

Policy SDT1 Vision-led Transport Approach (previously Policy SD19)

Number of comments on policy: 63

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
0	12	15	10	1	25

Summary of issues and key themes raised

Respondents raise concerns over traffic management, road safety and congestion driven by increasing vehicle volumes - especially large coaches, minibuses and excursion buses - on major routes and residential streets, compounded by inadequate pedestrian and cycling infrastructure. They suggest that clearer active travel measures, improved crossing design, reliable cycle parking and enhanced signage are required to support safer, more sustainable travel, while also calling for a better-integrated public transport network that connects well with walking and cycling options in both urban and rural contexts. Additionally, several respondents highlight the need for stronger emphasis on sustainable development and low-carbon transport, including provisions for electric vehicle charging and car-free corridors, alongside recommendations for accessible design that meets the needs of disabled users and non-motorised road users. Concerns also focus on parking provision and its effects on car dependency, the pressures of increased tourism on local routes, and the importance of a vision-led, evidence-based strategic planning approach that includes clearer technical language and a stronger alignment with current design standards.

Key themes raised:

- Traffic Management, Road Safety and Congestion
- Active Travel and Cycling Infrastructure
- Public Transport Provision and Modal Shift
- Inclusive Design and Accessibility
- Parking Provision and Car Dependency
- Impacts of Tourism and Visitor Flows

Overview of SDNPA response and way forward for the Local Plan

A number of comments relate to either regional issues for the Transport for South East (TfSE) Investment Plan, site specific issues which cannot be addressed in a strategic policy, issues beyond the scope of a local plan, or issues addressed in other policies in the local plan which do not need to be repeated in Policy SDT1 – i.e., active travel routes, highway and public realm design, parking provision, and air quality are addressed in Policies SDT2, SDT3, SDT4, and SDW5, respectively.

It is considered that the policy wording is the right way around – i.e., the first step is to reduce the need for travel (by locating development close to facilities) and the second step is to provide sustainable methods of transport where travel is necessary. This is set out in Criterion 2 which can also be used to support design to facilitate home-working. In terms of amendments to address all relevant comments raised:

- All transport policies prioritise active travel.
- **Policy name** changed to “Vision-led Transport Approach”.
- **Criterion 1** added to incorporate vision-led transport approach, with further explanation provided in new supporting text.
- **Criterion 2** amended to safeguard existing sustainable transport infrastructure unless it can be robustly demonstrated that it is no longer needed or is to be replaced by alternative infrastructure of an equivalent or better quality.
- **Criterion 4** amended to add “Public Rights of Way”.
- **Criterion 5a** amended to add “undercover and comfortable”.
- **Criterion 5c** amended to add “including the provision of Mobility Hubs”.
- **Criterion 5d** amended to change “bus stops” with “bus interchanges”.
- **Criterion 5e** added in relation to improvements to accessibility and step free access at railway stations.
- **Criterion 5f** added in relation to maximising opportunities to enhance green and blue infrastructure, and to create and connect habitats.
- **Criterion 6** amended to add bus interchanges and improved and accessible active travel routes.
- **New supporting text** added to provide clarification over what is meant by a “significant” number of journeys.
- **New supporting text** provides scope of road safety measures.
- **New supporting text** clarifies list in Criterion 5 is open, not closed.
- **Guidance** references include RTP1 guidance, Local Transport Note (LTN) 1/20, Local Transport Plans, and Natural England’s Green Infrastructure Framework.

In response to other comments that have not resulted in wording amendments:

- The South Downs Local Plan cannot include policies which relate to land outside the South Downs National Park's boundaries.
- The South Downs Local Cycling and Walking Infrastructure Plan (LCWIP) is under preparation. In the meantime, some local authority LCWIPs include areas of the South Downs National Park – i.e., the East Hampshire LCWIP.
- Active Travel England wish to be consulted on larger planning applications so the reference to them sits best in SDT1 as the overarching transport policy.
- Site specific comments about allocations in made neighbourhood plans should be considered alongside any future planning applications, along with the adopted allocation policy and any other material considerations.
- The Safer C7 Project is referenced in the supporting text as a good example. Otherwise, it would be out of step with the high level nature of the Plan to go into further detail. Similarly, references to specific schemes would become out of date every time the TfSE Investment Plan is updated.
- The Highways Authorities have to pay regard to NPPF Paragraph 116 in relation to preventing or refusing development on highways grounds.

Policy SDT2 Active Travel Routes (previously Policy SD20)

Number of comments on policy: 64

Number of additional responses to technical questions: 46

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
14	23	6	3	1	37

Summary of issues and key themes raised

Respondents emphasise the importance of promoting active travel by upgrading existing public rights of way, integrating high-quality non-motorised user routes, and incorporating supporting measures such as improved wayfinding and traffic calming. They highlight the need to enhance network connectivity by delivering and linking new, existing, and repurposed routes as set out in other plans and initiatives (such as local cycling and walking infrastructure plans). There were calls to establish clear criteria for path materials, widths, and signage that support user safety, but without being overly prescriptive so that development can respond to its local context. Respondents also called for routes to be direct, accessible, and inclusive for all non-motorised users - including equestrian users - and for the policy to be better aligned with broader planning frameworks through clear references to local and national guidelines and improved integration with public transport.

Key themes raised:

- Promotion of active travel and modal shift
- Network connectivity and integration
- Path materials and widths
- Wayfinding and signage
- Accessibility and inclusivity
- Integration with broader planning frameworks
- Multi-modal design and safety considerations
- Equestrian access and compatibility

Overview of SDNPA response and way forward for the Local Plan

This is a strategic policy and its purpose is to safeguard, conserve, enhance and expand the extensive network of active travel routes across and beyond the National Park. It is not considered appropriate to list all existing active travel routes, and all aspired and planned new and improved routes. To attempt do so would result in a very long policy and would risk indirect exclusion of existing and/or new routes.

The Development Plan must be read as whole. A number of issues are addressed in other policies and do not need to be repeated in Policy SDT2. For example:

- SDL1-4 address landscape character, design, views and tranquillity.
- SDN2-8 address nature, climate, and designated sites.
- SDG2-3 address green and blue infrastructure and public open spaces.
- SDT1 addresses a vision-led transport approach.
- SDT3 addresses highway and public realm design.

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

- “Active travel routes” is now used instead of “non-motorised user routes”.
- The policy and supporting text now include references to wayfinding.
- SDT2.1 and SDT2.2 – Amended to include accessible, legible and safe routes.
- SDT2.1 and SDT2.2 – Amended to link to green and blue infrastructure.
- SDT2.2 – Amended to support development of new and enhanced active travel routes and wayfinding as evidenced in local strategies.
- SDT2.2 – Amended to include “appropriate, feasible, and proportionate to their location, scale and impact”.
- SDT2.2 – Amended to require new development to provide new, and link to existing, active travel routes.
- The supporting text clarifies active travel can improve health and wellbeing.
- The supporting text provides definitions for active travel users and routes.
- The supporting text provides examples of guidance and local strategies – i.e., local cycling and walking infrastructure plans (LCWIPs).
- The supporting text clarifies support for proposals which improve accessibility to public transport hubs – i.e., bus and railway stations.

The county and unitary councils are the Highway Authorities and Rights of Way Authorities. These Authorities have designated specific types of active travel routes for specific / intended users – i.e., pedestrians, cyclists and/or equestrians.

The Authority will consider – either through the allocation process or via individual planning applications – which proposals may feasibly and/or viably contribute to the (physical and/or financial) delivery of routes safeguarded in SDT2.3 and SDT2.4.

Additional Technical Questions

Should we include a criterion or supporting text about path materials and widths? Of the 26 comments, 17 said “yes”, 7 said “no”, and 2 did not provide a reaction. The majority suggest that different locations, situations and users will require different surface materials, widths and maintenance, and that guidance is already provided by Highways Authorities and Rights of Way Authorities, and in national and local evidence and guidance. The supporting text reflects the above.

Should we include a criterion about wayfinding infrastructure? Of the 20 comments, 15 said “yes”, 4 said “no”, and 1 did not provide a reaction. The majority support wayfinding infrastructure subject to it being informed by local character and avoiding clutter and proliferation. The supporting text reflects the above.

Policy SDT3 Highway and Public Realm Design (previously Policy SD21)

Number of comments on policy: 25

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	11	10	3	1	26

Summary of issues and key themes raised

Respondents recommended revising the policy to better support active travel and address the needs of pedestrians, wheelchair users, cyclists, equestrians and individuals requiring dementia-friendly environments, suggesting measures such as adding a pedestrian crossing and ensuring controlled crossings on busy roads. They advised improving highway safety and traffic calming in line with design principles from the 2015 Hamilton-Baillie report, including clearer, well-marked pedestrian infrastructure. Concerns over policy clarity and consistency were raised, with calls to standardise terminology and explicitly integrate definitions from established guidelines. Additional feedback focused on strengthening environmental sustainability by protecting green verges and enhancing green and blue infrastructure, preserving historic roads, integrating public transport with active travel, and establishing funding mechanisms and cross-agency partnerships alongside accessible public art and public realm enhancements.

Key themes raised:

- Inclusive and Accessible Public Spaces
- Highway Safety and Traffic Calming Measures
- Public Realm Enhancement and Public Art
- Integration of Public Transport and Active Travel

Overview of SDNPA response and way forward for the Local Plan

A number of representations have been noted but are either too detailed and go beyond the scope of a local plan policy, or relate to implementation rather than policy wording. In terms of how the policy has been amended to address the comments raised:

- **Criterion 2** amended to add “alignment” and “routes within settlements”.
- **Criterion 3** added to encourage creation of healthy environments.
- **Criterion 4** amended to change “pedestrians, users of mobility aids” to “walkers and wheelers” for consistency throughout the Plan.
- **Criterion 4** amended to support facilitating access to public transport.
- **Criterion 5** amended to add green and blue infrastructure with specific reference to street trees and swales.
- **Guidance** references include Healthy Streets, Road User Utility Framework, and RTPi Dementia & Town Planning.

In response to other comments that have not resulted in wording amendments:

- Site specific issues cannot be addressed in a National Park wide policy.
- Site specific comments about allocations in made neighbourhood plans should be considered alongside any future planning applications, along with the adopted allocation policy and any other material considerations.
- The Safer C7 Project is referenced in the supporting text of Policy SDT1 (Vision-led Transport Approach) as a good example. Otherwise, it would be out of step with the high level nature of the Plan to include more detailed measures.
- The Highways Authorities have to pay regard to NPPF Paragraph 116 in relation to preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Policy SDT4 Parking Provision (previously Policy SD22)

Number of comments on policy: 32

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	5	6	2	1	17

Summary of issues and key themes raised

Respondents advocate a flexible, locally responsive approach to parking provision, noting that uniform standards risk overspill, congestion and safety issues. They recommend clearer policy language with explicit definitions and a distinct separation between requirements for new developments and public parking, alongside detailed implementation measures that reference current building regulations for electric vehicle charging. Concerns about community safety and traffic include reports of oversized vehicles and overflow on bridleways and residential roads, with calls to enforce vehicle size limits and monitor parking pressures. A context-specific planning approach is favoured for tourist, heritage and town centre areas, with mandates for adequate electric vehicle charging and secure cycle parking through proposed quotas and design codes sensitive to conservation concerns. Respondents further stress the need for strong links with sustainable and public transport networks, affordable parking charges, improved coordination between local planning and transport strategies, and recognition of the ongoing importance of private vehicle use.

Key themes raised:

- Adequacy and Allocation of Parking Supply
- Policy Clarity and Implementation Mechanisms
- Community Safety and Traffic Management
- Context-Specific Planning and Local Demand Management
- Provision for Electric Vehicle Charging and Cycling Infrastructure
- Integration with Sustainable Transport and Public Transport Linkages

Overview of SDNPA response and way forward for the Local Plan

A number of comments are either too detailed for a local plan policy or do not relate to the wording of this policy. In terms of how the policy has been amended to address the comments raised:

- **Criterion 1d** added to link car parks within settlements to other parts of the settlement by attractive walking/wheeling routes for easy onward journeys.
- **Criterion 2** amended to include “secure cycle storage”.
- **Criterion 2** amended to state that “unless lower provision is justified by access to other means of transport or measures such as car clubs”.
- References to Public Rights of Way (PRoW) have been replaced with active travel routes throughout the Plan to capture the wider active travel network.

In response to other comments that have not resulted in wording amendments:

- **Criterion 4b** refers to equestrian provision and so the reference to bridleways is appropriate.
- The South Downs Parking Supplementary Planning Document (SPD) [Adopted April 2021] sets out parking standards and allows for an approach tailored to local circumstances and car ownership patterns.
- The expectations for electric vehicle (EV) charging are set out in the South Downs Parking SPD [Adopted April 2021], South Downs Sustainable Construction SPD [Adopted August 2020], and Part S of Building Regulations.
- On-street EV charging does not generally require planning permission.
- The “decide and provide approach” has been replaced with the “vision-led transport approach” and this is further explained in Policy SDT1.
- Site specific issues cannot be addressed in a National Park wide policy.
- Site specific issues related to proposed allocations have been addressed in the associated allocation policies.

Policy SDT5 Infrastructure (previously Policy SD42)

Number of comments on policy: 23

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	3	1	3	11

Summary of issues and key themes raised

Respondents noted that the policy's wording and implementation require clearer definitions - including an explicit hierarchy of elements and a precise explanation of "infrastructure" to distinguish between hard and social types - as well as a detailed process for determining developer contributions. They also emphasised that new developments should be paired with adequate utility and community infrastructure, addressing needs in water, wastewater, education, healthcare, and transport. Concerns were raised about insufficient guidance on managing both new and existing nationally significant electrical infrastructure, particularly regarding the impact of power lines and pylons on the landscape, with suggestions to incorporate measures such as undergrounding and a mitigation hierarchy. Additional feedback called for robust funding mechanisms integrated with phased developer contributions, improved public transport to reduce car dependency, comprehensive healthcare planning in coordination with relevant agencies, and a review of speed limits and road safety measures on rural roads, alongside recommendations to consider green and blue infrastructure and cumulative impacts from smaller developments.

Key themes raised:

- Policy Clarity and Implementation Mechanisms
- Essential Utility Infrastructure
- Landscape and Environmental Mitigation
- Electrical Infrastructure and Electrification
- Infrastructure Funding and Developer Contributions

Overview of SDNPA response and way forward for the Local Plan

A number of points raised are already covered by the policy wording which has been re-worded for clarity. The policy has been amended to be consistent with the National Policy Statement (NPS) used for Nationally Significant Infrastructure Projects (NSIPs). In relation to other specific comments about the policy:

- **Criterion 2b** has been amended to clarify that it's the mitigation hierarchy.
- **New supporting text** has been added to define "infrastructure".

In response to other comments which have not resulted in wording changes:

- Policy SDG2 addresses green and blue infrastructure.
- This policy does not identify specific infrastructure.
- This policy requires the provision of appropriate, necessary and reasonable infrastructure investment.

- This policy would be relevant to electrification and would apply to considering options to underground ahead of overland cables.
- The wording about timely infrastructure provision is appropriate as some occupancy may be allowed ahead of infrastructure on bigger sites.
- The Authority collects Community Infrastructure Levy (CIL) which infrastructure providers can bid for.

Policy SDT6 Telecommunications Infrastructure (previously Policy SD44)

Number of comments on policy: 17

Number of additional responses to technical questions: n/a

Reaction to Regulation 18 Consultation

Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree	Not stated
1	4	6	1	2	3

Summary of issues and key themes raised

Respondents emphasised that telecommunications mast sites must be selected to minimise harm to the landscape, wildlife and cultural heritage by considering cumulative impacts and requiring robust, transparent impact assessments over a wide area. They noted that modern connectivity - including ultra-fast broadband and 5G - provides significant economic and social benefits to urban and rural areas, with some indicating that rollout decisions should rely on economic viability and alternative technologies such as satellite and fixed wireless for remote locations. Respondents also highlighted the need for aesthetic and design integration including measures like camouflaging masts, and stressed that applicants should bear any additional costs to mitigate visual and ecological impacts. Views on policy clarity varied, with some supporting retention of language that ensures applicants cover extra costs and others advocating for a broader geographical scope and a clear division between operational decisions and strategic intent.

Key themes raised:

- Strategic Siting and Environmental Mitigation
- Economic and Social Utility of Telecommunications Infrastructure
- Aesthetics and Design

Overview of SDNPA response and way forward for the Local Plan

In terms of responses to representations received:

- It is reasonable to require developers to ensure that new dwellings are provided with good telecommunications infrastructure.
- National policy does not require operators to use best available technology and makes it clear that local planning authorities should not question the need for telecommunications infrastructure.

As for a way forward for the revised local plan:

- **Criterion 1c** amended to include mitigation hierarchy.
- **New supporting text** added to explain that telecommunications operators should submit evidence with their applications to demonstrate how they have selected the least harmful location and design for the equipment and how they have followed the mitigation hierarchy.