

Policy SDC1 Furthering National Park Purposes (previously Policy SD1)

Number of comments on policy: 71

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
7	21	9	7	9	18

Summary of issues and key themes raised

Respondents identified key areas for improvement in the policy, emphasising the need for clearer, enforceable criteria that ensure natural landscapes, wildlife, cultural heritage and sensitive habitats are robustly safeguarded. They called for strengthened enforcement mechanisms - including post-development monitoring and penalties for non-compliance - to prevent reliance on broad exceptions and ambiguous principles. Respondents also highlighted the necessity of amending the policy language to increase legal clarity and align it strictly with national statutory frameworks and recent legislation, while ensuring cumulative impact assessments and essential infrastructure are in place before planning permissions are granted. Additionally, concerns were raised over difficulties in accessing and engaging with the planning process, alongside suggestions for incorporating more detailed guidance on transitioning from sustainable to regenerative development.

Key themes raised:

- Balancing Conservation and Development
- Enforcement Mechanisms and Accountability
- Clarity and Legal Robustness of Policy Language
- Integration with National Statutory and Planning Frameworks
- Planning Process Accessibility and Engagement
- Infrastructure and Cumulative Impact Assessment

Overview of SDNPA response and way forward for the Local Plan

The Development Plan must be read as a whole. This means that Policy SDC1 must be read alongside other policies in the Plan. A number of issues raised are outside the scope of a local plan or planning policy, or are focused on themes of cultural heritage, habitats, landscape, infrastructure provision, sustainable construction, and water which are already addressed by other policies and do not need to be repeated in Policy SDC1. For example, sustainable construction is addressed in Policy SDN9, and a vision-led transport approach is addressed in Policy SDI1.

The South Downs Local Plan can only provide policies for development within the South Downs National Park, while neighbouring local planning authorities generally include policies in their respective local plans about the setting of the South Downs National Park. That said, Criterion 3 does consider the cumulative impacts of development proposals outside of the National Park boundary when considering development proposals inside the National Park boundary.

The amended policy and its new supporting text is considered to comply with the National Parks and Access to the Countryside Act 1949 – as amended by Section 245 of the Levelling Up and Regeneration Act 2023 – and the 2024 National Planning Policy Framework. The duty to foster the economic and social wellbeing of local communities in the National Park is included in Criterion 1. This duty is placed on the Authority and is engaged when carrying out National Park purposes, but cannot outweigh National Park purposes.

Policy SDC2 Development Strategy (previously Policy SD25)

Number of comments on policy: 82

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
7	12	12	10	7	34

Summary of issues and key themes raised

Respondents raised concerns that the policy is unclear about settlement boundaries and exception mechanisms, calling for precise definitions of terms such as “exceptional circumstances” to limit development beyond designated areas. They recommended objective, evidence-based criteria for assessing land use and site suitability while noting that vague wording undermines effective enforcement and clear housing strategies. Calls for explicit guidance on community-led development and improved consultation practices were also made, along with remarks on an incomplete evidence base and opaque planning processes. Additionally, respondents urged robust infrastructure assessments, cumulative impact reviews, and stronger climate resilience measures, and they pointed to gaps in addressing rural sustainability, renewable design principles, and heritage protection.

Key themes raised:

- Settlement Boundaries and Exception Mechanisms
- Site Suitability Criteria
- Policy Clarity and Enforcement
- Housing Provision
- Community-Led Development

Overview of SDNPA response and way forward for the Local Plan

The Development Plan must be read as a whole. A number of issues raised (i.e., design, heritage, infrastructure, landscape, nature recovery [including biodiversity net gain], regenerative design principles, sustainable construction, and a vision-led transport approach) are addressed in other policies in the Plan and do not need to be repeated in Policy SDC2.

Brownfield / Previously Developed Land (PDL)

A PDL definition is in the NPPF Glossary. Residential gardens outside settlements are excluded from this definition for the purposes of Policy SDC2. If outside a defined settlement boundary, PDL redevelopment must still be in a sustainable location, and this is clarified further in supporting text.

Exceptional

The policy directs growth to sustainable settlements (Criterion 1) while considering development in the countryside where it is justified (Criteria 2 and 3). The word “exceptionally” has not been removed from the policy but, instead, relocated to clarify that proposals which comply with all other policies in the Development Plan do not need to be considered “exceptionally”.

Housing Growth and Allocations

The supply of housing is addressed in Policy SDH1. In terms of site allocations, all identified sites have been assessed in the Land Availability Assessment (LAA) to determine which sites should be considered further for allocation. This includes sites for older persons' accommodation and a new policy for specialist and older person's accommodation has been added to the Plan – see Policy SDH4. The settlement boundaries have been re-drawn around allocations as appropriate.

Settlement Boundaries

The listed settlements are the most sustainable in the National Park as evidenced in the Settlement Facilities Study. The Study has been updated to inform the local plan review and does not recommend any additional settlements which are wholly within the National Park to be added to the settlement list. That said, additional settlements which are outside and on the boundary of the National Park have been added to the settlement list if their defined boundary extends into the National Park by virtue of a made neighbourhood development plan, or because of an allocation in this Plan.

Whole Estate Plans (WEPs)

The local plan is a strategic document covering a large area. It would be inconsistent to have policies for specific estates and businesses. The policy wording for WEPs has been strengthened, but only where development would deliver multiple benefits in line with the purposes and special qualities of the National Park. Please note:

- WEP endorsement ensures that WEP preparation supports both National Park purposes and estates' needs;
- WEPs are not planning documents as they have not been formally consulted upon; and
- WEP preparation and endorsement processes are under review and are separate to the preparation of the local plan.

Finally:

- The term “landscape” includes the built environment and townscape.
- Places of worship are considered to be community facilities.
- Support for community-led development outside settlements is noted.
- It would not be appropriate to limit development to locations close to railway stations given the National Park's rural nature and limited railway stations.
- The redevelopment of farmsteads could result in sporadic development in unsustainable locations and, as such, it is more appropriate to consider these on a case-by-case basis.

**Policy SDC3 Regenerative Development and Ecosystem Services
(previously Policy SD2)**

Number of comments on policy: 82
 Number of additional responses to technical questions: 38

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
12	19	12	10	3	26

Summary of issues and key themes raised

Ambiguities in terms such as “circular economy,” “regenerative design” and similar phrases were noted, with requests for clearer definitions and instructions on trade-offs. Comments also highlighted concerns over additional reporting requirements that might affect development viability and affordability, how this would be implemented with different scales and types of development, and emphasised the need for effective monitoring. Feedback further stressed the importance of enhanced water management and flood risk strategies, on-site delivery of environmental net gain, and a balanced approach alongside considerations for agriculture, local food systems and community health, with overall calls for clearer language and better integration with existing frameworks. Implications for further requirements for those that already manage land well was raised and wording suggested regarding sustaining this. Respondents were divided on the need to submit an updated environmental benefits metric, with some suggesting its integration into existing submissions and others noting risks of added complexity and cost, while also calling for clearer guidance on proportionality, monitoring, enforcement and transitional arrangements.

Key themes raised:

- Metrics, Reporting and Enforcement
- Conceptual Clarity and Definitions
- Feasibility and Development Viability

Overview of SDNPA response and way forward for the Local Plan

Requirements for ecosystem services has become well established in Local Plan policy. Regenerative development is a natural evolution of the award-winning Ecosystems Services approach taken in the 2019 Local Plan. Policy SDC3 has been restructured to provide a clearer flow alongside supporting text to explain key terms. Key terms have also been added to the glossary. The concepts of ecosystem services, environment net gain, and regenerative design continue to evolve, and it is anticipated that the Authority will prepare a technical advice note (TAN) to help decision-makers and applicants in the interpretation and implementation of Policy SDC3.

Amended policy wording and new supporting text clarify that the principles of this policy should be applied proportionately to the nature and scale of a development proposal and its context. Similarly, the accompanying statement required by criterion 3 (previously 2) should be proportionate to the development proposal.

A number of comments raised (i.e., around aquifer protection, chalk streams, flood risk, habitats, pollution, sustainable drainage, water quality, nature recovery including

biodiversity net gain, and health impact assessments) are addressed in other policies in the Plan and do not need to be repeated in Policy SDC3. The plan should be read as a whole, and this core policy should not be read in isolation as it is linked to all other Local Plan policies.

Policy wording on health has been refined and further explained in supporting text.

Policy wording has been amended to support regenerative agriculture in recognition of the importance of agricultural businesses and local food production in the National Park alongside existing wording on protecting the best and most versatile agricultural land which aligns with national policy requirements.

A number of comments were outside the scope of the consultation and this policy such as comments related to individual planning applications.

Monitoring and compliance are addressed via planning conditions, planning obligations, the enforcement team, and the Authority Monitoring Report (AMR).

Additional Technical Question

If an updated Environmental Benefits from Nature Metric is published, should we include a requirement for this to be submitted as part of applications for major development? Of the 38 comments, 29 said “yes” and 9 said “no”. The metric has not been required because DEFRA has not advanced the test metric.

Policy SDC4 Major Development (previously Policy SD3)

Number of comments on policy: 74

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
6	12	9	11	9	27

Summary of issues and key themes raised

Respondents state that development proposals should deliver clear economic, community and infrastructural benefits - such as local housing, employment opportunities and improved public services - while avoiding undue strain on neighbouring areas. They call for the National Park's environment to be protected by establishing clear sustainability criteria that maintain wildlife habitats, scenic values and recreational opportunities, with targets like carbon neutrality and for renewable energy. Respondents also recommend that policy definitions be made measurable with set thresholds for health impact assessments and defined sustainability factors, ensuring alignment with existing national and local guidance. In addition, they suggest enhancing transport connectivity, integrating proven crime prevention measures, and treating affordable and specialist older persons' housing differently to acknowledge its inherent benefits without replicating current provisions. Finally, some advocate for flexible, proportionate assessment methods to account for cumulative impacts and design challenges.

Key themes raised:

- Economic and Community Impact Considerations
- Environmental Sustainability and Landscape Protection
- Policy Definition, Clarity and Measurability
- Health Impact Assessments and Wellbeing Outcomes
- Infrastructure and Transport Connectivity

Overview of SDNPA response and way forward for the Local Plan

The Development Plan must be read as a whole. A number of issues raised (i.e., design, landscape, sustainable construction, transport, and regenerative design principles etc.) are addressed in other policies in the Plan and do not need to be repeated in Policy SDC4. Other issues raised – i.e., separate regulatory processes such as airport safeguarding – are either outside the scope of the local plan or this specific policy, or are covered by other material considerations.

Policy SDC4 balances the need for development with protection of the National Park. This policy must be in conformity with the 2024 National Planning Policy Framework (NPPF) – specifically Paragraph 190 and Footnote 67. For this reason, the definition of major development cannot be changed, wording around exceptional circumstances cannot be altered, and the policy cannot outright prohibit major development. The National Park is too large and diverse in character to be more specific about what major development means in a local context.

Health Impact Assessments (HIA)

The requirement for Health Impact Assessment (HIA) has been added to Criterion 4 and to specific strategic allocations in the Plan. References to HIA advice, guidance, templates and toolkits has been included in the new supporting text.