

**Policy SDH1 Housing Supply (previously Policy SD26)**

Number of comments on policy: 137

Number of responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
5	10	30	21	22	83

**Summary of issues and key themes raised**

Concerns focus on the policy’s inability to fully address infrastructure, environmental, and safety challenges, with development potentially overburdening services and compromising areas prone to congestion and flooding while impacting biodiversity and landscape character. Quantitative targets remain unclear due to provisional figures and deferred assessments, prompting calls for measurable and updated metrics. Housing is advised to be sited on brownfield or urban areas with accessible transport and amenities to avoid placing undue pressure on rural and sensitive areas, and there is a need for improved cross-boundary coordination to balance local needs. Additional points stress that new developments should blend with local community character, offer a diverse, accessible mix to address affordability, and align with updated national planning framework methodology for calculating housing need.

**Key Themes raised:**

- Infrastructure Considerations
- Clarity in Provision Numbers
- Sustainable Site Allocations
- Cross-boundary Impact and Collaboration
- Impact on Landscape Character
- Housing Mix, Affordability and Accessibility
- Consistency with National Planning Policy

**Overview of SDNPA response and way forward for the Local Plan**

The housing requirement for the National Park is determined by landscape capacity and statutory purposes, not just by calculated need. The process is evidence-led, with final figures and allocations confirmed in the Regulation 19 Local Plan. We acknowledge the importance of cooperation with neighbouring authorities, the need to balance growth with conservation, and the inclusion of infrastructure and environmental considerations.

**Housing Requirement Figure and Evidence Base**

The housing requirement figure for the Regulation 19 Plan takes into account updated needs evidence, including the Housing and Economic Development Needs Assessment (HEDNA) Addendum and the AECOM Housing Needs Study. The appropriate housing need figure is considered to be 323 homes a year. The housing requirement is determined by the landscape capacity of the area, taking into account

the statutory purposes of the National Park, and considering evidence such as the Land Availability Assessment and the Integrated Impact Assessment.

There is no legal requirement to include housing numbers in the Regulation 18 Plan, and having fully considered national policy changes (such as the NPPF and standard method) figures are included in the Regulation 19 stage.

#### Landscape Capacity and Statutory Purposes

The housing requirement is set according to what the landscape can accommodate while still furthering the statutory purposes of the National Park. This means that even if evidence suggests a higher housing need, the actual requirement may be lower to avoid severe conflict with conservation and landscape objectives.

#### Duty to Cooperate and Cross-Boundary Issues

The SDNPA works closely with neighbouring and component authorities under the duty to cooperate, including on joint studies. However, it is important to recognise National Parks are not appropriate places to accommodate unmet needs from other areas, as per Planning Practice Guidance (PPG).

#### Site Allocations and Deliverability

Many unimplemented allocations from the current Local Plan are being carried over, and only sites that are deliverable (available, suitable, and achievable) can be allocated. Some sites are considered developable for the longer term, not just deliverable within five years. Any changes in circumstances since the previous Local Plan have been taken into account in reviewing whether to carry over existing allocations and whether their capacity or other criteria should be amended.

#### Affordable Housing and Housing Mix

We acknowledge the acute need for affordable housing and older persons' accommodation, and note that these issues are addressed in other policies within the Plan.

#### Policy Wording and Approach

Most policies are worded positively, however a negatively worded policy to safeguard existing dwellings is justified due to the difficulty of supplying new housing in a National Park.

#### Infrastructure and Environmental Considerations

Issues related to infrastructure (such as water, wastewater, and transport) are covered by other policies in the Plan. We seek early engagement with infrastructure providers as site allocations are confirmed. Requirements for BNG have been taken into account in assessing the capacity of sites.

## Policy SDH2 Mix of Homes (previously Policy SD27)

Number of comments on policy: 67

Number of additional responses to technical questions: 50

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	15	12	11	4	21

### Summary of issues and key themes raised

Respondents highlight a clear need for smaller, affordable dwellings to cater for downsizing, first-time buyers, young families, vulnerable people and older or disabled residents. Respondents argue that home design should be measured by functional criteria—such as the number of bed spaces or overall floor area—rather than a strict count of bedrooms, which may encourage loophole exploitation. There is also a call for greater policy flexibility and local adaptability, with assessments based on detailed, local evidence to better reflect market conditions and support a balanced, intergenerational housing mix that avoids the segregation of housing types. Additional feedback stresses the importance of a dedicated policy framework for specialist and accessible housing for older people.

#### Key Themes raised:

- Demand for affordable and smaller dwellings
- Bedroom metrics and configurations
- Flexibility and local adaptability
- Specialist and accessible housing for older people

### Overview of SDNPA response and way forward for the Local Plan

The consultation showed broad support from rural parishes and representatives from Lewes Town for retaining a strong emphasis on delivering smaller dwellings. This reflects ongoing local concerns about affordability, downsizing options and ensuring that housing provided within the National Park meets local needs. The policy retains focus on delivery of smaller dwellings, with a slight increase in the proportion of 4-bedroom market homes (to provide more flexibility and to recognise the potential for a general increase in home working), this is relatively modest and does not override the clear community preference for prioritising smaller units.

To guide the appropriate size of new dwellings, the supporting text now references the Nationally Described Space Standards (NDSS).

The policy framework also retains flexibility where justified. Part 2 of the policy allows for an alternative housing mix where robust local evidence demonstrates a specific need, recognising that some communities or sites may have particular circumstances that warrant a different approach. This allows the policy to remain responsive to local variation while maintaining overall strategic direction.

A new policy SDH3 on Specialist and Older Persons Accommodation has been introduced, acknowledging the increasing need for age-appropriate housing and supported living options across the National Park. This responds not only to demographic trends but also to stakeholder feedback highlighting gaps in provision and the desire to enable residents to age in place within their communities.

During the consultation, concerns were raised about the impact of second homes and holiday lets on housing availability and community cohesion in certain parts of the National Park. Census 2021 data indicates that levels of unoccupied dwellings—often associated with second homes and short-term lets—are slightly higher within the National Park than in surrounding areas, although the rates vary across different local authority areas. Importantly, the overall proportion of unoccupied dwellings within the SDNP is not substantially different from the national average. While these localised pressures are recognised, the current evidence does not support the need for strategic-level policy intervention. However, more targeted, place-specific responses—such as those that can be developed through Neighbourhood Development Plans—may be appropriate where demonstrable local issues exist.

In response to local feedback, support for innovative housing models has been added to the policy criteria 3.

## Policy SDH3 Accessible and Adaptable Homes (previously Policy NEW1)

Number of comments on policy: 49

Number of additional responses to technical questions: 38

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
4	11	9	7	4	14

### Summary of issues and key themes raised

Respondents offered a range of views on fixed percentage targets for accessible dwellings, with some favouring around 10% and others 15%, and several suggesting that flexibility based on development size or local need may be preferable. Concerns were raised over the clarity and consistency of evidence and definitions across the policy, particularly between market and affordable homes, and many called for a standardised approach linked to building regulations. There was strong support for incorporating adaptable design features in new housing to reduce the need for costly retrofits in the future, while questions were raised over potential impacts on viability and affordability if policy requirements increase construction costs or reduce housing density. Additionally, respondents emphasised the need for clear criteria on exceptions, the need for accessible external infrastructure, and accessible locations that ensure connectivity and community integration.

#### Key Themes raised:

- Percentage targets for accessible dwellings
- Policy coherence, evidence and clarity
- Design adaptability and future-proofing

### Overview of SDNPA response and way forward for the Local Plan

Consultation feedback strongly emphasised the need to increase the provision of accessible homes, particularly in light of the National Park's ageing demographic, and highlighted the importance of ensuring that the wider external environment is designed to support accessibility.

Respondents expressed a wide range of views on the appropriate proportion of homes that should be required to meet higher accessibility standards. Taking this into account and informed by viability testing relating to the delivery of wheelchair-accessible housing, a balanced and pragmatic approach is proposed. The policy therefore now requires that 10% of new homes be built to the M4(3)(2)(a) wheelchair-adaptable standard.

In direct response to the feedback received, the policy has also been expanded to address the design of external spaces, ensuring that the public realm, communal areas and movement networks contribute to creating genuinely inclusive and accessible places.

## Policy SDH5 Affordable Housing (previously Policy SD28)

Number of comments on policy: 95

Number of additional responses to technical questions: 52

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
9	16	20	20	6	77

### Summary of issues and key themes raised

Respondents called for clearer, locally tailored definitions of affordable housing—with explicit local occupancy criteria and concise wording on issues such as the inclusion of “first homes”. The need for development to benefit residents was highlighted by being well-located with access to transport, amenities, and employment. Respondents stressed the importance of robust, transparent monitoring and flexible management mechanisms to secure long-term affordability, alongside consistent local policy that aligns with national policy and clarifies key terms and review processes. Additionally, respondents advocated for detailed, site-specific viability assessments and financial appraisals, and raised concerns over ambitious delivery targets, performance shortfalls, and stringent design standards that may compromise quality and deliverability.

#### Key Themes raised:

- Definition and Scope of Affordable Housing
- Local Needs for Affordable Housing
- Long-Term Affordability and Management Mechanisms
- Policy Clarity and Consistency with National Policy
- Viability and Financial Appraisal Requirements

### Overview of SDNPA response and way forward for the Local Plan

In response to consultation feedback, Policy SD28 has been revised to provide a clearer, more deliverable approach to affordable housing. Viability testing of cumulative Local Plan requirements has informed a differentiated affordable housing requirement of 30% on brownfield sites and 40% on greenfield sites, with site-specific affordable housing levels set out for strategic site allocations.

Additional clarification is provided on securing a minimum 25% social rent, while allowing flexibility where local needs justify alternative tenures; this flexibility is particularly important on small rural sites of fewer than 10 homes.

The policy maintains a lower onsite delivery threshold (4 or more homes) consistent with NPPF paragraph 65, which applies to designated rural areas including National Parks and National Landscapes.

While some respondents suggested requiring developers to provide land in lieu where affordable homes cannot be delivered onsite, this is challenging given that the

National Park Authority is not a housing authority, and the preferred approach remains delivery through Section 106 agreements with Registered Providers.

Further detail on the use of review mechanisms—including trigger points—is now provided in the supporting text.

Long-term management provisions also allow for alternative reputable providers, such as Community Land Trusts and rural estates.

The former First Homes requirement has been removed, following its deletion from the NPPF, and local needs continue to be addressed through criterion 4 of the policy.

Finally, some respondents called for limits on second and holiday due to their impact on affordability. However, Census 2021 data shows that although unoccupied dwellings are slightly more common in the National Park than in surrounding areas, the overall rate is not significantly higher than the national average. As such, there is insufficient evidence for a strategic policy response in the Local Plan, though targeted measures through Neighbourhood Development Plans may be appropriate where clear local pressures are identified.

**Policy SDH6 Rural Exception Sites & Rural Estates Housing (previously Policy SD29)**

Number of comments on policy: 46  
 Number of responses to technical questions: 47

**Reaction to Regulation 18 consultation Policy**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	15	8	5	4	11

**Summary of issues and key themes raised**

Respondents expressed divided views on a fixed 20% cross-subsidy, with some considering it a balanced approach to affordable housing delivery and landowner incentives, while others favored a flexible, site-by-site adjustment or even higher percentages. Opinions were similarly split regarding flexibility in occupancy conditions and tenure, with calls for either fixed criteria or locally tailored responses. Concerns were raised that a one-size-fits-all percentage might not cover variable development costs, impacting economic viability, and that rigorous, locally informed site selection emphasizing small-scale projects near existing settlements is essential. Early, meaningful community engagement and clearer definitions aligning with national policy were also noted, along with technical recommendations to refine wording, evidence, and delivery mechanisms.

**Key Themes raised:**

- Landowner Incentivisation
- Delivery Challenges and Economic Viability
- Flexibility in Occupancy Conditions and Tenure
- Site Selection, Scale and Location Criteria
- Community Engagement and Local Input

**Overview of SDNPA response and way forward for the Local Plan**

Amendments are made to this policy to state that at least 70% of homes delivered must be affordable homes in perpetuity, providing a greater level of flexibility given the historic lack of Rural Exception Site delivery. The amended policy also makes provision for a landowner incentive; in recognition that providing a serviced plot or dwelling can be instrumental in releasing land for local affordable homes. In addition, the policy includes new provisions for rural estates. Consultation feedback showed wide support for community-led affordable housing initiatives, and preference for this form of development is retained in the policy.

**Policy SDH7 Replacement and Subdivision of Dwellings (previously Policy SD30)  
Policy SDH8 Householder Development (previously Policy SD31)**

Number of comments on policy: 42 (Policy SDH7) and 36 (Policy SDH8)

Number of additional responses to technical questions: 90

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
SDH7 – 0 SDH8 - 1	SDH7 – 18 SDH8 - 13	SDH7 – 9 SDH8 - 5	SDH7 – 7 SDH8 - 3	SDH7 – 3 SDH8 - 4	SDH7 – 5 SDH8 - 10

**Summary of issues and key themes raised**

**Policy SDH7:** Respondents highlight divergent views on balancing a fixed floorspace limit and the need for local discretion, noting that a fixed limit may produce inequitable outcomes while flexibility may lead to overdevelopment. Some respondents suggest that there could be flexibility for schemes that positively contribute to neighbourhood amenity and character, while other respondents raise that flexibility for larger dwellings would be socially inequitable and might reduce the availability of more affordable homes. The use of a 120sqm threshold to define smaller and larger dwellings is seen as arbitrary and there are calls for clarifications, particularly around supporting data, consistent definitions, and alignment between criteria and technical advice notes. Key themes raised:

- Flexibility versus uniformity
- Housing affordability and social equality and equity
- Appropriateness of the 30% floorspace limit and 120sqm definition
- Impact on local character, amenity and design quality

**Policy SDH8:** Respondents highlight divergent views on applying a fixed floorspace limit for householder developments, with some favouring a uniform National Park-wide approach and others calling for local tailoring, particularly in areas like Lewes and Petersfield. There are also split views on whether the 30% floorspace limit should be confined to smaller dwellings (up to 120sqm) or applied uniformly across both smaller and larger properties, noting implications for affordability, amenity, heritage, neighbourhood character, and social equality and equity. In addition, respondents raise the need for more flexible development controls (especially for schemes that positively contribute to amenity and character), clearer technical guidance, and consideration for modern working requirements (i.e., home working) and adequate parking provision. Key themes raised:

- Flexibility versus uniformity
- Geographical consistency versus local tailoring
- Housing affordability and social equality and equity
- Appropriateness of the 30% floorspace limit and 120sqm definition
- Impact on local character, amenity and design quality
- Modern working patterns

## Overview of SDNPA response and way forward for the Local Plan

The policies have been reviewed together because they share the same purpose and supporting text, and because similar issues and themes are raised. The policies' purpose is to facilitate the replacement and subdivision of homes and householder development while: avoiding potential adverse impacts on the landscape and amenities of occupants and neighbouring properties; and protecting the supply of small and medium dwellings. Proposals will be considered against all relevant policies in the development plan, and all other relevant material considerations. This includes, but is not limited to, amenity, design, landscape character, and parking.

The way we are using our homes is changing, especially since the Covid-19 pandemic. Home-working and home-based businesses are supported where this does not involve the change of use to a host dwelling. There is also a balance between the above and the policies' purpose.

The Housing and Economic Development Needs Assessment (HEDNA) and Parish Priorities Statements (PPS) indicate a need for 1-3 bedroom, or small and medium, dwellings. In recognition of evidence, flexibility, and learning from implementation and appeals, the policies have been amended to remove references to settlement policy boundaries and bedroom numbers. The policies retain the base date, 120sqm floorspace definition, and 30% floorspace limit from the adopted local plan, although the latter no longer applies to large dwellings. This is because applying the 30% limit to large dwellings will not protect the supply of small and medium dwellings.

### Base Date

The base date of 18 December 2002 for "existing dwellings" has been carried over from the adopted local plan. It is the date that the South Downs National Park was first formally designated and was considered by the Inspector of the adopted local plan. The Inspector concluded that this date is logical and in the wider interest of the National Park, while other key dates (such as 31 March 2010 and 01 April 2011) were thought to allow too much leeway for inappropriately large extensions.

### 120sqm Floorspace Definition and 30% Floorspace Limit

The 120sqm floorspace definition and 30% floorspace limit have been carried over from the adopted local plan. The floorspace definition and limit consider nationally described space standards (NDSS) and information published by the English Housing Survey and Office for National Statistics (ONS) and other evidence. The above provide different figures and there are size differences between regions, districts, and dwelling types. However, in reviewing all the above, it appears that the average dwelling floorspace in England is broadly between 90-100sqm.

The 120sqm floorspace definition is higher than the average dwelling floorspace in England. The definition captures NDSS for a 3-bedroom dwelling and some smaller variations for a 4+ bedroom dwelling. In terms of the 30% floorspace limit, the Inspector of the adopted local plan explained in their final report (June 2019) that: the

figure is arbitrary but consistent with practice elsewhere (i.e., New Forest National Park); the figure is a reasonable guideline in the context of the National Park with the aim to maintain the existing stock of small and medium dwellings and the priority to conserve the character of the landscape; and the word “approximately” allows a degree of flexibility and judgement in the context of the scale of existing buildings and other criteria regarding local character and amenity.

### Flexibility

The use of the word “approximately” and use of a percentage for the floorspace limit - and consideration of “exceptional circumstances” (Policy SDH8 only) - provide a degree of flexibility to ensure a proposal is landscape-led and sensitively designed, while protecting the supply of small and medium dwellings.

### Further Clarifications

In addition to the above, the following clarifications are provided below:

- The Development Plan must be read as a whole.
- Policy SDH2 addresses housing mix.
- Policy SDH5 addresses affordable housing.
- Proposals should take account of local design evidence and this can include parish and village design statements.
- There is no prescribed definition of “exceptional circumstances” and proposals will be considered on a case-by-case basis.
- The policies apply to Class C3, while all other use classes (including Class C4 Houses in Multiple Occupation) will be considered against all relevant policies in the Development Plan and all other material considerations.
- It is anticipated that the Extensions and Replacement Dwellings Technical Advice Note (TAN) will be updated after the local plan review is adopted.

### Additional Technical Questions

**Do these policies, in combination with Policy SDL1 (previously Policy SD4) and Policy SDL2 (previously Policy SD5), adequately capture amenity and design considerations in relation to replacement dwellings, subdivisions, and householder developments?** Of the 21 comments, 8 said “yes”, 10 said “no”, and 3 did not provide a reaction. The first criterion of both policies sets out amenity and design considerations, and the supporting text clarifies that proposals will be considered against all relevant policies in the Development Plan, including landscape character and design amongst others.

**Is 30% the right percentage limit?** Of the 20 comments, 3 said “yes”, 15 said “no”, and 2 did not provide a reaction. In terms of what these respondents thought a reasonable figure could be, 5 said “20-25%”, 6 said “30-35%”, 3 said “40%+”, 1 said “generally higher”, 2 said “no limit”, and 3 gave general comments. There is no

consensus amongst respondents. The percentage limit remains the same as the adopted local plan – see above.

**Should the percentage limitation be applied everywhere in the National Park or should a different approach be taken within Lewes and Petersfield?** Of the 25 comments, 8 said “everywhere”, 7 said “different approach”, 8 provided general comments, and 2 did not provide a reaction. There is no consensus amongst respondents. The policies apply the percentage limitation “everywhere” – see above.

**Should the restriction on the size of extensions / replacement dwellings be applied to all dwellings or only those which are currently small dwellings (120sqm or less)?** Of the 24 comments, 13 said “all dwellings”, 10 said “only those which are currently small dwellings”, and 1 did not provide a reaction. There is no consensus amongst respondents. The policies apply the size restriction to small and medium dwellings – see above.

## Policy SDH9 New Rural Workers' Dwellings (previously Policy SD32)

Number of comments on policy: 37

Number of additional responses to technical questions: n/a

### Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
5	17	6	2	2	5

### Summary of issues and key themes raised

Respondents raised concerns about the robustness and the potential exploitation of vague definitions, especially regarding the term “rural worker”. They underscored the need for tighter criteria that clearly differentiate between temporary and permanent permits, including explicit business linkage and viability requirements, such as a ten-year operational history, to guard against speculative conversions and misapplications. There were calls for improved clarity in dwelling design specifications and guidance that aligns with the local character, while also addressing how changing resident circumstances should be managed. Additionally, opinions varied on whether a broader interpretation of “rural worker” appropriately reflects modern rural employment or risks undermining the policy’s long-term effectiveness.

#### Key themes raised:

- Enforcement Robustness and Closure of Loopholes
- Ambiguity in the Definition of “Rural Worker”
- Viability and Business Linkage Criteria
- Protection Against Speculative Conversion
- Flexibility for Evolving Resident Circumstances

### 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 focused on themes of design and landscape character which are already addressed by other policies and do not need to be repeated in Policy SDH9.

The policy wording reflects the 2024 National Planning Policy Framework (NPPF) and definitions of rural workers and land-based industries have been added to the new supporting text. The concerns about a widened definition from “agricultural and forestry” to “rural” workers is understood. However, the policy provides adequate safeguards to ensure that it is not misused. The enforcement concerns raised are noted but not issues for the policy wording itself. Planning conditions should not be abused to secure open-market homes. The standard occupancy conditions placed on rural worker dwellings allow retired rural workers to continue living in their homes. In response to other representations:

- **Criterion 2** amended to include the word “permanent”.
- **Criterion 2e** amended to clarify total habitable floorspace.
- **Criterion 4** amended to clarify “permitted for a temporary period”.

**Policy SDH10 Gypsies, Travellers and Travelling Showpeople  
(previously Policy SD33)**

Number of comments on policy: 45

Number of additional responses to technical questions: n/a

**Reaction to Regulation 18 Consultation**

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
2	3	9	8	8	15

**Summary of issues and key themes raised**

Respondents emphasise that traveller site allocations should be based on clear, up-to-date assessments of local need and managed by local authorities to prevent imbalances between traveller and settled communities. They note that ambiguous definitions and an unclear consultation process undermine policy clarity and consistency, while concerns about community impact include potential strain on local infrastructure, increased traffic and social challenges. Several responses recommend that larger sites be located away from established non-traveller areas and call for robust site management and capacity enforcement through defined responsibilities, regular inspections and improved coordination among planning authorities. Further comments highlight the need for updated evidence bases and need assessments, an adaptive planning approach that considers alternative sites on brownfield land, and sustainable design measures that integrate natural screening and local ecological guidelines. Additional feedback points to challenges in securing planning permissions and safeguarding environmental values, indicating that clearer local planning measures and technical work are required.

Key themes raised:

- Local Priority & Fair Allocation
- Community Impact & Social Integration
- Policy Clarity & Procedural Consistency
- Cross-Jurisdictional Coordination & Local Authority Involvement
- Site Management & Capacity Enforcement
- Need Assessment & Evidence Base

**Overview of SDNPA response and way forward for the revised Local Plan**

The Development Plan must be read as a whole. A number of issues raised focus on themes of active travel, biodiversity, design, ecology, environmental designations, flood risk, infrastructure, landscape character and transport which are already addressed by other policies and do not need to be repeated in Policy SDH10. In addition, the comments related to site management and planning enforcement are outside the scope of a local plan and so no further action has been taken.

Evidence

The Authority has published the following (updated) evidence:

- The 2024 South Downs, Brighton & Hove and Adur and Worthing Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) covers the whole of the South Downs National Park and takes account of the change to the traveller definition in the 2024 Planning Policy for Traveller Sites.
- The 2026 South Downs Gypsy and Traveller Site Identification Report includes assessments of promoted and identified sites. This includes sites promoted in the general call for sites in Summer 2022, and sites promoted in the focused call for sites in March and Summer 2025. The latter call was carried out in partnership with East Sussex Authorities but still covered the whole of the National Park.

### Policy Wording

The Authority has considered representations, evidence, further site submissions, and wider officer reflections, as well as the 2024 updates to both the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites (PPTS). In doing so, the policy has been updated as follows:

- The word “genuinely” has been removed from Criteria 2 and 3a.
- A new criterion (3b) has been added to state that new gypsy, traveller and travelling showpeople pitches and plots will be permitted where they are in locations which are in reasonably close proximity to settlements from which residents can access education, health, welfare, and employment infrastructure, reflecting the extent to which opportunities for mixed residential and business uses can contribute to sustainability.

### Need and Allocations

The evidence highlights a need for 62 gypsy and traveller pitches and 11 travelling showpeople plots over the plan period. In terms of gypsies and travellers, the new supporting text explains that 4 pitches have recently been established in Greatham, reducing the need to 58 pitches. The Plan proposes to allocate 37 new permanent pitches - comprising 6 pitches from 2 existing allocations, and 32 pitches from 4 new allocations – equating to a shortfall of 21 pitches. As for travelling showpeople plots, no sites have been identified and so there is a shortfall of 11 plots. In light of shortfalls, unidentified sites will be considered positively against Criteria 3 and 4.

The need for gypsy and traveller pitches, and travelling showpeople plots, is a cross boundary and strategic matter. The Authority will continue to discuss unmet needs with neighbouring planning authorities under the duty-to-cooperate.