

South Downs

Local Access Forum

Dear Planning Policy Team,

South Downs Local Plan Review: response to the Regulation 18 Public Consultation

The attention of the South Downs Local Access Forum has been drawn to this current consultation exercise and this letter constitutes formal advice from the Forum. In accordance with Section 94(5) of the Countryside and Rights of Way Act 2000, the National Park Authority is required to have regard to advice from the Local Access Forum in carrying out its functions.

The comments of the Local Access Forum are as follows:

- Every effort should be made to identify opportunities for access improvements relating to the development sites being proposed in Chapters 4 and 5 of the draft Local Plan. It may be possible to create new short circular local routes into the countryside, or to provide ‘missing links’ in the Rights of Way network or to enable vulnerable users to have safe off-road paths instead of walking along dangerous roads
- Any such opportunities should be added into each relevant Local Plan Policy so as to add weight to the likelihood of these benefits being obtained if / when development takes place. Our experience in the past has indicated that unless such opportunities are identified and included in the Local Plan at this stage, developers are unlikely to agree to subsequent ideas
- If local communities or other consultees identify any instances where any of the local plan proposals might adversely impact the existing rights of way network, the National Park Authority should consider all the implications very carefully. Improving access, particularly for vulnerable and latent users, should be a primary aim of the authority
- The proposed changes to Policy SD23(1(b)) on page 74 of the draft plan are welcomed: stipulating that the design and location of visitor facilities must be accessible, closely associated with the network of non-motorised routes and encourage travel to and within the National Park by sustainable means, including public transport, walking/wheeling, cycling and/or horse-riding
- The proposed changes to Policy SD23(5) on page 75 of the draft plan are welcomed: ensuring that any proposals that generate significant additional pressure on non-motorised user routes will be required to successfully mitigate the additional pressure and enhance the route

- The proposed changes to Policy SD45(2(d)) on page 79 of the draft plan are generally welcomed: explaining the Green Infrastructure proposals must maximise opportunities for new (and connections to existing) non-motorised user routes to facilitate walking/wheeling, cycling and/or horse-riding, including circular routes where possible. The penultimate word “where” should, however, be changed to “wherever”
- With regard to the proposed changes to Policy SD20 on pages 85-86 of the draft plan, it is noted that the requirement for “appropriate signage” is being deleted from SD20(2). The lack of adequate signage is perceived to be a barrier for many potential users of rights of way and so this proposed change appears to be a retrograde step. It is unclear why the requirement for signage is being removed from this Policy
- The addition of “active travel” into both SD19 and SD21 is welcomed

The references to public rights of way, open access land and non-motorised user routes in Policies SD6(c), NEW8(g) and SD46(b) are noted.

Yours Sincerely,
Ben Marsh

On behalf of
Doug Jones
Chair of the South Downs Local Access Forum

Please reply to:

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For more information about the South Downs Local Access Forum: www.southdowns.gov.uk/laf