



# South Downs National Park

## New Local Plan - Regulation 18 Consultation Report

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**February 2026**

V2 Record of updates:

- i. LE148 (Ditchling) Number of comments updated and summary of comments included in report
- ii. EA212 (Stroud) Updated summary of feedback
- iii. CH203, CH206 & CH147 (Easebourne) Clarification of Parish Council comments on these three sites
- iv. Minor discrepancies in the total number of comments against specific policies and allocations have been corrected
- v. LE039 (County Hall, Lewes) Updated summary of feedback

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## Executive Summary

In line with statutory requirements, the South Downs National Park Authority (SDNPA) initiated a review of the 2019 Local Plan in May 2022. Following early engagement from June to September 2024, the Authority launched its first formal consultation under Regulation 18 between January and March 2025. The process was guided by the bespoke Community Involvement Plan and aimed to gather stakeholder feedback on draft policies and site allocations.

A comprehensive outreach strategy was implemented, including digital notifications to over 1,200 contacts, press releases, website content, promotional videos, and over 20 in-person consultation events across the National Park. The Authority also hosted an online exhibition and recorded webinar to ensure accessibility. In total, more than 1,900 individuals and organisations responded, generating over 3,700 comments—spanning policies, site allocations, and supporting assessments.

Summaries of public feedback on thematic policies and proposed sites have been compiled using AI-assisted tools and officer review, highlighting key issues and concerns to inform the next phase of plan development. All submitted comments have been considered in preparing the Reg 19 Proposed Submission Local Plan and are available to view on the consultation portal at <https://sdnpalocalplanreview.commonplace.is/>

## Introduction

### The New Local Plan

1.1 In May 2022, the South Downs National Park Authority agreed to review the South Downs Local Plan. The existing South Downs Local Plan was adopted in 2019, and we are required to review local plans every five years.

1.2 In December 2024, the Authority approved the consultation document for the first public consultation. This followed informal engagement on the scope of the new Local Plan, earlier in the year from June-September 2024. Public consultation took place for 8 weeks between 20 January and 17 March 2025.

### Regulation 18 consultation

2.2 The Regulation 18 consultation is the first formal, statutory round of consultation, which aimed to invite stakeholders to comment on the detail of draft policies and site allocations. The approach to the consultation was informed by a bespoke [Community Involvement Plan](#), met the Regulation 18 requirements, as well as the requirements of the [South Downs National Park Statement of Community Involvement](#), latest version adopted in November 2024.

2.3 A diverse range of stakeholders were invited to respond including residents, statutory consultees, infrastructure providers, developers, community groups, neighbouring Local Authorities, landowners, business owners and elected officials.

## What we did – consultation activity

### Local Plan Contact database (email & letter notification)

3.1 The Local Plan contact database (1,232 subscribers as of January 2025 – organisations listed in Appendix 1) was used to notify a wide range of stakeholders about the consultation. Email / letters provided information about the various ways to respond as well as information about the consultation events. This was the primary method for reaching our statutory consultees on the new Local Plan.

3.2 A follow up reminder notification was sent to the contact database, two weeks prior to the close of the consultation.

3.3 Teams across the South Downs National Park Authority also forwarded these notifications to their contacts and subscribers on behalf of the Planning Policy team (e.g. South Downs Educators Network and our South Downs business network).

### Commonplace subscribers

3.4 The Commonplace consultation platform was used to host a digital version of the consultation document and allowed stakeholders to directly comment on the draft policies, sites and evidence-base online. At the start of Reg 18 consultation, XXX existing subscribers to Commonplace were notified of the Local Plan consultation. Over 1,700 people signed up for weekly news updates from Commonplace on the Local Plan Review during the consultation period.

### **SDNPA website & video**

3.5 The consultation was published on the SDNPA website and Local Plan [promotional video](#) was on the landing page for the first two weeks of the consultation. There were over 2,600 views of the Local Plan video.

3.6 A consultation hub was set up on the SDNPA Local Plan Review webpage, with details of the consultation document, ways to respond and consultation events. An [online exhibition](#) and [webinar](#) were available for those who couldn't attend events (200 views of webinar).

### **Press release**

3.7 Press releases were sent to local newspapers and media outlets on 14 January 2025. There was a follow up press release on 27 February prior to the end of the consultation (see Appendix 2).

### **Public Notices**

3.8 Public notices were published in relevant local newspapers at the beginning of the engagement period, outlining the consultation dates and the various methods available to make comments (see Appendix 3)

### **Posters & Leaflets**

3.9 Posters with QR codes were displayed at SDNPA venues and copies provided to Parish Councils and local libraries to display on notice boards (see Appendix 4).

### **Consultation events**

3.10 A series of consultation events took place with a range of stakeholders. Public exhibitions were held in Midhurst, Twyford, Amberly, Petersfield, Liphook, Petworth and Lewes. Three consultation meetings were held with local representatives (parish, district and county councillors) in each county. Bespoke meetings with different stakeholder groups also took place, including Agents Forum, Farmers Breakfast and Local Access Forum. Over **1,000** people attended the consultation events. Details of each event are set out in Table 1.

**Table 1 Consultation Events**

| <b>Event date &amp; time</b>   | <b>Event title</b>                                  | <b>Event Location</b>   | <b>Attendance</b>                          |
|--|---|---|--|
| Wed 15 <sup>th</sup> January   | Friends of the South Downs Planning Committee       | Online  | 10   |
| Wed 22 <sup>nd</sup> January<br>4-6pm and public drop-in 6.30-8.30pm | West Sussex Parishes meeting & public drop-in event | Memorial Hall, South Downs Centre, Midhurst                                       | 45 representatives<br>40 members of public |
| Thurs 23 <sup>rd</sup> January                                       | Agents Forum  | SDC Midhurst  | 13   |
| Saturday 25 <sup>th</sup> January 2-5pm                              | Twyford public exhibition                           | Twyford Village Hall, Hazeley Rd, Twyford, Winchester SO21 1QY                    | 49   |
| Tuesday 28 <sup>th</sup> January<br>3.30-7.30pm                      | Amberley public exhibition                          | Amberley Church Hall, St Michael's Amberley Church St, Amberley, Arundel BN18 9ND | 107  |
| Wed 29 <sup>th</sup> January<br>4-6pm and public drop-in 6.30-8.30pm | Hampshire Parishes meeting & public drop-in event   | Petersfield, Festival Hall, Heath Rd, Petersfield GU31 4EA                        | 50 representatives<br>80 members of public |
| Saturday 1 <sup>st</sup> February<br>2-5pm                           | Liphook public exhibition                           | Liphook Church Centre, Portsmouth Road, GU30 7DJ                                  | 103  |
| Wed 5 <sup>th</sup> February<br>4-6pm and public drop-in 6.30-8.30pm | East Sussex Parishes meeting & public drop-in event | Lewes Town Hall, High St, Lewes BN7 2QS   | 161  |
| Thursday 6 <sup>th</sup> February 6.30-9pm                           | Lewes Local Plan – Cooksbridge Joint Event          | Beechwood Hall, Beechwood Lane, Cooksbridge BN7 3QG                               | 50   |
| Thursday 6 <sup>th</sup> Feb   | Meon Valley Partnership                             |   | 7  |
| Monday 10 <sup>th</sup> Feb  | Local Access Forum                                  | South Downs Centre  | 11   |
| Monday 10 <sup>th</sup> Feb  | Hassocks Parish Council                             | HPC Offices   | 25   |
| Tuesday 11 <sup>th</sup> Feb   | Farmers Breakfast (Hampshire)                       | Privett   | 6  |
| Tuesday 11 <sup>th</sup> Feb   | Farmers Supper (East Sussex)                        | Westmeston  | 6  |
| Wed 12 <sup>th</sup> Feb   | Farmers Breakfast (West Sussex)                     | SDC Midhurst  | 6  |

|  |                            |  |    |
|--|----------------------------|--|----|
| Wed 12 <sup>th</sup> February<br>3.30-7.30pm | Petworth public exhibition | Petworth, Leconfield Hall, Market Square,<br>Petworth GU28 0AH | 33 |
| Saturday 15 <sup>th</sup> February 1.30-4pm  | Lewes public exhibition    | Cliff Hall, 28 Cliffe High St, Lewes BN7 2AH                   | 96 |
| Friday 21 <sup>st</sup> February             | South Downs Network        | SDC Midhurst   | 11 |
| Monday 24 February                           | Midhurst public exhibition | South Downs Centre   | 46 |



### Online exhibition

3.11 At the Local Plan drop-in consultation events an exhibition displayed high level information needed by the public to make a comment about the Local Plan. To make this more widely available, a digital version of the exhibition was made available on the website at:

<https://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/consultation-hub/online-exhibition/>

### Webinar

3.12 For those unable to attend the drop-in consultation events, a short webinar (approximately 20 mins) was recorded and available on the website. The webinar highlights the main proposed changes to policies and how people can respond:

<https://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/consultation-hub/online-webinar/>

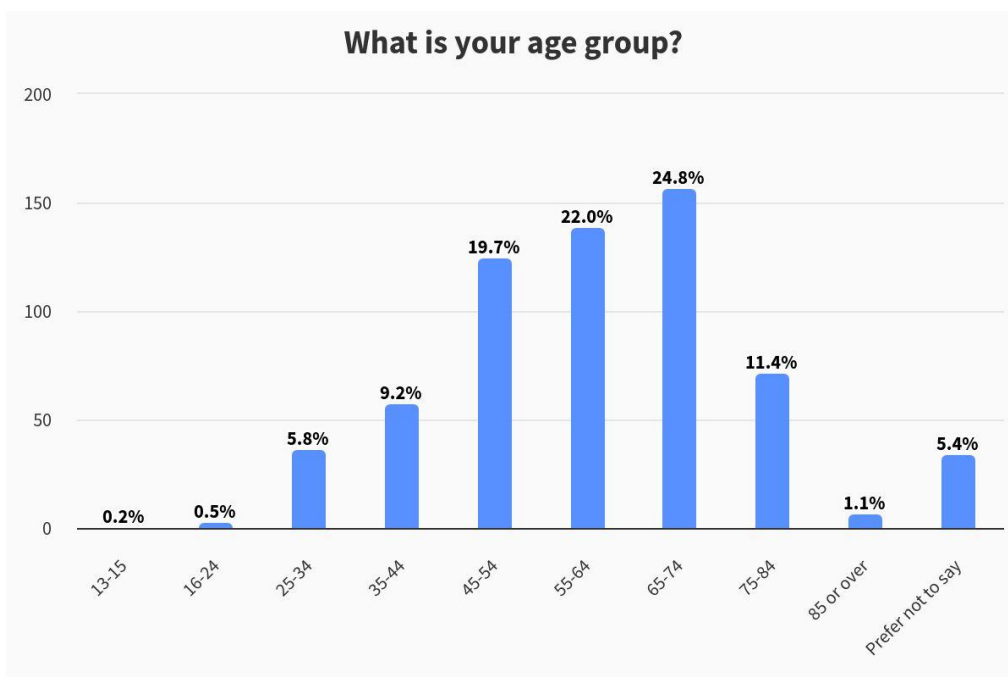
## Who responded

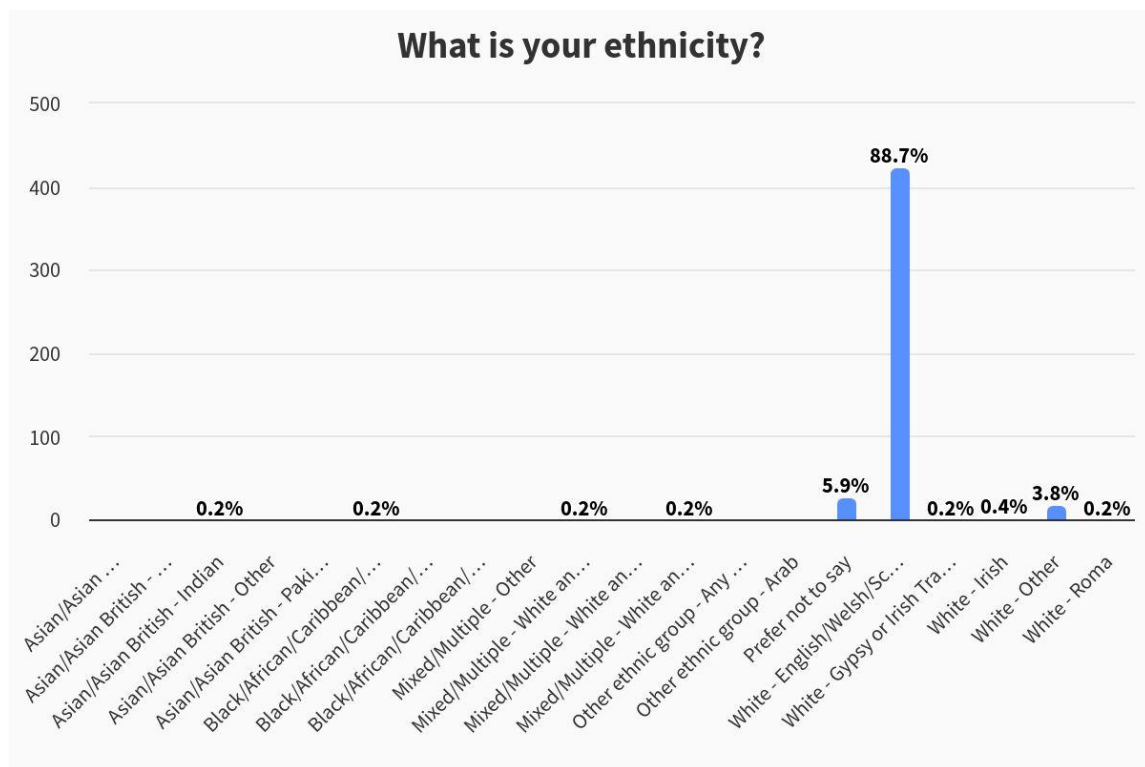
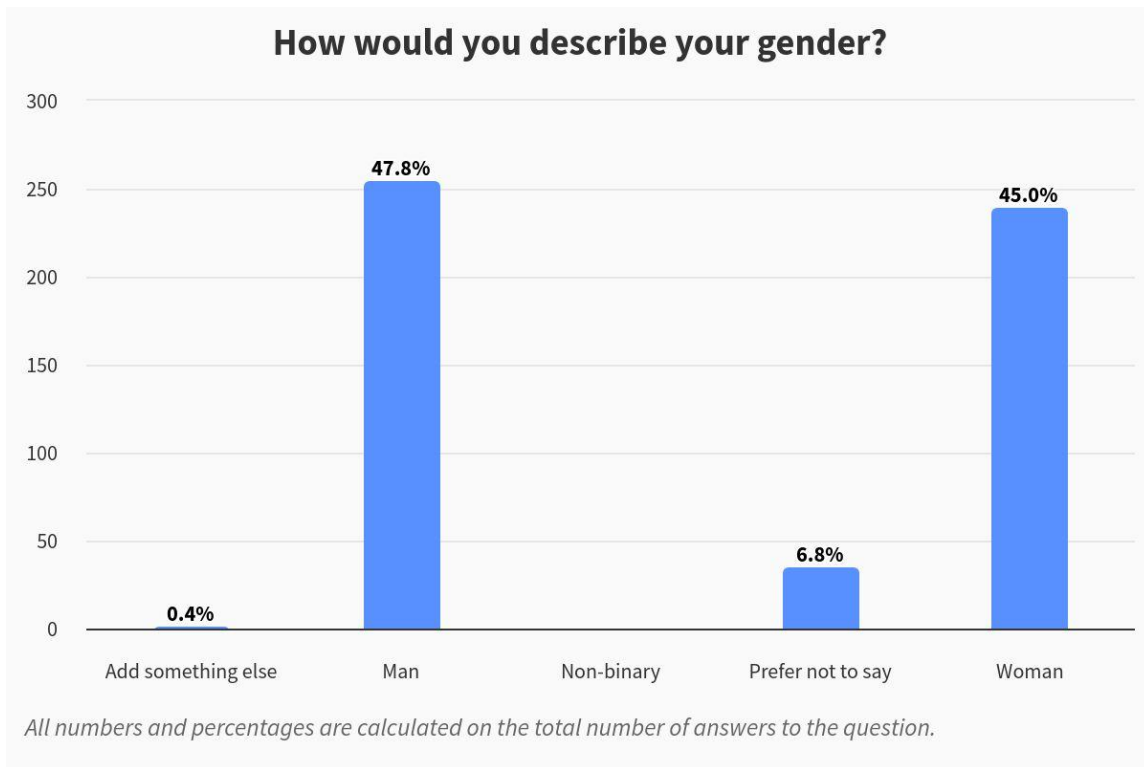
4.1 In total 1,900 people and organisations responded to the consultation. This included responses from the following types of stakeholders:

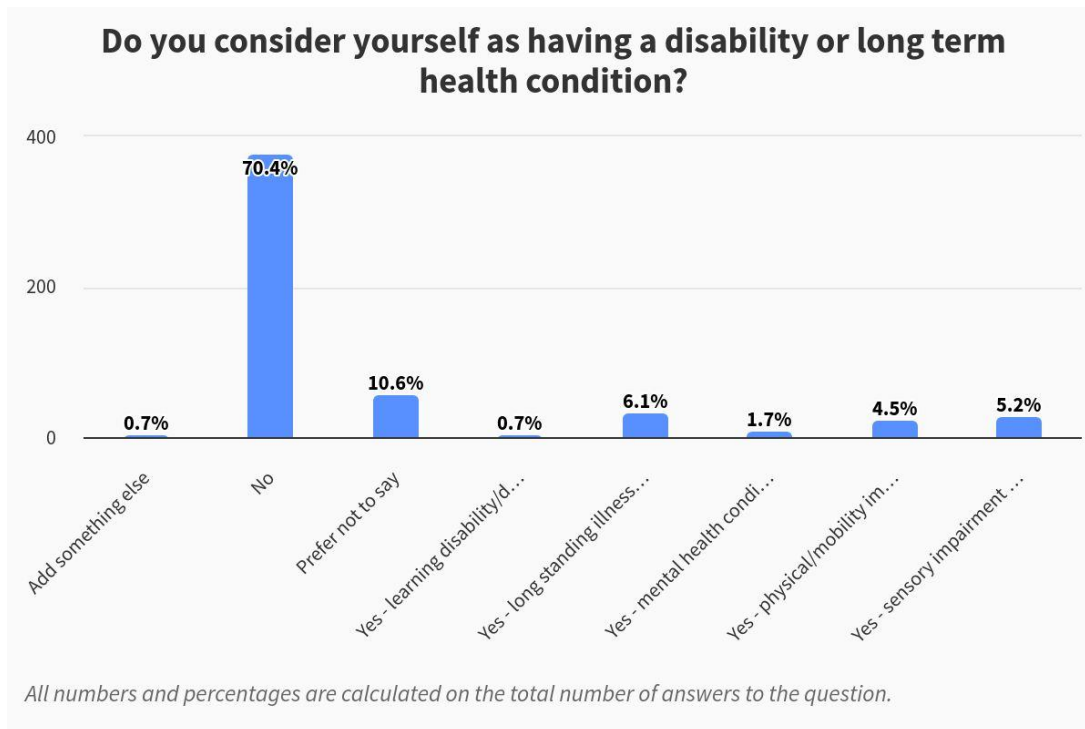
- National bodies or organisations: 28
- Parish & Town Councils: 50
- Landowners / developers: 41
- Local organisations / groups: 37
- Infrastructure / service providers: 11

4.2 995 people responded directly using the consultation platform. Over 1,000 people or organisations responded via email and 60 letters were received.

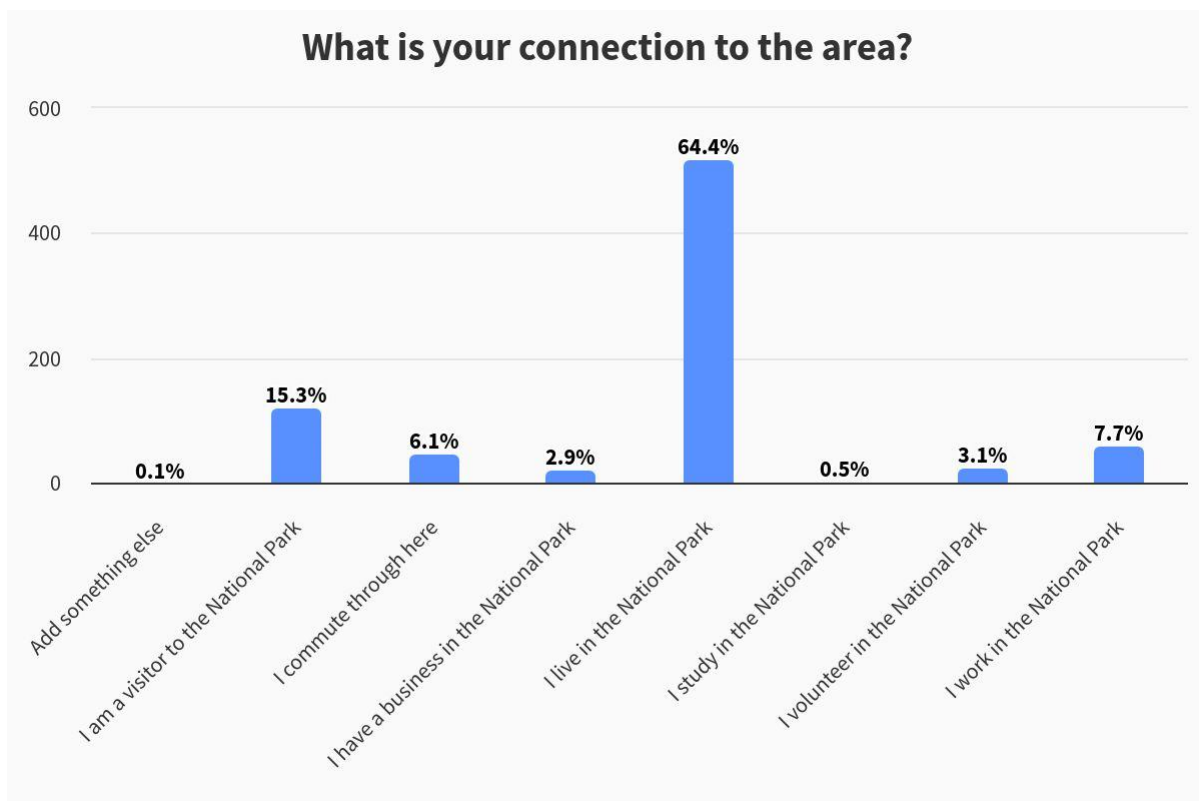
Where people provided details, we are able get an overview of the demographic profile of those responding:







4.3 The consultation aimed to reach people both living or working in the National Park, as well as people who visit the National Park.



## Response to the Consultation feedback

5.1 Summaries of all responses together with the Authority's comment and way forward for the new Local Plan can be viewed at: <https://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/previous-engagement/>. Details of key changes to criteria and supporting text is provided for each policy and site allocation

5.2 Changes to the policies, allocations and supporting text have been informed by analysis of the over 3,700 comments received during the Regulation 18 consultation. The draft Proposed Submission Local Plan has been prepared in light of this consultation feedback, along with any additional input from statutory consultees, developers and parish councils.

5.3 The following table provides examples of changes made between the first draft Local Plan (Reg 18) and draft proposed submission Local Plan (Reg 19) specifically responding to feedback from the public (this list is not exhaustive):

| Policy ref.<br>(Reg 19 draft) | Previous ref. (Reg 18 draft) | Chapter / Policy                              | Key changes made in response to comments from the public  |
|-------------------------------|------------------------------|---|---|
| SDC3                          | SD2                          | Regenerative Development & Ecosystem Services | Included wording in the supporting text to provide more information on regenerative development and confirmed update to the TAN will be undertaken to support applicants and decision makes on implementing the policy. |
| SDL1-2                        | SD4-5                        | Landscape Character and Design                | Defining landscape including townscape in both policy and supporting text   |
| SDL5                          | SD8                          | Dark Night Skies                              | Strengthened the policy in regards role of dark night skies on wildlife and explicitly included internal lightspill from buildings as a consideration in the policy.  |
| SDW1                          | SD17                         | Protection of the Water Environment           | Reference to aquifers added.  |
| SDN1                          | SD9                          | Nature Recovery                               | Proceeding with a higher than the minimum 10% BNG –20% included across all sites, except for strategic greenfield sites 33% is required.  |
| SDH3                          | NEW1                         | Accessible & Adaptable Homes                  | Policy 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.                        |

|                  |                  |  |  |
|------------------|------------------|--|--|
| SDH4             | n/a              | Specialist and Older Persons Accommodation   | New policy responding to feedback from residents and stakeholders highlighting gaps in provision and a desire to enable residents to age in place within their communities, also setting out policy support for innovative housing models such as co-living development.                   |
| SDH7-8           | SD30-31          | Replacements & Subdivisions of Dwellings and Householder Development                           | There was no consensus amongst feedback, however the wording (including supporting text) has been amended to provide clarity on frequently raised points and existing floorspace definition and limits in the adopted Local Plan are retained.   |
| SDE1             | SD34 -35         | Economic Development   | Less rural focused by the inclusion of manufacturing and professional services as key sectors.   |
| SDE3, SDE7, SDE8 | NEW2, SD23, SD24 | Winemaking & Wine Tourism, Regenerative Tourism, Equestrian Uses                               | Feedback on these 3 economy policies has led to substantial restructuring of the policies.   |
| SDG1             | SD43             | Community Facilities   | Supporting text includes clear definition of community facilities.   |
| SDG2             | SD45             | Green and Blue Infrastructure  | In response to comments, the policy has been amended to include “blue infrastructure”.   |
| SDG4             | SD47             | Local Green Spaces   | 3 new Local Green Spaces are designated following submissions from parish councils.  |
| SDT2             | SD20             | Active Travel Routes   | In response to comments, the policy title has been amended and definitions of routes and users have been added to the new supporting text. The support for new and enhanced active travel routes and wayfinding, as evidenced in local strategies, is explicitly stated in policy wording. |
| n/a              |                  | Site Allocations   | Allocations are grouped by settlement with a section summarising settlement characteristics and key relevant planning documents e.g. Parish Priority Statements and other community led plans.   |
| SDA1             | SD57             | North Street Quarter:<br>Comprising Phoenix Area;<br>Former Bus Station;<br>and Eastgate Wharf | Inclusion of ‘meanwhile uses’ in the Phoenix part of the allocation to reflect concerns expressed about how the site can be used in the interim before development comes forward.  |

|       |       |   |  |
|-------|-------|---|--|
| SDA4  | LE039 | County Hall, St Anne's Crescent, Lewes            | Inclusion of 'meanwhile uses' to reflect concerns expressed about how the sites can be used in the interim before development comes forward. Addition of comprehensive design principle requirements covering issues relating to the scale of the building, heritage assets, green infrastructure and drainage, pedestrian, vehicular and cyclist access and through routes, parking requirements. Requirement that embodied carbon implications of redevelopment should be fully considered throughout and the allocation will require the preparation of a Health Impact Assessment. |
| SDA5  | LE141 | East Sussex College, Mountfield Road, Lewes       | Adjustment to the transport strategy requirements and supporting text to clarify that parking requirements cover new development, the remaining educational use on the site, and any appropriate provision for adjacent sporting facilities.   |
| SDA6  | LE133 | Springman House, 8 North Street, Lewes            | Policy changes related to integrated and accessible active travel equipment storage, and supporting text regarding positive streetscape contribution and maintaining and increasing permeability for pedestrians   |
| SDA7  | LE103 | Land behind the White Hart, 55 High Street, Lewes | Changes to policy wording relating to design, massing and layout including interrelationships with adjacent residential properties.  |
| SDA10 | EA067 | Land at Penns Place, Petersfield                  | Policy amended to protect existing trees and boundary landscapes and requires further enhancement. Residential design requirements also included to specifically address its unique location   |
| SDA11 | EA071 | Land south of Paddock Way, Petersfield            | Policy requires pedestrian connections to the surrounding Public Rights of Way network and appropriate buffering for adjacent watercourses.  |
| SDA14 | EA225 | Land at Festival Hall, Petersfield                | The policy includes specific design requirements noting the needs of the outdoor swimming pool and the Festival Hall.  |
| SDA18 | CH222 | Land adjacent to The Grange Car Park, Midhurst    | Policy wording includes that development shall not lead to a net loss in parking provision unless it can be demonstrated that such provision is not needed to serve the locality.  |
| SDA19 | CH217 | Land at Forest Road, Midhurst                     | Policy wording requires that development should not lead to a net loss in parking provision unless it can be demonstrated that such provision is not needed to serve the locality.   |
| SDA20 | CH218 | Former Bus Depot, Pitsham Lane, Midhurst          | Vehicular access to be provided via Apple Tree Road and an active travel route to be provided through the site to connect with Pitsham Lane Bridleway.   |

|       |          |   |   |
|-------|----------|---|---|
| SDA21 | CH165    | Land east of Pitsham Lane, Midhurst                   | Indicative capacity set at 50 homes and supporting text which recommend the provision of smaller, higher density building typologies. Detailed landscape and design requirements with specific reference to the boundaries and the provision of a landscape-led masterplan.   |
| SDA22 | CH203    | Land at former Easebourne School                      | The policy sets an indicative capacity of 9 homes (13 dwellings per hectare), provides transitional wording from Local Plan allocation SD68 to SDA22, requires a road layout that prevents access to land to the north, and includes measures to protect trees on or adjacent to the site boundary.   |
| SDA31 | EA215    | Land west of Liphook/ Land at Westlands Park, Liphook | The policy provides for two 11v11 football pitches, skate/bike park facilities, an outdoor classroom and play areas, alongside design requirements to ensure the effective delivery of sustainable energy technologies across all homes on the site.  |
| SDA32 | EA216    | Land at Westlands, Liphook                            | Policy requires delivery of a shared pedestrian and cycle connection into Allocation Site SDA31   |
| SDA34 | WE014    | Alfriston Court, Sloe Lane, Alfriston                 | Policy includes requirements to retain the character of Sloe Lane, improve its functionality, and minimise conflict with its use to the north of the site as a bridleway.   |
| SDA35 | HO037-38 | East Street Farm, Amberley                            | Revised allocation is expected to deliver around 20 homes, with vehicular access from Station Road and improved pedestrian routes throughout. It also includes provision for a community hall and village shop, alongside requirements for pre-application infiltration testing and layout measures to enhance existing water management systems. |
| SDA38 | EA161    | Land south of Lovell Gardens, Binsted                 | Policy requires that the development provide characteristic planting on the southern boundary   |
| SDA39 | CH003    | Land East of Coombe Crescent, Bury                    | Policy secures public right of way alignment and future provision   |
| SDA41 | CH199    | Land east of A286 and north of Mill Lane, Cocking     | Developable area amended to protect views to the south east from the A286, requirement included for appropriate buffering for the Costers Brook and the adjacent ancient woodland habitat and support for public footpath and public open space provision.  |
| SDA46 | CH026    | Land at Hawksfold, Fernhurst                          | Securing access arrangements including the use of shared space principles and integration of a well used public right of way.   |

|       |       |   |  |
|-------|-------|---|--|
| SDA50 | AR009 | Former Allotments north of The Quadrangle, Findon | Inclusion of requirement to contribute towards a pedestrian crossing facility on the A24.  |
| SDA56 | LE118 | Land at Beaumont, Wellgreen Lane, Kingston        | Policy text amendment to secure a public open space in the eastern section of the site.  |
| SDA57 | LE124 | Audiburn Farm, Ashcombe Lane, Kingston            | The site allocation boundary has been reduced and developable area identified.   |
| SDA59 | CH215 | Land West of The Street, Lodsworth                | The revised policy requires a year-round usable new right of way with planting and natural surveillance, characteristic boundary treatments visible from the public realm, and design measures that support Lodsworth's status as a 'dark village'       |
| SDA62 | CH074 | Land west of Valentines Lea, Northchapel          | Amendments include provision of both on-site public open space and off-site public open space improvements, inclusion of options for allotment provision, and pedestrian and cycle connectivity improvements including a crossing for the A283           |
| SDA65 | WI100 | Land at Old Green Farm, Owslebury                 | Policy and supporting text set out access requirements for both vehicles and pedestrians focused on minimising vehicular impact and creating networks for walking and cycling  |
| SDA71 | EA200 | Land off Merryfield Road, Sheet                   | Site allocation boundary revised.  |
| SDA72 | AD001 | Land off Steepdown Road, Sompting                 | Inclusion of specific policy detail related to the landscaping of the edge of the site and its transition to open countryside and the provision of public open space directly adjacent to Steepdown Road.  |
| SDA78 | EA212 | Land north of Winchester Road, Stroud             | Amended policy requires a loose-knit layout consistent with existing development in Stroud north of the A272, while ensuring a positive relationship with neighbouring homes and preserving the outlook from the adjacent care home.                     |
| SDA79 | WI102 | Land north of Dodds Lane, Swanmore                | Policy includes a developable area to clarify that development should only be located on the western area of the site.   |
| SDA80 | WI056 | Land north of Hewlett Close, Twyford              | The policy adjusts the developable area and green space requirements to protect and enhance the setting of existing trees, while requiring pedestrian links to the public footpath west of the site leading to the Northfields Play Area on Coles Close. |

## Summary of responses

6.1 In total, 3,714 comments were received during the Reg 18 consultation. These comprised 1,491 comments on draft policies, 2,135 comments on draft site allocations and 88 comments on the Integrated Impact Assessment and other evidence studies.

### Feedback on policies

6.2 When commenting on draft policies, people were asked to state how much they agreed or disagreed with the draft policy. An overview of sentiment of each policy is set out in Table 1.

**Table 1: Feedback Sentiment by Policy**

| Policy Ref | Policy Name   | No. of reactions | Strongly Disagree | Disagree | Neutral | Agree | Strongly Agree |
|------------|---|------------------|-------------------|----------|---------|-------|----------------|
| SD1        | Sustainable Development   | 67               | 13%               | 10%      | 18%     | 46%   | 12%            |
| SD2        | Ecosystem Services  | 72               | 6%                | 17%      | 25%     | 35%   | 19%            |
| SD3        | Major Development   | 58               | 17%               | 19%      | 22%     | 31%   | 10%            |
| SD25       | Development Strategy  | 62               | 13%               | 16%      | 26%     | 29%   | 16%            |
| SD4        | Landscape Character   | 58               | 5%                | 10%      | 17%     | 45%   | 22%            |
| SD5        | Design  | 55               | 9%                | 11%      | 15%     | 45%   | 20%            |
| SD6        | Safeguarding Views  | 51               | 2%                | 11%      | 23%     | 32%   | 32%            |
| SD7        | Relative Tranquillity   | 50               | 6%                | 6%       | 22%     | 40%   | 26%            |
| SD8        | Dark Night Skies  | 47               | 2%                | 11%      | 23%     | 32%   | 32%            |
| SD12       | Historic Environment  | 49               | 2%                | 12%      | 22%     | 41%   | 22%            |
| SD13       | Listed Buildings  | 42               | 5%                | 17%      | 19%     | 36%   | 24%            |
| SD15       | Conservation Areas  | 42               | 7%                | 2%       | 31%     | 40%   | 19%            |
| SD16       | Archaeology   | 37               | 0                 | 3%       | 41%     | 35%   | 22%            |
| SD9        | Biodiversity & Geodiversity   | 57               | 9%                | 12%      | 15%     | 35%   | 32%            |
| SD10       | International Sites   | 40               | 3%                | 3%       | 32%     | 32%   | 30%            |
| SD11       | Trees, Woodlands and Hedgerows  | 45               | 9%                | 9%       | 13%     | 31%   | 38%            |
| NEW2       | Designated Sites Hierarchy  | 40               | 10%               | 13%      | 28%     | 35%   | 15%            |
| NEW3       | Arun Valley Special Protection Area (SPA) Functionally Linked Habitat | 32               | 0                 | 0        | 56%     | 22%   | 22%            |
| NEW4       | Arun Valley SPA/SAC/Ramsar – Water Neutrality                         | 37               | 3%                | 0        | 49%     | 19%   | 30%            |
| NEW5       | Wealden Heaths Phase II SPA – Urbanisation and Recreational Pressure  | 33               | 6%                | 0        | 52%     | 24%   | 18%            |
| NEW6       | Solent Coast SPAs – Recreational Pressure                             | 32               | 6%                | 0        | 50%     | 22%   | 22%            |
| NEW7       | Solent Coast SPAs & SACs & the River Itchen SAC – Nutrient Neutrality | 34               | 3%                | 0        | 53%     | 26%   | 18%            |
| SD48       | Climate Change & Sustainable Use of Resources                         | 51               | 6%                | 10%      | 8%      | 53%   | 24%            |
| SD14       | Climate Change Mitigation & Adaptation of Historic Buildings          | 32               | 9%                | 0        | 28%     | 50%   | 13%            |
| SD51       | Renewable Energy  | 41               | 7%                | 10%      | 17%     | 32%   | 34%            |
| SD17       | Protection of the Water Environment                                   | 49               | 2%                | 10%      | 20%     | 35%   | 33%            |
| SD49       | Flood Risk Management   | 40               | 5%                | 5%       | 15%     | 43%   | 33%            |
| SD50       | Sustainable Drainage Systems  | 46               | 2%                | 13%      | 11%     | 50%   | 24%            |

| Policy Ref | Policy Name  | No. of reactions | Strongly Disagree | Disagree | Neutral | Agree | Strongly Agree |
|------------|--|------------------|-------------------|----------|---------|-------|----------------|
| SD18       | The Open Coast   | 30               | 10%               | 7%       | 23%     | 47%   | 13%            |
| SD54       | Pollution & Air Quality  | 34               | 3%                | 12%      | 26%     | 35%   | 24%            |
| SD55       | Contaminated Land  | 32               | 0                 | 13%      | 34%     | 25%   | 28%            |
| SD26       | Supply of Homes  | 90               | 24%               | 23%      | 34%     | 11%   | 7%             |
| SD27       | Mix of Homes   | 67               | 9%                | 19%      | 39%     | 27%   | 6%             |
| NEW1       | Accessible Homes   | 64               | 8%                | 11%      | 38%     | 33%   | 11%            |
| SD28       | Affordable Homes   | 73               | 10%               | 27%      | 27%     | 22%   | 14%            |
| SD29       | Rural Exception Sites  | 53               | 11%               | 9%       | 36%     | 36%   | 8%             |
| SD30       | Replacement Dwellings  | 64               | 11%               | 9%       | 36%     | 41%   | 3%             |
| SD31       | Extensions to Existing Dwellings & Provision of Annexes & Outbuildings | 51               | 14%               | 8%       | 33%     | 39%   | 6%             |
| SD32       | New Rural Workers' Dwellings   | 57               | 9%                | 4%       | 28%     | 42%   | 18%            |
| SD33       | Gypsies and Travellers   | 54               | 20%               | 17%      | 44%     | 13%   | 6%             |
| SD34       | Sustaining the Local Economy   | 36               | 11%               | 19%      | 22%     | 36%   | 11%            |
| SD35       | Employment Land  | 26               | 8%                | 4%       | 58%     | 19%   | 12%            |
| SD39       | Agriculture and Forestry   | 23               | 9%                | 9%       | 43%     | 30%   | 9%             |
| SD41       | Conversion of Redundant Agricultural or Forestry Buildings             | 28               | 11%               | 7%       | 39%     | 39%   | 4%             |
| NEW8       | Viticulture, Winemaking and Wine Tourism                               | 45               | 27%               | 11%      | 11%     | 42%   | 9%             |
| SD36       | Town and Village Centres   | 22               | 0                 | 9%       | 55%     | 32%   | 5%             |
| SD37       | Development in Town and Village Centres                                | 23               | 0                 | 4%       | 57%     | 35%   | 4%             |
| SD38       | Shops Outside Centres  | 21               | 5%                | 5%       | 71%     | 14%   | 5%             |
| SD52       | Shop Fronts  | 21               | 0                 | 5%       | 57%     | 38%   | 5%             |
| SD53       | Adverts  | 21               | 0                 | 0        | 57%     | 38%   | 5%             |
| SD23       | Sustainable Tourism  | 41               | 2%                | 17%      | 39%     | 29%   | 12%            |
| SD24       | Equestrian Uses  | 25               | 4%                | 4%       | 40%     | 40%   | 12%            |
| SD43       | New & Existing Community Facilities                                    | 36               | 0                 | 11%      | 31%     | 50%   | 8%             |
| SD45       | Green Infrastructure   | 38               | 0                 | 5%       | 24%     | 53%   | 18%            |
| SD46       | Provision & Protection of Open Space...                                | 31               | 0                 | 6%       | 19%     | 61%   | 13%            |
| SD47       | Local Green Spaces   | 36               | 3%                | 11%      | 31%     | 39%   | 17%            |
| SD20       | Walking, Cycling & Equestrian Routes                                   | 49               | 2%                | 6%       | 16%     | 45%   | 31%            |
| SD19       | Transport & Accessibility  | 47               | 2%                | 23%      | 40%     | 32%   | 2%             |
| SD21       | Public Realm, Highway Design and Public Art                            | 24               | 0                 | 8%       | 58%     | 33%   | 0              |
| SD22       | Parking Provision  | 28               | 4%                | 7%       | 36%     | 43%   | 11%            |

| <b>Policy Ref</b> | <b>Policy Name</b> | <b>No. of reactions</b> | <b>Strongly Disagree</b> | <b>Disagree</b> | <b>Neutral</b> | <b>Agree</b> | <b>Strongly Agree</b> |
|-------------------|--------------------|-------------------------|--------------------------|-----------------|----------------|--------------|-----------------------|
| SD42              | Infrastructure     | 26                      | 12%                      | 4%              | 38%            | 31%          | 15%                   |
| SD44              | Telecommunications | 29                      | 7%                       | 3%              | 41%            | 34%          | 14%                   |

## Consultation feedback summaries – thematic policies

7.1 The following summaries of consultation comments have been generated with the assistance of AI software and have been reviewed and checked by officers. The purpose of the summaries is to communicate the main concerns and key issues raised in the consultation feedback. All comments submitted at Regulation 18 have been read and continue to be considered by officers in preparing the next stage of the Local Plan process. All comments submitted during the consultation are available to view at <https://sdnpalocalplanreview.commonplace.is/>

### **Introduction (203 Comments)**

#### **Summary of all comments**

Respondents emphasise that the introduction should prioritise environmental and landscape protection through a collaborative, landscape-led approach that limits development in sensitive areas and safeguards the South Downs National Park's natural, wildlife and cultural heritage. They call for a strategic vision with clear, measurable objectives—encompassing revised housing targets, nature recovery goals and infrastructure standards—that addresses long-term issues like climate change, urban sprawl and cross-boundary coordination. Feedback also highlights the need for a fairer allocation of housing, enhanced legal clarity regarding statutory duties and enforcement, and more accessible, transparent stakeholder engagement. Additionally, respondents suggest that the introduction's language, structure and organisation be refined to improve clarity and overall readability.

#### **Key Themes raised:**

- Environmental and Landscape Protection
- Strategic Vision and Objective Setting
- Housing Provision
- Integration with Wider Policy and Cross-Boundary Coordination
- Stakeholder Engagement and Consultation
- Legal and Regulatory Clarity

### **Vision and Objectives (92 Comments)**

#### **Summary of all comments**

Respondents identified that the vision and objectives are written in ambiguous terms, with key aspects such as access details, housing commitments, climate change targets and conservation measures lacking clear definition. They called for more specific, measurable targets and detailed implementation strategies, particularly to safeguard the National Park's natural and cultural heritage while ensuring sustainable community development and adequate infrastructure investment. Emphasis was also placed on the need for a more inclusive and well-documented stakeholder engagement process, improved cross-boundary integration, and explicitly stated climate change mitigation and accessible infrastructure standards, all aimed at balancing development pressures with the National Park's unique attributes.

#### **Key Themes raised:**

- Clarity, Specificity, and Feasibility of the Vision and Objectives

- Conservation of Natural and Cultural Heritage
- Housing Provision and Sustainable Development
- Economic Vitality and Infrastructure Investment
- Cross-Boundary Integration and Regional Impact
- Climate Change Mitigation and Environmental Sustainability

## Core Policies

### **Policy SD1 Sustainable Development** (71 Comments)

#### **Summary of all comments**

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

#### Key Themes raised:

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

### **Policy SD2 Regenerative Design, Ecosystem Services and Environmental Net Gain** (82 comments)

#### **Summary of all comments**

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

submissions and others noting risks of added complexity and cost, while also calling for clearer guidance on proportionality, monitoring, enforcement and transitional arrangements.

Key Themes raised:

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

### **Policy SD3 Major Development** (74 comments)

#### **Summary of all comments**

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

Key Themes raised:

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

### **Policy SD25 Development Strategy** (82 comments)

#### **Summary of all comments**

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

Key Themes raised:

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

## Landscape & Heritage Policies

### **Policy SD4 Landscape Character** (61 comments)

#### **Summary of all comments**

Respondents call for development proposals to be integrated with comprehensive landscape assessments that enhance conservation, heritage, and public amenity while incorporating high-quality design features such as native planting and inclusive public spaces. They recommend clearer, simpler policy language and definitions to distinguish between built and natural features, and suggest flexible phrasing (eg, using “or” instead of “and”) to allow for context-sensitive application, including consideration of temporary impacts and dynamic landscape changes. Several comments seek closer alignment with statutory planning frameworks and environmental guidance. Feedback also highlights a desire for robust, transparent procedures for implementing and enforcing the policy, along with suggestions for improvements in local connectivity and green corridor retention, and wording on historic environment. Several comments were received seeking this policy to be applied in the setting of the National Park.

Key Themes raised:

- Integration of Development with Landscape Conservation
- Heritage Value
- Balancing Prescriptive Controls and Flexibility
- Alignment with National Planning Policy Framework and Section 245 of the Levelling-Up and Regeneration Act 2023
- Clarity and Precision in Policy Wording
- The Setting of the National Park
- Dynamic Nature of Landscape Character

### **Policy SD5 Design** (70 comments)

#### **Summary of all comments**

Respondents stress the need for improved design quality and public realm measures that better cater to pedestrians and cyclists through safe, attractive routes and enhanced green infrastructure (active travel and sustainable transport), while preserving local character via sensitive material use and scale. They call for unambiguous definitions of terms like “landscape-led approach” and “enhancing settlement edges”, along with explicit references to local planning documents such as village/parish design statements. Concerns over environmental sustainability focus on rigid technical requirements for sustainable drainage, waste management, and utility infrastructure, prompting

suggestions for flexible, site-specific measures. Stronger enforcement mechanisms and proportionate developer guidance—especially for smaller projects—is also requested, with additional feedback urging improved clarity, consistency and alignment with national design guidelines. Additional criteria for healthy design principles is also sought.

Key Themes raised:

- Design Quality and the Public Realm
- Local Character, Landscape, and Heritage Integration
- Utility Infrastructure
- Sustainable Transport and Active Travel Infrastructure
- Clarity and Enforcement Mechanisms
- Sustainable Drainage and Flood Resilience

### **Policy SD6 Safeguarding Views** (50 comments)

#### **Summary of all comments**

Respondents noted that development should conserve and enhance the national park’s visual integrity through modest, sympathetic design incorporating transitional and landscape-led features, with a call for clearer policy wording—particularly regarding terms like “sequential views” and “key features.” They also recommended extending safeguarding measures to include lands immediately adjacent to the park and iconic views, in line with legislative provisions such as s245 of the Levelling Up and Regeneration Act 2023. Comments sought reference to local planning documents such as neighbourhood development plans and parish/village design statements that include locally important views. Concerns were raised about inconsistent enforcement and regulatory compliance, as well as the potential impact on sectors such as farming, estates, and commercial uses, alongside suggestions for improved stakeholder consultation and clearer guidelines on design and urban–rural transitions.

Key Themes raised:

- Balancing Development with Landscape Quality
- Scope and Boundary Considerations
- Design Considerations

### **Policy SD7 Relative Tranquillity** (40 comments)

#### **Summary of all comments**

Respondents noted that accessible, tranquil natural spaces support social wellbeing and cultural value by providing areas for reflection and mental health recovery, and the policy is seen as a means to protect these benefits by reducing noise and visual disturbances. They urged clearer, more precise wording and a broader scope that aligns with similar policies, including objective noise measurements (often suggested as +10 dB above ambient) and enforceable planning conditions. Concerns were raised about ambiguous language in regards “relative” tranquillity, and the potential impacts of increased traffic, higher visitor numbers, and concentrated development on both the

natural setting and visual quality of key areas. Calls for enhanced transparency, stakeholder engagement on specific development proposals, and better management of non-development activities also emerged, with suggestions for clearer definitions and measurable criteria to ensure that the policy effectively balances public access with the preservation of tranquillity.

Key Themes raised:

- Social Wellbeing and Cultural Value
- Policy Scope, Enforcement and Integration
- Definition and Clarity
- Traffic, Visitor and Development Impacts

### **Policy SD8 Dark Night Skies** (47 comments)

#### **Summary of all comments**

Respondents raised concerns that developments outside the National Park near heritage coast and national park areas risk undermining environmental heritage and disrupting nocturnal ecology through increased traffic, pollution and excessive lighting. They called for including stricter controls on light spillage and clearer enforcement strategies, while also highlighting that current controls do not adequately address internal sources such as large glazed areas. Feedback noted conflicts between dark skies protection and new planning priorities, recommended regular technological updates and design adaptations and clearer policy wording. Additional suggestions focused on managing street lighting levels, imposing stricter lumen limits and developing a detailed mapping of dark sky zones. Several comments raised the importance of cross-boundary coordination and sought the extension of this policy to areas outside the National Park.

Key Themes raised:

- Social Wellbeing and Cultural Value
- Policy Scope, Enforcement and Integration
- Definition and Clarity
- Traffic, Visitor and Development Impacts

### **Policy SD12 Historic Environment** (42 comments)

#### **Summary of all comments**

Respondents recommended revising the policy to better balance conservation with enabling development by broadening its scope to include cultural heritage and non-designated assets, such as those in the agricultural landscape. They advised that proposals be assessed on a case-by-case basis using clear, proportionate decision-making criteria and detailed guidance on when a heritage impact statement is necessary and what evidence is required. Several responses called for consistent heritage terminology aligned with national frameworks and Historic England guidance, while others suggested incorporating measures for energy efficiency, climate adaptation in historic buildings, and urban design constraints. Some feedback also noted that the current wording is vague and requires further refinement to address contemporary conservation and planning challenges.

Key Themes raised:

- Balancing Conservation with Enabling Development
- Protection of Both Designated and Non-Designated Assets
- Procedural Clarity and Proportionality in Decision-Making
- Clarity and Consistency in Heritage Terminology
- Alignment with National Policy and Best Practice
- Heritage Impact Statement Requirements
- Energy Efficiency and Climate Adaptation in Historic Buildings

**Policy SD13 Listed Buildings** (30 comments)

**Summary of all comments**

Respondents stressed that adaptive reuse and flexible alterations should allow internal modifications and renewable energy upgrades for listed buildings, provided that key architectural features remain intact and public benefits clearly outweigh any harm. Opinions on policy wording varied, with some noting internal consistency while others sought clarification of terms like ‘public benefits’ and ‘setting’, and some considered the policy included excessive detail that resemble design guidance. Maintaining the condition of heritage assets was seen as essential, with calls for criteria that support conservation even when buildings are in disrepair and for measures that ease administrative burdens, including high costs and extensive paperwork. There was also a preference for policies that support energy efficiency improvements, such as modern heating systems, insulation, and solar panels, without compromising historic fabric. , Suggestions also included a more modern approach that acknowledges the diverse nature of listed buildings alongside broader environmental priorities

Key Themes raised:

- Adaptive Reuse and Flexible Alterations
- Clarity and Consistency of Policy Wording
- Maintaining Condition and Conservation of Heritage Assets
- Energy Efficiency and Sustainable Retrofits

**Policy SD15 Conservation Areas** (35 comments)

**Summary of all comments**

Respondents indicated that the policy should ensure that new developments complement conservation areas through clear, enforceable guidelines that prevent discordant scales and features. They suggested that improved drafting and more precise terminology—such as using “conserve” instead of “preserve”—along with clearer definitions, would align the policy more closely with national standards. Robust monitoring, enforcement and a formal appraisal programme were also deemed essential, while detailed guidance on integrating energy efficiency and renewable measures was called for, particularly regarding the sensitive placement and screening of heat pump external units. A balanced approach to weighing potential harm against public benefit was noted, as was the need to address implementation challenges and enhance policy coherence, especially in clarifying

the hierarchy between conservation aims and climate change objectives. Further comments recommended updating the policy's wording and structure to incorporate modern criteria for assessing harm to heritage assets.

Key Themes raised:

- Design Control and Development Compatibility
- Clarity and Terminology
- Monitoring, Appraisal and Review Mechanisms
- Energy Efficiency, Renewable Integration and Sensitive Adaptation

### **Policy SD16 Archaeology** (24 comments)

#### **Summary of all comments**

Respondents called for archaeological finds to be managed in a way that enhance public accessibility through structured schemes for investigation, assessment, publication, and public access to archives and on site such as school visits, temporary exhibitions, on-site mini-museums, and community projects. Clearer terminology is also sought - some questioned the clarity of terms like “public engagement.” They recommended that heritage impact statements include detailed assessments of archaeological and heritage assets, with specific language to define terms such as “significant” and to delineate archaeological areas. Some feedback noted that the policy's restrictions and specialist focus might benefit from a more flexible approach, particularly to support sustainable farming practices. Respondents also emphasised that development proposals should incorporate effective mitigation measures to reduce harm to archaeological assets and that the policy align with national frameworks and established guidance.

Key Themes raised:

- Public Engagement and Educational Opportunities
- Enhanced Assessment Criteria
- Mitigation and No-Harm Principle
- Consistency with National Frameworks

## Nature Recovery Policies

### **Policy SD9 Nature Recovery** (76 Comments)

#### **Summary of all comments**

A mix of views were given on what percentage of biodiversity net gain should require. Some respondents recommend maintaining a statutory baseline of 10% biodiversity net gain and others were supportive of an increase to levels such as 20%. Respondents generally agreed that any increase needs to be supported by robust local evidence and viability testing. They stress that the policy should align with national and local frameworks—including the Environment Act 2021—and be written in clear, concise language that defines key terms and delineates its scope. The feedback highlights a preference for on-site delivery of biodiversity gains over off-site measures. There were a mix of views given on the potential for policy requirements for integrated wildlife boxes and bricks, with concern raised about blanket requirements. Feedback was given then provision should be backed by evidence-based guidelines and accompanied by appropriate nearby habitats for a tailored approach to the type of integrated wildlife spaces provided. Additional comments call for wording amendments to address climate change, enhanced ecological connectivity through clearly defined landscape priorities, invasive species. Feedback also calls for robust monitoring and enforcement, and the adoption of locally adapted, innovative measures that safeguard both development viability and housing delivery.

#### Key Themes raised:

- Biodiversity Net Gain (BNG) Targets
- Alignment with National Policy
- Integrated Wildlife Features
- Policy Clarity and Flexibility
- On-Site Versus Off-Site Gains
- Development Viability

### **Policy SD10 The Sussex Bat Special Areas of Conservation (SAC)** (23 Comments)

#### **Summary of all comments**

Respondents noted the importance of a clear, science-based spatial approach that defines 6.5 km and 12 km buffer zones extending from core sites and enhances key ecological features such as foraging habitats and commuting routes, with consistent regulation across boundaries. Proposals should be underpinned by robust ecological surveys and impact assessments that address both direct and indirect effects and include adequate mitigation measures. In addition, respondents recommended broadening habitat definitions and clarifying the protocol document's status to final and alignment across local planning authority areas.

#### Key Themes raised:

- Spatial Scope and Landscape Connectivity
- Buffer Zones and Disturbance Mitigation Measures

### **Policy SD11 Trees, Woodlands, Hedgerows and Scrub** (49 Comments)

#### **Summary of all comments**

Respondents highlighted that the policy language must be clearer and more consistent with national guidance, calling for explicit definitions of terms such as “scrub” and clear guidance on replacing felled trees, with an emphasis on best practice standards like BS5837:2012. They noted that buffer zones require additional precision, suggesting wider buffers—especially for ancient woodland—and clear measurement criteria for features like hedgerows. Opinions on scrub management were divided, with some favouring site-specific assessments to inform whether conservation or removal was appropriate. There was support for combining natural regeneration with active tree protection, provided that all arboricultural work is carried out by qualified professionals and robust protection plans are in place. Respondents also stressed the need for strict oversight, enforceable compliance and developer accountability through clear regulation and penalties for non-compliance. In addition, they recommended measurable targets for urban greening and multifunctional ecosystem services, improved management of existing woodlands, innovative tree planting approaches that include a broader range of species, and various other refinements such as net gain provisions and clearer policy organisation.

Key Themes raised:

- Policy Clarity, Consistency and Alignment with National Guidance
- Buffer Zones and Impact Protection Measures
- Scrub Conservation and Management
- Natural Regeneration and Active Tree Protection

### **Policy NEW2 Policy Designated Sites** (28 Comments)

#### **Summary of all comments**

Respondents noted that the policy would benefit from clearer definitions and more prescriptive language, particularly for ambiguous terms such as “dark corridors”, “significant” and “zone of influence”, and raised concerns over vague details related to buffer zones and site sizes. They recommended robust safeguards for irreplaceable habitats—including ancient woodland and veteran trees—by setting high thresholds for development and incorporating additional habitat types like chalk streams. Respondents also called for close alignment with both national planning frameworks and local nature recovery strategies, with detailed criteria for alternative greenspace provision, biodiversity net gain and defined spatial planning and buffer zones. Other feedback focused on balancing flexible, evidence-based approaches with stricter measures, ensuring rigorous environmental impact assessments by qualified professionals, enhancing enforcement and monitoring beyond park boundaries, and providing further clarification on mapping and wider planning issues.

Key Themes raised:

- Clarity, Definitions and Policy Organisation
- Robust Safeguarding of Irreplaceable Habitats

- Integration with National and Local Planning Frameworks
- Alternative Greenspace Provision and Biodiversity Net Gain
- Balancing Regulatory Flexibility with Prescriptive Measures
- Spatial Planning Controls and Buffer Zone Management
- Enforcement and Monitoring

**Policy NEW3 Arun Valley Special Protection Area (SPA): Functionally Linked Habitat** (14 Comments)

**Summary of all comments**

Respondents stress the importance of safeguarding the overwintering habitat of Bewick's swans by ensuring that any proposed alternative habitat is clearly demonstrated and in place before development commences. Several comments call for a strengthened evidence base and clearer policy wording, with compensation being considered only as a last resort in accordance with the mitigation hierarchy. There are also recommendations to reference the Arun Valley SPA Impact Risk Zone (IRZ). The importance of monitoring and enforcement was raised. A concern was raised regarding the importance of maintaining an appropriate hydrological regime and vulnerability of the site to potential water quality deterioration.

Key Themes raised:

- Focus on Conservation of Bewick's Swans
- Strengthening Policy Wording and Evidence Base
- Compensation Mechanisms and Mitigation Hierarchy Compliance
- Alternative Habitat Provision and Suitability

**Policy NEW4 Arun Valley SPA/SAC/Ramsar – Water Neutrality** (22 Comments)

**Summary of all comments**

Respondents noted that the policy aligns with the Natural England Position Statement on water neutrality by drawing on evidence, including from statutory agencies, and is consistent with the approach being taken in the other adopted or emerging Local Plans within the Sussex North Water Resource Zone area. A comment does raise disagreement with the principle of the policy and instead considers this a matter to be addressed by Southern Water's Water Resource Management Plan (WRMP)—to ensure proper allocation of responsibilities for water supply and protected sites without shifting responsibilities to developers. Remarks also highlighted issues with the current offsetting mechanism, particularly the reliance on the Sussex North Offsetting Water Scheme and its credit allocation method, and suggested a review of these processes alongside the incorporation of measures like greywater recycling to meet the 85-litre water consumption standard. Concern is also raised about the proliferation of alternative water supplies and the impact that may have on an already water stressed area.

Key Themes raised:

- Environmental Safeguarding and Protected Site Conservation

- Implementation and Regulatory Clarity
- Offsetting Mechanisms and Credits Control
- Water Consumption Standards and Efficiency Measures

**Policy NEW5 Wealden Heaths Phase 11 SPA – Urbanisation and Recreational Pressure** (14 Comments)

**Summary of all comments**

Respondents generally supported the principle of the policy to protect the habitat and species of Wealden Heaths Phase II SPA. Respondents noted that the policy and buffer zones should clearly include key sites like Woolmer Forest SAC and Shortheath common SAC. It was recommended that the policy makes clear the requirements for the 400m exclusion zone. They raised issues such as litter and overlapping use of public recreation land for Suitable Alternative Natural Green Space (SANG) provision, and urged robust urban development controls that restrict new residential dwellings, especially within 400m of designated sites. Concerns about governance and enforcement were shared, and the need for mitigation measures to be applied in perpetuity, resulting in overall varied opinions on the policy.

Key Themes raised:

- Buffer Zones and Spatial Delineation
- Environmental and Recreational Impact Management
- Development Controls

**Policy NEW6 Solent Coasts SPAs – Recreational Pressure** (14 Comments)

**Summary of all comments**

Respondents emphasise that effective mitigation measures are essential for managing recreational pressure on the Solent Coast SPAs, with new residential developments within 5.6km required to avoid or mitigate their impact. They highlighted the value of collaborative work through the Bird Aware Solent partnership, and noting the alignment with other Local Plans in the area. Some responses recommended a clear definition and a specific threshold for significant adverse impacts to reduce ambiguity, while concerns were raised regarding financial mechanisms, enforcement, and accountability. Consideration was recommended to include other types of development that may also need to address recreational impacts on a case by case basis. There were also observations on broader environmental challenges.

Key Themes raised:

- Mitigation Requirements
- Strategic Consistency and Partnership

**Policy NEW7 Solent Coast SPAs and SACs and the River Itchen SAC – Nutrient Neutrality** (18 Comments)

### Summary of all comments

Respondents stress the need to safeguard sensitive habitats—such as the Solent and the River Itchen, noted for its fragile chalk stream characteristics—by ensuring nutrient neutrality, applying catchment-wide measures and considering development buffer zones, while also observing that the policy may not fully anticipate future protected area designations. They call for mitigation and offsetting methods that deliver wider environment benefits, integrate with the local nature recovery strategy, favour stacking nutrient and biodiversity net gain benefits, and recommend improved legal agreements to secure local delivery. Comments also highlight that the policy’s focus on new overnight accommodation might exclude other development types that impact water quality, and advise clarifying ambiguous terms linked to hydrological connections and catchment boundaries. Wider comments are also made about addressing technical and monitoring challenges—such as those related to storm sewage overflow in the catchment and the current Natural England calculator.

Key Themes raised:

- Protection of Sensitive and Designated Habitats
- Mitigation and Offsetting Approaches

## Climate Action Policies

### **Policy SD48 Climate Change and Sustainable Use of Resources** (66 comments)

#### Summary of all comments

Respondents endorse the ambition for net zero operational carbon and enhanced energy efficiency while calling for practical, technology-aligned targets that reflect current industry capabilities and suggest referencing the UK Net Zero Carbon Buildings Standard for consistency. They advocate a balanced approach that applies targets to whole developments and incorporates clear, flexible criteria with phased or stepped requirements. Feedback supports incorporating embodied carbon assessments using consistent methodologies, with some respondents urging their application to all projects and others warning of burdens for smaller developments. In addition, respondents recommend explicit renewable energy targets, such as solar photovoltaic installations covering a defined area, and advise caution regarding battery storage systems in sensitive locations. They also propose specific water consumption limits, coupled with measures like rainwater harvesting and grey water recycling. Priority is given to retrofitting and reuse over demolition, accompanied by comprehensive pre-demolition audits and design for deconstruction principles. Thermal design measures are suggested to enhance climate resilience through natural ventilation, high insulation, and dynamic modelling.

Key Themes raised:

- Net Zero Operational Carbon and Energy Efficiency
- Integration with National Standards
- Policy Flexibility, Viability and Enforcement
- Embodied Carbon Assessment and Targets

- Renewable Energy and Battery Storage Systems
- Water Efficiency and Sustainable Resource Management
- Retrofitting, Reuse and Demolition Controls
- Thermal Design and Climate Resilience

### **Policy SD14 Climate Change Mitigation and Adaptation of Historic Buildings** (20 comments)

#### **Summary of all comments**

Respondents note that integrating renewable energy into historic buildings requires clear technical guidelines that outline acceptable modifications—such as replicating original window designs, adjusting doors, and upgrading insulation—to enable energy improvements while preserving heritage features. Respondents stress that interventions should be flexible yet sympathetic to a building’s character. There were also calls to streamline planning processes. Comments also point to the inherent challenges of retrofitting historic structures, inconsistencies with related policies that cause confusion, and the need for measures like mandatory climate risk assessments and sustainability targets.

Key Themes raised:

- Integration of renewable energy solutions and technical guidelines
- Heritage and energy efficiency balance
- Streamlined planning and clarity
- Flexible retrofit measures for listed buildings

### **Policy SD51 Renewable Energy** (47 Comments)

#### **Summary of all comments**

Respondents noted issues with policy clarity, particularly the use of ambiguous terms such as “permanent”, “permitted”, “suitably sited” and “screened”, and recommended explicit definitions for acceptable projects including small-scale solar and wind installations up to 1MW and clearer parameters for community-led initiatives. They highlighted the need for detailed guidance on environmental assessments, safety risks, including careful site selection for battery storage systems, solar arrays and wind turbines—and technical issues such as noise, water quality and airspace considerations. Calls were made for individual project assessments that protect landscape character, visual amenity, agricultural land and heritage, alongside improved planning processes with early consultation with relevant statutory bodies. Respondents also advised diversifying and integrating renewable technologies to support local energy security and net zero targets while updating site assessments and clarifying key terminology.

Key Themes raised:

- Policy Clarity, Terminology and Ambition
- Community-Led Renewable Energy
- Landscape, Visual Amenity and Site Sensitivity

- Safety, Environmental and Technical Risk Management
- Planning Process Efficiency and Local Consultation
- Agricultural Land Protection and Site Suitability
- Strategic Contribution to Net Zero and Energy Security

## Water and Pollution Policies

### **Policy SD17 Protection of the Water Environment** (60 comments)

#### **Summary of all comments**

Many respondents were positive about proposed changes to the policy for a catchment-based approach. There were calls for more information on how this would be applied, including proportional to development. Whilst many respondents were positive about a nature-based solutions approach, there were also comments that sought policy criteria that allowed a careful balance as man-made structures may sometimes be required. There was support for protections for chalk streams but it was considered that the policy lacks sufficient detail and could go further, particularly regarding aquifers and their catchments, calling for clearly defined source protection zones, natural buffers and improved mapping. They stress the need for detailed guidance on pollution control, including design, implementation and monitoring measures to prevent contamination of water supply, and recommend robust catchment management with cumulative impact of development assessed. Concerns over rising development pressure have led to calls for checks on water supply and sewage capacity and, where needed, restrictions on further development. Comments from stakeholders included guidance on source protection zones and buffers, improved sustainable urban drainage and criteria for infrastructure requirements for new development. Additionally respondents advocate for references to standards and best practice examples, and clearer integration of climate change and other environmental factors.

Key Themes raised:

- Chalk Streams and Aquifer Protection
- Pollution Control and Water Quality Standards
- Catchment Management and Cumulative Impact Assessment
- Development Pressure and Water Resource Capacity

### **Policy SD49 Flood Risk Management** (37 comments)

#### **Summary of all comments**

Respondents noted that natural flood management measures should explicitly include areas to store water, including restoration of floodplains, and the policy be supported by best practice examples, and many supported the emphasis on surface-based strategies rather than underground solutions. They recommended design requirements for sustainable drainage that clearly favour above-ground measures, limit hard surfacing and direct excess water to the ground or watercourses, suggesting multifunctional systems such as rainwater harvesting be used. Feedback also highlights the need to

incorporate long-term climate change projections, using robust data to guide flood defence and drainage design over a development's lifetime. Respondents expressed concern that the policy's prescriptive approach limits the flexibility required for site-specific geotechnical and hydrological assessments. In addition, they stressed the importance of restricting new residential development in high flood risk areas, clarifying cross-boundary responsibilities among authorities, maintaining flood defence infrastructure, and addressing broader issues such as linking rainfall with groundwater risks and mitigating environmental impacts.

Key Themes raised:

- Promotion of Natural Flood Management and Nature-Based Solutions
- Sustainable Drainage and Surface Water Management
- Incorporation of Climate Change Projections
- Balancing Prescriptive Measures with Design Flexibility
- Restriction of Development in High Flood Risk Areas
- Coordination and Cross-Boundary Governance

### **Policy SD50 Sustainable Drainage** (44 Comments)

#### **Summary of all comments**

Respondents advise that further refinement of this policy is required. Whilst there is support for nature-based solutions and surface level SuDS, there are call for the policy to be more flexible to different circumstances. Detailed technical criteria, including the prescribed sequence of components, may limit applications on smaller developments and sites where on-site infiltration is preferable. Flood risk and run-off management feedback calls for policy wording that more clearly follows the drainage hierarchy, maintaining natural flow paths, avoiding discharges to combined sewers and the need for early ground investigations such as site-specific infiltration testing and level 2 flood risk studies. Developer burden and economic feasibility comments suggest that proportionate criteria and flexible application are important to avoid undue financial impacts. Feedback included a request for additional wording that specifically supports development that contributes to addressing wider surface water management problems Further points address the, integration with broader environmental strategies and multifunctional drainage systems that enhance ecosystem services, along with clarifications on terminology, and the importance of monitoring.

Key Themes raised:

- Mandatory SUDS Implementation
- Flood Risk and Run-Off Management
- Technical Suitability and Site-Specific Considerations
- Developer Burden and Economic Feasibility
- Monitoring, Oversight and Maintenance
- Flexibility and Proportionality in Criteria
- Integration with Broader Planning and Environmental Strategies
- Multifunctionality and Ecosystem Service Enhancements

**Policy SD18 Open Coast** (17 comments)

**Summary of all comments**

Respondents generally support the principle of a policy that seeks to protect the open coast, however comments called for the policy to go further with more specific requirements, especially in regard to coastal erosion, flooding and the heritage coast. They urged coastal management to prioritise natural processes and the support of nature recovery. Comments stated that a Coastal Change Management Area should be designated. Comments also called for more specific policy guidance that differentiates between publicly and privately funded projects, removes ambiguous language, and sets clear standards for coastal safety and heritage areas. Concerns over managing visitor pressure were raised, including traffic congestion. There were calls for more integrated planning that aligns local plans, partnership management, and heritage coast strategies with measures such as the mapping of coastal change areas and a flexible application of the shoreline management plan.

Key Themes raised:

- Conservation of Designated Protected Zones
- Coastal Erosion and Natural Process Management

**Policy SD54 Pollution and Air Quality** (20 Comments)

**Summary of all comments**

Respondents noted that the policy's scope is ambiguous, with a predominant emphasis on air quality that leaves other pollutants, such as water and noise, insufficiently addressed, and they called for clearer integration with related guidance and supporting documents. They stressed the need for robust monitoring systems—including pre-development baselines, post-development assessments, and regular checks on renewable energy installations—to capture cumulative effects and ensure compliance. Feedback also urged improved measures for controlling emissions by addressing issues like high vehicle speeds, supporting electric vehicle infrastructure, public transport and active travel, and by setting explicit particulate matter targets and demolition protocols. Spatial planning concerns highlighted the prioritisation of air quality management in park areas and sensitive zones, with a call for mapping near heritage coastlines and enforcing strict criteria in declared air quality management areas. Additionally, respondents advocated for regenerative development that delivers long-term net positive outcomes, stronger enforcement and regulatory measures, enhanced policy integration with noise and contamination risk advice, and sustainable urban design that reduces reliance on cars, while also raising concerns about the policy's sufficiency and reliance on outdated data

Key Themes raised:

- Policy Scope and Comprehensiveness
- Monitoring, Evaluation and Impact Assessment
- Emission Sources Control and Mitigation
- Air Quality Management areas and sensitive area considerations
- Regenerative Development and Net Positive Outcomes

- Enforcement and Regulatory Compliance

**Policy SD55 Contaminated Land** (11 comments)

**Summary of all comments**

Respondents consider the policy too narrow and its wording unclear, recommending revisions that include supportive guidance and expanded risk assessments. They suggest broadening the policy's scope to cover additional environmental factors such as surface water, groundwater, and coastal waters, and extending its geographical reach to include adjacent areas beyond immediate boundaries. Respondents also stress the need for a dedicated register of contaminated land with improved data accessibility and call for robust pre-development investigations supported by thorough evidence and appropriate remediation measures. Further comments highlight the importance of clearly allocating financial liability for remediation costs, extending enforcement and monitoring measures beyond current limits, and maintaining integration with wider environmental and biodiversity safeguards.

Key Themes raised:

- Policy Appraisal and Adequacy
- Scope, Definitions and Risk Parameters
- Contaminated Land Register and Data Accessibility
- Robust Pre-development Investigations and Remediation Requirements
- Financial Liability and Remediation Cost Allocation
- Enforcement, Monitoring and Intervention

## Homes Policies

### **Policy SD26 Supply of Homes** (137 comments)

#### **Summary of all comments**

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

### **Policy SD27 Mix of Homes** (67 comments)

#### **Summary of all comments**

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

**Policy NEW1 Accessible Homes** (49 comments)

**Summary of all comments**

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

**Policy SD28 Affordable Homes** (95 comments)

**Summary of all comments**

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

**Policy SD29 Rural Exception Sites** (46 comments)

**Summary of all comments**

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 favoured 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

**Policy SD30 Replacement and Subdivision of Dwellings** (42 comments)

**Summary of all comments:**

There are similarities between the comments for Policy SD30 and SD31.

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 SD31 Householder Development** (36 comments)

#### **Summary of all comments:**

There are similarities between the comments for Policy SD30 and SD31.

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

### **Policy SD32 Rural Workers' Dwellings** (37 comments)

#### **Summary of all comments**

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

**Policy SD33 Gypsies and Travellers** (45 comments)

**Summary of all comments**

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

## Economy Policies

### **Policy SD34 Sustaining the Local Economy** (31 comments)

#### **Summary of all comments**

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** (19 comments)

#### **Summary of all comments**

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

**Policy SD39 Agriculture and Forestry** (12 comments)

**Summary of all comments**

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 non-existent 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** (17 comments)

**Summary of all comments**

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** (20 comments)

#### **Summary of all comments**

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

### **Policy NEW 8 Viticulture, Winemaking and Wine Tourism** (41 comments)

#### **Summary of all comments:**

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 metalled, 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

**Policy SD36 Town and Village Centres** (11 comments)

**Summary of all comments**

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

**Policy SD37 Development in Town and Village Centres** (11 comments)

**Summary of all comments**

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

### **Policy SD38 Shops Outside Centres** (8 comments)

#### **Summary of all comments**

Respondents indicated that the SD38 Shops Centres policy does not meet Lewes' 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

### **Policy SD52 Shop Fronts** (9 Comments)

#### **Summary of all comments**

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** (10 Comments)

**Summary of all comments**

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

**Policy SD23 Regenerative Tourism** (55 comments)

**Summary of all comments:**

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

### **Policy SD24 Equestrian Development** (14 comments)

#### **Summary of all comments:**

Respondents note a lack of consistency with Policy SD23 (Regenerative Tourism) and Policy SD25 (Development Strategy) 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

## **Communities, Open Space & Active Travel Policies**

### **Policy SD43 New and Existing Community Facilities** (35 comments)

#### **Summary of all comments:**

Respondents suggest that the policy's criteria and marketing requirements do not align with wider strategic approaches and have not been consistently implemented. Respondents recommend clearly defining "community facilities", clarifying phrases such as "or an equivalent community use", and addressing the separation between commercial and community sports facilities. Respondents advise that development should promote environmental sustainability through multifunctional uses, integrated green and blue infrastructure, and improved non-motorised connectivity. In addition, community facilities should be accessible, inclusive, and close to the community, with calls for design features that support residents without car access. There are also calls for updated evidence, recognition for assets of community value, and exemptions for surplus NHS sites from marketing requirements and community use obligations.

#### **Key themes raised:**

- Policy effectiveness and implementation
- Definition and scope of community facilities
- Environmental sustainability and multifunctional spaces
- Accessible and inclusive design

- Development impacts and community infrastructure contributions
- Location and spatial considerations
- Connectivity and active travel infrastructure

### **Policy SD45 Green Infrastructure** (33 comments)

#### **Summary of all comments:**

Respondents feel that the policy should be amended to both explicitly include blue infrastructure, and better integrate the policy's objectives with design, water, and climate frameworks. Respondents suggest connections, enhancements and guidance for active travel, and emphasise the need for green and blue areas to be accessible, inclusive, and safe. Clearer implementation guidance - including the use of existing mapping frameworks, refined terminology, and measurable criteria - is advised, along with the introduction of a mandatory urban greening factor for new development. Additional comments call for addressing long-term maintenance and funding, recognising local community initiatives, and making minor text amendments for clarity.

#### **Key themes raised:**

- Blue infrastructure
- Integrated policy framework (design, water and climate)
- Enhanced connectivity and active travel
- Safety and inclusivity

### **Policy SD46 Provision and Protection of Public Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries** (28 comments)

#### **Summary of all comments:**

Respondents endorse the delivery of public open space on new developments. However, in recognising the benefits of economies of scale, and that rigid criteria may undermine viability in areas with higher land costs, there are divergent views about whether the threshold for open space delivery should be 10 homes or more.

Respondents recommend adding food-growing elements into the policy (such as allotments, community orchards, and community farms) and stress that standards for public open spaces and sports facilities should be informed by up-to-date evidence and recognised benchmarks, while ensuring accessibility within a 15-minute walk. There are calls for the integration of accessible and inclusive design principles that address the needs of people with reduced mobility, preserve burial grounds as reflective spaces, and enhance sports and recreational facilities to better serve communities. There are also calls for early community engagement, exemption of school playing fields, and consideration for context-sensitive applications in both rural and urban areas.

**Key themes raised:**

- Mandatory open space provision in new developments
- Integration of food growing elements
- Evidence of open space provision and assessment
- Accessible and inclusive green infrastructure standards
- Preservation of burial grounds and cemeteries
- Enhanced provision of sports and recreational facilities
- Community engagement and inclusive design
- Context-sensitive application in rural and urban areas

**Policy SD20 Walking/Wheeling, Cycling and Equestrian Routes** (64 Comments)

**Summary of all comments:**

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

### **Policy SD47 Local Green Spaces** (32 comments)

#### **Summary of all comments:**

Respondents stress that accessible green areas can support community cohesion and wellbeing by providing safe and welcoming areas for informal recreation. Respondents insist that development should only be permitted on local green spaces in highly exceptional circumstances, and that such circumstances should be clarified in the policy. They also highlight the advantages of integrating local green spaces into the wider green infrastructure network for air quality, biodiversity enhancements, habitat restoration, and urban drainage.

Respondents feel that more green areas should be considered for designation, while other respondents object to the proposed designation of specific green areas listed in the policy. In addition, there are calls for clarity about the status of designated local green spaces in made neighbourhood development plans, and there are concerns over the duplication of various designations and the impact of land uses on the functionality of designated local green spaces.

#### **Key themes raised:**

- Community and recreational value
- Development constraints and exceptions
- Integration into wider green infrastructure
- Expansion and inclusion of new green areas

## **Transport & Infrastructure Policies**

### **Policy SD19 Transport & Accessibility** (63 comments)

#### **Summary of all comments**

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

**Policy SD21 Public Realm, Highway Design and Public Art** (25 comments)

**Summary of all comments**

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

**Policy SD22 Parking Provision** (32 comments)

**Summary of all comments**

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

#### **Policy SD42 Infrastructure** (23 comments)

##### **Summary of all comments**

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

#### **Policy SD44 Telecommunications** (17 comments)

##### **Summary of all comments**

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

## Regulatory assessments & evidence base

### Habitats Regulation Assessment (10 Comments)

#### Summary of all comments

Respondents emphasise the need for clear mitigation measures that include a defined 400-metre exclusion zone around Wealden Heaths Phase II Special Protection Area and detailed guidelines for managing developments between 400 metres and 5 kilometres. Some methodological inconsistencies, mapping omissions, and factual errors are noted that require correction in future revisions. There is support for cross-boundary collaboration with neighbouring authorities and Natural England to ensure coordinated strategic mitigation, alongside concerns that increased development may strain local infrastructure and compromise traffic safety. Additional comments seek greater accuracy in mapping designated sites, and robust assessments for nutrient budgeting and air quality impacts when undertaken for the next iteration of the emerging Local Plan, and regular updates to environmental data to address potential long-term impacts on protected habitats.

Key Themes raised:

- Mitigation and Buffer Zone Management
- Methodological Consistency and Documentation Accuracy
- Cross-boundary Collaboration for Strategic Mitigation
- Local Infrastructure and Traffic Safety Considerations from new development

### Integrated Impact Assessment (15 Comments)

### Summary of all comments

Respondents called for a more systematic integration of health, equality and wellbeing by addressing issues such as poor connectivity and car dependency and recommended including health and equalities impact assessments. Respondents raised concerns over housing growth, suggesting higher allocations and a combination of strategic options to better meet statutory targets. Inconsistencies in assessment methodologies were noted, particularly in flood risk evaluation, transport connectivity scoring and reliance on bottom-up population projections, prompting calls for more detailed analysis. Feedback also stressed the need for careful evaluation of sustainable transport and active travel potential, improved coordination with local cycling and walking infrastructure and clearer, less technical documentation to enhance public engagement. Additionally, respondents noted shortcomings in cross-jurisdictional coordination, hydrological and flood risk assessments and the scoring of biodiversity, heritage and environmental quality, with recommendations to strengthen water resource management and address factors such as tree loss.

Key Themes raised:

- Health, Equality and Wellbeing Integration
- Housing Growth
- Transport and Active Travel Integration

### Evidence for the new Local Plan (19 Comments)

#### Summary of all comments

Respondents recommend that the evidence base be continuously updated. Reference is made to the South Downs National Park **Housing & Economic Development Needs Assessment (HEDNA)**, being outdated due to the revised Standard Method for assessing housing needs. Concerns are raised that the current **Land Availability Assessment (LAA)** undervalues sustainability in site selection, potentially overlooking optimal locations like Petersfield. The Lewes **Integrated Movement Strategy** is highlighted as additional important evidence that aims to address rising traffic, enhance sustainable transport, and improve accessibility through public realm upgrades, modal shift, and inclusive mobility infrastructure. It is suggested that healthcare costs should be explicitly included in the Local Plan **Viability Assessment** so developers are aware of potential contributions early on as well as the **Infrastructure Delivery Plan (IDP)** clearly identifying necessary healthcare infrastructure. There are calls for incorporating evidence from the **Joint Strategic Needs Assessment (JSNA)** to identify key health issues and suggestion to include a Health Impact Assessment (HIA) in the Sustainability Appraisal. Concerns are raised that the current Local Plan lacks sufficient evidence on social infrastructure - particularly education and healthcare. Clarity is sought on how **transport evidence** to support the Local Plan will be developed, particularly regarding cumulative and cross-boundary impacts.

Key Themes raised:

- Methodological Robustness and Evidence Updating
- Housing Need and Allocation Evidence
- Stakeholder Engagement and Inter-agency Coordination

- Environmental and Landscape Evidence
- Transport Data and Cumulative Impact Analysis
- Health and Wellbeing Infrastructure Evidence
- Social and Educational Infrastructure Evidence

## Consultation feedback summaries - site allocations

8.1 People were asked to comment on proposed amendments to existing site allocations, which will be retained in the Local Plan, as well as opportunity to comment on proposed new site allocations. In total, **2,135** comments were made on site allocations. These were spread across the National Park as follows; Hampshire - 415 comments, West Sussex – 1,390 comments, and East Sussex – 330 comments.

8.2 Table 2 sets out the number of comments received on each existing or new site allocation. The most commented on sites were: MI014 Land East of Lodge Lane, Hassocks (398 comments), HO037-38 East Street Farm, Amberley (126 comments) and CH236 Land West of Village Hall, Rogate (120 comments).

### Consultation Feedback Summaries - Sites

8.3 The following summaries of consultation comments have been generated with the assistance of AI software and have been reviewed and checked by officers. Summaries are provided where **ten or more comments** were received on the proposed site allocation. The purpose of the summaries is to communicate the main concerns and key issues raised in the consultation feedback. All comments submitted at Regulation 18 have been read and continue to be considered by officers in preparing the next stage of the Local Plan. All comments submitted during the consultation are available to view at <https://sdnpalocalplanreview.commonplace.is/>

### Table 2 Number of comments received on Site Allocations

| Site Reference | Address  | Number of responses |
|----------------|--|---------------------|
| SD56           | Shoreham Cement Works  | 19                  |
| SD57           | North Street Quarter, Former Bus Station and Adjacent Eastgate Area, Lewes | 19                  |
| SD58           | Former Allotments, Alfriston   | 4                   |
| SD59           | Kings Ride, Alfriston  | 2                   |
| SD60           | Land at Clements Close, Binsted  | 4                   |
| SD61           | New Barn Stables, The Street, Binsted                                      | 4                   |
| SD63           | Land South of the A272 at Hinton Marsh, Cheriton                           | 6                   |
| SD64           | Land South of London Road, Coldwaltham                                     | 5                   |
| SD65           | Land at Park Lane, Droxford  | 5                   |
| SD66           | Cowdray Works Yard, Easebourne   | 6                   |
| SD69           | Land at Elm Rise, Findon   | 1                   |
| SD70           | Soldiers Field House, Findon   | 3                   |
| SD71           | Land at Petersfield Road, Greatham   | 5                   |
| SD72           | Land at Fern Farm, Greatham  | 3                   |
| SD73           | Land at Itchen Abbas House, Itchen Abbas                                   | 6                   |
| SD74           | Land at Castelmer Fruit Farm, Kingston Near Lewes                          | 4                   |
| SD76           | Land at Old Malling Farm, Lewes  | 8                   |
| SD77           | Malling Brooks, Lewes  | 6                   |
| SD79           | Holmbush Caravan Park, Midhurst  | 53                  |
| SD80           | Land at the Fairway, Midhurst  | 8                   |
| SD83           | Offham Barns, Offham   | 3                   |
| SD84           | Land at Ketchers Field, Selborne   | 5                   |
| SD85           | Land at Pulens Lane, Sheet   | 7                   |
| SD86           | Land at Loppers Ash, South Harting   | 4                   |
| SD87           | Land North of the Forge, South Harting                                     | 3                   |
| SD88           | Stedham Sawmill, Stedham   | 4                   |
| SD89           | Land South of Church Road, Steep   | 3                   |
| SD91           | Land South of Heather Close, West Ashling                                  | 3                   |
| WI102          | Land north of Dodds Lane, Swanmore   | 52                  |
| WI100          | Land at Old Green Farm, Owslebury  | 9                   |
| WI101          | Land at Whites Hill Farm, Owslebury  | 7                   |
| WI056          | Land north of Hewlett Close, Twyford                                       | 7                   |
| EA200          | Land off Merryfield Road, Sheet  | 11                  |
| EA071          | Land south of Paddock Way, Petersfield                                     | 12                  |
| EA182          | Land at Drum Court, The Spain, Petersfield                                 | 8                   |
| EA225          | Land at Festival Hall, Petersfield   | 13                  |
| EA195          | The Courtyard, Heath Road, Petersfield                                     | 7                   |
| EA187          | Windward, Reservoir Lane, Petersfield                                      | 8                   |
| EA067          | Land at Penns Place, Petersfield   | 12                  |
| EA043          | Land at Farnham & Station Roads, West Liss                                 | 12                  |
| EA212          | Land north of Winchester Road, Stroud                                      | 35                  |
| EA216          | Land at Westlands, Liphook   | 13                  |
| EA215          | Land west of Liphook/ Land at Westlands Park, Liphook                      | 73                  |
| EA161          | Land south of Lovell Gardens, Binsted                                      | 10                  |
| EA005          | Land at Greenways Lane and Kiln Lane, Buriton                              | 44                  |
| CH215          | Land West of The Street, Lodsworth   | 85                  |
| CH026          | Land at Hawksfold, Fernhurst   | 32                  |
| CH092/CH093    | Land at Rotherbridge Lane. Petworth  | 10                  |
| CH096          | Land north of Northend Close, Petworth                                     | 5                   |
| CH074          | Land west of Valentines Lea, Northchapel                                   | 51                  |
| CH236          | Land west of Village Hall, Rogate  | 120                 |

|          |  |     |
|----------|--|-----|
| CH203    | Land at former Easebourne School                     | 20  |
| CH206    | Land west of Budgenor Lodge, Easebourne              | 57  |
| CH147    | Midhurst Community Hospital and 1-2 Rotherfield Mews | 28  |
| CH165    | Land east of Pitsham Lane, Midhurst                  | 42  |
| CH222    | Land adjacent to The Grange Car Park, Midhurst       | 13  |
| CH218    | Former Bus Depot, Pitsham Lane, Midhurst             | 13  |
| CH217    | Land at Forest Road, Midhurst                        | 7   |
| CH199    | Land east of A286 and north of Mill Lane, Cocking    | 89  |
| CH003    | Land East of Coombe Crescent, Bury                   | 20  |
| AR009    | Former Allotments north of The Quadrangle, Findon    | 7   |
| AD001    | Land off Steepdown Road, Sompting                    | 114 |
| HO037-38 | East Street Farm, Amberley                           | 126 |
| MI014    | Land east of Lodge Lane, Hassocks                    | 398 |
| LE109    | Land at Seaford Golf Club, Firle Road, Seaford       | 50  |
| LE124    | Audiburn Farm, Ashcombe Lane, Kingston               | 10  |
| LE118    | Land at Beaumont, Wellgreen Lane, Kingston           | 14  |
| LE090    | Land at Beechwood Lane, Cooksbridge                  | 47  |
| LE148    | Land rear 71 East End Lane, Ditchling                | 41  |
| LE141    | East Sussex College, Mountfield Road, Lewes          | 25  |
| LE103    | Land behind the White Hart, 55 High Street, Lewes    | 9   |
| LE133    | Springman House, 8 North Street, Lewes               | 9   |
| LE039    | County Hall, St Anne's Crescent, Lewes               | 26  |
| LE114    | Land at the rear of 49-55 St Anne's Crescent         | 18  |
| LE134    | The Shelleys Hotel, 136 High Street, Lewes           | 11  |
| WE014    | Alfriston Court, Sloe Lane, Alfriston                | 14  |

## East Sussex Sites

### **Proposed Allocation LE039 County Hall, St Anne’s Crescent, Lewes** (25 comments)

#### **Summary of all feedback**

Respondents highlighted the need to maintain the car park and to manage access by concentrating construction traffic at the County Hall entrance while considering park-and-ride schemes and sustainable travel. They raised concerns that the proposed 240 dwellings may be excessive given the site’s steep topography, environmental constraints and proximity to the Conservation Area proximity. Requests were made for alternative development typology that accounts for affordable housing need and possible adaptive reuse of existing structures. Continuous green corridors, protection of local woodland and ecological networks were deemed important, along with a unified Masterplan that links County Hall and adjacent allocations to ensure coordinated vehicular, pedestrian and cycle access. Additional issues included the need for enhanced flood risk management with improved drainage and natural water mitigation measures and clearer design guidance.

Key Themes raised:

- Transport, Access & Parking strategies
- Housing Density, Affordability & Development Typology
- Biodiversity & Green Infrastructure
- Integrated Master Planning & Site Connectivity
- Reuse versus Demolition of Existing Structures
- Heritage, Townscape & Visual Impact
- Community Consultation & Social Infrastructure
- Flood Risk & Water Management

#### **Summary of feedback from specific stakeholders**

##### **National group or organisation**

The **Environment Agency** note that the site is within source protection zones 1,2 and 3, and suggest that the proposal should include wording to explicitly address groundwater protection considerations. **Natural England** highlights the development is within 500m of Lewes Brooks SSSI.

##### **District / Borough / County Council**

East Sussex County Council do not object to the allocation, but notes the need for review of the access options.

##### **Parish / Town Councils**

Lewes Town Council have no objection in principle but note the need for a detailed design brief given the complexities of the site and likely timescales of local government restructuring. The opportunity to support Western Road as a local neighbourhood service centre is also noted.

**Proposed Site Allocation LE090 Land at Beechwood Lane, Cooksbridge** (47 comments)

**Summary of all feedback**

Respondents noted that the policy might compromise the rural character through loss of dark skies, tranquillity, ancient hedgerows, veteran trees and agricultural land, with limited parking potentially affecting local events. They raised concerns that increased vehicle numbers could worsen congestion and road safety on both major routes and rural lanes, with calls for a full transport impact assessment. Environmental issues were also highlighted, including the risk of cumulative runoff and pollution degrading local biodiversity, key wildlife corridors and protected habitats. Additional feedback pointed to a strain on existing utilities and infrastructure such as water supplies, sewage, drainage and power, while emphasising the importance of considering the wider cumulative development context. Respondents recommended that planning should adopt a holistic, sustainable and landscape-led approach, ensuring that statutory conservation standards are met and that planning criteria and alternative community-led housing models are properly reviewed

Key Themes raised:

- Community Amenities and Rural Character
- Traffic, Transport and Road Safety
- Biodiversity & Ecology
- Utilities and Infrastructure Capacity
- Cumulative Development
- Sustainable, Landscape-led Planning and Policy Compliance

**Summary of feedback from specific stakeholders**

**National group or organisation**

Natural England support the proposed allocation subject to detailed landscape assessment.

**District / Borough / County Council**

East Sussex County Council no objection from transport perspective.

**Parish / Town Councils**

East Chiltington Parish Council strongly object to the proposed allocation; access from Beechwood Lane is considered to be unsuitable.

**Proposed Allocation LE109 Land at Seaford Golf Club, Firle Road, Seaford** (50 comments)

**Summary of all feedback**

Respondents expressed concerns that the policy could allow encroachment National Park land, risking the loss of natural buffers such as trees and hedgerows while compromising scenic views. They highlighted that the proposed development might damage a valued recreational and environmental area by affecting mature vegetation and wildlife habitats, and that increased traffic on a narrow, under-maintained road could further endanger pedestrian safety and emergency access. Additional comments noted that the development would put strain on already overstretched local infrastructure and services and reduce local amenity.

Key Themes raised:

- National Park and Protected Area Concerns
- Environmental and Landscape Impacts
- Traffic and Road Safety
- Infrastructure and Service Provision Pressures
- Impact on Local Amenity and Recreational Uses
- Housing Appropriateness and Accessibility

**Summary of feedback from specific stakeholders**

**National group or organisation**

Natural England support subject to detailed landscape assessment. Site in within 1km of Seaford to Beachy Head SSSI, a site sensitive to recreational pressure. Policy criteria to respond accordingly. The Environment Agency notes that the site is within source protection zones 3, and suggests that the proposal should include wording to explicitly address groundwater protection considerations.

**District / Borough / County Council**

East Sussex County Council would expect to see improvements to footpath SEA/13/2 as part of any development.

**Parish / Town Councils**

Seaford Town Council object to the proposed allocation, citing harm to the landscape and local character. Concerns include loss of green space, increased traffic, inadequate transport, and overwhelmed healthcare services. Delivery of affordable housing is considered unlikely due to high land prices. Coordination between planning authorities is urged for a balanced approach.

**Proposed Allocation LE114 Land at the rear of 49-55 St Anne’s Crescent, Lewes** (18 comments)

**Summary of all feedback**

Respondents raised concerns over access and traffic safety, noting that vehicular access is limited and risky—particularly via the eastern and Winterbourne Hollow routes—which could impact cyclists, pedestrians and emergency services. They pointed out that the policy does not align with established local and national planning policies or previous planning decisions, and indicated that the proposed development might negatively affect private gardens and residential amenity through the removal of mature trees and disturbance to nearby green space. Some responses suggested that a smaller-scale development would better preserve the existing gardens and address issues of limited vehicle access, while also calling for measures to protect the landscape, biodiversity, heritage features and overall sustainability. Limited consultation and transparency in the planning process were also noted, alongside additional recommendations for improving local infrastructure, pedestrian connectivity and traffic management.

Key Themes raised:

- Access and safety concerns
- Adherence to Planning Policy and Precedent
- Impact on Private Gardens and Residential Amenity
- Development Scale, Viability and Alternative Uses
- Design, Mitigation and Sustainability Requirements
- Biodiversity and Environmental Impact
- Heritage and Landscape Character

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** notes that the site is within source protection zones 1,2 and 3, and suggests that the proposal should include wording to explicitly address groundwater protection considerations.

**District / Borough / County Council**

**East Sussex County Council** state access onto Winterbourne Hollow is substandard, and additional traffic movements cannot be supported. Could only support this proposed allocation if it gains its access through the adjacent County Hall site and onto St Anne’s Crescent. They also recommend financial contributions to nearby footpaths.

**Parish / Town Councils**

**Lewes Town Council** objects to the proposed allocation, citing viability issues, biodiversity impact, and difficult vehicle access. Concerns include loss of green space, disruption to wildlife, and access complications near the cemetery. Alternative eco-friendly, car-free housing could mitigate some concerns, but overall, the Town Council opposes the development.

**Proposed Site Allocation LE118 Land at Beaumont, Wellgreen Lane, Kingston** (14 comments)

**Summary of all feedback**

Respondents raised concerns that converting agricultural land or open space into housing could irreversibly damage the landscape by compromising safeguarded view corridors and diminishing natural features such as trees and hedgerows, particularly when development occurs outside established settlement boundaries. Comments also focused on the site’s designation and location, with issues raised about weakened demarcations between settlements and the loss of open countryside. Additional concerns regarding traffic and access were raised—including altered entry routes, potential congestion near a primary school, and inadequate parking. There are also mixed views on the development’s design, scale and integration within the National Park setting.

Key Themes raised:

- Landscape Character and Visual Amenity
- Biodiversity and Habitat Conservation
- Settlement Boundary and Land Designation
- Traffic and Access Concerns
- Local Policy and National Park Objectives
- Development Design, Scale, and Infill Potential
- Hydrological Impact and Flood Risk

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** notes that the site is within source protection zones 2 and 3, and suggests that the proposal should include wording to explicitly address groundwater protection considerations. **Natural England** support subject to detailed landscape assessment. They also note the site is within 1km of, and potentially hydrologically linked to, Lewes Brooks SSSI, and recommend policy criteria that responds accordingly.

**District / Borough / County Council** n/a

**Parish / Town Councils**

**Kingston Parish Council** objects to the proposed site allocation, citing inflated land values, loss of green space, and threats to the village’s character. There is a need for smaller, affordable homes, but this site risks blurring Kingston-Lewes boundaries. Concerns include pedestrian access, flooding risks, and maintaining local housing for longstanding residents.

**Proposed Allocation LE124 Audiburn Farm, Ashcombe Lane, Kingston** (10 comments)

**Summary of all feedback**

Respondents raised concerns that the open eastern boundary could negatively affect views unless detailed landscape assessments and effective screening measures are implemented. They noted that extending the settlement boundary may blur the distinction between settlement and countryside contrary to Policy SD25. There are uncertainties over site access and suggestions to enhance local bridleways and footpaths. Calls for thorough community engagement, clearer deliverability and economic viability, and stricter policy compliance with policies SD25 and SD4 were also evident, along with views that the proposed housing typology might not meet local demand for smaller-scale homes and could encourage ribbon development.

Key Themes raised:

- Landscape Character and Visual Amenity
- Settlement Boundary and Countryside Character
- Access and Connectivity Infrastructure
- Community Engagement and Development Approach
- Deliverability and Economic Viability
- Policy Compliance and Precedent Concerns
- Housing Typology and Local Demand Alignment

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the allocation subject to detailed landscape assessment.

**District / Borough / County Council**

**East Sussex County Council** highlight opportunities for improvements to the local Public Rights of Way network.

**Parish / Town Councils**

**Kingston Parish Council** object to the proposed allocation, citing inflated land values, loss of green space, and threats to the village's character. There is a need for smaller, affordable homes, but these sites risk blurring Kingston-Lewes boundaries. Concerns include pedestrian access, flooding risks, and maintaining local housing for longstanding residents.

**Lewes Town Council** object to the proposed allocation, stating the proposed development lies outside the settlement boundary and lacks alignment with Policy SD25. Any permission granted should require sustainability measures like cycle routes or community-led planning. Approving it risks expanding ribbon development between Kingston and Lewes, conflicting with Policy SD4, which aims to preserve undeveloped land between settlements.

**Proposed Site Allocation LE133 Springman House, 8 North Street, Lewes** (9 comments)

**Summary of all feedback**

Respondents highlighted that the redevelopment may lead to the loss of essential public amenities such as ambulance, police, and fire services unless suitable replacement facilities are provided and funded. They noted that the current building does not fit with the conservation area and suggested a lower, more domestic design with specific height limits to improve integration with neighbouring properties. The central location was appreciated for its potential to support sustainable transport and active travel. Clear policy guidelines on housing mix, affordability, and energy-efficient design were also called for, while heritage features, including the naval prison wall, and the removal of Springman House were emphasised as important conservation considerations. Additional comments called for clarity on access requirements.

Key Themes raised:

- Public Amenities and Community Facilities
- Built Form and Integration
- Sustainable Transport and Active Travel
- Emergency and Public Safety Service Relocation
- Policy Framework and Development Guidelines
- Heritage Preservation and Conservation
- Affordable and Social Housing Provision

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** notes that the site is within source protection zones 2 and 3, and suggests that the proposal should include wording to explicitly address groundwater protection considerations.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Lewes Town Council** supports the proposed allocation and encourages communal living, net-zero carbon standards, and active travel. Relocation of emergency services should be secured before redevelopment proceeds.

**Proposed Site Allocation LE134 The Shelleys Hotel, 136 High Street, Lewes** (11 comments)

**Summary of all feedback**

Respondents emphasise that the building's historic character and tourism value should be preserved by retaining its hotel function through adaptive reuse, conservation and design standards, with conversion to housing considered only if rigorously justified. They note that local amenities must be maintained, including the club's event space, the continuity of the public garden, and the protection of groundwater resources. The building's role in supporting local employment, training and tourism is highlighted alongside the importance of retaining historic features such as Tudor frescos. Impacts on neighbouring properties is raised and calls for preserving significant trees.

Key Themes raised:

- Adaptive Reuse and Appropriate Use
- Neighbourhood and Amenity Impacts
- Local economy and Tourism Impact
- Heritage and Conservation
- Environmental and Landscape Considerations
- Structural Condition and Refurbishment Challenges
- Transport and Access Considerations

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** notes that the site is within source protection zones 2 and 3, and suggests that the proposal should include wording to explicitly address groundwater protection considerations.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Lewes Town Council** are neutral on the proposed allocation. They comment that the hotel is important to Lewes' tourism and economy, supporting jobs and training and hotel should be appropriately marketed for hotel use before justifying a change of use.

**Proposed Site Allocation LE141 East Sussex College, Mountfield Road, Lewes** (25 comments)

**Summary of all feedback**

Respondents highlight that increased traffic on Mountfield Road could further stress an already congested network, calling for improved pedestrian infrastructure, alternative access routes, and a comprehensive traffic management plan. They stress the importance of safeguarding the site's role as an educational facility and community asset. Feedback also underlines that any development must include robust sustainability measures such as thorough flood risk assessment and effective drainage measures. Concerns about the proposed housing scale focus on its potential to overwhelm existing infrastructure, including parking and local roads, while calls for a balanced, masterplanned approach seek to integrate commercial, educational, and residential uses alongside heritage conservation and support for local sports and community facilities.

Key Themes raised:

- Traffic and Access Management
- Educational Provision and Community Asset Preservation
- Sustainability and Environmental Mitigation
- Housing Scale and Infrastructure Capacity
- Flood Risk and Drainage Provisions
- Need for Comprehensive Masterplanning
- Heritage and Conservation of Historic Assets

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** supports f) and notes this site is within Source Protection Zones 1,2 and 3, no significant harm to be caused to groundwater resources. **Natural England** notes the site is within 500m of, and potentially hydrologically linked to, Lewes Brooks SSSI. Impacts to the SSSI to be assessed and appropriately mitigated.

**District / Borough / County Council**

**East Sussex County Council** - no objection to the principle provided suitable access provision for both Non-Motorised Users (NMU) and vehicles. The existing access has one-way movement through the college; the eastern access can only support exit of vehicles and adjacent resident parking and not NMUs. Good lighting provision essential for safe school route to Priory Secondary School. ESCC also seek want improvements to Ham Lane LEW/12/1 as part of the development.

**Parish / Town Councils**

**Lewes Town Council** object to the proposed allocation, citing concerns regarding future expansion potential of the college, traffic, impacts on access to local facilities and the historic environment.

**Proposed Site Allocation LE148 Land rear 71 East End Lane, Ditchling** (41 comments)

**Summary of all feedback**

Most respondents contend the policy conflicts with national and local planning requirements and statutory duties, understates landscape sensitivity and fails to justify harm to valued landscapes or heritage assets. They argue housing and access would erode the Ditchling Conservation Area's character and the setting of listed buildings, and damage a sensitive ecological network supporting protected species. Many highlight that narrow rural roads and blind bends would face increased traffic, congestion and risks to pedestrians without proper footpaths. Warnings about overloaded sewerage, known drainage failures and regular flooding suggest capacity constraints that new development would worsen. Concerns also cover loss of rural tranquillity, dark-sky qualities and visual amenity, threats to biodiversity through habitat fragmentation, and doubts over genuine community benefits from executive homes given high costs and limited local services. Additional points question the accuracy of land-availability and sensitivity assessments, previous planning refusals and mapping errors, although a few respondents note that careful design, biodiversity net-gain measures or infrastructure upgrades could mitigate some impacts.

Key Themes raised:

- Planning policy and legal compliance
- Heritage Assets and Conservation Area
- Ecology and Biodiversity
- Highways, Access and Pedestrian Safety
- Landscape Character and Visual Amenity
- Infrastructure Capacity and Local Services
- Flood Risk and Drainage

**Summary of feedback from specific stakeholders**

**National group or organisation**

There are no constraints on this site within the **Environment Agency's** remit.

**District / Borough / County Council**

**East Sussex County Council** suggest a contribution would be required towards improvements to footpath DIT/33/6 which borders the site, or alternatively it is undertaken as part of the development.

**Parish / Town Councils**

**Ditchling Parish Council** objects to the proposed site primarily due to conflict with the Neighbourhood Development Plan (NDP) and Local Plan policies, detailing specific conservation and heritage concerns and traffic and infrastructure issues.

**Existing Site Allocation Strategic Site Policy SD57: North Street Quarter, Former Bus Station and adjacent Eastgate area, Lewes** (19 comments)

**Summary of all feedback**

Respondents emphasise that the current bus station is a vital community asset which should be retained until a new, fully compliant interchange is secured, given that no safe alternative exists. They call for a comprehensive re-examination of public transport and road network design to ensure safe and free-flowing pedestrian, cycle and vehicular access, while insisting that transit facilities are well equipped and accessible. Feedback further stresses the need to protect local heritage and community amenities by maintaining appropriate urban scale and design that complements the town's character and conservation areas. In addition, respondents recommend an integrated masterplan with increased policy flexibility to address financial viability, risk management, infrastructure challenges, flood risk and housing on sensitive sites, alongside a call for clearer and more consistent policy language throughout.

Key Themes raised:

- Bus Station Redevelopment and Retention
- Public Transport Infrastructure and Road Network Re-design
- Protection of Local Heritage and Community Amenities
- Connectivity and Enhancement of the Public Realm
- Integrated Masterplanning and Policy Flexibility
- Financial Viability and Developer Risk Management
- Urban Form, Scale and Townscape Character

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support, but comment that criteria 4 m) and 4 n) should be retained. **Southern Water** ask that criterion l) of current Local Plan is retained.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Lewes Town Council** do not agree with the proposed amendments to this allocation. Comments are made in reference to the Conservation Area, retention of the bus station, traffic and pedestrian routes, design of Eastgate Wharf, preserving waterfront heritage, and limiting building height to five storeys.

**Proposed Site Allocation WE014 Alfriston Court, Sloe Lane, Alfriston** (14 comments)

**Summary of all feedback**

Respondents raised concerns that the allocation might harm a sensitive landscape by detracting from its character and historic features through overdevelopment. They noted that reliance on a single-track access road could lead to traffic congestion, compromised safety, and alternative routes would require disruptive excavation. Respondents also commented that the expansion—adding extra care home units—is disproportionate to the existing structure and conflicts with established planning advice as well as Local Plan policies on affordable housing and dark night skies. Additional feedback highlighted worries over reduced on-site parking and broader infrastructure challenges that may affect neighbourhood amenity and community access.

Key Themes raised:

- Visual and Landscape Impact
- Traffic and Access Challenges
- Neighbourhood Amenity and Community Impact
- Scale and Compatibility with Existing Structures

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the proposed allocation subject to detailed landscape assessment.

**District / Borough / County Council**

**East Sussex County Council** no objection in principle but a traffic assessment is recommended on the basis that the rural nature of the location and roads may affect the safe passage of users along the bridleway and adjoining highway. They also suggest a contribution towards White Bridge maintenance (B8029), part of South Downs Way National Trail and bridleway ALF/2/3.

**Wealden District Council** note the proposed allocation would provide the opportunity for a sympathetic and well-integrated extension to an existing care home located on the northern edge of Alfriston, that respects its sensitive and prominent setting within the National Park, particularly visibility from the Cuckmere River corridor.

**Parish / Town Councils**

n/a

## West Sussex Sites

### **Proposed Site Allocation HO037-38 East Street Farm, Amberley (123 comments)**

#### **Summary of all feedback**

Respondents noted that the proposed transport arrangements using narrow village streets may not accommodate both construction and additional resident vehicles, potentially increasing congestion and compromising safety. They highlighted that adding 25–45 dwellings could overwhelm local infrastructure, erode Amberley’s historic character, and reduce green open spaces, with some suggesting that development be focused on the bottom field. Concerns were also raised over ageing utilities—including electricity, water, and sewage systems—and the risk of increased flooding due to additional impermeable surfaces. Feedback also warned of potential harm to a rare chalk stream, disruption to wildlife habitats, and loss of valued visual features, while heritage concerns focused on the erosion of traditional rural aesthetics and protected views. Additional comments questioned compliance with settlement boundaries and called for greater transparency and further assessments in relation to landscape, flood risk, and sustainability.

#### Key Themes raised:

- Transport, Access and Safety
- Community Character and Social Sustainability
- Infrastructure and Utility Capacity
- Environmental and Habitat Protection
- Heritage and Landscape Integrity
- Scale and Alternative Development Options
- Flood Risk and Drainage

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

**Natural England** support subject to a detailed landscape assessment. The policy should reference Policy NEW3, ensuring an appraisal for wintering Bewick Swan within 5km of Arun Valley SPA. Additionally, given the site's proximity to Amberley Wild Brooks SSSI, an added criterion should require impact assessments and mitigation measures for designated sites.

##### **District / Borough / County Council**

**West Sussex County Council** to consider improving existing frequency for bus services on East Street to twice daily, to attract more bus trips from the development, subject to viability considerations.

**Horsham District Council (landowner)** support the proposed site allocation recognizing its role in addressing local housing needs. Clarification on development scale is requested to guide affordable housing, infrastructure, and open space provision. Early engagement with providers is emphasized for transport, education, utilities, and local power grid resilience.

##### **Parish / Town Councils**

**Amberley Parish Council** objects to the proposed site allocation citing overwhelming community opposition, environmental concerns, and policy conflicts. A survey showed 94% oppose 45 houses,

with strong preference for green communal space. Concerns include road access, infrastructure strain, and landscape impact, with support for a nature reserve and community centre. The current road access is considered unsafe.

### **Proposed Site Allocation CH003 Land East of Coombe Crescent, Bury (20 comments)**

#### **Summary of all feedback**

Respondents state that the proposed site allocation fails to comply with both local and national planning guidelines by supporting development on agricultural greenfield land instead of prioritising brownfield sites. They note that the proposal would undermine the rural character, compromise important views and heritage assets, and introduce a high density of dwellings that may overwhelm local infrastructure. Concerns also arise over transport and accessibility, with limited public services and unsafe pedestrian routes, while issues related to wildlife, biodiversity, flood risks and environmental impacts are seen as significant challenges. Additional points include uncertainties in planning terminology and mapping.

Key Themes raised:

- Planning Policy Compliance
- Landscape, Heritage and Visual Amenity
- Agricultural Land and Rural Character
- Overdevelopment and Density
- Transport and Accessibility
- Local Community Infrastructure
- Wildlife and Biodiversity
- Environmental and Flood Risk

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

The **Environment Agency** note this site has a small area of Flood Zone 3 and supports allocation criteria h). **Natural England** support this proposed allocation subject to detailed landscape assessment.

##### **District / Borough / County Council**

n/a

##### **Parish / Town Councils**

**Bury Parish Council** object to this proposed allocation, due to policy conflicts, density, transport concerns, and landscape impact. While housing is needed, the Council insists development should enhance, not exploit the village. They support reassessing site CH192 (Bury Manor Farm).

**Proposed Site Allocation CH199 Land east of A286 and north of Mill Lane, Cocking (87 comments)**

**Summary of all feedback**

Respondents noted that the proposed 25-house development—a 13% increase in existing housing stock—would impact the character and historic nature of Cocking, further strain Cocking’s limited community amenities and infrastructure, with concerns over parking shortages, heightened road safety risks on the busy A286, and persistent utility issues such as water, sewerage and power problems. They argued that additional street lighting could worsen light pollution in an area prized for its international dark sky reserve status, while the development is also seen as risking irreversible damage to the landscape, heritage and wildlife, including threats to a rare chalk stream, ancient woodland and key wildlife corridors. Feedback further highlighted inconsistencies in planning policy, procedural shortcomings, and the potential for cumulative impacts from future expansion that may undermine established local services and conservation objectives.

Key Themes raised:

- Community and Local Amenity Impact
- Infrastructure, Utilities and Local Services
- Landscape, Visual Amenity and Heritage
- Wildlife, Biodiversity and Environmental Integrity
- Traffic, Access and Road Safety
- Planning Policy Consistency and Strategic Objectives
- Future Expansion and Cumulative Impact
- Dark Night Sky and Special Environmental Designations

**Summary of feedback from specific stakeholders:**

**National group or organisation**

The **Environment Agency** notes there are no constraints on this site within the Environment Agency’s remit. **Natural England** note the site is adjacent to ancient woodland, and reference should be made to Policy SD11.4.

**District / Borough / County Council** n/a

**Parish / Town Councils**

**Cocking Parish Council** object to the site's inclusion in Regulation 18 due to landscape harm, harm to the relatively unchanged historic core and conservation area of Cocking, negative impact on settlement pattern, extending development into the countryside, impact on key views, would impact experiential and amenity qualities from the A286, South Downs Way and other public footpaths, lack of mature boundary to the north to mitigate impact of development, loss of agricultural land, biodiversity risks and environmental impact especially in regards the chalk stream, poor highway access and urbanising impacts of upgrading highways access, and disruption to dark skies.

## **Proposed Site Allocation CH203 Land at former Easebourne School (20 comments)**

### **Summary of all feedback**

Respondents raised concerns over local services and infrastructure, highlighting current issues with water, healthcare and school capacities, and a narrow, congested rural road could be further strained by additional development. Concerns were raised about the potential impact of additional traffic on Easebourne Street. Respondents were also concerned about potential impacts to local landscape character and the Easebourne Conservation Area. They noted that adding 8–10 dwellings on a 0.7ha green field may lead to overdevelopment that contrasts with the area’s low-density rural context and could affect privacy, visual prominence and the established character of local heritage assets. Several points mentioned risks to environmental quality and biodiversity, including the loss of mature trees, ponds and agricultural land, as well as increased impermeable surfaces that might worsen drainage and flood risks.

Key Themes raised:

- Community Services & Local Infrastructure
- Scale & Density
- Heritage & Landscape Character
- Environmental & Biodiversity Impact
- Traffic, Access & Safety
- Design Integration & Visual Impact
- Water Supply Issues

### **Summary of feedback from specific stakeholders:**

#### **National group or organisation**

**Natural England** support the proposed allocation subject to detailed landscape assessment. The **Environment Agency** says no constraints have been identified within their remit.

#### **District / Borough / County Council**

n/a

#### **Parish / Town Councils**

**Easebourne Parish Council** strongly objects to the allocation, citing heritage impact, traffic safety, loss of mature trees, flooding risks, and water shortages. The narrow roads and lack of pavements make pedestrian access dangerous, while the site’s development contradicts the Parish Council’s priorities for protecting open spaces and improving drainage.

## **Proposed Site Allocation CH206 Land west of Budgenor Lodge, Easebourne (57 comments)**

### **Summary of all feedback**

Respondents raise concerns about access to the site and note that development could worsen current traffic, access and safety issues, with narrow, poorly maintained routes such as Hollist Lane, Canada Grove and Hazelwood Close expected to face increased congestion and risks for vulnerable road users. Concerns extend to local infrastructure and services, including schools and medical centres, which may not cope with additional demand, while overdevelopment and an expanded settlement boundary could further strain community resources and convert valuable agricultural land. There are also worries that increased density and intrusive design may affect the heritage and visual amenity of sites like Budgenor Lodge and other existing properties to the south and east of the site, alongside a potential loss of local wildlife habitats and degradation of the natural environment. In addition, respondents question elements of the planning process, citing insufficient public consultation, policy overlap and risks related to flooding, drainage and ground stability, as well as issues such as noise, light pollution and an unbalanced housing mix.

#### Key Themes raised:

- Traffic, Access and Safety Challenges
- Pressure on Local Infrastructure and Services
- Overdevelopment and Settlement Boundary Pressure
- Agricultural Land Loss
- Heritage and Visual Amenity
- Wildlife and Biodiversity Impacts
- Flooding, Drainage and Ground Stability

### **Summary of feedback from specific stakeholders:**

#### **National group or organisation**

The **Environment Agency** encourage early consideration of how foul water will be managed for this site. They also note this site is within Source Protection Zones 2 and 3, and recommend policy wording to ensure no significant harm to be caused to groundwater resources.

#### **District / Borough / County Council**

n/a

#### **Parish / Town Councils**

**Easebourne Parish Council** strongly objects to the allocation, citing loss of active farmland, harm to a bat corridor, proximity to a listed building, flood risks, stability concerns, and unsafe road access. Residents fear it contradicts heritage protections, worsens parking shortages, and endangers pedestrian safety.

### **Proposed Site Allocation CH026 Land at Hawksfold, Fernhurst (32 comments)**

#### **Summary of all feedback**

Respondents detailed concerns that the proposal may reduce green spaces and public footpaths, disrupt the rural outlook, and strain local infrastructure, particularly on narrow routes such as Hawksfold Lane East. They highlighted that increased traffic could pose safety risks for pedestrians and local users. However it was also noted that even a modest development might not fully reflect the site's potential, as technical assessments suggest capacity for more dwellings. Additional comments focused on potential impacts to scenic views and wildlife habitats, issues with access on private roads now used as public paths, non-compliance with established planning guidelines, and shortcomings in the consultation process, with several respondents questioning communication and the clarity of proposal details.

Key Themes raised:

- Community and Local Amenity Impact
- Traffic and Road Infrastructure
- Landscape and Countryside Character
- Scale and Density of Development
- Access and Safety Issues
- Environmental and Ecological Impact

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

**Natural England** support this proposed allocation subject to detailed landscape assessment. The **Environment Agency** said there were no constraints noted within their remit.

##### **District / Borough / County Council**

n/a

##### **Parish / Town Councils**

**Fernhurst Parish Council** strongly objects to the Hawksfold site allocation, citing community opposition to creeping development, lack of special circumstances, and insufficient affordable housing provision. The Council insists any development must align with Fernhurst Neighbourhood Plan policies and continues to uphold their prior Local Plan submissions, including the Parish Priority Statement.

### **Proposed Site Allocation MI014 Land east of Lodge Lane, Hassocks (397 comments)**

#### **Summary of all feedback**

Local infrastructure and public services—including schools, GP surgeries, roads and utilities—are already under significant strain, with further development likely to increase these pressures. Respondents noted that recent housing developments have overburdened community resources, reduced green space and altered the local character, while proposals for new dwellings east of Lodge Lane could add to traffic and congestion. Environmental concerns focus on the potential loss of biodiversity and wildlife habitats caused by removing natural vegetation, increasing impermeable surfaces and exacerbating flood risks. Additional feedback highlighted road safety challenges on narrow, congested routes, design and access issues that do not align with the rural setting, and conflicts with local planning policy and national park protection that may affect the strategic separation between settlements.

Key Themes raised:

- Strain on Local Infrastructure and Public Services
- Overdevelopment and Housing Need Justification
- Environmental and Biodiversity Impact
- Traffic and Road Safety
- Design, Aesthetics, and Access
- National Park Protection and Strategic Gap
- Flood Risk and Drainage

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

**Natural England** support subject to a detailed landscape assessment.

##### **District / Borough / County Council**

**Mid Sussex District Council** does not object to the proposed site allocation but seeks clarity on the scope of mitigation/enhancement and flood risk measures. Concerns include impact on the Keymer Conservation Area, transport, pedestrian access, and infrastructure contributions. Further discussions with SDNPA are encouraged.

##### **Parish / Town Councils**

**Hassocks Parish Council** opposes the site due encroachment into the National Park, flood risk, and potential harm to the Keymer Conservation Area and nearby local nature site.

**Ditchling Parish Council** objects to the proposed site allocation citing encroachment into the Ditchling-Keymer settlement gap.

### **Proposed Site Allocation CH215 Land West of The Street, Lodsworth (85 comments)**

#### **Summary of all feedback**

Respondents questioned the suitability of designating agricultural, greenfield and historically significant rural land for residential development, noting that such change could erode the area's agricultural, ecological and heritage values while risking further pressure on protected green spaces. Concerns were raised over increased traffic on narrow, congested roads that currently lack sufficient pedestrian, cycling and public transport facilities, potentially compromising road safety and straining local infrastructure and services. Respondents also highlighted that the development might disrupt the village's historic pattern and visual landscape by obscuring valued views and heritage assets, while causing irreversible environmental impacts such as damage to wildlife habitats and natural features. Furthermore, there were apprehensions that the policy could set a precedent for additional development beyond established boundaries, with cumulative social and economic implications.

#### Key Themes raised:

- Land Use and Site Suitability
- Transport, Access and Traffic Safety
- Connectivity issues and infrastructure strain
- Heritage and Village Character
- Visual Impact and Landscape
- Environmental and Biodiversity Impacts

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

The **Environment Agency** encourage early consideration of how foul water will be managed for this site. **Natural England** support the proposed site allocation subject to detailed landscape assessment.

##### **District / Borough / County Council**

n/a

##### **Parish / Town Councils**

**Lodsworth Parish Council** strongly objects to this proposed site allocation due to landscape sensitivity, harm to historic setting, poor access, disruption to local businesses, and lack of housing need.

### **Proposed Site Allocation CH147 Midhurst Community Hospital and 1-2 Rotherfield Mews (28 comments)**

#### **Summary of all feedback**

Respondents expressed divided views on repurposing 1–2 Rotherfield Mews and the Community Hospital Site. Some propose that a detailed ecological and landscape assessment could support its use for care or retirement units or the redevelopment of the Rotherfield Mews part of the site might offer affordable housing for medical staff. However, concerns were raised regarding safe access to the site and overdevelopment of the site which is already narrow and provides vital local services such as the GP surgery and pharmacy. There was concern regarding reduced essential parking, and compromised safe access, particularly when proposed road widening might affect mature trees and green spaces. Many warned that increased residential and care developments could strain the GP surgery and pharmacy, and more widely and cumulative impact of development in Easebourne and Midhurst on local infrastructure and may intensify traffic congestion on routes like the A286. , There were calls for a comprehensive masterplan that aligns with established planning and environmental guidelines and ensures clearer, more consistent consultation. Economic implications were noted, including potential challenges to local job prospects and housing affordability, as well as additional pressure on schools and other community assets.

#### Key Themes raised:

- Site Appropriateness and Land Use Compatibility
- Impact on Local Healthcare Infrastructure
- Traffic, Access, and Parking
- Cumulative Impact on Local Infrastructure and Services
- Environmental and Ecological Considerations
- Housing Density and Overdevelopment

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

The **Environment Agency** notes the site has Flood Zone 2 within the site boundary and is close to Flood Zone 3 extents and supports allocation criteria e). They also note this site is within Source Protection Zones 1,2 and 3, and recommend policy wording to ensure no significant harm to be caused to groundwater resources. **Natural England** support this proposed allocation subject to detailed landscape assessment.

##### **District / Borough / County Council** n/a

##### **Parish / Town Councils**

**Easebourne Parish Council** strongly objects to this site allocation, due to inadequate access roads, strain on medical services, high density, parking concerns, and loss of mature trees. The proposal lacks consultation with Riverbank Medical Centre, and residents worry it would limit future expansion of medical facilities in the area. **Midhurst Town Council** object to housing development on this site, advocating for its retention as a medical facility due to parking shortages, expansion

limitations, and staff recruitment issues. If housing is considered, it should be affordable, with Rotherfield Mews converted for nursing/medical staff accommodation.

**Proposed Site Allocation CH222 Land adjacent to The Grange Car Park, Midhurst (13 comments)**

**Summary of all feedback**

Respondents presented divided views on housing provision, with some suggesting that development should prioritise truly affordable housing and allow for a higher dwelling count than the proposed ten if high architectural standards are achieved, while others contend that further housing should be delayed until local infrastructure such as roads, schools, healthcare and retail facilities are improved. Feedback on mixed-use development advocates for including community spaces and local amenities like retail or sports facilities alongside additional housing. Concerns over traffic, parking and transport management were highlighted, noting existing congestion and the potential loss of parking if adjacent car park land is incorporated, and respondents stressed the need for careful planning in this area. Additional comments addressed the optimisation of land use, improved urban design to enhance the town's visual impact, and environmental considerations regarding nearby natural areas.

Key Themes raised:

- Housing Provision, Affordability and Density
- Mixed-Use Development and Community Amenities
- Local Infrastructure and Service Capacity
- Traffic, Parking and Transport Management
- Optimising Land Use
- Urban Design and Visual Impact
- Environmental and Landscape Implications

**Summary of feedback from specific stakeholders:**

**National group or organisation**

n/a

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Midhurst Town Council** support the proposed site allocation emphasising its prominent location for visitors. They advocate for affordable flats or cottages that uphold high architectural standards to complement the town's character.

## **Proposed Site Allocation CH165 Land east of Pitsham Lane, Midhurst (42 comments)**

### **Summary of all feedback**

Respondents noted that increased traffic from construction, delivery, heavy goods and private vehicles may worsen congestion on narrow local roads and main roads through Midhurst while adding to noise, air pollution and pressure on schools, health care and emergency services. They raised concerns about the greenfield site's suitability, highlighting its location outside the designated settlement boundary and potential adverse effects on flood risk areas, ancient woodland and natural vistas, which could conflict with planning policies. Other comments focused on environmental risks such as habitat fragmentation and degraded water quality, as well as safety issues on routes that may require road widening. Feedback also pointed to worries over housing scale and design straining local facilities, alongside criticisms of a planning process marked by limited public consultation and ambiguous terminology, with additional comments addressing construction noise, loss of agricultural land and changes to the town's character.

Key Themes raised:

- Traffic and Infrastructure Impact
- Site Suitability and Planning Policy Compliance
- Environmental and Biodiversity Impact
- Access and Vehicular Safety
- Landscape and Countryside Character
- Housing Scale and Design Considerations
- Community and Local Services Impact

### **Summary of feedback from specific stakeholders:**

#### **National group or organisation**

The **Environment Agency** notes the site is close to Flood Zone 2 and 3 and supports allocation criteria e). The site is also located on an historic landfill (Pitsham Rough), so they recommend policy criteria should include that any contaminated land issues require adequate assessment. **Natural England** note the site is adjacent to ancient woodland, and reference should be made to Policy SD11.4.

#### **District / Borough / County Council**

**West Sussex County Council** recommends Holmbush Way as the main vehicular access due to narrow, unsafe roads on Hornbeam Way and Hawthorn Close. While active travel access is feasible, widening existing roads is impractical. Pedestrian access to Holmbush Way would also improve bus connectivity to Midhurst and Chichester via Downview Drive.

#### **Parish / Town Councils**

**Cocking Parish Council** object to the site's inclusion in Regulation 18 due to landscape harm, loss of agricultural land, biodiversity risks, environmental impact, poor highway access, and disruption to dark skies. Concerns include damage to bat habitats, flooding risks, and unsafe road conditions, making development inappropriate for the area. **Midhurst Town Council** object to the proposed site allocation and assert that the site is a rural exception site for affordable housing.

**Existing Site Allocation Policy SD79: Holmbush Caravan Park, Midhurst (53 comments)**

**Summary of all feedback**

Respondents highlight that the current road network—including the Fairway, Bourne Way and nearby routes—is in poor condition and unsafe for both vehicles and pedestrians, with hazards such as potholes and blind bends potentially worsening with an additional 140 cars from 70 new homes. They note the site’s rich wildlife and mature trees, expressing concern that development would lead to the loss of valuable ecological corridors and irreversible habitat disruption, while also indicating that the area might be better preserved as a community asset or nature reserve. There are worries that the planned housing scale could overburden local amenities and infrastructure, with noise, dust and increased traffic further straining a small town. Some respondents question the amendment process, emphasising the need to balance local interests and equitable benefits, and raising issues over flood risk and the overall suitability of the land.

**Key Themes raised:**

- Traffic, Road Safety and Access Infrastructure
- Environmental and Biodiversity Impact
- Community Character and Local Infrastructure Pressure
- Alternative Land Use
- Housing Scale, Affordability and Density
- Flood Risk and Land Suitability

**Summary of feedback from specific stakeholders:**

**National group or organisation**

The **Environment Agency** note the site has areas of Flood Zones 2 and 3 within the boundary. They are supportive of the policy wording 1.c-d.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Midhurst Town Council** comment that the site is suitable for development, with a recommendation for maximum flexibility in design rather than strict adherence to previous designs.

**Proposed Site Allocation CH218 Former Bus Depot, Pitsham Lane, Midhurst (13 comments)**

**Summary of all feedback**

Respondents raised concerns about the potential loss of natural features and visual amenity, including the removal of tree screens and an unattractive building design, alongside risks from increased construction traffic such as noise, pollution and safety issues. They noted that a rise in vehicles on narrow residential roads—also used by pedestrians and cyclists—could affect emergency access and contribute to congestion, while alternative routes like Apple Tree Road were seen as offering some relief. Some respondents questioned the intensity of new housing given its impact on local schools, healthcare, and community facilities, with current plans not addressing these service pressures. There were also reservations about shared access routes and the need for dedicated pathways, mixed views on the extent of community consultation.

Key Themes raised:

- Environmental Impacts and Visual Amenity
- Traffic and Safety Impacts
- Site Suitability and Development Intensity
- Alternative Access Solutions and Route Design

**Summary of feedback from specific stakeholders:**

**National group or organisation**

n/a

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Midhurst Town Council** support the proposed site allocation.

### **Proposed Site Allocation CH074 Land west of Valentines Lea, Northchapel (50 comments)**

#### **Summary of all feedback**

Respondents raised concerns over community infrastructure, with some suggesting that a higher local population could support amenities such as schools, pubs, shops, and community clubs, while others noted a lack of essential services and the risk of strained traffic, parking, water pressure, and drainage systems. They highlighted that additional housing might increase vehicle numbers and complicate access on narrow or hazardous routes, potentially impacting the safety of local children, elderly residents, and pets. Environmental issues were also noted, including the potential loss of wildlife habitats, mature trees, and green corridors, alongside fears of worsened drainage and flooding due to reduced permeable surfaces. Preservation of productive agricultural land was seen as vital for local food security and the countryside character, although some commented on the need for affordable housing despite concerns over transport, employment, and empty properties. Further points included worries about temporary construction impacts—such as noise, dust, and safety hazards—and criticisms of the planning process for its limited consultation and short notification periods, with additional remarks on potential loss of privacy and diminished aesthetic qualities.

Key Themes raised:

- Community Infrastructure and Local Amenities
- Traffic, Parking and Access Safety
- Environmental and Ecological Impact
- Flood Risk and Drainage
- Agricultural Land Use and Countryside Preservation
- Housing Demand and Affordability
- Construction Impacts and Temporary Disruption
- Planning Process and Stakeholder Engagement

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

**Environment Agency** encourage early consideration of how foul water will be managed for this site.

**Natural England** note this site allocation is adjacent to ancient woodland, and recommend reference to Policy SD11.4.

##### **District / Borough / County Council**

**West Sussex County Council** suggest extension of existing shared use path into the Northchapel site as a policy requirement for the site allocation.

##### **Parish / Town Councils**

**Northchapel Parish Council** objects to the proposed site allocation due to flood risks and unsafe road access. While recognizing local housing needs, they suggest an alternative rejected site (CH266), believing it could be viable if concerns about buffer zones and sewage works are addressed.

**Proposed Site Allocation CH092/CH093 Land at Rotherbridge Lane. Petworth (10 comments)**

**Summary of all feedback**

Respondents noted that the development lacks sufficient natural screening, defined boundaries, and the trees and hedgerows that currently safeguard existing vegetation belts, potentially affecting countryside views and character. They stressed the need for robust sustainable design measures, including water neutrality and enhanced planting, although the site's limited size may impede effective transitions. Recommendations included formalising links with adjoining parcels and upgrading non-motorised pathways, with some connections seen as offering only limited benefits. Concerns were raised over the retention of key hedgerows, inconsistencies with current planning policies, the preservation of historic public open space, and issues regarding transport access and parking.

Key Themes raised:

- Landscape and Visual Amenity
- Sustainable Design and Environmental Mitigation
- Connectivity and Active Travel Infrastructure
- Site Boundaries and Integration
- Community and Local Amenity Impact

**Summary of feedback from specific stakeholders:**

**National group or organisation**

**Natural England** support the proposed allocation subject to detailed landscape assessment.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Petworth Town Council** raise concerns about access to Station Road (A285) and parking availability.

**Proposed Site Allocation CH236 Land west of Village Hall, Rogate (118 comments)**

**Summary of all feedback**

Respondents report that the proposal would alter the landscape by removing hedgerows and protected views at a key, elevated site near the conservation area and historic assets. They note that access via North Street is hazardous due to its narrow width, lack of pavements and lighting, and dangerous bends, with increased traffic expected to worsen congestion and safety risks. Concerns also emerge over the loss of heritage features and changes to rural character, as the development may harm the setting of listed buildings and longstanding village aesthetics. Additionally, respondents point to potential environmental harm from habitat loss and increased flood risk, as well as the strain on local infrastructure and services. They further question the consultation process and suggest that alternative sites with lower sensitivities could offer a more appropriate solution.

Key Themes raised:

- Landscape and Visual Impact
- Traffic, Access and Safety
- Heritage and Conservation Impact
- Environmental and Ecological Considerations
- Infrastructure and Service Capacity
- Procedural and Community Consent Issues
- Alternative Site Viability
- Development Scale and Density

**Summary of feedback from specific stakeholders:**

**National group or organisation**

**Natural England** support this proposed allocation subject to detailed landscape assessment. The **Environment Agency** said there were no constraints noted within their remit.

**District / Borough / County Council**

n/a

**Parish / Town Councils**

**Rogate Parish Council** opposes developing site CH236, citing conflicts with the Neighbourhood Plan, landscape sensitivity, traffic hazards, and harm to the conservation area. The land is agricultural, highly visible, lacks safe access, and would disrupt heritage views and village character. Flooding, wildlife loss, infrastructure shortcomings and increased light pollution are also cited. They call for more suitable, smaller-scale alternatives to protect the character and wellbeing of the community.

### **Proposed Site Allocation AD001 Land off Steepdown Road, Sompting (114 comments)**

#### **Summary of all feedback**

Respondents raised concerns that additional development may worsen traffic congestion and strain local infrastructure, citing narrow, poorly maintained roads, limited public transport and insufficient drainage, healthcare and educational services. They warned that converting greenfield land would risk irreversible damage to established wildlife habitats and local ecosystems, while contributing to overdevelopment in an already heavily built-up area. Comments also highlighted potential losses to cherished landscape, heritage and visual amenity in a nationally protected landscape and questioned whether a modest housing mix meets planning policy criteria for exceptional local benefit. Additional issues include increased flood risk due to inherent site conditions, and broader impacts on property values and community character.

Key Themes raised:

- Traffic and Local Infrastructure
- Environmental and Biodiversity Impact
- Housing Need and Overdevelopment
- Landscape, Heritage and Visual Amenity
- Planning Policy Compliance and Exceptional Benefit
- Community Services and Local Amenities
- Site Conditions and Flood Risk

#### **Summary of feedback from specific stakeholders:**

##### **National group or organisation**

The **Environment Agency** note this site has a small section within Source Protection Zones 1,2 and 3, and recommend policy criteria wording accordingly. **Natural England** support the proposed site allocation subject to detailed landscape assessment.

##### **District / Borough / County Council**

**Arun District Council** notes the proposed site near Sompting, and is keen to collaborate with SDNPA as proposals for the site are further developed. The Council also notes poor transport and amenities for a care home option.

##### **Parish / Town Councils**

n/a.

## Hampshire Sites

### **Proposed Site Allocation EA005 Land at Greenways Lane and Kiln Lane, Buriton** (44 comments)

#### **Summary of all feedback**

Respondents note that converting fields that currently absorb runoff into impermeable surfaces may reduce water absorption and strain drainage systems, particularly given the history of flooding and high water tables in the area. They raise concerns that the proposed increase in housing could alter the village's traditional character and intrude on established heritage features, scenic views, and protected green spaces. Additional issues include increased traffic on narrow rural lanes, compromised road safety, and pressure on limited public transport and water supply, alongside an oversaturated housing market. Furthermore, respondents point to potential environmental harm from the loss of farmland and wildlife habitats, increased light pollution, and a risk of further development beyond the initial proposal through gradual relaxation of planning rules.

Key Themes raised:

- Flood Risk and Drainage Concerns
- Impact on Local Character and Heritage
- Traffic, Safety, and Access Issues
- Housing Demand and Market Saturation
- Environmental Impact and Biodiversity
- Infrastructure and Service Capacity Constraints

#### **Summary of feedback from specific stakeholders**

##### **National group or organisation**

**Natural England** support subject to detailed landscape assessment. The **Environment Agency** says there are no constraints identified in their remit.

##### **District / Borough / County Council**

**Hampshire County Council** note developer funding may be sought to enhance walking and cycling routes to key village facilities. Although no flooding is recorded, groundwater and outfall options need further investigation.

##### **Parish / Town Councils**

**Buriton Parish Council** strongly objects to the proposed development, citing serious flood risks, harm to local character and views, overburdened infrastructure, and threats to sustainability and village identity.

### **Proposed Site Allocation EA043 Land at Farnham and Station Roads, West Liss** (12 comments)

#### **Summary of all feedback**

Respondents emphasise that the development should protect mature trees, preserve the character of West Liss, and give careful attention to massing, layout and materials in order to minimise adverse visual impacts. They raise existing planning policy and call for clearer criteria, including precise housing figures, alignment with settlement boundaries, and the need to maintain local rural character and the strategic gap between Liss and West Liss. In relation to housing, a more varied mix incorporating affordable, starter and traditional home types is recommended over a singular, high-density approach. Infrastructure concerns focus on dangerous access points, discontinuous footpaths, vehicle access challenges, and parking provisions affected by flooding risks. Environmental issues centred on groundwater protection and potential impacts on bat activity and mature oak trees. Respondents also urge the preservation of working agricultural land by utilising alternative brownfield and infill options.

Key themes raised:

- Landscape and visual impact
- Policy compliance and planning process
- Housing scale, mix, and typology
- Neighbourhood identity and settlement boundaries
- Infrastructure and access
- Environmental and hydrological risks

#### **Summary of feedback from specific stakeholders**

##### **National group or organisation**

The **Environment Agency** highlight that the site is in Source Protection Zone 3 and, as such, development will need to demonstrate no significant harm to groundwater resources. **Natural England** state that a detailed landscape assessment and bespoke mitigation will be required. This will include SANG due to the proximity of the Wealden Heaths Phase II SPA.

##### **District / Borough / County Councils**

**Hampshire County Council** comment that the site is in a possible groundwater flood risk area; developer contributions are required to improve Footpath 6; and that it will need to be demonstrated that suitable visibility splays and junction spacing can be achieved. **East Hampshire District Council** supports the proposed allocation but urges the allocation of more homes - especially affordable homes – in the area to meet housing and local needs.

##### **Parish / Town Councils**

**Liss Parish Council** object due to the site's previous rejection in the neighbourhood plan, overdevelopment of the village, oversupply of care homes in the village, loss of green space and food production, infrastructure constraints, existing dangerous access, and impacts on the protected gap, a mature oak tree, neighbouring properties, and recently documented bat activity. They suggest exploring alternative and better suited sites for affordable housing.

**Proposed Site Allocation EA067 Land at Penns Place, Petersfield** (12 comments)

**Summary of all feedback**

Respondents suggest that potential allocations (including their quantum and uses) should be reassessed, and that more homes are required in Petersfield to address local needs. In terms of EA067, respondents support a dedicated sports hub and call for an integrated and enhanced active travel network that links footpaths and cycle routes with local destinations. Robust environmental, landscape, and flood risk assessments and measures are also advised, with suggestions to regulate artificial grass pitches and plant trees along site boundaries. Concerns over increased car dependency (due to limited transport options and congested roads) have led to calls for improved offsite transport links and better integration with neighbouring developments. Additionally, respondents stress the need for enhanced cross-government coordination, a clear mineral safeguarding assessment, and attention to potential impacts on local healthcare services.

Key themes raised:

- Site allocation and land use strategy
- Active travel and pedestrian/cycle connectivity
- Environmental, landscape, and flood risk management
- Vehicular traffic, parking, and car dependency

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the proposed allocation subject to a detailed landscape assessment.

**District / Borough / County Council**

**Hampshire County Council** recommend that a mineral resource or safeguarding assessment is required given the site's location in a mineral safeguarding area. Footpath 502 could be used for cycling and equestrian users, and developer contributions and a diversion may be required to protect and enhance the footpath and its users. Flood risk improvements will need to be considered given surface water flood risk and potential discharge to the watercourse.

**Parish / Town Councils**

**Petersfield Town Council** comment that the site lies outside the settlement boundary and is an island surrounded by a sports and recreation allocation in the neighbourhood plan. Housing would be incongruous with the identified sports hub initiative, disconnected from the existing settlement, and contrary to the neighbourhood plan unless suitable alternative sports provision is made.

**Proposed Site Allocation EA071 Land south of Paddock Way, Petersfield** (12 comments)

**Summary of all feedback**

Respondents raise concerns about inadequate transport and pedestrian infrastructure, noting that key routes such as Paddock Way and Borough Road are too narrow for anticipated traffic. They call for revised multimodal transport criteria, enhanced water management and drainage measures, and clearer links with the wider road network. Concerns are also raised about active travel infrastructure with a need for wider and better signposted pedestrian and cycle routes that cater to all users. Clarifications are sought on housing typology and intended uses, alongside improved community infrastructure and the capacity of existing services. Additional comments include securing developer contributions for infrastructure enhancements, ensuring adequate vehicular access, and consideration of the adjacent safeguarded waste site.

Key themes raised:

- Neighbourhood character and public realm connectivity
- Water management, drainage and environmental compliance
- Active travel and pedestrian/cycle connectivity
- Community infrastructure and service capacity
- Developer contributions and infrastructure enhancements
- Vehicular access and traffic management
- Housing typology and use clarity

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the proposed allocation subject to a detailed landscape assessment. The **Environment Agency** comment that development should prioritise connecting foul drainage to the public sewer and only assess alternative measures if necessary. There is a very small area of Flood Zones 2 and 3 within the boundary. Policy criteria should reflect the need for a sequential approach to direct development away from areas of higher flood risk.

**District / Borough / County Council**

**Hampshire County Council** (landowner) comment that the site is no longer within a mineral safeguarding area for brick clay as per updated geological data. However, it lies near a safeguarded waste facility which must be considered. It needs to be demonstrated that the access via Paddock Way is suitable to facilitate the proposed development quantum. No flood risk issues are identified, water discharge to a nearby watercourse is potentially feasible, and developer contributions may be required to enhance the public rights of way network.

**Parish / Town Councils**

**Petersfield Town Council** comment that the site lies outside the settlement boundary and that access is via a narrow residential road. Development would need to: integrate with nearby footpaths and cycle routes; integrate and respect the existing playground and playing field; and ensure playground access is not compromised. The lack of identification of the playground and playing field is a significant omission which requires correction.

**Proposed Site Allocation EA161 Land south of Lovell Gardens, Binsted** (10 comments)

**Summary of all feedback**

Respondents noted that current infrastructure—comprising water supply, sewage treatment, transport links and local facilities—appears stretched and may not support additional development. They questioned the site’s overall suitability and need, observing that previous measures seem to have met identified social housing requirements while Binsted’s rural context, limited facilities and green belt location raise concerns. Feedback also highlighted potential environmental impacts, including encroachment on green spaces, prime agricultural land and wildlife habitats, and the possible loss of valued scenic views. Issues relating to traffic and accessibility were raised, with extra vehicles likely to increase existing congestion and insufficient bus services and traffic calming measures compounding the challenges. Further comments stressed the risk of cumulative overdevelopment and called for strategic mitigation measures, including improved public route connectivity and reassessment of water supply, utility capacity and flood risk, while one remark noted that any potential integration with the existing settlement did not sufficiently address these concerns.

Key Themes raised:

- Community Infrastructure and Social Services
- Questionable Need and Site Suitability
- Environmental and Countryside Impact
- Traffic, Transport and Accessibility
- Cumulative Overdevelopment
- Disruption to Local Character and Heritage
- Water Supply, Utility and Flood Risk

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support subject to detailed landscape assessment. Further strategic mitigation may be required for development within 5km of Wealden Heaths SPA. The **Ministry of Defence** recommends that detailed criteria to include measures to prevent impact on defence operations due to the site's proximity to RAF Odiham.

**District / Borough / County Council**

**Hampshire County Council** comment access via Lovell Gardens may require formal adoption as a public street due to the increased dwelling numbers. Existing crossover arrangements and rights of access must be reviewed. Flood risk is minimal, but suitable drainage outfall needs further investigation.

**Parish / Town Councils**

**Binsted Parish Council** raise significant infrastructure strain—especially concerning water supply, roads, and GP services. They also highlight overdevelopment concerns given the broader regional pressures, such as the 1,650-home site at Neatham Downs.

**Proposed Site Allocation EA200 Land off Merryfield Road, Sheet** (11 comments)

**Summary of all feedback**

Respondents raise that the site is unsuitable for development and should be retained as open space. They highlight that development would be in breach of restrictive covenants and that planning permission has recently been refused for 9 dwellings. Concerns are raised about the increased traffic on Pulens Lane, the need for further safeguards in a Source Protection Zone, and the risk of felling protected trees that support essential wildlife. Further comments focus on housing density, typology and neighbourhood character, emphasising that proposed dwelling heights and compact arrangements could negatively impact adjoining properties.

Key themes raised:

- Policy, legal constraints, and compliance
- Environmental impact and habitat conservation
- Open space preservation
- Cumulative impact on local infrastructure
- Road safety, traffic impact, and infrastructure improvements

**Summary of feedback from specific stakeholders**

**National group or organisation**

The **Environment Agency** highlight that the site is in Source Protection Zone 3 and, as such, development will need to demonstrate no significant harm to groundwater resources.

**District / Borough / County Council**

**Hampshire County Council** comment that no watercourse is identified on site and that further investigation into a suitable outfall should be undertaken.

**Parish / Town Councils**

**Sheet Parish Council** object due to safety and congestion concerns relating to Love Lane and Pulens Lane. They request that development contributes to the delivery of a pedestrian bridge crossing over Tilmore Brook to improve access to the Rotherlands Nature Reserve and Taro Leisure Centre. They also raise that traffic calming and safety improvements for the “Sheet end” of Pulens Lane are in the last phase to be implemented.

**Steep Parish Council** raise concerns about road infrastructure.

**Proposed Site Allocation EA212 Land north of Winchester Road, Stroud** (35 comments)

**Summary of all feedback**

Respondents raise concerns that additional development may worsen existing road access issues on the A272—characterised by excessive speeds, blind bends, poor sight lines and flooding—and increase congestion around junctions and busy routes. They note that further housing and associated traffic could strain local infrastructure and exacerbate safety challenges, particularly at key access points and near schools and amenities. Respondents also highlight that the heavy clay composition and high groundwater of the land contribute to poor drainage and recurrent flooding, with additional impervious surfaces likely to intensify these problems. Comments on the environment raise loss of valuable habitats, mature woodlands and hedgerows, along with potential reductions in biodiversity and increases in light pollution, while concerns about preserving rural character and agricultural land are expressed. Comments also emphasise that recent housing developments may have already met local needs, that strategic planning and community consultation have been insufficient, and that approving this site could set a precedent for further expansion without adequate safeguards. Adjacent landowner notes that they would not permit vehicular access to the site via Rothercombe Lane which is in their ownership.

Key Themes raised:

- Road Access and Traffic Safety
- Traffic Congestion and Infrastructure Capacity
- Flooding and Drainage Challenges
- Environmental and Ecological Impacts
- Housing Demand and Alternative Solutions
- Impact on Rural Character and Agricultural Land

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** – support subject to detailed landscape assessment

**Environment Agency** – There are no constraints on this site within the Environment Agency’s remit.

**District / Borough / County Council**

**Hampshire County Council** – access from the A272 will need to demonstrate suitable access in line with the relevant Hampshire Technical Design Guidance relating to visibility splays (TG3). Pedestrian connection to Rothercombe Lane should be provided

**NHS Hampshire & IOW** – note that infrastructure is over capacity and CIL

**Parish / Town Councils**

**Stroud Parish Council** voices concern regarding the location of the site, the complex access issues including pedestrian safety, over development, and the need for local engagement potentially through an updated Parish Plan.

**Steep Parish Council** voices concern that the proposed development could lead to increased traffic through their parish via narrow, single-track roads—Church Road and Ridge Common Lane—potentially creating unsafe “rat runs” unsuitable for higher vehicle volumes.

### **Proposed Site Allocation EA215 Land west of Liphook, Liphook** (73 comments)

#### **Summary of all feedback**

Respondents raise that development could negatively impact the environment and landscape by altering cherished vistas, green spaces, and wildlife habitats, and increasing issues such as drainage, noise, traffic, sewerage, and urban sprawl. They highlight that local services and infrastructure are already at capacity, with some respondents raising the need for a local bypass. Further comments relate to the planning process, lack of adherence to National Park purposes, and the need for proper consultation. Respondents view the proposed quantum of 250 homes as potentially excessive in relation to local heritage and rural character. They also object to the allocation of traveller pitches, citing poor location and the number of existing pitches in the area. Respondents suggest that alternative sites, improved flood risk management, accurate mapping, and a focus on long-term sustainability should be considered.

Key themes raised:

- Environmental and landscape impact
- Strain on local public services and infrastructure
- Traffic and transport infrastructure
- Policy compliance and planning process
- Strategic opportunities and community benefits
- Housing density and design quality
- Community character and heritage
- Traveller accommodation provision

#### **Summary of feedback from specific stakeholders**

##### **National group or organisation**

**Natural England** comment that due to scale of development (50+ dwellings), a bespoke Suitable Alternative Natural Greenspace (SANG) is likely to be required.

##### **District / Borough / County Council**

**Hampshire County Council** highlight LTN 1/20 and their Technical Guidance Note 10. They comment that: options for traffic calming may be limited on Portsmouth Road; there are some areas of low surface water flood risk; and developer contributions could enhance footpaths. **East Hampshire District Council** broadly support the proposed allocation but seek clarity on uses, transport impacts, and SPA restrictions. They comment that infrastructure, housing needs, and environmental concerns require cross-boundary coordination.

##### **Parish / Town Councils**

**Bramshott and Liphook Parish Council** object to the proposed allocation citing: no evidence of exceptional circumstances; no evidence of need for housing, care home and traveller pitches; existing permissions and proposals for homes and traveller pitches in the EHDC planning area; impacts on existing infrastructure; and conflicts with the neighbourhood plan.

**Milland Parish Council** comment that cumulative impacts with proposed development at Chiltley Lane must be considered. They highlight concerns over infrastructure (i.e., highways and healthcare) and the use of Milland as a “rat run”.

**Proposed Site Allocation EA216 Land at Westlands, Liphook** (13 comments)

**Summary of all feedback**

Respondents raise that existing transport issues require a local bypass, improved active travel links, and a revised field access to address existing congestion in Liphook Centre. A technical assessment suggests minimal traffic increases from 8 dwellings, while other respondents warned of potential overload to existing infrastructure – i.e., community, education, and healthcare uses and sewage systems. Respondents' views on landscape and ecology issues range from observations of low ecological value to calls for an enhanced and sustainable setting that preserves village character and the National Park boundary. There is emphasis on a need for coordinated planning that integrates local community perspectives and encourages joint working with authorities. There are also suggestions to extend settlement boundaries, review longstanding covenants, and update housing need assessments. Additional comments include the need for further flood risk investigation, and improved connectivity for a site located on the boundary near key catchment areas and local landmarks.

Key themes raised:

- Transport and traffic implications
- Landscape, ecology and environmental impact
- Strategic planning and stakeholder coordination
- Policy, legal constraints and covenant considerations
- Local infrastructure and service capacity

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the proposed allocation subject to a detailed landscape assessment. The site is within 5km of the Wealden Heaths Phase II SPA and so mitigation will be required.

**District / Borough / County Council**

**Hampshire County Council** comment that traffic calming along Longmoor Road may not be necessary due to the site's size. The county council may require developer contributions to improve active travel links in Liphook (i.e., Footpath 5). No watercourse is identified on the site and so further investigation into a suitable outfall should be undertaken. **East Hampshire District Council** comment that the site would provide a small quantum of development. If the site is not incorporated into the adjacent strategic site, then they suggest the settlement boundary is amended to include the properties to the west of the site, providing potential windfall opportunities for future development.

**Parish / Town Councils** n/a

**Proposed Site Allocation EA225 Land at Festival Hall, Petersfield** (13 comments)

**Summary of all feedback**

Respondents raise concerns that the policy does not fully align with key guidelines, noting the need for flood risk measures, enhanced parking for community amenities, and a more integrated approach to local planning. They question the demand for extra commercial floorspace given current town centre vacancies, and stress that development should retain existing parking, improve vehicle and cycle routes, and enhance pedestrian connectivity. Environmental and engineering issues are also noted, with warnings that earthworks and drainage alterations could affect the pool structure. Calls are made to preserve mature trees and improve planting to boost biodiversity. Feedback further emphasises that key community assets (i.e., the open-air swimming pool and Festival Hall) must be safeguarded, and that sustainable design with renewable energy solutions should be integrated into development.

Key themes raised:

- Infrastructure needs
- Residential and commercial land use balance
- Transport and parking accessibility
- Urban connectivity and public Realm enhancements

**Summary of feedback from specific stakeholders**

**National group or organisation**

n/a

**District / Borough / County Council**

**Hampshire County Council** comment that existing access points may need to be rationalised. They also note some areas of low surface water flood risk and possible groundwater flood risk.

**Parish / Town Councils**

**Petersfield Town Council** comment that Festival Hall and its surrounding area is a key part of the town, offering an excellent performance venue, community hall, and open-air swimming pool. The above must be respected and any redevelopment should be holistic, carefully considering the entire site and its character including the setting of listed buildings. The neighbourhood plan envisages high-quality residential and employment uses, a new access off Tor Way, and a (potential) town centre hotel.

**Proposed Site Allocation W1102 Land north of Dodds Lane, Swanmore** (52 comments)

**Summary of all feedback**

Respondents highlight that proposed development could harm the local environment by reducing green space and mature vegetation, and impacting protected species. They raise that housing need in Swanmore appears to be met by existing and planned developments, and they question whether the proposed benefits justify further growth, particularly on a greenfield site at the edge of the National Park. Further concerns focus on access, traffic and safety issues on narrow roads like Dodds Lane, and already overstretched local infrastructure and services. Respondents point to a lack of strategic coherence with existing planning policies, potential loss of the village's visual character and rural amenity, and doubt that the proposed mitigation measures will adequately offset highlighted negative impacts. Additional observations include the need for further consultation, improved pedestrian connectivity, and better management of drainage and flood risks.

Key themes raised:

- Environmental and ecological impact
- Housing need and 'exceptional benefits' test
- Access and highway safety
- Strain on local infrastructure and services
- Preservation of village character and visual amenity

**Summary of feedback from specific stakeholders**

**National group or organisation**

**Natural England** support the proposed allocation subject to a detailed landscape assessment.

The **Environment Agency** comment that development should prioritise connecting foul drainage to the public sewer and only assess alternative measures if necessary. They would encourage early consideration of how foul water will be managed for this site.

**District / Borough / County Council**

**Hampshire County Council** comment that the site is well located for active travel movements to local facilities, and that sufficient visibility and traffic calming will be required and welcomed, respectively. Developer contributions will be welcomed to improve pedestrian access to and from the site (including improvements to Footpaths 11 and 19). They also comment that no watercourse is identified on site, so investigation into a suitable outfall should be undertaken.

**Winchester City Council** support the proposed allocation but raise that it could deliver more homes, and question why 'exceptional benefits' are needed or justified for 'boundary sites'.

**Parish / Town Councils**

**Swanmore Parish Council** object to the proposed allocation for the following reasons: there are no exceptional benefits; infrastructure is overstretched; risk of settlement sprawl; risk of further development in the future; detrimental impacts on biodiversity, wildlife, and views; safety concerns regarding Dodds Lane and proposed access; and impact on amenity of neighbouring properties.



## Appendix 1 - List of organisations on the Local Plan consultee database

|  |  |
|--|--|
| Abri (Housing Association)                               | Brighton and Hove Centre for Spirituality            |
| Action in Rural Sussex                                   | Brighton and Hove City Council                       |
| Adjoining District and Parish Councils                   | Brighton and Hove Muslim Forum                       |
| Adur and Worthing District Councils                      | Brighton and Hove Traveller Liaison Team             |
| Aerodrome Safeguarding                                   | British Gas  |
| Air Traffic at Fly Brighton                              | British Horse Society                                |
| Albion Water   | Broadband Vantage                                    |
| Alfriston Cabins   | BT   |
| Alice Holt Community Forum                               | Butterfly Conservation                               |
| Amberley Museum and Heritage Centre                      | Byways and Bridleways Trust                          |
| Amphibian & Reptile Conservation                         | Cable and Wireless                                   |
| Angmering Park Estate                                    | Cala Homes   |
| Arquiva  | Callstone Ltd  |
| Arun and Rother Rivers Trust                             | Campaign for National Parks                          |
| Arun District Council                                    | Campaign to Protect Rural England - Hampshire        |
| Arundel Chamber of Commerce                              | Chawton House  |
| Arundel Community Website                                | Chichester District Council                          |
| Barlavington Estate                                      | Chichester Gypsy Traveller Liaison Officer           |
| Bayards Field Community Group                            | Chichester Harbour Conservancy Development           |
| Bereleigh Estate Ltd                                     | Chichester Society                                   |
| Bignor Park Estate                                       | Church Commissioners                                 |
| Black Down and Hindhead Supporters of the National Trust | Churches Together Sussex                             |
| Blackmoor Estate   | Civil Aviation Authority                             |
| Bohunt School  | Clapham Neighbourhood Development Plan Working Group |
| Bricycles - Brighton and Hove Cycling Campaign           | Coal Authority                                       |
| Brighton & Hove Energy Services Co-op (BHESCo)           | Coast to Capital LEP                                 |
| Brighton & Sussex Hindu Society                          | Coldean Neighbourhood Forum                          |
| Brighton and Food Partnership                            | Council for British Archeology                       |
|  | Country Land and Business (CLA) Association          |

County Councillors

Cowdray Estate

CPRE Sussex

Crown Estates

Cycling UK

DEFRA

Department for Transport

Department of Levelling Up, Housing and  
Communities

District Councillors

Ditchling Beacon and Commons

Dudman Group of Companies

Easebourne Planning Panel

East Hampshire District Council

East Sussex County Council

East Sussex Disability Association

East Sussex Fire And Rescue Services

East Sussex, West Sussex and Brighton & Hove  
CCG

Eastbourne Downland Group

Edf Energy

EE/ T-Mobile

Enterprise M3

Environment Agency

Eon

Equality and Human Rights Commission

ESCC Traveller & Gypsy Liason Officer

Esso Petroleum Company, Limited

Fareham and Gosport CCG

Federation Of Small Businesses

Ferring Conservation Group

Findon Neighbourhood Plan Working Group

Firle Management Ltd

Forest Holidays

Forestry Authority

Freeborough and Co

Friends of Hollingbury and Burstead Woods

Friends of Lewes

Friends of Rother Valley

Friends of the South Downs

Friends of Withdean Park

Game and Wildlife Conservation Trust

Gardens Trust

Gatwick Airport

Gawthorpe Estates Ltd

Giff Gaff

Gilbert Estate

Glynde Estate

Goodwood Estate

Greening Steyning

Hampshire & IOW Police Crime Commissioners  
Office

Hampshire and Isle of Wight Local Nature  
Partnership (LNP)

Hampshire County Council

Hampshire Swifts

Hampshire Wildlife Trust

Hampshire, Southampton and Isle of Wight CCG

Health & Safety Executive

Highways Agency

Historic England

HMPC Ltd

Home Builders Federation

Homes England

Horsham District Council

Idsworth Farm

J R Sykes (Farms) Denmead Farm

Joint Committee of The National Amenities  
Society

KeatsFearn Estate Agency

Lancing College

Land Owning Trust

Learning Through Landscapes

Leconfield Estate

Lewes Area Access Group

Lewes Conservation Area Advisory Group

Lewes District Council

Lycamobile

Marine Management Organisation

Mid Sussex District Council

Mid Sussex Ramblers

Midhurst Society

Ministry of Defence

Motorsport UK

National Farmers Union

National Grid

National Trust

Natural England

Network Rail

NHS England

NHS South Eastern Hampshire CCG

NHS West Hampshire

Northeast Farm

Nottcutts Ltd

O2 UK Ltd

Office of Rail and Road

Open Spaces Society

Orange Personal Communications Ltd

Ordnance Survey - Rights of Way Team

Ouse Adur Rivers Trust

Parham House and Gardens

Parish Councils

Petersfield Climate Action Network (PeCAN)

Petersfield Society

Police and Crime Commissioner Sussex

Portsmouth Water

Public Health England

Rail Future

Romany Rights Association

Royal Society for Protection of Birds

Scottish Power

SELEP Eastern Area

Shoreham Airport

Shoreham District Ornithological Society

Sky

Solent LEP

Solent Transport

Sompting Estate

SOS Bohunt Manor Community Action Group

South Downs Farmers Group

South Downs Partnership

South East England Tourist Board

South East Rivers Trust

South East Water

South Eastern Hampshire CCG

Southern Electric

Southern Gas Networks

Southern Gas Networks

West Saltdean Neighbourhood Forum

Southern Water

West Sussex County Council

Sport England

West Sussex Cycle Forum

SSE Plc

West Sussex Local Access Forum

Stansted Park Foundation

West Tisted Manor Estate

Surrey Hills AONB

Western Sussex Rivers Trust (WSRT)

Sussex & Surrey Police

Wey and Arun Canal Trust

Sussex Chamber of Commerce

Winchester Action On Climate Change

Sussex Community Rail Partnership

Winchester Chamber of Commerce

Sussex Gardens Trust

Winchester City Council

Sussex Police

Winchester College

Sussex Swifts Local Group

Winchester Health Authority

Sussex Wildlife Trust

Wine GB

Sustrans

Wiston Estate

Talk Talk

Woodland Trust

Thames Water

Worthing Borough Council

Three / Hutchinson G3 UK Ltd

Transition Town Lewes

Traveller Education Support Team

Truleigh Hill Youth Hostel

UK Power Networks

Underhill lane Community Association

University of Chichester

University of Sussex

Upper Beeding Neighbourhood Plan

Upper Itchen Valley Society

Vodafone Ltd

W L West & Sons

W&W Comm Association

Wessex Rivers Trust

West Dean Estate

## Appendix 2 - Press Releases

### SOUTH DOWNS NATIONAL PARK

14/01/2025

#### Have your say on National Park's Local Plan Review

An eight-week consultation begins this month as the National Park invites people to have their say on how and where development takes place.

The award-winning South Downs Local Plan is being reviewed to ensure it's up-to-date and addresses important issues such as nature recovery, climate change, affordable housing and helping local communities thrive.

The public consultation of the Local Plan Review starts on 20 January and will run until 17 March. This is the main opportunity for people to help shape the final Plan, so the National Park is encouraging the public to get involved.

Local Plans set out where future development will take place, such as new homes and locations for business growth, as well as key policies, such as protecting nature and heritage, against which future planning applications will be judged.

The National Park Authority proposes to keep much of the existing Local Plan, including the emphasis on landscape-led, which means that the nationally-designated landscape is considered in every planning decision. The Local Plan will continue to prioritise the provision of clean air, water, dark skies and food and a medium level of growth spread across the towns and villages of the UK's youngest National Park.

The Local Plan Review document contains:

- An introductory chapter explaining the purpose of the Local Plan Review and what the consultation will cover.
- The vision and objectives for the Local Plan Review.
- 55 existing policies that have been updated, as well as 10 new, thematic policies. Changes include strengthening climate, nature and green infrastructure policies, greater protection



### SOUTH DOWNS NATIONAL PARK

27/02/2025

#### Time running out to have your say on National Park's Local Plan Review

People are being urged to have their say as the clock counts down to the deadline for a major public consultation on the future of the National Park.

The Local Plan Review will decide how and where development takes place in the National Park, as well as addressing important issues such as nature recovery, climate change, affordable housing and helping local communities thrive.

Well over 600 comments have been received from the public so far, including more than 400 through the online consultation platform and a further 200 via email or post.

More than 800 people have attended consultation events at venues across Sussex and Hampshire throughout January and February.

The consultation runs until midnight on **Monday, 17 March**.

Claire Tester, Planning Policy Manager for the National Park Authority, said: "We've had a really good response to the consultation and I'd like to thank everyone who has taken the time to give their feedback.

"This is the main opportunity for people to help shape the final Plan, so it's really important that if you care about the future of the National Park that you take part in the consultation.


"Probably the easiest way to submit comments is through the online platform, so we encourage everyone, both inside and outside the National Park, to have their say if they can."

The National Park Authority proposes to keep much of the existing Local Plan, including the emphasis on landscape-led, which means that the nationally-designated landscape is considered in every planning decision. The Local Plan will continue to prioritise the provision of clean air, water, dark skies and food and a medium level of growth spread across the towns and villages of the UK's youngest National Park.



## Appendix 3 - Public notice

**Public Notice**  
**South Downs National Park Authority**  
**Local Plan Review**  
**First Public Consultation Document**  
**(Regulation 18)**



**PUBLIC NOTICE**  
**SOUTH DOWNS NATIONAL PARK AUTHORITY**  
**TOWN AND COUNTRY PLANNING ACT (LOCAL PLANNING)**  
**(ENGLAND)**  
**REGULATIONS 2012**  
**REGULATION 18 CONSULTATION NOTICE**  
**PREPARATION OF A LOCAL PLAN CONSULTATION**

The National Park Authority ("NPA") for the South Downs National Park has drafted a revised Local Plan for consultation. This will shape development in the National Park up to 2042.

The NPA considers that a revised Local Plan is necessary to ensure it is up to date and in compliance with national planning policy and guidance. The NPA proposes to keep much of the existing Local Plan, including the emphasis on landscape-led, which means that the nationally-designated landscape is considered in every planning decision.

Local plans play an important part of the planning system and are the main consideration in deciding planning applications. They set the framework in which decisions on proposals are taken locally subject to any other strong planning reasons or material considerations.

Pursuant to Regulation 18 of the Town and Country Planning Act (Local Planning) England Regulations 2018 the NPA is required to consult the following bodies and/or individuals as listed below to make representations to the National Park Authority about what the revised Local Plan ought to contain:

- a. such of the specific consultations bodies as the NPA consider may have an interest in the subject of the proposed revised Local Plan;
- b. such of the general consultation bodies as the NPA consider appropriate; and
- c. such residents or other persons carrying on business in the NPA's area from which the NPA consider it appropriate to invite representations Consultation Period

The consultation will run from 20 January to 17 March 2025 ("Consultation Period") and the NPA invites and encourages all consultees to make representations about what the draft revised Local Plan should contain at the earliest opportunity and in any event no later than by the end of the Consultation Period.

**Inspection of documents:**

Copies of the draft revised Local Plan together with relevant background and supporting documents are available for inspection:

- on South Downs National Park website, [www.southdowns.gov.uk/local-plan-review](http://www.southdowns.gov.uk/local-plan-review)
- at the following libraries (during normal opening hours):
  - Lewes: Styles Field, Friars Walk, Lewes, BN7 2LZ
  - Midhurst: The Grange, Bepton Road, Midhurst, GU29 9HD
  - Petworth: High Street, Petworth, GU28 0AU
  - Findon Valley: Lime Tree Avenue, Worthing, BN14 0DH
  - Hassocks: 9 Ewart Close, Hassocks, BN6 8FJ
  - Lancing: Penstone Park, Lancing, BN15 9DL
  - Seaford: 15-17 Sutton Park Road, Seaford, BN25 1QX

At South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH and at Seven Sisters Country Park Visitor Centre, Exceat, near Seaford, East Sussex, BN25 4AD. Email us at [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk) to make an appointment.

**Representations:**

Formal written representations on the draft revised Local Plan are invited to be made during the Consultation Period and can be made in the following ways:

- Online: Using the consultation platform to view and give feedback on the draft revised Local Plan at <https://sdnpalocalplanreview.commonplace.is/>
- Email: [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk)
- In writing: Planning Policy Team, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH

A paper copy of the draft revised Local Plan can be requested by email to [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk). The document will be issued following the payment of a charge to cover administrative and production costs.

All of the above information can be found on the South Downs National Park website using the link below.

<http://www.southdowns.gov.uk/local-plan-review>  
Tim Slaney, Director at the National Park Authority

## Appendix 4 - Consultation poster & leaflet

**South Downs National Park Authority**

# HAVE YOUR SAY LOCAL PLAN REVIEW

For more information scan the QR code or visit: [www.southdowns.gov.uk/local-plan-review](http://www.southdowns.gov.uk/local-plan-review)  
First public consultation on the revised Local Plan Monday 20 January to Monday 17 March 2025

FIND OUT MORE AT ONE OF THESE CONSULTATION DROP-IN EVENTS:

| Where:      | Date:                 | Time:       | Location:  |
|-------------|-----------------------|-------------|--|
| Midhurst    | Wednesday 22 January  | 6.30-8.30pm | South Downs Centre Memorial Hall, North Street, Midhurst GU29 9DH                      |
| Twyford     | Saturday 25 January   | 2.00-5.00pm | Twyford Village Hall, Hazeley Rd, Twyford, Winchester SO21 1QY                         |
| Amberley    | Tuesday 28 January    | 3.30-7.30pm | Amberley Church Hall, St Michael's Amberley, Church Street, Amberley, Arundel BN18 9ND |
| Petersfield | Wednesday 29 January  | 6.30-8.30pm | Festival Hall, Heath Road, Petersfield GU31 4EA  |
| Liphook     | Saturday 1 February   | 2.00-5.00pm | Liphook Church Centre, Portsmouth Road, GU30 7DJ                                       |
| Lewes       | Wednesday 5 February  | 6.30-8.30pm | Lewes Town Hall, High Street, Lewes BN7 2QS  |
| Petworth    | Wednesday 12 February | 3.30-7.30pm | Leconfield Hall, Market Square, Petworth GU28 0HA                                      |
| Lewes       | Saturday 15 February  | 1.30-4.00pm | Cliffe Hall, 28 Cliffe High St, Lewes BN7 2AH  |

- East Sussex – Lewes
- Hampshire – Petersfield, Liphook, Twyford
- West Sussex – Midhurst, Amberley, Petworth

planningpolicy@southdowns.gov.uk 01730 814810 South Downs Centre, North St, Midhurst, GU29 9DH

**SOUTH DOWNS NATIONAL PARK LOCAL PLAN**

**South Downs National Park Authority**

# HAVE YOUR SAY LOCAL PLAN REVIEW

For more information, scan the QR code or visit: [www.southdowns.gov.uk/local-plan-review](http://www.southdowns.gov.uk/local-plan-review)  
Have your say on how and where development takes place in the South Downs National Park. The first public consultation on the revised Local Plan is open from Monday 20 January to Monday 17 March 2025

planningpolicy@southdowns.gov.uk  
01730 814810  
South Downs Centre, North Street, Midhurst, GU29 9DH

**SOUTH DOWNS NATIONAL PARK LOCAL PLAN**

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| Lewes       | Saturday 15 February  | 1.30-4.00pm   | Cliffe Hall, 28 Cliffe High St, Lewes BN7 2AH  |
| Midhurst    | Monday 24 February    | 4.00pm-6.30pm | South Downs Centre, Memorial Hall, North Street, Midhurst GU29 9DH                     |

- East Sussex – Lewes
- Hampshire – Petersfield, Liphook, Twyford
- West Sussex – Midhurst, Amberley, Petworth

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**SOUTH DOWNS NATIONAL PARK LOCAL PLAN**