

Policy SDE1 Economic Development (previously Policies SD34 and SD35)

Number of comments on policy: 50 (31 for Policy SD34 and 19 for Policy SD35)
 Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
SD34 – 3 SD35 – 1	SD34 – 6 SD35 – 2	SD34 – 3 SD35 – 5	SD34 – 7 SD35 – 1	SD34 – 3 SD35 – 2	SD34 – 9 SD35 – 9

Summary of issues and key themes raised

Policy SD34 Sustaining the Local Economy:

Respondents call for clearer, more specific policy measures that extend support beyond farming, forestry and tourism to include modern agricultural practices, local crafts, and small enterprises, while also improving community wellbeing through enhanced training, start-up spaces and youth employment opportunities. They note that the policy’s current language is ambiguous and lacks measurable targets, and that key sectors such as public infrastructure, sustainable transport and industrial land use are insufficiently addressed. Further comments stress the need for better coordination within local planning documents, updated visitor studies to guide regenerative tourism and a more integrated approach that considers the broader challenges of retail limitations, environmental impact and infrastructure deficits.

Key themes raised:

- Sectoral Support and Diversification
- Community Wellbeing, Training and Engagement
- Policy Clarity and Measurable Targets
- Supporting Public Infrastructure and Sustainable Transport
- Employment Generation and Industrial Land Use
- Local Enterprise and Small Business Development

Policy SD35 Employment Land:

Respondents raised issues with employment land supply and allocation, noting that although the land requirement is based on HEDNA data, it remains unclear whether targets are met and that there is an undersupply of industrial floorspace - including workshops and warehousing - while planning policies appear to shift opportunities away from Lewes toward rural areas. They emphasised the need to maintain a full range of employment uses and to create accessible local job opportunities by ensuring that developments are well sited, with recommendations to focus on brownfield sites and to re-evaluate allocation safeguards using clearer mapping or a dedicated site allocation framework. Criticisms also focused on the policy’s lack of clarity, outdated appendices, and narrow safeguarding measures that do not reflect current market conditions, prompting calls for more flexible change-of-use provisions, including the re-designation of redundant employment premises and allowances for non-employment uses such as care homes. Additional comments

suggested adjusting marketing campaign durations, extending regulatory safeguards for principal employment sites, and improving interagency coordination and enforcement—especially regarding rural road regulations—while concerns were raised about heavy lorry traffic, noise, and environmental impacts; further, some respondents noted potential benefits in enhancing employment intensification and protecting national park landscapes, coupled with a call for a review of related applications and broader employment trends.

Key themes raised:

- Employment Land Supply and Allocation
- Local Job Creation and Spatial Distribution
- Policy Clarity and Updates
- Policy Flexibility and Change of Use

Overview of SDNPA response and way forward for the Local Plan

The adopted policies on employment land and sustaining the local economy have been merged into one policy. The employment floorspace need identified in the South Downs Housing and Economic Development Needs Assessment (HEDNA) can be largely met by existing commitments – i.e., allocations, completions and extant planning permissions – with the imbalance between over-supply of industrial/warehousing space and under-supply of offices corrected through a criterion supporting changes of use between these two categories. The new policy supports economic growth by protecting existing employment facilities and encouraging new employment facilities. The associated local plan objective specially mentions farming and forestry. However, the policy’s support for economic growth is not limited to these sectors. Any comments from neighbouring local planning authorities about employment needs can be included in duty-to-cooperate discussions about strategic cross-boundary matters.

The Development Plan must be read as a whole. A number of issues raised (i.e., affordable housing, green and blue infrastructure, regenerative tourism, transport and infrastructure etc.) are addressed in other policies in the Plan and do not need to be repeated in Policy SDE1.

The word “permitted” is used throughout the Plan and was accepted at the last local plan examination. In terms of comments that have resulted in changes:

- The new supporting text explains that a prosperous local economy can contribute to improving mental health and wellbeing and reducing health inequalities for the population.
- Reference to professional services and manufacturing has been added to the list of key sectors.
- Marketing requirements have been reduced to 12 months.
- Appendix A1 sets out associated marketing requirements.

In response to comments that have not resulted in changes:

- The assessment and consideration of sites for potential allocations have been carried out in the South Downs Land Availability Assessment (LAA) and the South Downs Site Selection Paper. Comments related to specific sites have been considered in the assessment and consideration of potential allocations.
- Parish Priorities Statements, Whole Estate Plans (WEPs), and public service needs (including Local Government Reorganisation) are taken into account as relevant to individual proposals and alongside all other material planning considerations.
- Employment development is monitored in the Authority Monitoring Report.
- Planning cannot control where employees live, or the age of farmers.
- Peacehaven and Telscombe Cliffs are outside the South Downs National Park.

Policy SDE2 Agricultural Development, Diversification, and Conversion of Rural Buildings (previously Policies SD39, SD40, and SD41).

Number of comments on policy: 49 (12 for SD39, 17 for SD40, and 20 for SD41)

Number of additional responses to technical questions: 19

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
SD39 – 1	SD39 – 1	SD39 – 4	SD39 – 2	SD39 – 2	SD39 – 2
SD40 – 0	SD40 – 3	SD40 – 7	SD40 – 3	SD40 – 0	SD40 – 4
SD41 – 0	SD41 – 5	SD41 – 7	SD41 – 2	SD41 – 3	SD41 – 3

Summary of issues and key themes raised

Policy SD39 Agriculture and Forestry:

Respondents call for a revised policy that explicitly supports land-based enterprise development through a whole estate plan, including clearly defined criteria for forestry to meet biodiversity net gain targets. They note that forestry provisions appear limited and point to regulatory gaps - for example, the exclusion of forestry replanting and haul road conditions under the Commons Act 2006 - while also stressing that all forestry initiatives should adhere to set criteria. Additional comments question the requirement to develop on agricultural building sites, suggest that the policy does not prioritise food security or maintain local agricultural viability, and offer mixed views on industrial livestock units and the management of increased motorised vehicle use along public routes.

Key themes raised:

- Support for Land-Based Enterprise Development and Estate Planning
- Forestry Initiatives

Policy SD40 Farm and Forestry Diversification:

Respondents reported mixed views on community and environmental protection, noting that the policy may not offer adequate safeguards for residents near underused farm buildings or fully address cumulative impacts such as increased traffic, noise and deterioration of the national park. They raised concerns that diversification often produces only supplementary income and called for clearer financial incentives, greater planning flexibility and improved access to funding. Respondents also recommended stronger land-use safeguards to preserve the agricultural character of sites, emphasising that diversified activities should remain ancillary and that ambiguous terms require clarification. Additional observations highlighted a lack of a clear strategy to manage cumulative impacts and the need for clearer policy language and definitions to better align with the national planning framework, while also addressing issues related to rural employment and infrastructure.

Key themes raised:

- Community and Environmental Protection
- Economic Viability and Diversification Incentives
- Appropriate Land-Use and Development Safeguards

- Safeguarding Farmland and Traditional Farming Operations
- Rural Employment and Infrastructure Implications
- Cumulative Impact Management

Policy SD41 Conversion of Redundant Agriculture or Forestry Buildings:

Respondents questioned the cascade ordering, noting that prioritising affordable housing over alternative uses such as visitor accommodation may restrict the flexible conversion of redundant agricultural or forestry buildings. They noted that rigid controls and the potential misfit of certain structures, including newer open-span barns, could lead to the loss of viable rural dwellings or result in urban-style developments in rural settings. Comments stressed that any conversion should respect local context, addressing issues like traffic congestion and parking near schools, while also aligning with national planning guidelines and reducing administrative burdens. Several respondents also raised questions about ambiguous definitions - particularly of 'rural worker' - and requested clearer criteria for technical aspects such as substantial reconstruction and future use controls.

Key themes raised:

- Residential and Housing Outcomes in Rural Areas
- Contextual Suitability and Compatibility of Conversions
- Economic and Employment Considerations
- Consistency with National Policy

Overview of SDNPA response and way forward for the Local Plan

The adopted policies on agriculture and forestry, farm and forestry diversification, and conversion of redundant agricultural or forestry buildings, have been merged into one planning policy to help clarify the policy position to applicants and third parties.

The Preamble (including National Park Purposes and WEPs)

The preamble highlights the duty to further National Park purposes, and requires the submission of a holistic plan / strategy for a holding to help demonstrate this. This could take the form of a Whole Estate Plan (WEP). It is important to note that WEPs are not planning documents as they have not been through full consultation and, as such, it is not considered appropriate to go further than proposed wording. As for comments about rewilding, this could be one option in a holistic plan for a holding.

Development Plan

The Development Plan must be read as a whole. A number of issues raised (i.e., pollution, tourism, traffic, transport, winemaking, and impacts on residents) are addressed in other policies in the Plan and do not need to be repeated in Policy SDE2. In terms of viticulture, although the growing of vines is agriculture, the impacts of winemaking and wine tourism are quite different to other agricultural operations and so related development is addressed in a separate policy – see Policy SDE3. The Plan, as a whole, encourages the use of PRowS for active travel and it would not be appropriate to have a blanket policy prohibiting the use of PRowS by motorised traffic as, in some instances, this will be the best access solution.

Farm Diversification

Farm diversification, by its definition, would retain a functional farming or forestry land use alongside additional uses to support the retention and viability of the land-based business. In response to comments about wholesale land use changes that do not retain any land-based uses, these would be considered under other policies in the Plan – i.e., Policy SDC2 (Development Strategy).

Changes:

The following changes have been actioned in response to comments:

- SD39.1f is SDE2.1f and has been amended to include historic character.
- SD39.2d has not been included in SDE2 as, in practice, tracks have not been opened up as permissive paths. The Authority will continue to encourage appropriate public access where compatible with land management.
- SD41.1g is SDE2.4f and has been simplified.
- The new supporting text defines a “rural worker”.

No Changes:

A number of comments are either outside the remit of a local plan, or are about implementation and non-planning matters. In response to planning related comments where no changes have been actioned:

- The National Park designation means there is a higher test for development.
- The policy would address redevelopments of whole farm yards.
- The re-use of rural buildings is supported by national policy.
- Modern barns can make good quality dwellings subject to design.
- Applications for land use changes would be considered on their merits.
- Conditions and obligations should not be used to prevent future applications.
- Site specific comments have been considered in the assessment of site allocations (if applicable), otherwise this is a National Park wide policy.

Additional Technical Questions

Does Policy SD40 (in combination with others including SD5 [now SDL2]) adequately protect communities from the impacts of farm diversification schemes, including from incremental changes? Of the 9 comments received, 2 said “yes”, 5 said “no”, and 2 did not provide a reaction. The Authority’s response is included in the above.

Does Policy SD40 facilitate farm diversification sufficiently to address changes to the economics of agriculture? Of the 10 comments received, 1 said “yes”, 6 said “no” and 3 did not provide a reaction. The Authority’s response is included in the above.

**Policy SDE3 Winemaking and Wine Tourism
(New Policy previously referred to as Policy NEW8)**

Number of comments on policy: 41

Number of additional responses to technical questions: 24

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
3	19	4	5	12	33

Summary of issues and key themes raised

Respondents emphasise that the policy should safeguard the landscape, heritage and local environment by addressing impacts such as pesticide use, increased commercial traffic on unsuitable rural roads, and disturbances including noise, light and additional fencing, while also protecting historic settlements and the dark night skies. They advise that permitted activities should be strictly limited to core winemaking – i.e., production, sale and closely related tourism - to prevent planning creep and the expansion of unrelated commercial uses. There were calls for clearer language, enforceable measures, and more precise criteria and definitions – particularly around site selection. Concerns were raised over the current road infrastructure and potential conflicts with the public rights of way network, prompting recommendations for fully metaled, two-way roads and dedicated pedestrian routes to enhance public safety. Economic views vary, with some noting local benefits through tourism and job creation, while others caution that ventures beyond core activities may limit local employment and negatively impact on nearby retail centres. Respondents also recommend integrating sustainable agricultural practices and biodiversity measures, updating the evidence base to reflect current trends, and clarifying terminology to ensure the policy aligns with local community and environmental standards.

Key themes raised:

- Landscape, heritage and environmental impacts
- Scope of permitted activities
- Policy clarity and enforcement
- Infrastructure, traffic and public safety
- Economic viability and local employment

Overview of SDNPA response and way forward for the Local Plan

Viticulture is a form of agriculture as defined in the Town and Country Planning Act 1990. Planning permission is not generally required to cultivate the land, plant vines, grow grapes, or install trellising if it is already in agricultural use. In terms of the making and selling of wine, grapes grown on the same premises (or associated vineyard) can be considered as ancillary agricultural activities. However, where sites process grapes on behalf of other growers and/or include additional or more intense activities, the impacts can be quite different to other agricultural operations and so would be considered under this policy, and other relevant policies.

There is a growing body of evidence that the south-east is the focal point of the UK wine industry and significant growth is predicted – see 2022 Visit Britain Survey, 2023

South Downs and Rural West Sussex Partnership Viticulture Sector Economic Profile and Business Insight Report, and 2023 Sussex Wine Tourism Growth Plan. In addition, the 2025 South Downs Visitor Accommodation Review identifies the symbiotic relationship between the viticulture industry and visitor accommodation, attractions and facilities, and existing vineyards are mapped in the document's appendices.

The Development Plan must be read as a whole. More specifically:

- SDC1-4 are core policies, including furthering National Park purposes and regenerative development and ecosystem services;
- SDL1-9 address landscape and heritage, including landscape character, design, relative tranquillity, dark night skies, and the historic environment;
- SDN1-10 address nature and climate, including nature recovery, protected species, and renewable energy; and
- SDE7 address regenerative tourism.

The comments have been used (as appropriate) in the preparation of policy wording and supporting text. More specifically:

- SDE3.1 – New criterion to require a proportionate and holistic management plan and long-term strategy to demonstrate how a proposal will support regenerative land management, enable long-term viability of the enterprise, support the green rural economy, and further National Park purposes.
- SDE3.2a – The “site selection process” has been replaced with a requirement for a contextual analysis and landscape appraisal to ensure development occupies the most suitable area of an enterprise in terms of conserving and enhancing natural beauty, wildlife and cultural heritage of the National Park.
- SDE3.2c(iii) – Added to ensure new buildings and structures do not adversely impact on the amenities of neighbouring properties, uses, and communities.
- SDE3.2d – Amended to better consider use of existing, and need and design for new, access tracks.
- SDE3.2e – Criterion remains largely unchanged but supporting text added to provide an example of a third party accreditation.
- SDE3.2f – Amended to demonstrate that any potential environmental impacts are avoided, reduced or fully mitigated.
- A previous draft criteria about active travel routes has been removed as this is more appropriately considered in Policy SDT2.
- A previous draft criteria about avoiding the removal or erosion of historic field boundaries, and minimising field subdivisions and fencing, has been removed as this will need to be considered on a case-by-case basis and is more appropriately considered under Policies SDL1-2.
- SDE3.3c – Criterion remains largely unchanged as it broadly mirrors adopted policy criteria – see SD38.3 of the adopted South Downs Local Plan.

Additional Technical Question

What aspects of viticulture, winemaking and wine tourism should this new policy address, consider and/or cover? In response to the 24 comments received, the policy and its supporting text considers amenities, energy and water efficiencies, and regenerative land management (including organic practices). In addition:

- SDE3.3 explains that the expansion of viticulture and winemaking activities must be linked to the core business of growing grapes and making wine.
- The supporting text explains that regenerative land management could include avoiding or minimising the use of artificial fertilisers, herbicides, pesticides and soil disturbance.
- The supporting text explains that the Authority will consider the use of planning conditions to restrict sale goods, operational hours, and event and occupancy numbers, as appropriate and relevant.

It is important to remember that the Development Plan must be read as a whole. As such, transport and pollution considerations are addressed in the following policies:

- SDW5 Pollution and Air Quality.
- SDW6 Contaminated Land.
- SDT1 Vision-led Transport Approach.
- SDT2 Active Travel Routes.
- SDT3 Highway and Public Realm Design.

Policy SDE4 Hierarchy of Town and Village Centres (previously Policy SD36)

Number of comments on policy: 11

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	2	5	2	0	3

Summary of issues and key themes raised

Feedback comments indicate that statutory protection measures should preserve the historic character of town and village centres, with proposals suggesting that new central public spaces be registered rather than governed by amendable s106 agreements. Fernhurst’s designation as a sustainable village centre is linked to its accessible public transport and diverse local amenities, along with recommendations for traffic calming on rural roads and reduced traffic in town centres. Comments on town identity noted that grouping Lewes with traditional market towns overlooks its distinct status as a county town within a National Park and that policies should accurately reflect each area’s unique history. Respondents also advised that any policy changes must safeguard the established public realm and local landscape character, and that local retail sectors - particularly those affected by online shopping trends - could benefit from the implementation of protective measures outlined in the neighbourhood plan. Additionally, concerns were raised regarding the application of statutory provisions affecting public recreation land, with calls for a thorough public review and tailored traffic management strategies reflecting different local contexts, while overall views on the policy framework varied.

Key themes raised:

- Statutory Protection for New Public Spaces
- Designation of Village Centres and Sustainable Local Amenities
- Clarifying Town Identity and Classification
- Preservation of Historic and Local Landscape Character
- Promoting Overall Economic Vitality

Overview of SDNPA response and way forward for the Local Plan

The word “market” has been removed from the description of town centres.

Policy SDE5 Development in Town and Village Centres (previously Policy SD37)

Number of comments on policy: 11

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	2	6	1	0	4

Summary of issues and key themes raised

Respondents recommended that the policy explicitly support improvements in the public realm and community engagement through enhanced green infrastructure, increased community activities, additional seating, healthy streets assessments, and community-run services. They stressed the need for a diverse retail mix to underpin economic vitality and raised concerns that current marketing requirements may not sufficiently preserve a distinct commercial identity with active frontages. Further recommendations called for clearer definitions of mixed use and more effective measures to protect office spaces above shops, with concerns noted about how reducing dedicated office space might affect retail functionality and local growth. Respondents also questioned the two-year licensing and monitoring period, suggested that rural service provision be reoriented to reduce reliance on car travel, and proposed wording clarifications to specify floorspace loss in ground floor units.

Key themes raised:

- Public Realm Enhancements
- Diverse Retail Mix and Economic Vitality
- Mixed-Use Definition and Clarity
- Active Frontages and Enforcement of Commercial Identity

Overview of SDNPA response and way forward for the Local Plan

Main town centre uses are defined in the 2024 NPPF Glossary and the new supporting text of Policies SDE4-6. In response to other representations:

- **Criterion 1** amended to include “community-led development”.
- **Criterion 2** amended to include “floorspace”.
- **Criterion 2(i)** requirement for a 2-year temporary period allows “meanwhile” uses to keep frontages active without permanently losing retail / office space.
- **Criterion 2(ii)** amended to include “active frontage”.
- **Criterion 3** amended to include “agent-of-change” principle.
- **Criterion 5** (and **Appendix A1**) marketing requirements are stringent without being unnecessarily onerous.
- **New supporting text** added to explain that appropriate enhancements to the public realm and greater use of these areas for community activities and seating can be assessed through a Healthy Streets Assessment or similar and can include good quality green infrastructure.
- **Permitted development rights (PDR)** mean that first floor areas can be converted to residential use without requiring planning permission and planning policies cannot prevent this.

Policy SDE6 Shops Outside Centres (previously Policy SD38)

Number of comments on policy: 8

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	1	5	1	1	1

Summary of issues and key themes raised

Respondents indicated that the SD38 Shops Centres policy does not meet needs, noting insufficient retail and amenity facilities for a population exceeding 20,000, including a lack of a dedicated supermarket and limited local produce in farm shops. Some comments focused on reduced local production at a garden centre, which has increased reliance on long-distance horticultural deliveries linked to concerns over heritage site damage and road accidents, while other feedback stressed that designs should reflect the town's historic character rather than generic shop fronts. Concerns were also raised about transport, with comments highlighting overcapacity at key road junctions, limited bus services, and the potential for further congestion from housing developments. Additional responses queried the clarity of policy enforcement and the realism of the 12-month local produce requirement, with further remarks pointing to restrictions outside main centres and challenges such as school capacity constraints.

Key themes raised:

- Local Retail and Amenities Provision
- Transport and Connectivity
- Local Produce and Sustainability

Overview of SDNPA response and way forward for the Local Plan

In response to the representations received:

- Planning policies cannot be retrospectively applied to existing businesses.
- The specific settlements referred to by respondents are all outside the National Park and cannot be affected by policies in this local plan.
- Farm shops are permitted in the countryside because they support the rural / agricultural economy. Without such restrictions, they could become standard retail outlets or other Class E uses that would not require a rural location.
- **SDE6.3a** is the same as SDE3.3c and does not expect a 12 month supply of own produce.

Policy SDE7 Regenerative Tourism (previously Policy SD23)

Number of comments on policy: 55

Number of additional responses to technical questions: 13

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	10	14	7	1	52

Summary of issues and key themes raised

Respondents recognise the economic role of tourism but stress that growth must be managed to safeguard businesses, farming, infrastructure, and residential areas, and prevent the degradation of environmental designations, heritage assets and the heritage coast. They express concerns that existing transport routes are ill-equipped to handle rising visitor numbers and large coaches, leading to congestion, unsafe parking and speeding in residential areas, roads and non-motorised user routes. There are also warnings that increased tourism risks not only degrading sensitive environments, but also compromising community safety due to inadequate pedestrian and cycle provisions. There are calls for updated evidence, clearer mapping, and clearer definitions and criteria for visitor accommodation. In addition, respondents recommend enhanced inter-agency coordination to better manage visitor flows and mitigate adverse impacts.

Key themes raised:

- Economic development and community impacts
- Transport infrastructure, traffic management and safety
- Environmental and heritage conservation

Overview of SDNPA response and way forward for the Local Plan

The Authority has published the following (updated) evidence:

- 2021 South Downs Visitor Survey;
- 2023 South Downs Business Survey;
- 2025 South Downs Visitor Accommodation Review; and
- 2025 South Downs Economic Profile.

The above – and the wording additions / changes suggested by respondents – have all been considered in the preparation of this policy and its supporting text. In doing so, the policy has been re-structured as follows for ease of reading and implementation:

- Criterion 1 applies to all accommodation, attractions and facilities.
- Criterion 2 applies to existing accommodation, attractions and facilities.
- Criterion 3 applies to new accommodation, attractions and facilities.
- Criterion 4 considers loss of accommodation, attractions and facilities; and
- Criterion 5 considers cumulative impacts, including identified hotspots and honeypots.

The *2025 South Downs Visitor Accommodation Review* found that visitor bedspaces have more than doubled since 2014, and that immediate needs can be met by existing accommodation across the National Park. The Authority will continue to consider applications for new and expanded visitor accommodation, attractions, and facilities, especially where these support a year round visitor economy and longer visitor stays. However, the expectation will be for development to deliver on the vision for regenerative tourism in National Parks and make net positive contributions.

The *2025 South Downs Visitor Accommodation Review* has also mapped known areas that experience high visitor numbers – i.e., hotspots and honeypots. These may change over the plan period and so the most recent evidence of visitor numbers and pressures should be considered when determining a planning application.

The Sussex Heritage Coast – which includes the Birling Gap and iconic Seven Sisters - is a recognised hotspot in the eastern area of the National Park. There is a clear trend of increasing visitor activity in the area (including around South Hill Barn) since 2022. The Authority is one of several landowners in the area working together to manage visitor impacts along the coastline. However, the Authority is not the Highway Authority nor Rights of Way Authority, and is not the landowner of South Hill Barn and its immediate area. Instead, the Authority is the owner of Seven Sisters County Park (SSCP) and the local planning authority for the National Park. The Authority can consider potential impacts – such as access, parking, and increased pedestrian and vehicular traffic - when considering and determining planning applications within the National Park. In terms of sustainable transport and modal shift, the Authority is committed to working with the Highway Authorities, Rights of Way Authorities and public transport providers.

The local planning authority for the built-up area of Seaford is Lewes District Council (LDC), and not the South Downs National Park Authority. The respondents who raised comments about the built-up area of Seaford (including Chyngton Field) should engage with LDC about the emerging Lewes Local Plan. Please note, the Authority and LDC are liaising with one another about their respective local plans.

The policy wording and supporting text have been amended (as appropriate) and it is important to remember that the Development Plan must be read as a whole. More specifically:

- References to Whole Estate Plans (WEPs) have been carefully considered.
- SDE7 marketing requirements are set out in Appendix A1.
- SDE7 supporting text recognises surrounding areas (outside the SDNP).
- SDE7.3b considers accessibility features for older and disabled visitors.
- SDE7.3c considers access via active travel routes or public transport, while Policy SDT2 addresses other considerations in relation to active travel routes.

- SDE7.3d – amongst other policies - considers the amenities of neighbouring properties and uses. This can include residential areas.
- SDE7.3g considers the impact of new accommodation, attractions and facilities on community facilities, while a reference to Assets of Community Value (ACV) is in the supporting text of Policy SDG1 (Community Facilities).
- SDE2 considers agricultural development, agricultural diversification, and conversion of rural buildings, including rural worker and succession dwellings.
- SDG3 considers public open space, sports and recreational facilities.
- SDT1 considers a vision-led transport approach.
- SDT3 considers highway and public realm design.
- SDT4 considers parking provision.

Additional Technical Question

Does the policy strike the right balance between furthering the purposes of the National Park and supporting the local economy? Of the 13 comments, 3 said “yes”, 7 said “no”, and 3 did not provide a reaction. The comments were similar to those on the main policy. As such, the Authority’s response is captured in the above.

Policy SDE8 Equestrian Development (previously Policy SD24)

Number of comments on policy: 14

Number of additional responses to technical questions: 6

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	5	3	1	1	4

Summary of issues and key themes raised

Respondents note a lack of consistency with “Regenerative Tourism” (Policy SDE7, previously Policy SD23) and the “Development Strategy” (Policy SDC2, previously Policy SD25) and recommend the adoption of similar exceptional circumstances criteria. They point out that while the policy adequately covers traditional equestrian land use, it does not fully address environmental and landscape impacts from the broad range of equestrian activities and built facilities. Respondents urge for a clearer policy structure that differentiates between low-impact countryside land use and more intensive activities and built facilities, and incorporates green infrastructure principles, measures to tackle pollution, and clearer definitions to prevent misuse. In addition, respondents call for improvements to active travel infrastructure by expanding the equestrian trail network, and advocate for a uniform testing approach for permanent facilities.

Key themes raised:

- Cross-policy consistency
- Safeguarding the environmental and landscape
- Inclusivity of diverse equine uses and facilities
- Infrastructure and active travel integration

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 are addressed in other policies in the Plan and do not need to be repeated in Policy SDE8. Equestrian uses and related development require a countryside location. For this reason, suggestions of “exceptional circumstances” and “local connection criteria” are not appropriate. In terms of other specific suggestions:

- The policy has been amended to set out criteria for all equestrian development (including changes of land use) and further criteria for buildings, structures, yard areas, and associated infrastructure.
- SDE8.1 and supporting text have been added in relation to regenerative land management.
- SDE8.2f has been amended to include restricted byways and byways open to all traffic (BOATs).
- SDE8.2g has been amended to include local landscape character and green infrastructure principles.

Additional Technical Question

Does the policy sufficiently capture all considerations for equine development?

Of the 6 comments, 1 said “yes”, 3 said “no”, and 2 did not provide a reaction. In response to these comments:

- The Development Plan must be read as a whole; and
- Policy SDT2 addresses active travel routes, including definition of users.

Policy SDE9 Shop Fronts and Advertisements (previously Polices SD52 and SD53)

Number of comments on policy: 19 (9 for Policy SD52 and 10 for Policy SD53).
Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
SD52 – 0 SD53 – 1	SD52 – 2 SD53 – 3	SD52 – 5 SD53 – 5	SD52 – 1 SD53 – 0	SD52 – 0 SD53 – 0	SD52 – 2 SD53 – 2

Summary of issues and key themes raised

Policy SD52 Shop Fronts:

Responses on policy SD52 Shop Fronts varied, with one response describing the policy as consistent with local conditions, another raising concerns, and a third indicating it was unproblematic in the area. In historic settings, two responses noted that current measures preserve important shop fronts, with one comment suggesting that aesthetic control should prevent the use of glaring neon signs or flashing lights. One response recommended a prohibition on such lighting to conserve historic shopfront character, while another maintained that the existing approach fulfils that role. Additional comments addressed the need to reduce bright night-time illumination to protect dark skies and to limit open door practices for improved energy efficiency, with further observations highlighting the area’s mix of shop types.

Key themes raised:

- Signage in Historic Settings
- Night-time Illumination Management

Policy SD53 Adverts:

Respondents emphasised that the policy should protect public spaces by limiting intrusive commercial advertising and ensuring that outdoor adverts remain proportionate and contextually appropriate. They advised that illuminated signage and large hoardings be designed to blend with the local landscape and to avoid creating street clutter, particularly in rural and conservation areas. Strict controls on illumination were highlighted, with internal lighting permitted only when premises operate after dark and regular reminders provided to planning committees, while limited discussion on the substance of SD53 Adverts alongside observations on stakeholder awareness and regulatory stability underscore the need for clear guidelines in advert design and placement.

Key themes raised:

- Public Realm Protection against Commercial Overreach
- Visual Impact
- Contextual Compatibility

Overview of SDNPA response and way forward for the Local Plan

The adopted policies on shop fronts and adverts have been merged into one policy. In response to representations received on both adopted policies:

- **Criterion 1a** amended to consider illumination.
- **Criterion 5** amended to clarify that there will be a presumption against flashing or moving image signage/logos or advertisements.
- **New supporting text** clarifies that many shops are within historic town and village centres where heritage Policies SDL6-9 will be relevant.
- **New supporting text** highlights that Policy SDL5 (Dark Night Skies) will be a key policy for illuminated shop fronts and advertisements.
- Planning cannot control doors being left open.
- In terms of large banner type advertisement hoardings in rural areas, these could be refused under this policy where they are harmful to the character of the area and advertisement consent is required.