposals should provide adequate protection zones and buffers around trees, woodland and hedgerows to prevent damage to root systems and taking account of future growth.

4. The felling of protected trees, groups of trees or woodland will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species, size and in an appropriate location will normally be required.

5. Where the loss of non-protected trees, woodland or hedgerows is proposed as part of development proposals, appropriate replacement or compensation will be required.

Evidence
- DEFRA (2013) Government Forestry and Woodlands Policy Statement
ENERGY PERFORMANCE AND HISTORIC BUILDINGS

10.32 The use of buildings evolves over time. Historically, lower-status structures were only really expected to protect their occupants from the worst ravages of the elements. Since the mid-twentieth century, expectations of domestic comfort have dramatically increased and our domestic and commercial premises are now expected to be fit for purpose and comfortable to use.

10.33 These expectations necessitate continued change for historic buildings in the years to come. Climate change will present a challenge throughout the Local Plan period and beyond, and will result in a range of impacts for the historic environment, including archaeological assets. National park authorities are charged with a responsibility to promote energy efficiency, as part of their wider role to lead the way in the mitigation of climate change.

10.34 Therefore, the retro-fit of historic buildings to enhance their energy efficiency has the potential to become an issue. The Authority will assess the impact of the adaptations taking due regard of the significance of the historic asset and the character, historic interest and integrity of those elements of the asset likely to be affected.

Development Management Policy SD38: Energy Performance and Historic Buildings

1. Planning permission and, where relevant, listed building consent will be granted for works required to improve the energy performance of heritage assets where it complies with other relevant policies and can be clearly demonstrated that this is consistent with all of the following:
   a) The heritage asset’s character and appearance,
   b) The heritage asset’s special architectural or historic interest,
   c) The long-term conservation of the built fabric; and
   d) The wider setting of the heritage asset.

CONSERVATION AREAS

10.35 The towns of Lewes, Petersfield, Midhurst and Petworth all have up-to-date conservation area appraisals and management plans. A programme of appraisal work to cover the smaller settlements is underway, but is expected to take many years to complete. A number of existing conservation areas are very closely defined and the SDNPA will consider extending the boundaries of these designations in order to reflect wider heritage interest. The SDNPA will also work closely with the highway authorities to reduce clutter and improve historic streetscenes, in accordance with Policy SD43 (Public Realm and Highway Design) and following the principles in the draft document ‘Roads in the South Downs’.

10.36 Some historic settlements within the National Park are small or diffuse in nature. Conservation area designation is not intended for the protection of open countryside. Therefore, the conservation area boundaries of these diffuse settlements may not reflect the broader heritage interest of their surrounds. Policy SD39 reflects the importance of setting and extends consideration to such locations.

10.37 Policy SD39 sets out a number of matters that will be considered by the Authority in the determination of planning applications within conservation areas. Reference to character zones relates to the discrete character areas described within some individual conservation area appraisals.
Development Management Policy SD39: Conservation Areas

1. Planning permission will only be granted for development proposals that conserve or enhance the character and appearance of a conservation area and comply with other relevant policies.

2. Consideration will be given to all the following matters for development proposals within a conservation area or sufficiently close to or prominent in their setting:
   a) the relevant conservation area appraisal and management plan;
   b) overall settlement layout and relationship to established landscape setting;
   c) historic pattern of thoroughfares, roads, paths and open spaces, where these provide evidence of the past life of the settlement;
   d) the historic street scene;
   e) distinctive character zones within the settlement;
   f) mix of building types and uses, if significant to the historic development of the settlement;
   g) use of locally distinctive building materials, styles or techniques;
   h) historic elevation features including fenestration, or shop fronts, where applicable;
   i) significant trees, landscape features, boundary treatments and focal points; and
   j) existing views and vistas through the settlement as well as views into it which contribute to its character and appearance.
10.38 The long-term conservation of some heritage assets present particular problems. This is a result of the disparity between the costs of renovating the asset in a suitable manner and the final end value. This disparity is known as the ‘conservation deficit’.

10.39 Cases of conservation deficit may be rare in prosperous South East England in comparison with other regions of the country, but cannot be completely excluded. One recognised way of addressing a conservation deficit is to allow development in a location that would normally be considered unacceptable in planning policy terms, which would generate sufficient funds to cover the shortfall in the renovation costs. This approach is known as ‘enabling development.’ This should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted.

10.40 English Heritage published *Enabling Development and the Conservation of Significant Places* in 2008, which provides useful guidance on enabling development. This defines enabling development as development that would be unacceptable in planning terms but for the fact that it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. Development should constitute the minimum required to cover the conservation deficit. It should also not materially harm the heritage significance of the place including its setting, and should produce public benefits which outweigh the dis-benefits of conflicting with other policies.

10.41 The Authority will use the detailed and rigorous tests set out by English Heritage in order to determine planning applications that propose enabling development.

### Development Management Policy SD40: Enabling Development

1. Planning permission will only be granted for development proposals presented as enabling development in wholly exceptional circumstances and where they represent the last resort to secure the conservation of designated heritage assets.

2. Planning permission will only be granted for development proposals that demonstrably meet the tests and criteria set out in the English Heritage guidance *Enabling Development and the Conservation of Significant Places* (or guidance superseding it) and fulfil national park purposes.
**Partnership Management Plan Outcomes and Policies**

**Outcome 4:** The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.

**Policy 9:** The significance of the historic environment is protected from harm, new discoveries are sought and opportunities to reveal its significance are exploited.

**Policy 10:** Improve the management of heritage assets, particularly focusing on those that are ‘at risk,’ including from crimes against heritage.

**Introduction**

10.42 The National Park’s rich archaeological record, which spans a period of more than 500,000 years, is a crucial part of its cultural heritage and is fundamental in defining its special qualities. It results in a high cultural sensitivity to development throughout the National Park.

**Supporting Text**

10.43 Archaeological sites are finite, irreplaceable and fragile resources which are vulnerable to damage, either from specific works or from gradual degradation over time, where features like barrows and ditches, and finds like walls, pottery, tools and bones, can all be displaced.

10.44 The most significant known archaeological heritage assets are usually designated as scheduled monuments and are of national or international importance. It is also widely recognised that there are sites which have an equal significance but which are not designated. In addition, there are many other archaeological sites which do not have such a great significance but which form a valuable part of the National Park’s cultural heritage. These may be referred to as non-designated heritage assets which should be taken into account when making planning decisions. The relevant historic environment record (HER) is the definitive record of all known archaeology, including such sites. The nature of the archaeological record also means that there are many sites of which nothing is presently known, which may be revealed during development works.

10.45 Planning decisions will take account of the significance of remains, including the wider benefits that conservation of the historic environment can bring. The first stage will be to ensure that the significance of the archaeological resource affected, including its setting, is clearly understood. Development proposals potentially affecting known or suspected archaeological resources will be required to include a heritage statement.

10.46 The level of detail required in a heritage statement should be proportionate to the heritage asset’s importance. It may comprise a desktop-based assessment, using the known archaeology recorded in the HER, but it can also extend to various forms of field evaluation. The aim is to produce a degree of understanding of the significance and survival of the archaeological remains and the impact of the proposed development on that significance.

10.47 In respect of scheduled monuments or non-designated heritage assets of equivalent significance, the preservation of the archaeological remains in situ and undisturbed will usually be required. In some cases this can be achieved by avoiding archaeologically sensitive areas. Where this has not been taken into account it could lead to a refusal of an application. It should also be noted that development which affects a scheduled monument will require permission from the Secretary of State.
In other cases, preservation by record (i.e. full excavation, recording and post excavation analysis) may be the appropriate response. In these instances, a written scheme of archaeological investigation will be required. The Authority will be advised by the relevant curatorial/development management archaeologist on the exact scope of the written scheme of investigation in each case.

Those projects that affect significant archaeological remains such as major infrastructure projects and projects within historic urban centres, particularly those which are the subject of an extensive urban survey, will require a written scheme of investigation. This will include a programme which promotes a wider understanding and appreciation of the site’s archaeological heritage in a local and regional context.

The Authority may wish to secure a ‘watching brief.’ This requires the presence of an archaeologist during groundworks. The scope of the watching brief, including any provision to accommodate the discovery of archaeology, will be agreed through a written scheme of investigation. This shall meet the requirements of Chartered Institute for Archaeologists’ (CIfA’s) Standard and guidance for an archaeological watching brief (2014) or successive documents.

In addition to direct physical impacts on archaeology, development can potentially impact on the setting of archaeological sites and this will be assessed. When considering archaeological resources within a development management context, the Authority will be advised by the relevant curatorial/development management archaeologist for that purpose.

Where there is evidence of deliberate neglect or damage to archaeology, its deteriorated state will not be taken into account in any decision.

### Development Management Policy SD41: Archaeology

1. Development proposals will only be permitted where they comply with other relevant policies and do not cause unacceptable harm to archaeological heritage assets and/or their setting.

2. The Authority will require applicants to provide sufficient information to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance.

3. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance.

4. Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset’s significance, will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm/loss, also meet the following requirements:
   a) there is no less harmful viable option; and
   b) the amount of harm has been reduced to the minimum possible.

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required.

5. The SDNPA will require all archaeological works to be undertaken to proper professional standards, as defined by the Chartered Institute for Archaeologists (CIfA).
**SUSTAINABLE DRAINAGE**

**Relevant Partnership Management Plan Outcomes and Policies**

**Outcome 2**: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

**Policy 6**: Favour natural functions and processes in and around the National Park where they support the value and resilience of terrestrial, freshwater, marine, coastal and estuarine habitats.

**Policy 23**: Improve the sustainability of water resources and waste water management through partnership working across the water sector.

**Policy 24**: Support and promote river catchment management approaches that integrate sustainable land management, wildlife conservation, surface and groundwater quality and flood risk management.

**Introduction**

10.53 Sustainable drainage systems (SuDS) are designed to replicate, as closely as possible, the natural drainage from a site before development and treat run off to remove pollutants, reducing the impact on groundwater and receiving water courses. In brief terms, SuDS comprise a series of features connected via a ‘treatment train’ that aim to slow down and treat run off as close as possible to the point at which the water falls. SuDS are illustrated by Figure 10.1 and Table 10.1. Further information can be found on the SuDS web site; www.susdrain.org In particular, the infographic ‘Going with the Flow’ provides a helpful summary: http://www.susdrain.org/files/resources/ciria_guidance/susdrain_going_with_the_flow_infographic.pdf

10.54 SuDS are effective in conserving and enhancing the natural capital of the environment and, from an ecosystem services perspective, offer a wider range of benefits when compared to traditional drainage.

10.55 Policy SD42 highlights the strategic importance of the National Park’s aquifers. In this context, the integration of SuDS in new development offers the following benefits:

- improvements to water quality discharging to ground and watercourses, thereby reducing pollution and water treatment costs;
- a reduction in the rate of flow and volume of run off that is of particular importance in reducing flood risk in urban areas and locations that are prone to surface water flooding;
- in rural areas it can reduce the risk of soil erosion and associated diffuse pollution from agricultural run off thereby improving soil quality; and
- it can offer wider environmental benefits such as wildlife habitat and improved amenity.
FIGURE 10.1: SUDS TREATMENT TRAIN

1 Prevention
Good housekeeping and site design to reduce and manage runoff and pollution, eg land-use planning, reduction of paved surfaces

2 Source control
Runoff managed as close to the source as possible, eg using green roofs, rainwater harvesting, permeable paving, filter strips

3 Site control
Runoff managed in a network across a site or local area, eg using swales, detention basins, public realm SUDS components for attenuation and treatment. Also, flow should be slowed using overland conveyed routes

4 Regional control
Downstream management of runoff for a whole site/catchment, eg retention ponds, wetlands

FIGURE 10.2: COMMON SUDS FEATURES AND THEIR FUNCTION

<table>
<thead>
<tr>
<th>Description</th>
<th>Setting</th>
<th>Required area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Swales</td>
<td>Swale open space</td>
<td>Allow free flow to allow water to flow into the surrounding area</td>
</tr>
<tr>
<td>Hardstanding</td>
<td>Hardstanding open space</td>
<td>Could be sloped or be bared or paved or be a permeable material</td>
</tr>
<tr>
<td>Pond</td>
<td>Pond open space</td>
<td>Dependent on use and vivid</td>
</tr>
<tr>
<td>Wetland</td>
<td>Wetland open space</td>
<td>Typically a small drainage area or lowland drainage treatment</td>
</tr>
<tr>
<td>Underdrainage</td>
<td>Underdrainage open space</td>
<td>Water storage underground or below ground</td>
</tr>
<tr>
<td>Grass roof</td>
<td>Grass roof open space</td>
<td>Buffering natural vegetation</td>
</tr>
<tr>
<td>Rainwater harvesting</td>
<td>Rainwater harvesting open space</td>
<td>Water storage underground or below ground</td>
</tr>
<tr>
<td>Bioretention</td>
<td>Bioretention open space</td>
<td>Dependent on use and vivid</td>
</tr>
<tr>
<td>Filter strip</td>
<td>Filter strip open space</td>
<td>Minimum length 5 metres</td>
</tr>
</tbody>
</table>

---


10.56 There are locations in which elements of SuDS are either unfeasible or inappropriate; for example, infiltration mechanisms may not be appropriate on floodplains, areas of high groundwater or in areas with known soil contamination; similarly they will be unfeasible in impermeable soils. Further guidance can be obtained from the evidence list at the end of this policy but advice should be sought at the earliest instance from the Authority’s staff.

National Policy Context

10.57 In 2001, Building Controls were updated to incorporate Section H3 addressing issues of surface water drainage. It required that disposal of surface water drainage should preferably be by infiltration, secondly by discharge to a watercourse and lastly, by discharge to a surface water sewer. This has now been reinforced in the latest planning practice guidance on SuDS.

10.58 Paragraph 103 of the NPPF requires that planning applications demonstrate that development has given priority to SuDS.

10.59 More recently, in December 2014, the Secretary of State for Communities and Local Government issued a ministerial statement introducing the following requirements, effective from 6 April 2015:

- The Government expects local planning policies and decisions on planning applications relating to major development – developments of ten dwellings or more; or equivalent non-residential or mixed development to ensure that sustainable drainage systems are put in place, unless demonstrated to be inappropriate.
- Local planning authorities should:
  - consult the relevant lead local flood authority on the management of surface water;
  - satisfy themselves that the proposed minimum standards of operation are appropriate; and
  - ensure, through the use of planning conditions/obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development.
- The current requirement in national policy that all new developments in areas at risk of flooding should give priority to the use of sustainable drainage systems will continue to apply.

10.60 In 2014, Defra undertook an informal consultation on draft national standards and specified criteria for sustainable drainage that set out the requirements for the design, construction, maintenance and operation of SuDS, but this draft has been superseded by new National Planning Practice Guidance (NPPG) and non-statutory technical standards for SuDS that have yet to be adopted.

Options Considered and Preferred Approach

10.61 There was no specific reference to sustainable drainage in the options consultation for the Local Plan during 2014.

Supporting Text

10.62 All ‘major’ planning applications\(^{38}\) submitted after 6 April 2015 are required to include a surface water drainage statement. Decisions about the suitability of sustainable drainage provision will be made by the Authority in consultation with the appropriate county/unitary authority in its role as lead local flood authority. Similar statements will be required for all new development in areas at risk of flooding. The surface water drainage statement should incorporate all site calculations, including pre-development and post-development run-off rates and storage volumes using approved methods. Where a software

---

\(^{38}\) As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015
package is used, all appropriate input and results files should accompany the surface water drainage statement.

10.63 It will be essential that the type of SuDS for a site, along with details of its extent/position, is identified at the design stage of the whole scheme such that SuDS can be fully integrated into the site layout. This information will be required for both outline and full applications, so it is clearly demonstrated that the SuDS can be accommodated within the development that is proposed. In view of this, applicants are strongly advised to make use of pre-application advice that the Authority will provide to ensure that applications are based upon best available knowledge and satisfy statutory requirements.

10.64 The development layout must take account of any existing watercourses (open or culverted) to ensure that future access for maintenance is not restricted. Ditches and watercourses should retain a 3 metre easement with access that allows for its future maintenance.

10.65 Design considerations will need to address the practicalities and funding arrangements for lifetime maintenance, identifying the body responsible and ensuring that financial mechanisms are in place such as bonded maintenance arrangements via S106 agreement and planning conditions.

10.66 Approved Document Part H of the Building Regulations 2010 and planning practice guidance establishes a hierarchy for surface water disposal, which encourages a SuDS approach beginning with infiltration where possible such as soakaways or infiltration trenches. Where SuDS are used, it must be established that these options are feasible, can be adopted and properly maintained, including confirming easements where necessary are in place, and would not lead to any other environmental problems.

10.1 Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment Digest 365.

10.2 Culverting (piping) a watercourse is not advised unless there is no alternative. The resulting reduction in storage volume, flow capacity and habitat potential would be unacceptable. Culverted watercourses are also more difficult to maintain due to the limited accessibility.

10.3 Land drainage consent must be sought from the lead local flood authority prior to starting any works (temporary or permanent) that affect the flow of water in the watercourse. Such works may include culverting, channel diversion and the installation of trash screens.

---

**Development Management Policy SD42: Sustainable Drainage**

1. In order to attenuate the rate and volume of surface water run-off and improve water quality all new development in areas at risk of flooding will identify opportunities to incorporate Sustainable Drainage Systems (SuDS) that is appropriate to the size and characteristics of the development at an early stage of the design process, taking consideration of natural site drainage and topography. SuDS that comply with other relevant policies will be permitted providing that they satisfy the following criteria:

   a) Compliant with the National Standards and Specified Criteria for Sustainable Drainage;\(^{39}\)
   b) Take account of the 1 in 100 year 6 hour storm event plus 30 per cent allowance for climate change, on stored volumes, to ensure that there is no flooding of properties or the public highway or inundation of the foul sewerage system. Any excess flows must be contained within the site boundary, and within designated storage areas and compliant with Policy SD15 on Flood Risk Management;
   c) The SuDS is designed to ensure that there is no flooding on a 1 in 30 year storm event;

---

\(^{39}\) Currently still in draft form following consultation 2014.
d) Demonstrate that management and maintenance arrangements for the lifetime operation of the scheme are in place;

e) Retain existing open drainage ditches in their current form;

f) Follow the hierarchy of preference for different types of surface water drainage disposal systems as set out in Approved Document H of the Building Regulations, planning practice guidance and the SuDS manual produced by CIRIA;

g) Effectively manage water including maintenance of and, where possible improvement to water quality; and

h) Provide amenity for local residents whilst ensuring a safe environment.

2. Where SuDS via ground infiltration is feasible, in order to ensure that SuDS discharge water from the development at the same or lesser rate as prior to construction, developers must undertake:

   a) up to six months groundwater monitoring within the winter period;

   b) winter percolation testing in accordance with BRE365.

3. Proposals for ‘major’ development should seek to integrate SuDS within public open spaces and roads, in liaison with the appropriate county council or unitary authority.

Evidence

- British Standards Institution BS8582:2013 – *Code of Practice for Surface Water Management for Development Sites*

- Building Research Establishment, ‘Soakaway Design’ – *Digest 365 (BRE 365)*


- CIRIA R156 *Infiltration Drainage – Manual of Good Practice* Bettess, R.


- SDNPA (2015) *Water Cycle Study*

- Susdrain website: [www.susdrain.org](http://www.susdrain.org)


---

40 As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015
The special qualities of the National Park are largely experienced from the public realm: those places to which the public normally have unrestricted access. Across the National Park much of the public realm consists of highway routes: for example, public rights of way, roads and pavements. To protect and enhance peoples’ experience of the special qualities, these places need to be designed as multifunctional and distinctive public spaces that have a close relationship with their context.

Management of most roads and pavements is the responsibility of local transport authorities and the SDNPA will work closely with them to achieve appropriate solutions. However, this policy guides the design of the streetscape when relevant planning applications are submitted. This should be read in close conjunction with Policy SD6 (Design).

Local Guidance

The guidance document Roads in the South Downs, currently being developed by the SDNPA and local highways authorities, sets out broad principles and procedures which should be followed by all developments involving changes to the public realm and the creation of new public spaces and highways.

Street layout

Formal traffic calming measures can be inappropriate. Roads in the South Downs and the national guidance document Manual for Streets describe how careful site layout and design measures can make the public realm legible and ensure the safe and slow movement of traffic along minor roads, as well as the safety and enjoyment of pedestrians, cyclists and equestrians.

Sensitivity to context

Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of towns and villages.

New street lighting may be inappropriate in areas of the National Park due to the need to protect dark night skies. Detail on street lighting is contained in Policy SD9 (Dark Night Skies).

Public Art

Public art can play an important role in environmental enhancement, community development, education, employment and tourism. The National Park has a proud tradition of public art, notably including the Goodwood Sculpture Park and the work of Eric Gill. Public art is generally more characteristic of towns, villages and designed landscapes than of the broader countryside. The principle of new public art will be supported within settlement boundaries, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. Proposals for new public art outside settlement boundaries, where it is subject to the planning process, will be assessed on a case by case basis according to the policies contained in this Local Plan. New public art should be site specific, reflecting and respecting the site and its context and should have the backing of the local community.

---

41 Legibility is a term used to describe the ease with which people can understand the layout of a place (i.e. its users should be able to understand how to use the space without the need for signage).
Development Management Policy SD43: Public Realm and Highway Design

Local Guidance

1. Development proposals that comply with other relevant policies will be permitted where they maintain highway safety and follow the principles set out in the draft document, *Roads in the South Downs*.

Street Layout

2. Every element of the street scene should be well designed and sensitively placed. Site layout should be designed to protect pedestrians and other road users and limit the need for further physical measures. The design and layout of new development should give priority to the needs of pedestrians, cyclists and equestrians. Movement through the site should be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.

Sensitivity to context

3. Street design and management proposals should be context-sensitive, responding to the specific character, activities, heritage, built form and layout, paving materials and street furniture of the location. Highway design should pay particular attention to the role and location of buildings, doors and entry points.

Public art

4. Appropriately designed and located new public art will be supported where it complies with other relevant policies.
VEHICLE AND CYCLE PARKING PROVISION

**New public car parks**

10.74 Roadside car parking is a problem at various locations around the National Park. The ability of the National Park’s road network and car parks to accommodate an increasing number of visitors’ cars is limited. It is not practicable, nor would it be desirable in landscape terms, to cater for peak demand. The SDNPA will direct new public car parking provision to locations in or adjacent to the settlements listed in policy SD22 (Development Strategy), where it will maximise benefits to the local economy and minimise harm to the landscape.

10.75 The construction of new public car parks should always be part of an overall traffic management scheme whose primary focus is increasing access to the site by public and non-motorised transport. Large scale car parks with supporting infrastructure such as lighting can be particularly obtrusive in the landscape. It should be noted that development proposals for significant new car parks will be subject to the major development tests set out in Policy SD3.

10.76 Outside the planning system, Traffic Regulation Orders (TROs) can be a means of improving access and preventing inconsiderate parking in towns and villages, although street clutter should be avoided and additional signage kept to a minimum.

**Parking standards for residential and non-residential developments**

10.77 There are a number of existing supplementary planning documents (SPDs) and guidance on parking produced by different local transport authorities. The provision of vehicle and cycle parking on new development should be in accordance with the local parking SPD or guidance applicable to that area. The SDNPA will prepare its own parking standards SPD which, when adopted, will supersede the existing parking SPDs.

**Design, location and layout of new vehicle parking**

10.78 New vehicle parking areas, whether public or private, have a particularly high potential for negative landscape impact when inappropriately sited and designed. The policy on car parking should therefore be read in close conjunction with those related to landscape and design (SD5–SD10).

10.79 All new vehicle parking areas, whether private residential, private non-residential or public, should have their design, layout and location chosen so as to avoid negative impact on the landscape and on biodiversity. Design and materials should reflect the positive elements of the surrounding environment, whether that be urban or rural. Usage should be made of existing buildings and landscape features to shield views of the parking area. Parking should be designed into the overall streetscape in accordance with Policy SD43 (Public Realm and Highway Design), with signage and painted road markings kept to a minimum. Entrances and boundaries, and public facilities (for example, ticket machines and toilets) should be treated especially carefully, with creative means sought to reduce their visual impact. Changes to existing parking areas to bring them into line with these principles will be encouraged.

10.80 Hard and soft landscaping features have the potential to generate net benefits to biodiversity from new vehicle parking areas (for example, through the planting of trees and hedgerows that are characteristic of the area). Such opportunities should be taken in a way that is consistent with the landscape and design criteria above. Sustainable drainage systems should be used to ensure that the runoff from vehicle parking areas is equal to greenfield rates. Permeable parking surfaces should be used in preference to impermeable surfaces unless there are overriding reasons that render their use unsuitable. Such systems will significantly reduce surface water run-off when compared to tarmacked surfaces and will allow filtration of run-off to reduce pollutants entering drains.
and ground water. Applicants are recommended to discuss choice of design with Authority staff at an early stage.

**Development Management Policy SD44: Car and Cycle Parking Provision**

1. Development proposals for new public parking provision that comply with other relevant policies will be permitted where they are located in or adjacent to the settlements listed in Policy SD22 (Development Strategy) provided that:
   a) there is evidence that overriding traffic management or recreation management benefits can be achieved;
   b) it is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
   c) the site is close to and easily accessible from main roads by appropriate routes.

2. Development proposals that comply with other relevant policies will be permitted where they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the appropriate adopted parking standards for the locality. Further guidance will be provided in a parking standards SPD.

3. All new private and public parking provision will comply with Policy SD42 (Public Realm and Highway Design); be of a location, scale and design that reflects its context and make a positive contribution in terms of ecosystem services, protect and enhance the landscape, and incorporate appropriate sustainable drainage systems.

**Evidence**

- *Access Network and Accessible Natural Greenspace Study (2013)*
- *Roads in the South Downs* (in draft)
- *Local Transport Plans for Hampshire, West Sussex, Brighton and Hove, East Sussex*
- *Manual for Streets*
- *Transport Study Phase 1 (2013)*
TOWARDS A SUSTAINABLE FUTURE

REPLACEMENT DWELLINGS AND EXTENSIONS

Partnership Management Plan Outcomes and Policies

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Policy 48: Support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.

Policy 50: Housing and other development in the National Park should be closely matched to the social and economic needs of local people and should be of high design and energy efficiency standards, to support balanced communities so people can live and work in the area.

Introduction

10.81 The replacement of existing dwellings with larger modern properties and the extension of dwellings can have a cumulative impact on the character of the National Park and lead to a reduction in the stock of smaller dwellings. This has the potential to cause an imbalance in the range and mix of housing stock available.

10.82 The current housing stock is skewed towards large, owner-occupied, detached properties, with a relatively small proportion of smaller homes and affordable tenures. However, it is important to have a well-balanced mix of tenures and dwelling types within the housing stock.

Options Considered and Preferred Approach

10.83 The Local Plan Options Consultation Document (February 2014) included an issue on how the Local Plan can best address housing mix in the National Park. This included options relating to the replacement or extension of existing dwellings:

- Option 31b – Existing properties should not be extended excessively, further diminishing the existing property stock of small- and medium-sized dwellings.
- Option 31d – Existing properties should not be replaced (one for one) by significantly larger properties.
- Options 31e – Any proposed size restrictions to extensions and replacement dwellings should apply only to dwellings outside settlement policy boundaries.

10.84 The preferred approach to the mix of dwellings is dealt with in the strategic policies on Housing (Policy SD23) and Affordable Housing Provision (Policy SD24). The Housing policy states that the size and type of homes for each proposal will be based on up-to-date evidence of local needs and a suitable mix will be determined through liaison with the SDNPA, parish or town councils, housing authority and rural housing enablers, where applicable.

10.85 Responses to the Options Consultation on Option 31b or 31d relating to residential extensions and replacement dwellings, was split with just under 50 per cent of respondents supporting restrictions. There was very little support for only applying proposed size restrictions to extensions and replacement dwellings to areas outside settlement policy boundaries. Comments made suggested that this could be applied depending on the settlement size rather than being based on location inside or outside policy boundaries. This would mean restrictions in the countryside and villages but not in towns. There were different views on the benefits of allowing some expansion, for example, for growing families or annexes for elderly relatives, and the need for restrictions, for example, to retain smaller units. An alternative option suggested was to allow the replacement of substantial dwellings with more than one smaller dwelling.
When is planning permission required?

10.86 There are circumstances where the building of a small extension may not require planning permission. This is known as permitted development. However, in some cases, permitted development rights will have been removed. This might be the result of a condition of an earlier planning consent; by virtue of its location within a conservation area or; by the imposition of an ‘Article 4’ direction taking away such rights. There are an additional range of controls, under listed building legislation, intended to preserve the character of a building of historic or architectural interest. Even if planning permission is not required, alterations, extensions or additions to a listed building will normally require listed building consent. As permitted development rights are subject to change, it is not appropriate to set them out in detail here. Guidance from the Authority on whether planning permission is required should be sought at the earliest opportunity.

Supporting text

10.87 The SDNPA has drawn up the following definitions based on best practice in order to provide clarity and certainty on the implementation of this policy:

i. The ‘existing’ dwelling means the dwelling as it existed on 1 July 1982, or as the dwelling was originally built or legally established, if the residential use post-dates 1 July 1982.

ii. A ‘small’ dwelling is defined as having a total floorspace of 100m² or less.

iii. Floorspace will be measured as total internal floorspace of the dwelling.

10.88 A replacement dwelling should normally be sited in the location of the existing dwelling. Where it is proposed that a replacement dwelling should be re-sited within the residential curtilage, it will need to be demonstrated that there are clear environmental benefits to relocating the dwelling. This may include reducing negative landscape impact, improved access arrangements or benefits to local amenity.

10.89 This policy does not apply to former dwellings that have either been demolished or abandoned. Abandonment is likely to have occurred where there has been a deliberate intention to cease the residential use of the property by:

i. leaving the dwelling vacant for a considerable period; or

ii. allowing the dwelling to deteriorate to the extent that residential re-use would involve what would be tantamount to a new build; or

iii. introducing a different use that supplants the earlier residential use.
Development Management Policy SD45: Replacement Dwellings and Extensions

1. Proposals for the replacement of an existing dwelling, where the existing dwelling does not make a positive contribution to the character and appearance of the locality, will be permitted provided that they comply with other relevant policies and:
   a) the replacement dwelling is sited in the same position as the existing dwelling, unless there are clear environmental benefits for re-siting the dwelling elsewhere within the residential curtilage;
   b) it does not result in the loss of a small dwelling; and
   c) outside of the market towns of Petersfield, Midhurst, Petworth and Lewes the replacement dwelling is not materially larger than the one it replaces.

2. Proposals for the extension of an existing dwelling will be permitted provided that they comply with other relevant policies and:
   a) is of an appropriate design, in accordance with Policy SD6 (Design), and is visually subservient to the main dwelling and in keeping with the scale and character of the existing dwelling;
   b) the extension does not compromise the established character and pattern of the surrounding area;
   c) it is not overbearing or of a form which would be detrimental to the amenity of nearby residents, particularly in regard to natural light and overshadowing;
   d) it does not result in a loss of a small dwelling; and
   e) outside of the market towns of Petersfield, Midhurst, Petworth and Lewes, it does not increase the floorspace of the dwelling by more than 30%.
   f) in the case of annexes, as well as the above, it has a functional or physical dependency to the main dwelling.

3. Where permission is granted future extensions may be controlled by the removal of permitted development rights.
AGRICULTURE AND FARMING

Partnership Management Plan Outcomes and Policies

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

**Outcome 6:** There is widespread understanding of the special qualities of the National Park and the benefits it provides.

**Outcome 10:** A diverse and sustainable economy has developed which provides a range of business and employment opportunities, many of which are positively linked with the special qualities of the National Park.

**Policy 2:** Develop landscape-scale partnerships and initiatives to focus on enhancing the key ecosystem services delivered by the National Park.

**Policy 11:** Support land managers to access and maintain agri-environment schemes that deliver high-quality results on the ground and influence the development and delivery of new incentive schemes.

**Policy 12:** Support conservation grazing on semi-natural habitats as part of a profitable livestock and mixed-farm economy.

**Policy 13:** Support the financial viability of farm businesses through appropriate infrastructure and diversification developments, in particular, encouraging those that will support sustainable farming.

**Policy 14:** Develop the market for and production of sustainable food, drink and other products with a National Park provenance.

**Policy 15:** Increase the understanding of farming and of farmers as the custodians of many of the special qualities of the National Park.

**Policy 55:** Promote opportunities for diversified economic activity in the National Park, in particular, where it enhances the special qualities.

**National Policy Context**

10.90 The *National Parks Vision and Circular 2010* states that additional and concerted efforts are required to ensure that communities, planners and businesses have clear, consistent advice regarding the acceptable forms development might take, so that National Park communities are places where people can live and work by maintaining sustainable livelihoods; and also that authorities should continue to promote agri-environment schemes and other measures that enable farmers and land managers to deliver a wide range of ecosystem services and sustainable, secure and healthy food supplies. It states that farming in the national should embrace modern farming practices in order to support an agricultural sector that can sustainably increase its resilience and productivity, taking account of climate change.

10.91 The *National Parks Vision and Circular* states that woodlands should be managed to increase their contribution to climate change mitigation through carbon sequestration or the production of wood fuel and construction timber, and that the SDNPA should work in partnership to improve woodland management and increase woodland cover, contributing to a step change in planting rates in England. It requires recognition of environmental trends resulting from climate change and provision for natural systems, habitats and species to adjust to this; and a strategic framework for the protection, restoration and creation of priority habitats.

10.92 The *NPPF* (para 28) states that local plans should promote the development and diversification of agricultural and other land-based rural businesses. It also states (para 55) that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as the essential need for a rural worker to live permanently at or near their place of work in the countryside.

10.93 The *NPPF* states (para 117) that local planning authorities should plan for biodiversity at a landscape-scale across local authority boundaries, identify and map components of local ecological networks, and promote the preservation, restoration and re-creation of priority habitats and ecological networks. Deciduous woodland is a priority habitat and all woodland has the potential to form part of an ecological network.
10.94 Biodiversity 2020, the Government strategy for ecosystem services, commits to a priority action of establishing more coherent and resilient ecological networks that safeguard ecosystem services for the benefit of wildlife and people, and provides detail on how this should be accomplished, which is cited by the NPPG. Another priority action in Biodiversity 2020 is to bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England.

### Options Considered and Preferred Approach

10.95 The Local Plan Options Consultation Document (February 2014) included three issues relating to agriculture and forestry:
- **Issue 21** – What development should the Local Plan permit outside settlements?
- **Issue 34** – How can the Local Plan best meet the housing needs of agricultural and forestry workers?
- **Issue 42** – What approach should the Local Plan take to the diversification of agricultural land and buildings?

10.96 In relation to Issue 21, the preferred option follows what was proposed in the Options Consultation, which received overwhelming support, in limiting development in the countryside to agriculture, forestry and farm diversification (along with tourism, recreation and education), with farm diversification targeted towards the reuse of vacant farm buildings. New agricultural buildings will be on brownfield land in the first instance but this will not always be possible.

10.97 In relation to Issue 34, the preferred option follows what was proposed in the Options Consultation, which received very strong support, as well as Option 34a for limiting the size of agricultural dwellings, which received strong support. There was less support for the more restrictive Option 34b, so this has not been taken forward. As suggested in some written comments, there is allowance made for housing rural workers in a limited range of other types of business.

10.98 In relation to Issue 42, a combination of Options 42a and 42b is preferred, with a wider range of diversification options allowed for which promote the National Park purposes, but also a strong requirement that diversification support the core agricultural use. A very wide range of new uses are now allowed under the permitted development rights for change of use of agricultural buildings.

### Permitted development

10.99 There are a wide range of permitted development rights available to farms, both for agricultural development and for the change of use of agricultural buildings, without the need for planning permission.

10.100 As a brief summary, the agricultural permitted development rights allow agricultural units of 0.4 to 5ha to extend agricultural buildings to a certain degree, or carry out various other works including new trackways, without the need for planning permission in most cases. For agricultural units over 5ha, the rights also extend to the erection of new agricultural buildings up to a certain size. However, in a National Park the developer must offer the local planning authority the opportunity to require a prior approval application on most of these types of permitted development, which can test the siting, design, appearance, noise, flooding, contamination and highway impacts of the development.

10.101 Permitted development rights for development necessary for forestry cover the erection or extension of buildings and the construction of private ways on forestry land, with certain restrictions.

10.102 The rights for change of use of agricultural buildings allow the use of buildings up to 500m² on any one agricultural unit, to various uses including retail, café, office, warehouse, hotel, school and leisure uses. The local planning authority can require a prior approval application, to test the impacts on flooding, noise, highways and transportation.
AGRICULTURE AND FORESTRY

Supporting text

10.103 Most agricultural and forestry related development can be carried out under permitted development rights without applying for planning permission. Policy SD46 will be applied to proposals that exceed the limits of permitted development. Proposals that enable farm and forestry businesses to grow will be supported, provided that do not harm the special qualities.

10.104 Developments permitted under this policy must be used to meet agricultural or forestry needs. Given that they will normally be in open countryside, where there is a general policy of restraint on development, they should be built at the minimum scale required to meet that need, and if there are any practical opportunities to meet the need outside the National Park while maintaining the viability of the holding, they should be taken. Development that would be detrimental to the landscape or amenity of the surrounding area will not be permitted.

10.105 Appropriately sized and located agricultural and forestry buildings are part of the rural character of the National Park, and their generally functional and minimal design reflects their integral relationship with the management of the surrounding land. New agricultural and forestry development should follow the same principle, and not be disguised as any other type of development.

10.106 Development should minimise its landscape impact by being located in close proximity to existing buildings, wherever possible, and be appropriately landscaped in accordance with Policy SD5 (Landscape Character) to minimise its impact on the landscape. Any development of buildings or structures within woodland should follow the principals of good sustainable design and use materials locally sourced, as far as possible. Consideration should also be given to the protection of the mycology and health of forest soils, mitigating the negative effects of development, where possible. Development should also seek to minimise its impact on the landscape in accordance with Policy SD5 (Landscape Character).

10.107 If agricultural or forestry buildings become redundant and are not granted permission for change of use within 3 years they will be required to be demolished to minimise impact on the landscape.

10.108 Where the development of forest tracks and roads are proposed, applications should give consideration to the overall design and materials that meet the needs of the development but are in keeping with the local geology and vernacular. Proposals for forest tracks should consider all forestry activity including turning circles at track junctions, timber stacking and loading areas and access to trunk roads. Holistic designs which incorporate sustainable features such as scalloped edges for wildlife should form part of any proposal.
Development Management Policy SD46: Agriculture and Forestry

1. Development proposals for new buildings, tracks or structures for the purposes of agriculture or forestry that comply with other relevant policies will be permitted where:
   a) there is a functional need for the development within the National Park and its scale is commensurate with that need;
   b) appropriate measures are taken to ensure development does not, including through the level of activity, have an adverse impact on the locality, exacerbate flood risk or surface water run-off, cause pollution or other unacceptable environmental impacts;
   c) the development is designed for the purposes of agriculture or forestry;
   d) the site is related physically and functionally to existing buildings associated with the business, and, where possible, on previously developed land, unless there are exceptional circumstances relating to agricultural or forestry necessity for a more isolated location;
   e) a landscaping scheme which reduces the visual impact of the proposal on the wider landscape and is appropriate to the character of the locality is submitted as part of the proposal; and
   f) the owner has not been instrumental in disposing of a building in the last three years which would otherwise have met the need proposed.

2. New or improved access tracks for forestry will be permitted if all the following criteria are met:
   a) the proposal would be essential for the management of the land;
   b) all other possible opportunities have been fully considered;
   c) the layout and design is to a high environmental standard and is located to minimise impacts on the special qualities of the National Park; and
   d) appropriate measures are taken to ensure they do not, including through the level of activity, have an adverse impact on the locality, exacerbate flood risk or surface water run-off, cause pollution or other unacceptable environmental impacts.

3. Development proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused.
FARM DIVERSIFICATION

Supporting Text

10.109 In many cases farms depend on income from other activities to remain viable. Around half of the farms in the National Park are estimated to have diversified into other activities. This is considerably below the regional figure for South East England of 75 per cent. The continuity of farming activity is desirable where it benefits the special qualities. However, some diversified activities can be undesirable in a protected landscape.

10.110 Farm diversification should make the best possible use of existing buildings without perpetuating the existence of buildings that have a negative impact on the landscape. Farm diversification proposals that comply with other relevant policies will be favoured in disused pre-1914 agricultural buildings that are vernacular in style, or in disused and modestly scaled, post-1914 agricultural buildings which make a positive contribution to the landscape.

10.111 New buildings to accommodate farm diversification will only be permitted if they are located in existing clusters of buildings, well designed and scaled and fit in well with the surrounding buildings and landscape. Given that they will be in the context of an agricultural farmstead, a functional and relatively inexpensive design may be appropriate, provided that the buildings are modest in scale.

10.112 Farm diversification may also include the change of use of areas of agricultural land for outdoor recreational activities, so long as they come under the list of uses in Criterion 1 of Policy SD47. Such uses must comply with Policy SD21 on recreation. The installation of infrastructure for such purposes which substantially changes the appearance of agricultural land is unlikely to be appropriate in landscape terms.

10.113 The potential exists for diversified businesses, once established, to outstrip the success of the parent farm and grow to a size disproportionate to their location. This may have a negative impact on the special qualities. Once a business is too big to be considered subsidiary to the farm business, a location within one of the settlements or existing industrial estates in or around the National Park may be more appropriate. It may, therefore, be necessary to seek legal agreements or impose planning conditions to ensure that commercial activities remain tied to the agricultural business and do not undermine farming in the longer term.

10.114 Outdoor storage of materials, caravans or other vehicles in the countryside is likely to be visually intrusive or to require the construction of barriers which are themselves visually intrusive. New outdoor storage for purposes other than agriculture or forestry will therefore not generally be an appropriate form of diversification, unless it is ancillary to other uses. Proposals for ancillary vehicle parking will be assessed according to Policy SD44 (Car and Cycling Parking Provision).

10.115 Forms of possible farm diversification include:

a) farm shops selling local produce;

b) educational facilities directly related to the farm/countryside location;

c) leisure facilities promoting the quiet enjoyment and understanding of the special qualities, including increased access to the countryside;

d) small-scale tourist accommodation;

e) small-scale generation of electricity or heat from local renewable sources of energy, primarily for use on site or in the local area;

f) processing facilities for the outputs of sustainable livestock farming within the National Park; or

g) services to the agriculture or forestry sectors that contribute to the sustainable maintenance of the landscape of the National Park.
Development Management Policy SD47: Farm Diversification

1. Development proposals for farm diversification that comply with other relevant policies will be permitted where there is no harm to the special qualities.

2. Wherever possible, development proposals should utilise disused agricultural buildings from before 1914, or disused agricultural buildings from later periods which make a positive contribution to landscape character. Where no such buildings are available, proposals should use new buildings which are sited within an existing group of buildings and have a modest scale and design which harmonises with the surrounding area.

3. Development proposals should provide long-term benefit to the farming business as an agricultural operation. Development proposals should be accompanied by a comprehensive farm or estate diversification plan in line with Policy SD22 (Development Strategy). Outdoor storage will not be allowed other than as a minor ancillary element of other uses.

4. All diversified activities should remain ancillary to the farming operation and not cause severance or disruption to the agricultural holding.
AGRICULTURAL AND FORESTRY WORKERS DWELLINGS

Supporting Text

10.116 Some agricultural and forestry activities require a worker to live close to the site. However, there may not be accommodation in proximity to the site or such workers may not be able to afford the high price or rental costs of rural housing. These same market values make it crucial that any accommodation unit for such workers is subject to strict criteria and conditions to ensure that they are only used for the accommodation of essential workers.

10.117 Agricultural and forestry workers’ dwellings will not be permitted on holdings where other dwellings on or closely connected with that holding have recently been disposed of, for example, by sale or by removal of restrictive conditions so that the dwelling can be let out on the open rental market.

10.118 There will not normally be any need for agricultural and forestry workers’ dwellings to be over 120m² in floor area. Redundant agricultural buildings of vernacular construction should be converted to rural workers’ housing, in preference to constructing new dwellings.

10.119 The use of agricultural and forestry workers’ dwellings will be secured by condition, and such conditions will not be removed while there is a need for such dwellings in the local area. If a need on the given agricultural unit disappears, there may still be a need for agricultural and forestry workers to live close to other holdings in the vicinity, and the re-use of existing dwellings with agricultural occupancy conditions will prevent the proliferation of dwellings in the countryside. Applications seeking the removal of agricultural occupancy conditions will only be permitted where the unit has been marketed unsuccessfully in its current use for at least 12 months.

10.120 The scope of the marketing exercise required to demonstrate the lack of need for agricultural and forestry worker housing will comprise an independently corroborated statement from a local land agent demonstrating that there is no longer the immediate requirement for a unit of this type within a suitable catchment, and the marketing of the property at no more than 70 per cent of deemed open market value, through advertisements in the local press, the internet and other publications including at least one agricultural publication, for at least 12 months. The unit will then be made available as an affordable dwelling in the first instance. Only if it can be robustly demonstrated that such use would be unviable, unsuitable or unnecessary at the location, will release on to the open market be deemed acceptable.

10.121 Permanent dwellings will be permitted for full-time workers on established agricultural holdings, according to the criteria listed in the policy. The need for a permanent or temporary dwelling for an agricultural worker to live on or in close proximity to the holding, in order to be readily available at most times, will be subject to a functional test. Such a requirement might arise, for example, if workers are needed to be on hand day and night:

a) in case animals or agricultural processes require essential care at short notice; or

b) to deal quickly with emergencies that could otherwise cause serious loss of crops or products, for example, by frost damage or the failure of automatic systems.
Development Management Policy SD48: Agricultural and Forestry Workers’ Dwellings

1. Development proposals for agricultural workers’ dwellings that comply with other relevant policies will be permitted where:
   a) the nature and demands of the work concerned make it essential for one or more people engaged in the enterprise to live at, or very close to, the site of their work;
   b) the functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned;
   c) no other dwellings either on or closely connected to the holding/enterprise have been sold separately or in some way alienated from the holding/enterprise in the past ten years; and
   d) the size of the proposed dwelling would not result in a total habitable floorspace exceeding 120m²;
   e) where practicable and appropriate, first consideration has been given to the conversion of an existing building under the terms of Policy SD49 (Conversion of Redundant Agricultural Buildings); and
   f) the continued use of such dwellings by agriculture and forestry will be protected by condition. Applications for the removal of such conditions will not be permitted unless it can be demonstrated that there is no longer a current or possible renewed need for the dwellings in its current use for the foreseeable future.

2. Temporary dwellings for agricultural workers will be permitted where they comply with other relevant policies and accommodation is essential to support a new farming activity, whether on a newly created agricultural unit or an established one, and it should satisfy the following criteria:
   a) clear evidence of a firm intention and ability to develop the enterprise concerned;
   b) there is a clearly established functional need to support the activity;
   c) clear evidence that the proposed enterprise has been planned on a sound financial basis;
   d) the location would be suitable for a permanent agricultural worker’s dwelling; and
   e) easily dismantled or taken away.
   The Authority will specify the period for which the temporary permission is granted and the date by which the temporary dwelling will have to be removed. Successive extensions to a temporary permission will not normally be granted unless material considerations indicate otherwise.
CONVERSION OF REDUNDANT AGRICULTURAL BUILDINGS

**Partnership Management Plan Outcomes and Policies**

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

**Outcome 4:** The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

**Policy 9:** The significance of the historic environment is protected from harm, new discoveries are sought and opportunities to reveal its significance are exploited.

**Introduction**

10.122 The National Park has a substantial number of historic farm buildings, many of which are listed. They represent a long farming history and settlement in the landscape which is part of the National Park’s cultural heritage. They are very much part of landscape character, illustrate underlying geology and contribute to a sense of place and local distinctiveness through their historic functional uses and the techniques and materials used in their construction. Their individual qualities, historical and archaeological value are worthy of conservation.

10.123 Whether they are individually isolated or part of a farmstead the best option is, wherever possible, to keep these buildings in agricultural use. However, changes in farming practices like larger farm machinery, higher yields, the need for larger storage, as well as changes in land ownership, have made many traditional buildings redundant. This threatens their survival, and whilst some may remain in agricultural use, this is typically of a low key nature. Consequently, many have already been converted into other uses, predominantly residential. This often represents the most economically viable use because of the significant costs of their restoration and preservation.

10.124 Historic farm buildings have often been adapted over time to accommodate developing farming practices and technologies, so reusing them continues this sustainable evolution. Where they have lost their original purpose, new uses can be beneficial in sustaining their long term care. With any new uses, it is fundamental that, when converted, these buildings still bear witness to the important local features and materials as well as the historic crafts which were used to build them. They must also conserve and enhance their setting.

10.125 Traditional agricultural buildings, whether listed or unlisted can have particular special qualities which are worthy of retention. This policy aims to seek the retention and sympathetic re-use of such traditional buildings.
10.126 Post war modern farm buildings, may also become redundant due to changes in farming practices. These buildings do not possess the same qualities of older traditional buildings because they are often steel framed and clad in asbestos or steel sheeting. Their construction can also limit the range of uses they could be adapted to without substantial works. If it is not feasible to demolish such a building when it is no longer required for its original agricultural purpose, its suitability for a range of uses should be considered. Re-using existing buildings can support farm diversification and can help to conserve the National Park landscape in reducing pressures for new buildings.

**National Policy Context**

10.127 *National Parks Vision and Circular (2010)* requires national park authorities, in delivering the Purposes and Duty, to secure a diverse and healthy natural environment by managing landscape, heritage, value, safeguard and enhance biodiversity; foster and maintain thriving rural economies; and provide new access and recreational opportunities.

10.128 Paragraph 28 of the National Planning Policy Framework (NPPF) outlines support for a prosperous rural economy. Paragraph 55 of the NPPF states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and avoid new isolated homes in the countryside unless there are special circumstances. These include where such development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets; or where it would re-use redundant or disused buildings and lead to an enhancement to the immediate setting.

10.129 The NPPF also advocates proposals are of a high quality design and paragraph 56 outlines that the Government places great importance on the design of the built environment and good design is a key aspect of sustainable development, indivisible from good planning, and should contribute positively to making places better for people.

10.130 Paragraph 109 of the NPPF outlines that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; recognising the benefits of ecosystems services; minimising impacts on biodiversity. Paragraph 115 states that great weight should be given to conserving landscape and scenic beauty.

10.131 Paragraphs 126-141 of the NPPF outline national planning policy for conserving and enhancing the historic environment. Paragraph 126 states that heritage assets should be conserved in a manner which is appropriate to their significance. In terms of decision making, paragraphs 128 and 129 outline that the significance of a heritage asset affected by proposals and the impacts upon it and its setting should be understood.

**Options Considered and Preferred Approach**

10.132 The Local Plan Options Consultation Document (February 2014) raised several issues which are relevant to this policy:

- Issue 1 – How best can the Local Plan best help conserve and enhance landscape character?
- Issue 7 – What approach should the Local Plan adopt to heritage at risk?
- Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?
• Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?

10.133 The preferred approach is to include a policy specifically to address the impacts of the conversion of agricultural buildings which are worthy of being retained. This would relate to all agricultural buildings, not just those designated as heritage assets.

Supporting text

**Traditional agricultural buildings**

10.134 Where a traditional farm building is considered a heritage asset, the optimal viable use should be sought to secure its future. This may include a mix of uses which are sympathetic to the historic fabric. The optimal viable use does not just relate to economics, it is the suitability of a use(s) for the building’s on going conservation.

10.135 Effective conservation requires a thorough understanding of the building and its context, including the historic development of the site. It is important to follow these key principles in any proposed change of use and alterations or additions:

• Promote their sustainable long-term use.
• Understand their history, cultural significance, and contribution to local distinctiveness and landscape character.
• Understand how the building is constructed and its condition (in particular any structural issues).
• Respect the architectural and historic interest of the building and its setting and the sensitivities to changes of use and alterations/additions.
• Achieve high standards of design and craftsmanship.
• Minimise the loss of significant historic fabric.
• Assess wildlife interest.
• Assess archaeology.
• Understand any issues between retaining historic fabric and features while incorporating the practical requirements of a new use, particularly with Building Regulations.
• Conserve and enhance its setting.

10.136 The character of the building should dominate as this is what justifies its worthiness to be conserved. This should be achieved through minimal changes and retention of the existing structure and its characteristics. Anything more than localised re-building may not constitute a conversion. It will be necessary to examine a building for indications of what features are original and which are alterations over time and which of these is worthy of being retained.

10.137 Residential conversion is very often the most popular and the most viable, but the most difficult form of re-use. By its very nature, it inevitably requires a high degree of change and intervention and a high level of design skill is needed so as the buildings character is not substantially harmed. There are often conflicts with the potential desire for more domestic character by occupiers. The key is to value a building as an historic agricultural structure.

**Setting of traditional buildings**

10.138 A sensitive conversion respects the relationship the building has with the surrounding landscape. It is the buildings in their setting and not just the building themselves which are important to cultural heritage.

10.139 Existing boundaries which are defined by hedge banks, traditional walls, fences or gates, and other enclosed spaces are likely to possess historical interest and aesthetic value. These features should be respected from the outset as they contribute to the character and integrity to the existing structure. Any new private areas, such as car parks and gardens should be sited and contained using appropriate materials.
Where a farmstead is proposed for conversion in to multiple units, care must be taken in the subdivision of surrounding land, as, for example, new separate gardens can greatly affect setting of the group by eroding the scale and proportion of the existing building. The use of inappropriate materials and design can also lead to erosion of the integrity of the building within its setting. Aspects of subdivision of shared spaces can also create problems between the new use and any continuing agricultural use and should be given consideration in proposals.

New ancillary buildings can often detract from the non-domestic character of farm buildings and adversely impact on surrounding views. Historically, outbuildings can enhance the group value of a farmstead and can be of some significance in their own right. Re-using existing ancillary structures is desirable and any new structures will be carefully scrutinised.

Agricultural buildings which are not heritage assets

The reuse of such buildings should be considered after an assessment of any traditional buildings on the holding which may be available or suitable for conversion, as these are likely to be more worthy of being retained.

Conversion should not result in the need for another agricultural building on the holding. An assessment will be made as to what extent the building has been designed and used for agricultural purposes, its age, and how long it has been unused. These aspects will be particularly scrutinised where a building has been erected under permitted development rights and its early conversion is proposed.

Consideration will be given to the impact of a proposed new use. Additions such as car parking or open storage of materials may cause further landscape harm, particularly as these buildings tend to be in isolated and often prominent locations.

The day to day operations of the proposed use will also be taken into consideration. Agricultural and forestry traffic are part of the rural character of the National Park and as such will not constitute a precedent for increases in non-agricultural traffic.

Extensions to traditional and modern buildings

Extensions to agricultural buildings are not encouraged but may be acceptable where they can safeguard the character of the main buildings and farmstead. Where unavoidable, they should be subordinate in scale and should not compromise the setting of the building or farmstead.

Sustainable construction

Sustainable construction measures (as outlined in Policy SD31 (Climate Change and Sustainable Construction)) are encouraged. Renewable technologies (see Policy SD56 (Renewable Energy)) may be difficult to introduce but these may be appropriate provided they are sympathetic to the building’s conservation and setting.

Ecology

Many rural buildings are in locations where there is a lot of potential for them to provide a home for wildlife, particularly protected species like bats and owls. Where there is a reasonable likelihood that the proposal may affect a protected species, an assessment by qualified surveyors should be carried out and submitted with a planning application. Including features for enhancing wildlife on site such as barn owl boxes and bat tiles.

What is required in an application?

Applications should be accompanied by a feasibility assessment and robust marketing exercise to determine what uses the building may be suitable for. Details should be provided for all proposed works, a structural survey, heritage statement which has assessed the cultural significance of the building and the impact of the proposed use and
alterations upon this and its character. The implications of Building Regulations should also be submitted to justify any specific works.

**Development Management Policy SD49: Conversion of Redundant Agricultural Buildings**

1. The conversion of redundant agricultural buildings outside of defined settlement boundaries will only be permitted where they comply with other relevant policies and:
   
   a) it is not in a wholly isolated location from infrastructure, amenities and services;

   b) it is structurally sound and capable of conversion without substantial reconstruction which may constitute a re-build;

   c) existing traditional buildings within the holding are not capable of being re-used in the first instance;

   d) it can accommodate the proposed use(s) without the need for significant extensions or ancillary buildings;

   e) it incorporates measures to enhance the environmental performance of the building, where appropriate;

   f) the proposed use does not impact upon the amenities and/or activities of neighbouring properties and uses;

2. And in instances where agricultural buildings are identified as heritage assets:

   a) the optimal viable use is proposed to conserve and enhance its architectural and historic interest and leads to an enhancement of its setting;

   b) wherever possible, essential utilities and other functional requirements do not harm significant internal fabric.
EQUESTRIAN DEVELOPMENT

Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Outcome 10: A diverse and sustainable economy has developed which provides a wide range of business and employment opportunities.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

Policy 13: Support the financial viability of farm businesses through appropriate infrastructure and diversification developments.

Policy 29: Enhance the health and wellbeing of residents and visitors by encouraging healthy outdoor recreation and relaxation.

Introduction

Horses have played a significant role in shaping the National Park’s landscape, agriculture and industry. Working horses in the landscape have now all but disappeared, and the horse today is almost entirely kept for recreational and sport. Horse keeping today ranges in size from private horse owners and small livery yards up to the large stud farms and training stables for racehorses and polo ponies. The race meetings at Goodwood and the polo fixtures in Midhurst are important national sporting events.

The keeping of horses has the potential to make a positive contribution to the local landscape and offers opportunities to diversify the rural economy. While the grazing of horses does not require planning permission, the keeping of horses and related development does. This type of development includes small-scale private domestic stables, riding schools, commercial livery yards of various scales and polo related activities.

There are potential individual and cumulative impacts associated with equine. This policy recognises the special places horses have in the landscape and will help to ensure that future development does not detract from it.

When is Planning Permission required?

It is highly recommended that advice should be sought from the Authority at the earliest opportunity in order to establish whether planning permission is required. The grazing of horses on pasture which is their main/only source of feed is unlikely to require planning permission because this is regarded as an agricultural use. However, the keeping of horses which involves, for example stabling for part of the day/night and supplementary feeding would be considered as equine development in many cases and hence requires planning permission for a material change of use of the land for the keeping of horses. The distinction between grazing and the keeping of horses can be a matter of fact and degree and evidence such as field shelters, fencing or subdivision of the land, or feed bins and general storage could be a good indication of this. Where stables or other buildings are in the curtilage of a dwelling and are used incidentally, they may be permitted development and not require planning permission.
National Policy Context

10.154 Equine related development may constitute major development in certain circumstances. All applications for equestrian development will need to accord with Core Policy SD3 on major development.

10.155 In addition to landscape considerations in the NPPF, paragraph 28 advocates planning policies should support the economic growth in rural areas of all types of businesses, through a positive approach to sustainable new development. It does, however, include a proviso that such development should ‘respect the character of the countryside.’

Options Considered and Preferred Approach

10.156 The Local Plan Options Consultation Document (February 2014) included an issue on the approach the Local Plan should take to equine-related development. Issues raised in responses included sites being well connected to the bridleway network, farm diversification, cumulative impacts, subdivision of fields and best practice for managing sites.

10.157 Taking these into consideration, a single policy on equestrian development is proposed. Its criteria cover a wide range of issues associated with equestrian development, which will link with other Local Plan policies. The policy below supports the appropriate use of land for equine development provided its criteria are met.

Supporting text

10.158 The SDNPA seeks to encourage the careful planning, design and management of land on which horses are kept. Good design should be informed by local character and distinctiveness, with particular reference to farm buildings, layout and materials.

10.159 It is important that equestrian activities have a positive impact on the National Park and protect its natural beauty. The SDNPA seeks to encourage owners to adopt a best practice approach towards managing the land, depending on the breed, size and purpose of keeping horses, which supports horse welfare as well. This approach may also be influenced by soil type and natural drainage patterns. It will be appropriate in some cases for management plans to be devised and submitted to support planning applications to demonstrate how this approach will be delivered. Advice should be sought from the Authority at the earliest opportunity and prior to submitting an application on whether a management plan would be needed. A separate SPD on equestrian uses is being prepared and will provide further information on these matters.

10.160 These are a number of issues on equestrian development which Policy SD50 seeks to address:

- **Fencing and subdivision**
  The subdivision of fields into small turnout paddocks can affect landscape character. Fencing which subdivides large fields into individual paddocks can have a significant visual impact on the landscape. Sensitive and well thought out fencing which respects the existing field pattern and contours, together with appropriate levels of grazing can enhance a site leading also to improvements in biodiversity and the quality of grazing. The removal of hedgerows from existing field boundaries will be strongly resisted by the Authority.

- **Stables, field shelters and new buildings**
  The location of new buildings like stables, field shelters, and tack storage can change the character of the land and views, particularly when poorly sited substantial and intrusive earthworks take place (including maneges). Equine buildings on sites which are open, exposed, elevated or sloped are likely to have particular landscape
impacts which may make it difficult to achieve sensitive design solutions. Wherever viable, existing buildings should be re-used to avoid additional buildings in the countryside. New buildings should be sited next to existing buildings and new structures should be kept to a minimum. The layout of buildings should seek to contain and enclose yard areas for storage, parking and other activities.

- **Car parking and access arrangements**
  Access for cars and larger vehicles is often required as part of an application. Car parking, trailer storage and manure arrangements can create clutter and have urbanising influences in the landscape. This should be addressed through good design and the careful location of these areas in relation to existing landscape features and boundaries.

- **Jumps, feed bins, general storage**
  Equestrian equipment like jumps and open storage can harm views which affect landscape character. Careful design and layout should mitigate against these impacts through the siting of buildings and permanent structures to screen and protect them from the elements. Management of manure and waste should take account of the amenities of local residents and other uses as well as environmental protection requirements.

- **Tranquillity and intrusion**
  Intensification of traffic and human activity in otherwise tranquil areas will be resisted by the Authority. Sites that are well located adjacent to the bridleway network can reduce pressures on the land and provide good recreational opportunities.

- **Dark Skies and light pollution**
  Impacts on intrinsically dark skies and light pollution should be avoided in line with Policy SD9 (Dark Night Skies). Examples of equestrian development that can impact on dark night skies include barns with extensive glazing and rooflights, floodlit menages and other intrusive lighting may not be permitted.

---

**Development Management Policy: SD50 Equestrian Uses**

1. Development proposals for equestrian development will be permitted provided that they comply with other relevant policies and they:
   a) have a scale and/or an intensity of equestrian use which would be compatible with the landscape and its special qualities;
   b) demonstrate good design which responds to local character and distinctiveness including location and siting, any subdivision of field(s) and earthworks;
   c) have a location which satisfactorily relates to existing infrastructure, where necessary, which includes vehicular and field accesses, tracks and bridleways;
   d) re-use existing buildings wherever practicable and viable;
   e) locate new buildings, stables, yard areas and facilities adjacent to existing buildings provided they respect the amenities of surrounding properties and uses;
   f) provide new or supplementary planting, hard landscape features and boundary treatments consistent with local character, where appropriate; and
   g) are compatible with other users of the countryside.

2. Development proposals for equestrian development that would have an unacceptable adverse impact on the special qualities of the National Park will be refused.
Evidence

- DEFRA ‘Keeping horses on farms’ (2012).
- [www.gov.uk/keeping-horses-on-farms](http://www.gov.uk/keeping-horses-on-farms)
- SDNPA (2011) *South Downs Integrated Landscape Character Assessment*. 
## SHOPS OUTSIDE CENTRES

### Partnership Management Plan Outcomes and Policies

**Outcome 10:** A diverse and sustainable economy has developed which provides a range of business and employment opportunities, many of which are positively linked with the special qualities of the National Park.

**Policy 48:** Support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.

**Policy 49:** Maintain and improve access to a range of essential community services and facilities for communities in the National Park.

**Policy 52:** Enhance local production by developing local economic supply chains and enabling businesses in the National Park to gain added value by linking their marketing activities to the special qualities of the area.

**Policy 55:** Promote opportunities for diversified economic activity in the National Park, in particular, where it enhances the special qualities.

### National Policy Context

10.161 The National Park Vision and Circular (2010) contains no specific guidance on retail development, but does recognise that the communities of our National Parks are an absolutely critical ingredient to the sustainability of the parks themselves and that national park authorities must give significant weight to socioeconomic interests.

10.163 The National Planning Policy Framework (NPPF) (para 28) states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood development plans should:

- support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;
- promote the development and diversification of agricultural and other land-based rural businesses;
- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
Options Considered and Preferred Approach

10.164 The planning issues relating to shops were not specifically considered as part of the Issues and Options consultation; however, they did form part of the consideration of the roles of settlements in various ‘tiers’. In smaller communities it was proposed that there would be a presumption in favour of small-scale retail and against the loss of such facilities in order to meet local needs.

10.165 In relation to farm shops a related issue was presented on the approach the Local Plan take to the diversification of agricultural land and buildings. The preferred approach in relation to farm shops is to support their development in principal. The sale of products from various locations is based on the National Farmers’ Retail and Marketing Association’s guidelines.

10.166 The issues and options in relation to garden centres were not specifically considered through the Local Plan Options Consultation Document but matters relating to economic development were as well as issues of design and landscape character, which all have an impact.

Supporting Text

10.167 In principal the National Park supports the development and expansion of small-scale shops that meet day-to-day shopping needs. They support local communities, businesses and can be an attraction for visitors. However, their development needs to be carefully considered in order not to put at risk an existing shop that might be the only service within a small village.

Farm shops

10.168 Planning permission is not normally required if an existing building is used as a farm shop only for the sale of unprocessed goods produced on the farm. However, if the farm shop is used to sell significant amounts of produce from elsewhere or produce that has been processed, then planning permission will probably be required.

10.169 To be considered a farm shop, it should aim to sell fresh produce and/or local foods that are normally grown, picked, reared or produced on the farm or on land close to where the shop is located. For the purposes of this policy local food is considered to be that which has come from within a 16 kilometre radius and regional is considered to be that which has come from the south and south-east, with particular support for producers from within the National Park and its immediate environs.

Garden centres

10.170 The SDNPA recognises that some garden centres are becoming destination locations in themselves and offer a wide range of popular activities such as cafes and play areas. Some advertise themselves as an alternative to motorway service stations. These can be of value to local communities and visitors alike but can also lead to increases in traffic and activity in previously tranquil areas. In some cases they detract from the primary purpose of a garden centre, which is to sell plants and gardening related products, and become intrusive urbanisation in an otherwise rural landscape.

10.171 The National Park recognises the contribution they make to the local economy and the services they provide. However, the SDNPA would like to see any expansion of retail or leisure facilities contributing to the purposes of the National Park, for example, through linking with tourism initiatives, walking and cycling objectives and being sources of information for visitors.
Development Management Policy SD51: Shops Outside Centres

1. Development proposals for small convenience stores that comply with other relevant policies will be permitted where they:
   a) have a net sales area less than 150m²; and
   b) are to meet the everyday shopping needs of the local community.

2. The SDNPA will safeguard existing retail units (A1, A2, A3) outside of centres, that are fit for purpose, from development proposals for non-retail uses. Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises.

3. Farm Shops
   a) Development proposals for the introduction or expansion of a farm shop will be permitted provided its scale and scope would not harm the retail offer in the immediate area. Such shops should aim to sell:
      • at least 40 per cent of goods that are own produce plus local foods;
      • 40 per cent of goods that are regional; and
      • 20 per cent are from elsewhere.
   b) In the first instance applicants should explore the re-use of existing buildings and, if not possible, then set out why not. New buildings and associated parking should be positioned to ensure that the overall feeling of development does not extend out into open countryside and will minimise negative impact on the landscape.

4. Garden Centres
   a) The primary purpose of a garden centre must remain the sale of plants and gardening related products.
   b) Development proposals for new, or extensions to, existing garden centres will be permitted if it can be demonstrated that it is required in order to support a local horticultural business and are of a scale and scope appropriate to the location.

c) Garden centres seeking to diversify into other retail markets and leisure will only be permitted where this will not introduce inappropriate types and levels of use in the area. Such developments should seek to provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities.

d) In the first instance applicants should explore the re-use of existing buildings and, if not possible, then set out why not. New buildings and associated parking should be positioned to ensure that the overall feeling of development does not extend out into open countryside and will minimise negative impact on the landscape.
SHOP FRONTS

Introduction

10.172 Shop fronts can make a significant contribution on the character of town and village centres. Towns and villages are not only a destination for local residents but also for visitors, many of whom come to enjoy the attractive nature of these places. Many shop fronts incorporate traditional features. These features make a valuable contribution to the street scene and their retention will be sought. Policy SD11 relates to the historic environment and Policy SD39 relates to conservation areas. Due reference should be made to these policies in applications for new shop fronts in areas with historic designations such as listed buildings or conservation areas.

10.173 A shop front should be considered as an integral part of the whole building in which it is situated, and should also be in sympathy with neighbouring buildings. Particular attention should be paid to materials, style, proportion and size of windows and fascias. Colours, too, are important both for the shop front itself and for any lettering. In many situations, a corporate company style may have to be modified, especially if a brightly coloured and/or internally illuminated logo is proposed.

Options Considered and Preferred Approach

10.174 The issues and options in relation to shop fronts were not specifically considered through the Local Plan Options Consultation Document but matters relating to the adaptation of historic buildings were.

10.175 The preferred approach in relation to shops fronts is to ensure that their design complements and adds value to the street scene, most of which are historic in nature, rather than detracts.

Supporting Text

10.176 The use of solid shutters will not be supported except in exceptional circumstances where evidence supported by the police has shown that security poses a particular problem.

10.177 Proposals for external lighting must accord with the requirements of the Dark Night Skies policy (Policy SD9)

10.178 Traditional blinds/canopies will normally be canvas, of retractable roller or fan type.
**Development Management Policy SD52: Shop Fronts**

1. Development proposals for new, or changes to, existing shop fronts that comply with other relevant policies will be permitted where they:
   a) relate well to the building in which they are situated, giving special regard to upper floors, in terms of scale, proportion, vertical alignment, architectural style and materials;
   b) take account of good architectural features of neighbouring shopfronts so that the development will fit in well with the street scene; and
   c) use appropriate materials which respect the street scene.

2. If a single shop front is to be created by joining two or more units, it should respect and show the original divisions that existed, particularly in the case of historic properties and their setting.

3. There will be a presumption against internally illuminated signage/logos and solid shutters or any other feature which obscures window displays, unless this is a traditional feature of a historic premises.

4. External lighting is only normally appropriate for businesses operating in the evening. If required, it should be kept to a minimum and be discreetly positioned.

5. Any blinds/canopies will be expected to be traditional in nature.
COMMUNITY INFRASTRUCTURE AND FACILITIES

Partnership Management Plan Outcomes:

**Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

**Outcome 9:** Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Introduction

10.179 Community infrastructure includes those public services and facilities used by residents such as health and wellbeing services, sports and leisure uses, cultural and religious institutions, pubs and local shops, education and youth facilities and open space. Services and facilities across the National Park are a source of local pride and greatly contribute to the quality of life for residents. This is reflected in the seventh special quality and is essential for the creation of sustainable communities.

10.180 There has been a general decline in local services and an increased dependency on more centralised provision in larger settlements, including those outside of the National Park. The growth of internet-based services and shopping has also contributed to the decline of local provision. This erodes the autonomy, vitality and vibrancy of local communities, particularly in smaller villages, and the Local Plan will support local authorities, communities, partners and entrepreneurs to reduce this trend, where appropriate.

10.181 The most active communities have responded to this challenge by taking on the running of services themselves. The Local Plan will provide a positive framework for the protection of existing services and facilities, and the provision of new infrastructure to meet the unique needs of communities in the National Park where there is a need. This is addressed in Policy SD53 (New and Existing Community Infrastructure).

10.182 New development proposals, particularly for housing and employment, should be sufficiently supported by infrastructure. New development increases the pressure on existing infrastructure, from large-scale facilities serving a wide catchment area to small-scale local provision. The Local Plan will ensure that the impact of new development is mitigated by the provision of new or improved services and facilities. This is addressed in Policy SD54 (Supporting Infrastructure for New Development).

10.183 Funding for new community infrastructure is currently secured alongside new housing development through negotiated financial contributions known as ‘Section 106 agreements’. The Community Infrastructure Levy (CIL) will largely replace Section 106 agreements for this purpose and a proportion of CIL funds will be passed directly to parish councils to spend on projects of their choosing. Innovative forms of funding and service delivery such as community land trusts, community-run buses, energy schemes and community broadband solutions will also be supported.

10.184 Wider growth, including outside of the National Park, often requires more strategic infrastructure upgrades and provision which deliver a positive socio-economic impact but can be harmful to the natural environment and landscape. Where proposals for strategic infrastructure development are located within the National Park, the Local Plan will seek to address the balance of considerations through Policy SD30 (Strategic Infrastructure Provision).
**National Policy Context**

10.185 A core planning principle in the NPPF (para 17) is to take account of and support ‘local strategies to improve health, social and cultural wellbeing for all’, and deliver ‘sufficient community and cultural facilities and services to meet local needs’. Local strategies in this context could also include parish plans and neighbourhood plans.

**Options Considered and the Preferred Approach**

10.186 The *Local Plan Options Consultation Document* set out six issues and ten options on community infrastructure. These included:

- How can the Local Plan best ensure communities have access to local services?
- How can the Local Plan best resist the loss of community infrastructure?
- How best can the Local Plan best ensure adequate infrastructure provision for new development?
- How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/renewable-energy schemes?
- How can the CIL be best allocated?
- How should the Local Plan deal with proposals for strategic infrastructure?

10.187 Key responses to the Options Consultation Issues 47 and 48 (concerning access to facilities and resisting the loss of community infrastructure) which informed this preferred options policy include:

- A focus on the re-use and conversion of existing buildings in the first instance to meet any identified community need.
- The clustering of parishes and smaller settlements is supported, if it enables the provision of important community facilities to serve more than one settlement.

- Use community led plans (CLP) to evidence need and support the provision of appropriate services and facilities.
- Where enabling development is to be allowed, policy should be clear that community support is required.
- It may not be appropriate to maintain a facility if there is adequate sustainable transport links to another facility in close proximity.

10.188 A combination of options from Issues 47 and 48 in the Options Consultation Document were considered to deliver a range of complementary benefits and have been taken forward into one policy in this Preferred Options Local Plan.

10.189 Delivery mechanisms (such as community right to build orders) did not need to be identified specifically in the policy wording but could be referenced in the supporting text.

10.190 There were no alternative policy options suggested through the consultation.
NEW AND EXISTING COMMUNITY INFRASTRUCTURE

Supporting Text

10.191 Many communities have little or no access to public transport and so it is important to locate services and facilities as close as possible to users. The Local Plan encourages the delivery of efficiency savings and quality improvements including through clustering facilities and sharing premises, where appropriate.

10.192 Funding for the provision and retention of infrastructure is likely to be limited and the SDNPA will support innovative solutions including community-run services, the use of community land trusts and community right to build orders. Capital or revenue funding may be available through the CIL to deliver or support the ongoing operation or maintenance of community infrastructure and potential projects should be identified in the Infrastructure Delivery Plan (IDP) and through community-led plans such as parish plans or neighbourhood plans.

10.193 The SDNPA will help to identify groups of parishes with similar community infrastructure needs to encourage the creation of clusters.

Development Management Policy SD53: New and Existing Community Infrastructure

1. In Lewes, Petersfield, Midhurst, Petworth, Liss and Fernhurst, planning permission will be granted for new and expanded community infrastructure that comply with other relevant policies, where there is an established need and local community engagement, including identification in a community led plan, where relevant. Consideration should be given to the re-use of existing buildings or the shared use of space to maximise efficiency and viability.

2. In all other settlements planning permission will be granted for community infrastructure proposals that comply with other relevant policies serving an proven local need where the scale, nature and location is appropriate for the existing settlement. Larger-scale proposals addressing an established wider need will be supported where they serve a cluster of communities and the following criteria are all met:
   a) there is local community engagement including identification in a community led plan where relevant;
   b) the catchment area serves a coherent cluster of settlements and is accessible by sustainable means; and
   c) consideration has been given to the shared use, partial re-use or partial redevelopment of existing buildings to maximise efficiency and viability.

3. Planning permission will only be granted for development proposals resulting in the loss of community infrastructure by change of use or demolition if the following criteria are all met:
   a) Alternative provision is available in the vicinity or accessible by sustainable means, including through clustering or shared facilities, without causing an unreasonable reduction or shortfall in meeting the local need.
   b) The existing use is not viable in whole or in part, including through cross subsidy from a shared use or enabling development, or
   c) There is a demonstrable lack of need for the existing use.

4. Evidence of a robust marketing campaign of at least 12 months will be required that clearly demonstrates that there is no market demand for the premises.

5. Partial loss of floorspace through change of use will be supported when the operational need of the community use requires less floorspace, or where clustered uses are able to share premises, or in order to sustain the viability of the existing use by cross-subsidy.
SUPPORTING INFRASTRUCTURE FOR NEW DEVELOPMENT

10.194 Key responses to the Options Consultation Issue 49 (ensuring sufficient infrastructure is provided by new development) which informed the preferred options Policy SD54 include the following:

- Encourage contributions in kind very close to the major development where ever possible, getting better value for money.
- Consider viability, but this must be subservient to the National Park purposes (so cheaper but poorer quality infrastructure is not acceptable).
- The phasing of infrastructure is important in relation to development.

Preferred Approach

10.195 There were no specific options proposed for this issue. The preferred approach takes forward what we proposed to do in the Local Plan Options Consultation Document and incorporates useful consultation responses.

10.196 There were no alternative policy options suggested through the consultation.

Supporting Text

10.197 New development places a burden on existing infrastructure such as school places. In addition to providing the minimum services and utilities necessary to support development proposals, the SDNPA will negotiate a suitable package of supporting infrastructure to ensure proposals are self-supporting and contribute to National Park purposes and duty.

10.198 The SDNPA will publish an up-to-date CIL Regulation 123 List to clearly define what infrastructure is provided through Section 106 and CIL for on-site and off-site infrastructure. This will prevent developers from being charged twice for the same type of infrastructure.

10.199 Critical service and utility infrastructure can include access, clean water provision, wastewater and sewerage, power supplies and telecommunications connectivity.

10.200 On-site infrastructure to be secured through Section 106 legal agreements can include affordable housing, green infrastructure, biodiversity protection, open space, car and cycle parking, visual screening and flood management. This will be negotiated based on the individual needs of the site and the capacity of existing infrastructure. Provision-in-kind, either through the nil-cost transfer of land or payment-in-lieu for provision off-site will be considered for each development based on its circumstances.

10.201 Off-site infrastructure to be secured through the CIL, Section 278 agreement and other mechanisms, where appropriate, includes highway works, school places, sports facilities, environmental protection and enhancement, community facilities and any other project identified on the IDP. The SDNPA will allocate funding based on the needs of the new development and wider community in consultation with local communities. A proportion of CIL funds will be passed directly to parish councils to spend on projects of their choice.
High-speed broadband will improve the socioeconomic wellbeing of residents, business prosperity, facilitate working at home and reduce travel. However, this is still unavailable across many rural locations and the Government programme to roll-out SuperFast Broadband to 90 per cent of premises by 2015 (with an extension to 95 per cent of premises by 2017) is unlikely to reach all residents and businesses in rural locations. This policy seeks to facilitate the connectivity of all new developments to the wider broadband network. This should be fibre optic cabling to each dwelling supporting an external connection of 100Mbps or higher. The overall system should be able to deliver SuperFast Broadband (24Mbps or higher) to dwellings and UltraFast Broadband (100Mbps or higher) to businesses. For smaller sites (under 50 dwellings or under 2000 sqm of business floorspace) wireless alternatives may be acceptable.

Development Management Policy SD54: Supporting Infrastructure for New Development

1. New development will contribute towards new infrastructure or improve the capacity of existing infrastructure, as appropriate.

2. Critical service and utility infrastructure will be provided on-site by the developer and utility providers to ensure development is properly serviced.

3. In addition, a suitable package of supporting infrastructure will be negotiated by the Authority and secured through legal agreements to ensure the development is acceptable in planning terms, self-supporting and its impacts are properly mitigated.

4. On-site infrastructure will be secured through legal agreements based on the needs of each proposal and delivered directly by the developer or through financial contributions and/or land. Infrastructure delivery will be integrated with development phasing to ensure timely provision and commuted payments will secure necessary future maintenance.

5. Off-site infrastructure will be secured through development contributions (including the CIL). Section 278 agreements will be secured, where appropriate, to ensure safe and suitable access and highway improvements.

6. The need for SuperFast broadband is a key issue for the National Park. Proposals for residential and business development should include sufficient on-site SuperFast and UltraFast broadband infrastructure to enable connectivity to wider networks.

7. The design of infrastructure through partnership working with developers and infrastructure providers should reflect the high-quality landscape and ensure, where possible, benefits to the economic and social wellbeing of the local community.
ADVERTISEMENTS AND SIGNAGE

**Partnership Management Plan Outcomes and Policies**

**Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change.

**Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

**Policy 1:** Conserve and enhance the natural beauty and special qualities of the landscape and its setting.

**Policy 48:** Support the towns and villages in and around the National Park to enhance their vital role as social and economic hubs.

---

**Introduction**

10.203 Advertisements have a role to play in making people aware of businesses and directing people to their locations. This is particularly important for businesses like public houses and hotels which can rely on passing trade and support the visitor economy. Because of the volume of traffic, the most prevalent areas for advertisements are on the A roads, such as the A27 and A272, and main roads which link to these. There are notable continuing incidences of advance signage being erected on these roads to make people aware of businesses or events in their vicinity. Temporary advertisements for events at various times throughout the year are also a regular occurrence.

10.204 By their very nature, permanent and temporary advertisements are conspicuous and prominently displayed. Individually and cumulatively, they can affect the character and appearance of buildings, settlements, the landscape and views. Illuminated advertisements can also affect the tranquillity of an area at night. Careful management of commercial and event advertisements, in particular, is needed to ensure that they are sensitively located and of a scale and appearance which is sympathetic to the visual amenity of the area and public and highway safety.

**What is an advertisement?**

10.205 A wide variety of advertisements and signs are covered by the relevant regulations. These are:

- posters and notices;
- placards and boards;
- fascia signs and projecting signs;
- pole signs and canopy signs;
- models and devices;
- advance advertisements and directional signs (for example, roadside adverts like advertising a premises or event in the area);
- estate agents’ boards;
- captive balloon advertisements;
- flag advertisements;
- price markers and price displays;
- traffic signs;
- town and village name signs; and
- parked vehicular signage.
National Policy Context

10.206 The National Parks Vision and Circular (2010) requires NPAs, in delivering the purposes and duty, to secure a diverse and healthy natural environment by managing landscape, heritage, value, safeguard and enhance biodiversity; foster and maintain thriving rural economies; and provide new access and recreational opportunities.

10.207 The NPPF (para 28) outlines support for a prosperous rural economy. Paragraph 109 outlines that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; recognising the benefits of ecosystems services and minimising impacts on biodiversity. Paragraph 115 states that great weight should be given to conserving landscape and scenic beauty.

10.208 The Town and Country Planning (Control of Advertisements (England), 2007) contain the relevant legislation concerning advertisements. It requires local planning authorities to have regard to amenity and public safety, taking into account development plan policies in so far as they relate to these two aspects. Amenity is defined as both the visual and aural amenities of advertisements. Public safety principally relates to the dangers to road users, such as obstructions to sight lines or illuminated signs causing glare.

Options Considered and Preferred Approach

10.209 The Local Plan Options Consultation Document did not raise advertisements as a specific option. Issue 41 questioned how the Local Plan can support new businesses, small local enterprises and the rural economy. This relates to the sustainable growth and expansion of a range of businesses and enterprises through the conversion of existing buildings and well designed new buildings, as well as providing small and flexible business start up units. Advertisements can play a role in supporting these and other types of businesses.

Supporting text

10.210 This policy relates to outdoor advertisements and signage, but excludes road traffic signage. Depending for example on their location, overall size, height, content, size of lettering, appearance and materials other proposed advertisements, like an advert on a building, may not require permission. This is subject to the criteria of the Advertisement Regulations and referred to as a deemed consent. These criteria can also be used for temporary advertisements and signage. In instances where permission is required, this is known as express consent, whereby a formal planning application will need to be made. There are different limitations for either permanent or temporary advertisements.

10.211 In areas of special advertisement control, further restrictions will apply as to whether an advertisement has deemed consent. This is an area where stricter limitations for advertisements are applied in relation to height, size and illumination. It is recommended that advice is sought from the Authority before erecting an advertisement.

10.212 When considering putting up any form of advertisement it is important to consider the following:

- size;
- location;
- colour;
- materials;
- lettering;
- illumination and harmful light pollution which may impact upon wildlife habitats, residential amenities and dark night skies;
- means of fixture including either on a building or freestanding;
- impact on amenities of neighbouring properties;
- contribution to an unsightly proliferation or clutter of advertisements and signs which impact upon the amenities of the area;
• creation of a hazard to pedestrians or road users; and
• impact on the character and appearance of a building and/or area.

10.213 Whether proposals are within towns and villages or in more rural locations, the above considerations should be taken into account. Businesses and communities may experience difficulties in being able to advertise their business or event. However, advanced signage is a particular issue in the National Park whereby the cumulative impact of this type of signage can be detrimental to the amenity of the area and the landscape character. These, therefore, will only be permitted where a justifiable case can be made. All information should be displayed on one sign to avoid the proliferation of signage, subject to Policy SD55. This could also include more generic signage on high streets in towns which direct people to other areas or shops elsewhere in the town.

10.214 Technology can also contribute to reducing the amount of signage. This can include satellite navigation as well as mobile phone applications which notify passers by of the presence of particular businesses. These options should also be investigated, which may negate the need to apply, erect and maintain signage.

Development Management Policy SD55: Advertisements and Signage

1. Advertisement Consent which complies with other relevant policies will be permitted where:
   a) their location, size, scale, proportions, design and materials respect the character and appearance of a host building, site, or area;
   b) the number of advertisements is kept to a minimum and amalgamated with existing signage;
   c) there is no harmful cumulative impact in relation to other signage in the vicinity;
   d) there is no adverse impact on neighbouring amenities,
   e) there is no harmful impact to public safety; and
   f) for advance directional signage, it is reasonably necessary for the purposes of a business and complies with other policy criteria of this policy.

2. Where an advertisement would have an unacceptable adverse impact on the special qualities it will be refused.

3. Relevant conditions will also be applied to consents, including that where adverts with permanent consent are no longer required these should be removed and the site is left in a condition that does not endanger the public or harm the character and appearance of the area.

Evidence

• SDNPA (2011) South Downs Integrated Landscape Character Assessment.
RENEWABLE ENERGY

Relevant Partnership Management Plan Outcomes and Policies

Policy 13: Support appropriate renewable energy schemes, sustainable resource management and energy efficiency in communities and businesses in the National Park, with the aim of meeting Government climate change targets.

Introduction

10.215 Renewable energy, in contrast to fossil fuels, offers more sustainable use of natural capital therefore is an important ecosystem service. However, the landscape character of the National Park is a finite and precious resource that the SDNPA is charged with conserving and enhancing. Development of renewable energy within the National Park, therefore needs to be constrained so as not to compromise the special qualities.

10.216 Renewable energy potential is diverse and includes:

- a) wood fuel.
- b) solar energy on a domestic and commercial scale.
- c) wind energy
- d) anaerobic digestion plants that are fuelled by agricultural feed stocks
- e) ground, air and water source heat pumps.
- f) hydropower (although significant hydropower is not envisaged for the SDNP).

10.217 At a domestic property scale micro-generation renewable energy is possible by a range of methods including:
- a) solar photovoltaic (pv) cells,
- b) solar thermal panels,
- c) micro-wind turbines,
- d) wood-fuel or wood chip boilers,
- e) ground source, water source or air source heat pumps.

10.218 Whereas, for much of the country permitted development rights apply to solar p.v. and solar thermal technologies, there are restrictions on designated landscapes including National Parks. Similarly there are more specific restrictions that apply to the installation of renewable technologies in listed buildings or conservation areas. Potential applicants should seek guidance from the Authority on the nature of these restrictions.

10.219 The SDNPA actively supports renewable energy schemes where the scale, design and location of the installation do not adversely affect the special qualities. Some examples of best practice schemes currently operating in or near the National Park are provided below.

West Dean Wood Fuel Biomass Heating System

The boiler is fed on wood chip from the Estate’s own woodland which supplies the 1,200 tonnes of chips required annually, making it an excellent example of sustainable woodland management. The underground mains feed not only the college, five large student residences, 6,000 square feet of new teaching and exhibition space, but also the glasshouses in the walled kitchen garden, nine estate houses, the gardens visitor centre, an outdoor swimming pool, and even the village church. Planned expansion of the system would allow a further 20 properties on line.

---

42 Part 40 of The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2008
Stansted Park Wood Fuel Biomass Heating System

The Stansted Park mansion and its outbuildings are now heated by a bio-fuel boiler fed by wood grown sustainably in Stansted Forest. Up to 100 employees in local businesses located on the estate benefit from the subsidised low carbon heat supplied by the plant. By using woodchip as an alternative to oil, Stansted Park are saving around £34,000 per annum on fuel. Using an SDNPA sustainable communities grant, the estate has provided a glass window to the boiler room for education/interpretation purposes.

Harvey’s Brewery

In July 2011, the UK’s first community owned PV system was launched in Lewes, East Sussex. The large 98kWpeak system was organised by the community energy services company OVESCO and managed, designed and installed by Southern Solar. The system is owned by shareholders from the local community with the power used by the solar panels on top of Harveys Brewery Depot. The 544 solar PV panels generate an estimated 98,000 kilowatt hours per year.

Barfoots Sefter Farm Anaerobic Digestion Plant

This 1,200 kWe AD plant producing green energy in the form of Biogas from the 20,000 tonnes p.a. waste from sweet corn processing on site, provides an example of the type of scheme that could be considered in the National Park. The plant also generates a containerised combined heat and power (CHP) unit that generates 1.1MW of electricity to power all aspects of the Barfoots’ produce marketing business and allowing excess energy to be exported to the National Grid.

National policy context

10.220 The expectation for national parks is set out in the National Parks Vision and Circular which states in para 46:

“The Authorities also have a role to play in reducing emissions from sectors other than the land. Renewable energy is key to achieving the UK’s emissions reductions targets and the move towards low-carbon living. The Parks should be exemplars in renewable energy.”

10.221 National planning policy reflects this commitment, exhorting local planning authorities to recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources by the following measures:

- “have a positive strategy to promote energy from renewable and low carbon sources;
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;
- support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and
- identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.”

10.222 Noting the second bullet, and the great weight given to conserving landscape and scenic beauty in national parks (para 115), the scope for major commercial renewable energy schemes is constrained.
The Climate Change Act 2008 commits the UK to set a long-term binding framework to cut our emissions by at least 80 per cent by 2050 and by at least 35 per cent by 2020 against 1990 levels.

Options Considered and Preferred Approach

The Local Plan Options Consultation Document set out one issue and three options relating to renewable energy.

All respondents to the issues and options consultation supported draft Option 50. There was little support (29 per cent) for schemes giving overriding preference to community energy schemes (Option 50b). Schemes meeting local needs (50a) enjoyed 53 per cent support and views were mixed on the use of landscape sensitivity analysis (Option 50c); while 51 per cent supported this there were concerns expressed about the dangers of a process that may attribute lower landscape sensitivity to certain areas of the National Park, notwithstanding that it is a nationally designated landscape. Other comments received stressed the importance of considering the cumulative impact of small schemes; a suggestion of options analyses for different technologies; and a suggested priority for wood fuel schemes.

Given the overwhelming support in favour of Option 50 the Preferred Option policy reflects the policy direction given through the options consultation.

In considering the appropriateness of local schemes potential applicants are referred to the SDILCA and to the South Downs Viewshed Characterisation Study. They should also note that major development is subject to Policy SD3 (Major Development) and should not take place except in exceptional circumstances. In view of the sensitivity of the landscape to renewable energy schemes, potential applicants are advised to consult the Authority at the earliest opportunity when considering schemes making use of the Pre-application Advice facility.

Applications submitted will be expected to have made full use of Best Practice guidance for appropriate technologies, details of which are included in policies SD5 (Landscape Character) and SD6 (Design) and in the evidence list at the end of this policy.

Renewable energy installations in the National Park that comply with other relevant policies will be encouraged providing that:

a) The siting, scale, design and appearance will not have an adverse impact upon landscape character, including cultural heritage, and wildlife;

b) adjoining uses, residential amenity and relative tranquillity are not adversely impacted in terms of noise and disturbance, vibration, stroboscopic effect, or electromagnetic interference;

c) existing public access is not impeded; and

d) the installation does not result in the loss in use of Grade 1 or 2 agricultural land.

Evidence


- Climate Change Act 2008.

- Cornwall Council (2012) The Development of Domestic and Medium Scale Solar PV arrays up to 50kW and Solar Thermal.

- Royal Agricultural Society of England; A Review of Anaerobic Digestion Plants on UK Farms.


Partnership Management Plan Outcomes and Policies

**Policy 51:** Increase the availability and speed of broadband and the coverage of the mobile phone network, to facilitate business growth, encourage home working and improve quality of life.

**Introduction**

10.229 The landscapes of the National Park are easily damaged by vertical built features such as telecommunications masts. Similar problems exist with electricity transmission pylons, and the SDNPA will encourage schemes for the undergrounding or appropriate screening of such existing infrastructure where it has a negative impact on the landscape.

10.230 However, mobile reception in the National Park is very difficult. In addition the lack of high speed broadband in many areas has been identified as a major constraint to businesses based there. As of 2012, only 0.1 per cent of the National Park had broadband above 8 Mb/s, and 80 per cent of the National Park had broadband speeds of less than 1Mb/s.

10.231 With regard to other utilities, the Water Cycle Study published in 2015 identified capacity constraints on the wastewater treatment and sewerage system in a small number of areas within the National Park. It also identified serious stress in the water supply system over the next 25 years although it stated that this can be dealt with by demand management.

10.232 Policy SD54 (Supporting Infrastructure for New Development) describes the approach that will be taken on a site-by-site basis to ensure that new developments are adequately provided for in terms of infrastructure. However, telecommunications and other utilities infrastructure often constitutes development in its own right, and this policy relates to such developments.

**National Policy Context**

10.233 The National Parks Vision and Circular 2010 states that communications infrastructure in the National Parks needs to be fit for purpose, although national policy on telecommunications as it applies to the National Parks will mean there is a more measured approach to the implementation of such policies.

10.234 The NPPF (para 43) states that local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband; minimise the number of masts and mast sites; and camouflage equipment on new sites. It states that the local planning authorities should not ban new telecommunications development in certain areas or insist on minimum distances between new telecoms development and existing development. It lays out a list of the information and evidence that applicants for new telecommunications development should provide.

10.235 The NPPF (para 162) states that local planning authorities should work with other authorities and providers to assess the quality and capacity of infrastructure for water supply, wastewater and its treatment, energy (including heat), telecommunications and utilities, along with other elements of infrastructure, and its ability to meet forecast demands.

**Options Considered and Preferred Approach**

10.236 The Local Plan Options Consultation Document included an issue and options on how the Local Plan can best ensure adequate infrastructure provision of new development. Most of the options raised under Issue 49 have been taken forward in Policy SD54 (Supporting Infrastructure for New Development). However, the utilities infrastructure covered under Policy SD57 (Telecommunication, Services and Utilities) will help to meet the infrastructure needs of new development.
What requires planning permission?

10.237 Different types of utility provider have permitted development rights for various works, equipment, extensions to buildings and in some cases new buildings, generally up to a certain scale. In national parks, planning permission is required for the installation or replacement of any electronic communications line which connects any part of an electric line to any electrical plant or building, and the installation or replacement of any support for any such line.

10.238 With regard to telecommunications infrastructure, the permitted development rights are extremely detailed. Permitted development rights are generally more limited in national parks with regard to the scale of new telecommunications equipment or developments that affect the scale or visual appearance of existing equipment.

Supporting Text

10.239 Development proposals for new telecommunications and other utilities infrastructure must be consistent with other policies. Proposals which do not meet the requirements of these policies will not be permitted. Applications must be accompanied by full details of all new landscaping, screening and of any trees or vegetation to be retained on the site, and also of associated developments, including access roads and other ancillary buildings to service the development, and their likely impact upon the environment.

10.240 Proponents of new telecommunications masts must demonstrate that they have exhausted all the opportunities for use of existing masts and other structures, including buildings where the impact of the use of a roof for telecommunications infrastructure would not be as detrimental in landscape terms as the erection of a new mast.

10.241 The maximum possible use should be made of technologies with lower landscape impact, before technologies with greater landscape impact are considered. For example, where it is possible to improve mobile signal through the combination of fibre to the cabinet with wi-fi, this should be preferred to the erection of new masts for mobile transmission.

10.242 The visual impact of telecommunications infrastructure will generally be lower when it can be located in close proximity to existing buildings, where this would not damage the setting of buildings that contribute to the special qualities. This will therefore be a requirement of new telecommunications infrastructure.

10.243 The number of masts and mast sites must be kept to a minimum. However, there may be occasions where it is more appropriate in landscape terms to meet a telecommunications need through two or more smaller masts than through one large mast, and in such cases a greater number of masts may be acceptable.

10.244 Before the establishment of the National Park, infrastructure, in particular telecommunications masts and electricity pylons, were erected that have a negative impact on the landscape. If opportunities arise, for example through new development, to remove or underground such facilities, screen them with appropriate landscaping in compliance with Policy SD5 (Landscape Character) or replace them with facilities that are less prominent or otherwise have a less negative impact, these should be taken. Undergrounding will be supported provided that this is compatible with other policies, especially those on biodiversity and archaeology.
The development or expansion of facilities for essential utilities, either where needed to serve existing or proposed development, or in the interests of long-term utility management, will be permitted where they comply with other policies. Such proposals will be required to minimise environmental harm and provide adequate mitigation measures. They will be assessed in the light of the operational requirements and technical limitations of the technology. A full survey of deployment options will be required to demonstrate that the selected option has the minimum negative impact on the special qualities.

**Development Management Policy SD57: Telecommunications, Services and Utilities**

1. Development proposals for new telecommunications infrastructure that comply with other relevant policies will be permitted where the telecommunications need cannot be met using existing masts or other appropriate structures and they:
   a) are of a scale, design and location that would not have a potential adverse impact on the special qualities;
   b) make use of all available technologies to minimise landscape impact;
   c) take opportunities on any new infrastructure to meet the needs of local communities as far as possible;
   d) are located in close proximity to existing buildings, without damaging the setting of those buildings where they contribute to the special qualities;
   e) ensure that the number of sites is kept to a minimum consistent with the efficient operation of the network and the protection of the landscape; and
   f) take all available opportunities for the removal or reduction in prominence of previously permitted telecommunications infrastructure that is prominent in the landscape, including through the undergrounding of infrastructure.

2. Development proposals for the undergrounding or appropriate screening of utilities infrastructure that is prominent in the landscape will be encouraged where they comply with other relevant policies.

3. Development proposals for new or improved utility service infrastructure providing essential services and facilities, including electricity supply, gas or heating supply, water supply and waste water management, that comply with other relevant policies will be permitted provided they minimise environmental harm, and provide adequate mitigation measures, having regard to all deployment options and in light of operational requirements and technical limitations.

**Evidence**

- The Town and Country Planning (General Permitted Development) Order 1995 (as amended)
AIR QUALITY

Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

Outcome 5: Outstanding visitor experiences underpinned by a high quality access and sustainable transport network providing benefits such as health and well-being.

Policy 28: Improve and maintain rights of way and access land, to provide a better connected and accessible network for a range of abilities and users, and reduce conflict where it occurs.

Policy 29: Enhance the health and well being of residents and visitors by encouraging, supporting and developing the use of the National Park as a place for healthy outdoor activity and relaxation.

Introduction

In general, air quality in the National Park is good. However, there are concerns with regard to nitrogen dioxide emissions in certain areas of concentrated and congested traffic particularly diesel vehicles, be that from cars or heavy goods vehicles (HGVs). In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre for nitrogen dioxide, mainly due to emissions from traffic. There are similar AQMA designations in areas very close to the National Park boundary including Winchester Town Centre, Storrington High Street in Horsham District, and the A27 Upper Brighton Road in Worthing, where high levels of air pollutants may impact areas both outside and within the National Park.

In order to achieve the PMP outcomes particularly in regard to healthy outdoor activity it is important to ensure that further pockets of poor air quality do not become prevalent by reducing the negative impacts of development and reducing the need to travel by private car.

National Policy Context

Air quality is closely controlled by European Directives that set out statutory health-based objectives for key air pollutants that Member States are expected to achieve by certain dates. These targets have been transposed into minimum national standards for certain air pollutants, which are set out in the Air Quality Standards Regulations 2010.

43 Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached.

44 Air Quality Standards Regulations (2010) www.legislation.gov.uk/uksi/2010/1001/pdfs/uksi_20101001_en.pdf For nitrogen dioxide there are two targets. That the level not to exceed 200μg.m⁻³ more than 18 times a year (1 hour mean) something which is not currently an issue in Lewes. And that the annual mean should not exceed 40μg.m⁻³ – currently exceeded in Lewes town centre, causing the AQMA to be declared.
With regard to plan making, the National Planning Policy Framework (NPPF) states that the planning system should seek to promote the conservation and enhancement of the natural environment by ‘preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution’ (paragraph 109). It goes on to say that the potential cumulative impacts of new development on both environmental and human health should be taken into account in the decision making process (paragraph 120).

**Options considered and Preferred Approach**

There were no specific references to air quality in the options consultation for the Local Plan.

**Supporting Text**

An Air Quality Action Plan (AQAP) has been produced for the Lewes town centre AQMA, including a number of measures that aim to improve air quality. It is expected that development will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development’s potential negative impacts.

Applicants for development within or adjacent to an AQMA should discuss requirements with the Authority at the earliest opportunity and certainly before a planning application is submitted, to determine whether a proposed development could impact upon the AQMA and therefore require mitigation measures.

The effects of air pollution can be felt far beyond the original source of the pollution and impact other areas. Therefore all proposals, not just those for development within or adjacent to AQMAs need to consider the potential impact on air quality.

**Development Management Policy SD58: Air Quality**

1. The Authority, working with local authority partners and other relevant agencies will seek to improve air quality throughout the National Park. Development proposals that may lead to a significant deterioration in local air quality resulting in unacceptable effects on human health, the natural environment or local amenity, will require the submission of an air quality assessment, which should address:
   a) The existing background levels of air quality;
   b) The cumulative impact of development levels of air quality; and
   c) The feasibility of any measures of mitigation that would prevent the national air quality objectives being exceeded, or would reduce the extent of the air quality deterioration.

2. Development proposals that by virtue of their location, nature or scale could impact on an AQMA will be required to:
   a) Have regard to any relevant AQAP and to seek improvements in air quality through implementation of measures in the AQAP; and
   b) Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

3. Development proposals that comply with other relevant policies, will be permitted where they:
   a) Provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA,
   b) Ensure that the development will not have a negative impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts,
c) Promote opportunities for walking, cycling and public transport and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town or village centre locations, and promote the opportunity for cycling through the provision of cycleways, and

d) Secure best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.

Evidence and Background Documents

- 2014 Air Quality Progress Report for Lewes District Council
  [www.lewes.gov.uk/environment/824.asp](http://www.lewes.gov.uk/environment/824.asp)

- Air Quality Standards Regulations (2010)


- The Environment Act (1995)
CONTAMINATED LAND

Partnership Management Plan Outcomes and Policies

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Policy 1: Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.

Introduction

10.254 In order to make the maximum appropriate use of previously developed land it is necessary to sometimes recycle contaminated land and bring it back into productive use. This can also provide an opportunity to address any threats posed by a site to health or the environment. Types of land likely to be contaminated include old petrol filling stations, land used for industrial processes involving hazardous substances, landfill sites and sewage works.

National Policy Context

10.255 Paragraph 109 of the NPPF is clear that in order to enhance the natural environment development should contribute to the remediation of contaminated land. New developments should:

- remediate and mitigate despoiled, degraded, derelict, contaminated and unstable land, where appropriate
- be resisted where they contribute to unacceptable increases in soil, air, water or noise pollution or land instability
- aim to minimise pollution and other adverse effects on the local and natural environment

10.256 Paragraph 111 of the NPPF states that planning authorities should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.

10.257 The classification of contaminated land is set out in Part 2A of the Environmental Protection Act 1990. This is supported by Guidance published by the Department for Environment, Food and Rural Affairs “Environmental Protection Act 1990: Part 2A Contaminated Land Statutory Guidance” (April 2012)

Options considered and Preferred Approach

10.258 There were no specific references to contaminated land in the options consultation for the Local Plan.

Supporting Text

10.259 In considering the development of land known, or thought likely to be contaminated, the principle is one of ensuring the land is "suitable for use". This requires that the owner, occupier or developer of a site should undertake those measures necessary to deal with any unacceptable risks to health or the environment, taking into account the use intended for the land. Consideration must be given to the potential impact on neighbouring developments, residents and the road network of the decontamination process. The Authority would encourage any applicant to fully explore and mitigate to the fullest extent any contamination issues. It is for the owner or developer to determine the existence and extent of any contamination. The Authority will follow national guidance in regard to the need for pre application investigation into contamination issues. Such investigations will be required if a site is known or strongly suspected to be significantly contaminated. If there is only a suspicion of contamination or the contamination is slight, planning permission may be granted subject to conditions requiring site investigation and any necessary remedial measures. The need for and
type of remedial measures are likely to vary from site to site. The Authority will work closely with other licensing and governing bodies with regard to regulation for the identification, remediation, removal and disposal of contaminated waste.

10.260 There are areas within the National Park which may also be affected by contamination. For proposed development on or adjacent to land suspected of being affected by contamination, risks posed to end users will be required to be appropriately investigated and if necessary remediated so as to comply with current UK industry good practice. The standard of remediation shall take full account of the development’s intended use(s) and be to a level which ensures the future safe use of the land with respect to human health, groundwater and the wider environment. Where there is no evidence to the contrary, the possibility of contamination will be assumed when concerning applications in relation to land on or adjacent to previous industrial use or where proposed uses are considered that are particularly sensitive to contamination for example housing, schools, allotments, hospitals, children’s playing areas.

10.261 It shall remain the responsibility of the developer to identify land affected by contamination and to ensure that such land is remediated to secure a safe development (paragraph 120, NPPF).

10.262 The National Park also has a number of major aquifers that are particularly sensitive to contamination. Protection of these aquifers is a priority (see Policy SD15).

Development Management Policy SD59: Contaminated Land

1. Development proposals for sites with known or suspected contamination will require the submission of robust evidence regarding investigations and remedial measures sufficient to ensure that any unacceptable risk to health or environmental health or aquifers in accordance with Policy SD15 (Aquifers) is removed prior to development proceeding.

Evidence

- Environment Act 1990
  www.legislation.gov.uk/ukpga/1990/43/contents
11. IMPLEMENTATION AND MONITORING

11.1 The policies in this Local Plan will be implemented through the investment of private and public resources, together with the South Downs National Park Authority (SDNPA) working in partnership with a range of organisations.

LOCAL PLAN

11.2 The policies in the Local Plan will be used to assess planning applications and guide the development management process. As the policies are implemented through planning decisions, ongoing monitoring will be essential to measure how effective the policies are in achieving the Vision and Objectives of the South Downs National Park (SDNP), as set out in the Partnership Management Plan (PMP). This requires a clear monitoring framework that identifies indicators and targets for the Local Plan to be measured against.

11.3 The Authority Monitoring Report (AMR) will set out the monitoring framework against which the National Park Authority will measure how well the Local Plan is being implemented and whether the objectives are being achieved. The effectiveness of policies should be assessed, wherever possible, against measurable targets. Some policies aim to deliver a qualitative rather than a quantitative outcome. In such instances it is appropriate to monitor whether the policy is delivering the intended trend or direction of travel.

11.4 Regular monitoring against this framework will ensure a robust means of identifying if certain policies are failing to deliver and to take alternative action if required, including the need to initiate a review of the Local Plan. Policies and proposals in this Plan are positively and flexibly expressed to ensure that changes in circumstances can be addressed.

11.5 At some point the Plan will need to be reviewed, either to roll it forward beyond its current end-date, to deal with any serious shortfalls or unintended consequences identified through monitoring, or if it becomes inconsistent with national policy.

11.6 The Monitoring Indicators set out in table 11.1 have been produced using the existing statutory requirements set out in The Planning and Compulsory Purchase Act (2004) (as amended) and a number of existing targets and indicators monitored by the Authority and its partners. Some targets and indicators may apply to more than one policy.

11.7 A housing trajectory will be included in the Publication version of the Local Plan and will set out past and projected housing completions over the plan period 2014 to 2032. This will be robustly monitored to ensure an adequate 5 year supply of housing land across the National Park particularly in relation to the strategic allocations. The Local Plan does not seek generally to phase housing provision or artificially hold back development, so if market demand is strong delivery may progress more quickly than expected in the trajectory.

NEIGHBOURHOOD DEVELOPMENT PLANS

11.8 There are currently 47 neighbourhood planning groups preparing neighbourhood development plans within the National Park (as at July 2015). Once ‘made’ these Neighbourhood Development Plans will form part of the development plan for the National Park. Many of these neighbourhood planning areas are responsible for identifying land suitable for housing, using the housing requirements set out in policy SD23 (Housing).
11.9 It is necessary for the National Park to have a five year housing land supply including land allocated in this Local Plan and neighbourhood development plans. The Authority will work in partnership with the neighbourhood planning groups to ensure that timely progress is being made with neighbourhood development plans including the allocation of suitable housing sites within a nationally protected landscape in line with the National Park Purposes and Duty.

COMPREHENSIVE ESTATE AND FARM PLANS

11.10 Policy SD22 (Development Strategy) addresses development within country estates and large farm enterprises. It makes reference to comprehensive estate and farm plans that deliver multiple benefits in line with the Purposes and Duty of the National Park and in regard to Ecosystem Services. The SDNPA will provide a guidance note and template for estate and farm plans.

MONITORING INDICATORS

11.11 Table 11.1 shows the indicators which will be used to measure progress of National Park policies against the objectives of the Partnership Management Plan (PMP).

11.12 The table shows the established indicators from the PMP as well as new indicators which relate to specific elements or policies of the Local Plan, which are in italics and have the prefix “SDLP”.

### TABLE 11.1: MONITORING INDICATORS

**Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMP1:</td>
<td>Character of the Landscape, including historic elements is maintained</td>
</tr>
<tr>
<td>PMP2:</td>
<td>Percentage of the National Park that is relatively tranquil for its area</td>
</tr>
<tr>
<td>PMP3:</td>
<td>Percentage area considered to have dark night sky</td>
</tr>
<tr>
<td>PMP4:</td>
<td>Percentage of designated or notified geological/geomorphological sites managed in better condition</td>
</tr>
<tr>
<td>SDLP1:</td>
<td>Number and proportion of applications called in by the National Park Authority. Applications permitted, applications refused and applications withdrawn.</td>
</tr>
</tbody>
</table>

**Outcome 2: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMP5:</td>
<td>Percentage of rivers and groundwater bodies with water available for abstraction</td>
</tr>
<tr>
<td>PMP6a:</td>
<td>Percentage of farmland and of woodland area that is managed under agri-environment or other schemes</td>
</tr>
<tr>
<td>PMP6b:</td>
<td>Percentage of farmland that is managed under agri-environment or other schemes</td>
</tr>
<tr>
<td>PMP6c:</td>
<td>Percentage of woodland area that is managed under agri-environment or other schemes</td>
</tr>
<tr>
<td>PMP7:</td>
<td>Total greenhouse gas emissions in the National Park</td>
</tr>
<tr>
<td>SDLP2:</td>
<td>Number of Air Quality Management Areas within the National Park.</td>
</tr>
</tbody>
</table>

**Outcome 3: A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMP8a:</td>
<td>Area, condition and connectivity or target priority habitats - connectivity of target priority habitats</td>
</tr>
<tr>
<td>PMP8b:</td>
<td>Area, condition and connectivity or target priority habitats - percentage of broadleaved, mixed and yew woodland that is in a favourable condition</td>
</tr>
<tr>
<td>PMP8c:</td>
<td>Area, condition and connectivity or target priority habitats - percentage of calcarious grassland that is in a favourable condition</td>
</tr>
<tr>
<td>PMP8d:</td>
<td>Area, condition and connectivity or target priority habitats - percentage of lowland heath that is in a favourable condition</td>
</tr>
<tr>
<td>PMP8e:</td>
<td>Area, condition and connectivity or target priority habitats - percentage of neutral grassland that is in a favourable condition</td>
</tr>
<tr>
<td>PMP9:</td>
<td>Population and distribution of target priority species</td>
</tr>
<tr>
<td>PMP10:</td>
<td>Distributions of target non-native invasive species</td>
</tr>
<tr>
<td>PMP11:</td>
<td>Percentage of water bodies achieving 'good' or 'high' status or potential</td>
</tr>
</tbody>
</table>

**Outcome 4: The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMP12:</td>
<td>Percentage of heritage assets 'at risk'</td>
</tr>
<tr>
<td>PMP13:</td>
<td>Number of new heritage assets in the National Park added to the Historic Environment Record</td>
</tr>
</tbody>
</table>

**Outcome 5: Outstanding visitor experiences are underpinned by high quality access and sustainable transport network providing benefits such as improved health and well-being**

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>PMP14:</td>
<td>Percentage of Public Rights of Way (PRoW) that is 'easy to use' or in good condition</td>
</tr>
<tr>
<td>PMP15: Number of routes promoted as accessible</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>PMP16: Proportion of visits by public transport</td>
<td></td>
</tr>
<tr>
<td>PMP17: Proportion of visitors who felt very satisfied with the visitor experience</td>
<td></td>
</tr>
<tr>
<td>PMP18: Number of day visits to museums and heritage sites</td>
<td></td>
</tr>
<tr>
<td>SDLP3: Gross increase in non motorised multi-user routes (km)</td>
<td></td>
</tr>
</tbody>
</table>

**Outcome 6:** There is widespread understanding of the special qualities of the National Park and the benefits it provides

**PMP19:** Percentage of people who are aware of why the National Park is a special place

**PMP20:** Percentage of schools within a 5km radius of the boundary using the National Park for learning outside of the classroom experiences at least once a year.

**Outcome 7:** The range and diversity of traditional culture and skills has been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park

**PMP21:** Number and value of grants made by key organisations for cultural projects inspired by the special qualities

**PMP22:** Number of courses in traditional crafts

**Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely

**PMP23:** Total Number of volunteer days spent on activity relating to the special qualities

**PMP24:** Average public water supply consumption for areas supplied by sources within the National Park

**PMP25:** Average daily traffic flows on National Park roads

**PMP26:** Number and proportion of community led plans that are adopted and/or endorsed by the National Park Authority

<table>
<thead>
<tr>
<th>SDLP4: Number of Neighbourhood Areas designated</th>
</tr>
</thead>
<tbody>
<tr>
<td>SDLP5: Number of Neighbourhood Development Plans made</td>
</tr>
<tr>
<td>SDLP6: Number of other community plans adopted or endorsed by the National Park Authority (Parish Plans, Village Design Statements, Local Landscape Character Assessments)</td>
</tr>
<tr>
<td>SDLP7: Number of Community Right to Build Orders and Neighbourhood Development Orders made</td>
</tr>
</tbody>
</table>

**Outcome 9:** Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities

**PMP27:** Percentage of communities with access to natural greenspace

**PMP28:** Percentage of communities with access to key facilities

**PMP29:** Number and proportion of new homes built that are 'affordable housing'

**SDLP8:** Community Infrastructure Levy monies generated and collected

**SDLP9:** Proportion of Community Infrastructure Levy funds passed to Parish or Town Councils

**SDLP10:** Community Infrastructure Levy funds spent

**SDLP11:** Number of dwellings with extant planning permission (net)

**SDLP12:** Number of dwellings completed (net)

**SDLP13:** Number of dwellings completed in areas with housing requirements set by Joint Core Strategies (net)

**SDLP14:** Number of affordable dwellings completed (net)

**SDLP15:** Number and percentage of annual housing completions within/outside settlement boundaries (net)

**SDLP16:** Number and percentage overall percentage of housing completions on previously developed land (net)
SDLP17: Percentage of applications approved contrary to Environment Agency advice on flooding.

SDLP18: Net additional permanent Gypsy or Traveller pitches and Travelling Showpeople plots with extant permanent permission, against total need figure.

SDLP19: Net additional Transit pitches with extant permanent permission, against total need figure.

SDLP20: Completions on Gypsy, Traveller and Travelling Showpeople sites.

Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities, many of which are positively linked with the special qualities of the National Park.

PMP30: Number and diversity of business types that exist within the National Park.

PMP31: Average length of visitor stay and spend per visitor per day.

PMP32: Area of National Park with broadband connection (superfast/normal) and mobile coverage.

SDLP21: Total net and gross new employment floorspace completed, by use class.

SDLP22: Total net and gross retail floorspace completed, by use class.

SDLP23: Total net and gross retail floorspace permitted, by use class and by settlement.

Outcome 11: Local People have access to skilled employment and training opportunities.

PMP33: Number of jobs created and supported by local enterprises in the National Park.

PMP34: Skills levels of employees in the National Park.

PMP35: Young people not in education, employment or training.