

Report to **South Downs National Park Authority**
Date **20 March 2026**
By **Director of Placemaking**
Title of Report **Local Plan: Regulation 19 Publication**
Decision

Recommendation: The Authority is recommended to

- 1. Note the contents of the Regulation 18 Consultation Report (Appendix 1).**
 - 2. Approve the draft Proposed Submission Local Plan (Appendix 2) and the associated changes to the Policies Map (Appendix 3) for publication under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, subject to:**
 - Consideration of comments from the National Park Authority; and**
 - Any minor factual or presentational amendments being agreed by the Director of Placemaking in consultation with the Chairs of Planning Committee and the National Park Authority.**
 - 3. Note the draft Integrated Impact Assessment (IIA) (Appendix 4) and draft Habitats Regulations Assessment (HRA) (Appendix 5) as supporting evidence for the draft Proposed Submission Local Plan.**
 - 4. Delegate authority to the Director of Placemaking in consultation with the Chairs of Planning Committee and the National Park Authority to:**
 - Propose modifications arising from responses to the Regulation 19 publication and any other relevant new information;**
 - Submit the Proposed Submission Local Plan and proposed modifications to the Secretary of State (and other documents required) in accordance with regulation 22 of the Town and Country Planning (Local Planning) (England) Regulation 2012 for examination; and**
 - To suggest any necessary modifications to the Submission Local Plan during the examination process to help secure its soundness (pending further public consultation as required).**
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Executive Summary

- This new Local Plan has been prepared in the context of significant planning reforms under the previous and existing Government, including a draft new National Planning Policy Framework (NPPF) published for consultation in December 2025.**
- The first statutory consultation (Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) on the new Local Plan took place from 20 January to 17 March 2025. Key changes to the Local Plan following feedback received during the Regulation**

18 Consultation are set out in the table associated with paragraphs 5.1-5.3 of the Consultation Report at **Appendix 1**.

- A new Local Plan has been prepared, and it is intended that this document, following examination and any required modifications, will replace in full the South Downs Local Plan adopted in 2019.
- The draft Proposed Submission (Regulation 19) new South Downs Local Plan is appended to this report at **Appendix 2**. It has been informed by consultation feedback and further evidence as explained in this report. This is the plan which is proposed to be submitted to the Planning Inspectorate for examination.
- The appropriate figure for housing need in the National Park is 323 homes per year (or 6,137 new homes between 2024 and 2042).
- The draft Proposed Submission (Regulation 19) new South Downs Local Plan includes Partnership Management Plan Planning Principles as the Local Plan Objectives, 58 thematic strategic policies, and 77 allocations that contribute to housing supply and other development needs. Changes to the Policies Map arising from the policies and allocations in the Local Plan are also proposed at **Appendix 3**.
- The findings from the Integrated Impact Assessment at **Appendix 4** and Habitats Regulations Assessment at **Appendix 5** have been taken into account in the preparation of the Proposed Submission new Local Plan.
- On 12 February 2026, Planning Committee agreed to recommend the Proposed Submission Local Plan and proposed Policies Map changes to the National Park Authority for approval subject to the removal of two proposed allocation sites due to their adverse impacts on the purposes of the National Park:
 - SDA41 Land east of A286 and north of Mill Lane, Cocking; and
 - SDA63 Three Cornered Piece, Nyewood.
- Another site – SDA66 Novington Sandpit, Plumpton – was withdrawn by officers prior to the Planning Committee meeting because evidence had been submitted that the site was undeliverable due to a covenant that restricted development.
- If approved, the Proposed Submission new Local Plan will be published in May for comment for a 6-week period. Delegated authority is sought from the NPA for submission of the Plan to the Planning Inspectorate for examination following the publication period, alongside the comments received and any proposed modifications.
- The examination will focus on matters of soundness (whether the Local Plan is positively prepared, justified, effective and consistent with national policy). In most cases an Inspector will recommend main modifications to make the plan sound and legally compliant. These will be brought back to the Planning Committee and the National Park Authority for consideration and will be consulted on for a further 6 weeks (probably in mid-2027).
- The Inspector will consider any further representations on these modifications before issuing their final report. If the new Local Plan is found sound, this will be reported to the Planning Committee and the National Park Authority, and the latter will then decide whether to adopt the new Local Plan.

I. National Context

- I.1. This new Local Plan has been prepared in the context of significant planning reforms under the previous and existing Government. This has included changes brought in through the Levelling Up and Regeneration Act 2023, the Planning and Infrastructure Act 2025, several iterations of the National Planning Policy Framework (NPPF) and revised Planning Practice Guidance.
- I.2. These planning reforms are continuing to emerge, with a draft NPPF published for consultation in December 2025 and new Regulations published in early March 2026 which include the removal of the legal 'Duty to Cooperate' and the provisions that enable local

plans to be examined under the existing plan-making system if they are submitted for examination before 31 December 2026.

- 1.3. Annex A of the draft NPPF explains in paragraph (8) that local plans progressing under the current plan-making system (such as the South Downs Local Plan) will be examined against the 2024 NPPF. However, it also says in paragraph (2) that “Development plan policies which are in any way inconsistent with the national decision-making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework”.
- 1.4. This potentially means that some of our new Local Plan policies could be endorsed by the Planning Inspectorate at examination, because they comply with the December 2024 NPPF, but then be given very little weight in decision making on adoption because they are inconsistent with the new NPPF due to be finalised in ‘Summer’ 2026. This is obviously not ideal and would be very confusing for decision-makers, applicants and our community. We have commented in our response to this part of the consultation NPPF that there should be a clear period when newly adopted policies, having gone through examination, have the full weight of the Development Plan system.
- 1.5. We are not suggesting any significant changes at this stage because we don’t know how the draft NPPF will change prior to its adoption. However, when the Local Plan is submitted for examination, we may be suggesting modifications to the Inspector to minimise any conflicts with the then finalised 2026 NPPF. It is proposed that these modifications for submission be discussed by Members at a Workshop and then agreed by the Director of Placemaking in consultation with the Chairs of Planning Committee and the National Park Authority.

2. Early Engagement and Regulation 18 Consultation

- 2.1. A key part of the plan making process is to seek early and open engagement on the content and shape of the new Local Plan. At the heart of any new Plan is the development strategy for the area and the public consultation that has directly informed its content.
- 2.2. The Authority initiated the preparation of a new Local Plan by engaging residents, Parish and Town Councils, local community organisations and statutory agencies from July to September 2024, seeking feedback on the scope of the Local Plan and key issues for it to address. This early engagement included using a digital consultation platform (Commonplace) and attending events in and close to the National Park over the summer of 2024.
- 2.3. The first statutory consultation (Regulation 18) on the new Local Plan took place from 20 January to 17 March 2025. A first draft Local Plan, including draft policies and site allocations, was published for the consultation. Twenty in-person consultation events were held across the National Park from January – February 2025, and people were invited to respond using the consultation platform (Commonplace) or via email or letter. The **Consultation Report (Appendix I)** sets out how the consultation was undertaken, who responded, and the key issues raised in the feedback. More than 1,900 individuals and organisations responded, generating over 3,700 comments – spanning policies, site allocations and background assessments.
- 2.4. Officers have reviewed all comments received during the consultation and have taken these into account in preparing the Proposed Submission Local Plan. Taking into account the nature of the changes arising from comments received and the challenging timetable for the preparation of the new Local Plan, it was considered that a further Regulation 18 was not necessary and it was appropriate to proceed to preparing a Proposed Submission Local Plan. Key changes to the Local Plan following feedback received during the Regulation 18 Consultation are set out in the table associated with paragraphs 5.1-5.3 of the **Consultation Report (Appendix I)**. These include changes to the structure of the Local Plan so that each settlement with allocations now has its own introductory section, with cross-references to community-led plans such as Parish Priority Statements. A new policy, SDH4 (Specialist and Older Persons’ Accommodation), has been added, in response to feedback from residents and stakeholders who identified gaps in provision and highlighted the need for people to be able to age in place within their communities. There are also extensive changes to site allocations arising from the consultation, including the relocation of

development in one village, (SDA35 Land at East Farm, Amberley), largely reflecting the community's preferred approach. In addition, many allocation criteria have been updated to address specific concerns raised - for example, the inclusion of provision for 'meanwhile' uses at the Phoenix site in Lewes.

3. Planning Committee

3.1. Planning Committee unanimously agreed that the draft Proposed Submission Local Plan should be recommended to the National Park Authority for approval. Three speakers addressed the Committee focusing on proposed allocations for 25 homes in Cocking and a proposed permanent gypsy and traveller pitch at Nyewood. Members discussed the matters arising and voted that these sites should be removed.

3.2. Changes to the Proposed Submission Local Plan have been made to reflect the decision of planning committee. Other changes have also been made and are summarised below:

- SDH1 – addition of the Five Year Housing Land Supply.
- SDH2 – additions to require 10% of plots as self-build or custom-build on sites of 50+ homes (including additions to the marketing appendix A1), and the addition of supporting text to SDC2 to clarify that 2(e) could also be used for self-build or custom-build homes to align the new Local Plan with NPPF paragraphs 63 & 71.
- SDH4 – removal of criterion 4 requiring a proportion of 50+ sites to be specialist housing to reflect the viability evidence.
- Chapter 5 Allocations Introduction – additions to reflect that employment, retail, and gypsy and traveller sites are included in the allocations, and to add SDH2 – Housing Mix, SDH3 - Accessible and Adaptable Homes and SDH5 – Affordable Housing to the list of policies that all allocations will need to take into account (caveated that only applies to housing allocations).
- SDA1, SDA4, SDA5, and SDA30 – removal of development criteria for 20% Biodiversity Net Gain to reflect viability evidence.
- SDN1 and SDN2 – reference added to Species Recovery Strategies and Protected Sites Strategies.
- SDN3 – addition to the supporting text setting out the developer contributions for Bird Aware mitigation.
- SDN4, Policies Map and consequential amendment to SDA25 – to reflect the recommendations of the Habitats Regulations Assessment for the zone of potentially functionally linked habitat for the Arun Valley Special Protection Area to extend to 6.5km (previously 5km), plus amendments for consistent terminology between the policy and the HRA.
- SDN5 – addition to the supporting text providing a space for including the developer contributions to the mitigation strategy currently in preparation.
- SDN7 – new criterion to require a project-level HRA for development proposals in the Meon catchment in regards the River Meon Compensatory Habitat for the River Itchen SAC.
- Minor amendments to site names and other corrections for consistency across the Plan.

4. The Proposed Submission South Downs Local Plan 2024-2042 (Regulation 19)

4.1 The Proposed Submission South Downs Local Plan is appended to this report (**Appendix 2**).

4.2 There are many elements of the award-winning 2019 South Downs Local Plan that remain relevant and fit for the future of the National Park. These include:

- Its landscape-led approach, reflecting the primary purpose of National Park designation – to conserve and enhance the natural beauty, wildlife and cultural heritage of the area;

- An ecosystems services approach, recognising that human influences are part of a much wider natural capital system which provides us with goods and services such as clean air and water and food; and
- A dispersed growth strategy, reflecting the multi-centric character of the many towns and villages spread across the National Park and the need for their communities to thrive and grow sustainably.

4.3 However, there have been changes at a national and local level, since the last Local Plan was adopted in 2019, including revised National Park priorities and new Partnership Management Plan. Development needs have continued to grow so further site allocations are needed to for the plan period to 2042.

4.4 A new Local Plan has been prepared, and it is intended that this document, following examination and any required main modifications, will replace in full the South Downs Local Plan adopted in 2019. Planning Committee approved amendments to the Local Development Scheme (the timetable for the preparation of development plan documents) to ensure clarity on this point.

5. **Summary of the key elements of the Proposed Submission South Downs Local Plan (2024-2042)**

Vision and Objectives

5.1 The vision for the National Park was set through the recently updated South Downs Partnership Management Plan (2026-2031) and covers the period to 2060. The Partnership Management Plan includes a suite of Planning Principles; these principles provide the objectives in the Regulation 19 Plan.

Spatial Strategy, Development Need and Provision

5.2 The Local Plan seeks to address development needs in a way that supports the National Park's statutory purposes and duties. The National Park Authority has a duty to seek to foster the social and economic wellbeing of its local communities. However, it is key that the legislation places this duty in the context of pursuing the statutory purposes of a National Park. The Authority has worked extensively with constituent and neighbouring local authorities on strategic cross-boundary issues, including development needs. This 'duty to cooperate' work was recently reported to Planning Committee on 11 December 2025 so is not repeated in this report.

5.3 National Park Authorities are permitted to establish their housing needs using 'an alternative approach' to the Standard Method mandated for most local planning authorities (Planning Practice Guidance 2a-014-20241212). The ten English National Parks and the Broads Authority have worked together to agree a set of principles for such an alternative method. In summary, these are:

- The standard method is a starting point for assessing housing need and plan-making;
- In seeking to understand housing need in a National Park/The Broads context, we will look at population, housing stock, affordability and community services; and
- An understanding of development capacity is a key part of this process. We cannot build homes at the volume that would be required to impact on affordability without irreparable damage to the very purpose of designation.

5.4 Two studies have been conducted using these principles: the AECOM study was jointly commissioned in 2025 by the South Downs National Park Authority and Lewes, Chichester, East Hampshire and Winchester Councils, in consultation with the other councils with land in the National Park. It considered data on existing housing stock and applied the Standard Method figures issued by Government for the 12 councils with land within the National Park. It then apportioned them between the National Park and the rest of the council areas based on the proportion of existing homes in each area. This approach resulted in a figure of 1,048 dwellings per annum (dpa) for the National Park.

- 5.5 The second study was commissioned from consultants Icen Projects as an Addendum to their 2023 Housing and Economic Development Needs Assessment. This Addendum takes into account the findings of the AECOM report on housing stock and affordability ratios but goes further to consider other relevant factors. It concludes that:
- The demographic analysis reveals that a continuation of recent trends would result in a population growth of around 4,000 people over 20 years. This would translate into a household growth of 323 dwellings per annum once a vacancy rate is applied.
 - The application of the Standard Method as set out in the AECOM report would result in a population growth of 40,800 people (35%), entirely out of kilter with past trends, with the main growth projected to be in the 16-64 age group. Whilst an increase in the economically active population is generally considered a good thing, that would only be the case if there were a concurrent significant increase in jobs. This is unlikely to be the case in a National Park context and is likely to result in unsustainable commuting patterns.
 - The analysis estimates a need for 259 affordable homes per annum to meet all needs. The link between affordable need and overall need (of all tenures) is complex and many of those with an affordable need are already in housing (and therefore do not generate a net additional need for a home). In addition, the private rented sector is providing benefit supported accommodation for many households. That said, the level of affordable need does suggest the Authority should maximise the delivery of such housing at every opportunity.
- 5.6 As a result of the above work the Authority considers that the appropriate level of housing need in the National Park is 323 homes per year (or 6,137 new homes between 2024 and 2042).
- 5.7 This new Local Plan seeks to disperse growth across the National Park, focusing larger scale growth on 'primary settlements' and strategic allocations with the greatest potential for creating or supporting sustainable communities, and allowing smaller scale growth of other settlements which enable occupiers to access day-to-day services and facilities. It also allows some limited growth outside of these settlements to support more rural communities and economies.
- 5.8 Through a robust process, the Authority has considered all known potential development sites and has proposed a housing supply figure of 6,735 over the lifetime of the Plan. This exceeds the demographic-driven housing need figure of 323 homes per year, allowing some headroom of 598 homes (approximately 10%) to allow flexibility if some sites do not come forward as anticipated. This provision is an uplift of 42% compared to the 2019 Local Plan planned provision of 250 homes per year and reflects the Authority's commitment to contributing to the Government's ambitions to boost housing supply where this is compatible with the statutory purposes of the National Park, as well as addressing to some degree our need for affordable homes for local communities.

Strategic Policies

- 5.9 The South Downs National Park covers a very large area with 46 made Neighbourhood Development Plans, most of which were approved subsequently to the adoption of the 2019 Local Plan. This enables this Local Plan to focus purely on strategic policies which apply to the whole National Park, leaving the non-strategic, more localised, policies to the Neighbourhood Development Plans. The Local Plan policies must be considered as a whole, taking into account their purpose and place within the Local Plan.
- 5.10 Chapter 4 of the Plan sets out 58 strategic policies, and these are arranged as follows, including reference to the strategic matters identified in NPPF paragraph 20:
- **Core Policies** – which set the overall strategy for development in the National Park (preamble to NPPF 20);
 - **Landscape and Heritage** – conservation and enhancement of the natural, built and historic environment (NPPF 20d);

- **Nature and Climate** – conservation and enhancement of the natural environment and measures to address climate change and adaptation (NPPF 20d);
- **Water and Pollution** – conservation and enhancement of the natural environment, measures to address climate change and adaptation, water supply, wastewater, flood risk and coastal change management (NPPF 20b and d);
- **Housing** – housing supply, mix, accessibility, affordable housing and gypsy and traveller provision (NPPF 20a);
- **Economy** – economic development, agriculture, tourism, retail and town and village centres (NPPF 20a);
- **Green, Blue and Community Spaces** – community facilities and green infrastructure (NPPF 20c and d); and
- **Transport and Infrastructure** – transport, telecommunications and other infrastructure (NPPF 20b).

Site Allocations

- 5.11 Chapter 5 of the Plan sets out a total of 77 site allocations that contribute to the housing supply as set out in policy SDH1 and gypsy and traveller accommodation need. Some sites include an element of commercial or employment provision as part of mixed-use schemes.
- 5.12 The allocations include unimplemented allocations carried over from the 2019 Local Plan, updated where necessary, and new allocations for this Local Plan. It does not include allocations in made Neighbourhood Development Plans.
- 5.13 Allocations are arranged by settlement in two parts:
- **Primary Settlements and Strategic Sites:** Lewes, Petersfield, Midhurst and Easebourne, Petworth, Liss, Shoreham Cement Works, and Liphook; and
 - **All Other Settlements:** in alphabetical order
- 5.14 Sites are identified as strategic sites where they propose to allocate 100+ new homes. Seven strategic sites are proposed for allocation in the revised Local Plan:
- **SDA1 North Street Quarter:** Phoenix Area; Former Bus Station; and Eastgate Wharf (previously SD57 in the adopted South Downs Local Plan)
 - **SDA2 Land at Old Malling Farm, Lewes** (previously SD76 in the adopted South Downs Local Plan)
 - **SDA4 County Hall, St Anne’s Crescent, Lewes**
 - **SDA5 East Sussex College, Mountfield Road, Lewes**
 - **SDA25 Land south of Herbert Shiner School, Petworth (includes Petworth NDP allocation H7)**
 - **SDA30 Shoreham Cement Works (previously SD56 in the adopted South Downs Local Plan)**
 - **SDA31 Land west of Liphook**
- 5.15 Site allocation policies include an indicative quantum of development, and some sites also have a developable area shown on inset maps to be included in the designed version of the Proposed Submission Local Plan for publication in May. Red-line boundaries and developable areas for sites can be viewed in **Appendix 3**, along with any changes to settlement policy boundaries. The developable areas for the sites will not form part of the policy but provide further information and clarity on the requirements set out in the allocation policy criteria.
- 5.16 While the Local Plan does not seek to allocate any sites for renewable energy generation, strategic policy SDN10 Renewable Energy does identify five solar energy sites that would be supported in principle where they provide demonstrable benefits to local businesses or communities and subject to further technical work.

6. The Policies Map

- 6.1 The Policies Map is a spatial interpretation of the development plan policies covering the National Park. The Policies Map for the South Downs Local Plan consists of an interactive online map, PDF overview maps and inset maps for individual settlements and neighbourhood planning areas.
- 6.2 Revisions and additions to our strategic policies and site allocations mean that changes will be required to the Policies Map. **Appendix 3** of this report shows the mapping changes arising from the strategic and site allocation policies that will be made to the Policies Map. In addition, aspects of the presentation will be updated, and any datasets provided by other partners/organisations (such as the nature conservation designation layers provided by Natural England) will be updated on the Policies Map. We will also explore how the Local Nature Recovery Strategy mapping can be included on the interactive online map, so it can be viewed alongside the Local Plan proposals.
- 6.3 A fully updated Policies Map will be prepared for the publication of the South Downs Proposed Submission Local Plan in May.

7. Evidence Base

- 7.1 There is a legislative requirement to carry out the following Assessments of the new Local Plan to inform policies and allocations:
- Habitats Regulations Assessment.
 - Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA).
 - Equalities Impact Assessment (EqIA).
- 7.2 In addition, a Health Impact Assessment (HIA) is also recommended under the East Sussex Health & Wellbeing Engagement Process & Protocol.
- 7.3 Draft versions of these Assessments are appended to this report, but they will continue to be updated as further information becomes available prior to the submission of the Local Plan for examination and as part of any consultation on modifications to the Local Plan.

Integrated Impact Assessment (IIA)

- 7.4 The Integrated Impact Assessment (IIA) at **Appendix 4** incorporates the SA/SEA, the EqIA and the HIA. It does this by using a set of objectives which cover all the relevant issues, and then assessing the development strategy, policies and allocations of the new Local Plan against these objectives. The outcomes from this Assessment have informed the choices made about the content of the new Local Plan, with a view to avoiding or mitigating negative effects and maximising positive effects.
- 7.5 The IIA has not identified significant issues. Minor additions to policies and site allocations have been suggested through the IIA process and have been addressed as appropriate in the Proposed Submission Local Plan. This is explained at pages 252-255 of the IIA.

Habitats Regulations Assessment (HRA)

- 7.6 The Habitats Regulations Assessment (HRA) at **Appendix 5** looks at the impact of the new Local Plan on the 20 International Habitats Sites within or near the South Downs National Park. These are:
- Special Areas of Conservation (SAC) – designated for habitat types and species considered to be most in need of conservation at a European level (excluding birds);
 - Special Protection Areas (SPA) - classified for rare and vulnerable birds and for regularly occurring migratory species; and
 - Ramsar Sites - wetlands which are of international significance.
- 7.7 The consultancy AECOM has been commissioned to undertake the HRA for the new Local Plan. No significant new issues have arisen. The main notable change is in connection with the Arun Valley SPA, designated for its wintering population of Bewick's swan which

frequently feed on suitable farmland surrounding the site. The zone for this area was identified as 5km in the adopted Local Plan. Review of the underlying Site of Special Scientific Interest Impact Risk Zones extends this to approximately 6.5km from the SPA. Policy SDN4 and the Policies Map are therefore proposed to be amended to show a 6.5km zone. A small part of allocation SDA25 Land south of Herbert Shiner School falls within the 6.5km zone. A policy criterion is added to ensure this matter is addressed in the development of the site. Other minor amendments to policies have been proposed as set out in the HRA, and these have been addressed in the Proposed Submission Local Plan and Policies Map.

Other Evidence

- 7.8 The policies and proposed allocations in the new Local Plan have been informed by a suite of evidence base studies. Published studies can be found on the SDNPA website at [Local Plan Review](#).
- 7.9 In addition to evidence prepared and published as part of the Regulation 18 consultation, further evidence has been prepared and published. This includes:
- **Housing and Economic Needs Assessment (HEDNA) Addendum and Applying the Standard Method to the South Downs National Park Area and overlapping Local Authorities report by AECOM** – Following an update to Government policy and advice in December 2024, these two further studies were carried out to inform the approach to identifying the housing need figure for the new Local Plan.
 - An updated **Land Availability Assessment (LAA)** – this study assesses all known potential development sites for their suitability, availability and achievability, and informs the allocation of sites in the Local Plan review.
 - **Site Selection Paper (SSP)** – this paper explains the rationale for why the proposed new site allocations were selected. It also includes an assessment of the strategic sites in terms of whether they would comprise ‘major development’ under paragraph 190 of the NPPF, and if so whether they would meet the tests in that paragraph.
 - **Gypsy and Traveller Accommodation Site Identification Report** – this assesses potential sites for allocation.
 - **Viability Report** – to assess the financial implications of the infrastructure and policy requirements (particularly affordable housing, biodiversity net gain and sustainable construction standards) on the viability of the development strategy and types of sites to ensure that the Local Plan is deliverable. *This is key to the Plan’s implementation and likely to be scrutinised by many.*
 - **Local Green Space Assessment (LGS)** – this study assesses submitted sites against the criteria for Local Green Spaces identified in NPPF paragraph 106-108: The sites that meet the criteria are designated in the new Local Plan.
 - **Visitor Accommodation Review** – updates information on the demand and supply for tourist accommodation to inform SDE7 and future planning applications.
 - **Economic Profile 2025** – provides updated information on the economic health of the South Downs, including its business sectors, main town and village centres, employment trends, and skills and demographics.
 - **Shoreham Cement Works Transport Assessment** – updates the work done for the Area Action Plan to test the levels of development in SDA30 and proposes infrastructure improvements and other measures to facilitate a vision-led approach.
 - **Employment Land Review** – updated with 24/25 information about employment land supply.
 - **Settlement Boundary Review** – to explain how we have addressed any submissions about existing settlement boundaries and corrected any anomalies.

- 7.10 Additional evidence and supporting material is in the process of being finalised and will be published as part of the revised Local Plan publication in May:
- **Infrastructure Business Plan** – pulling together all the infrastructure requirements necessary to support the development strategy as identified in the technical studies and the Parish Priorities Statements.
 - Updated **Renewable Energy Study** - this study assesses submitted potential sites for renewable energy.
 - **Heritage Strategy** – an overview of the approach being taken on heritage in the revised Local Plan.
 - **Open Space Study** – to inform open space standards.
 - **Landscape Assessment of allocated sites** – to supplement the landscape assessments undertaken by officers as part of the Land Availability Assessment.
 - Updated **Strategic Flood Risk Assessment (SFRA) and a sequential test.**
 - **Various topic papers** - to support policy approaches.

8. Regulation 19 Publication

- 8.1 The Regulation 19 publication needs to follow the formal statutory process set out in relevant legislation.
- 8.2 The Regulation 19 consultation is the last opportunity for people to comment on the new Local Plan before the Authority submits it to the Inspectorate for examination. The Planning Inspector will be sent any representations that are made during this Regulation 19 publication. Any comments should specify the matters to which they relate and the grounds on which they are made relating to legal compliance or soundness. Plans are considered 'sound' under the December 2024 NPPF if they are:
- a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 8.3 In February, the Planning Committee approved the Community Involvement Plan which sets out the details of the 6-week Regulation 19 publication to be undertaken from May to June 2026.

9. Next Steps for the new Local Plan

- 9.1 This report asks that the National Park Authority approves the South Downs Proposed Submission Local Plan for publication for comment as set out in the approved Community Involvement Plan. It also asks for delegated authority to be granted to the Director of Placemaking, in consultation with the Chairs of NPA and Planning Committee, for the subsequent stages of submission of the Local Plan for examination alongside its supporting documents, comments received during the Regulation 19 consultation and any proposed modifications to the Plan.
- 9.2 Following NPA, if approved, the Proposed Submission Local Plan will begin to have some weight in decision making on planning applications. Paragraph 49 of the 2024 NPPF explains the weight given to emerging plans. For the Proposed Submission Local Plan this weight will

be extremely limited prior to the close of the Regulation 19 publication period. Policies with comments that raise significant concerns regarding soundness will generally have less weight than those that receive few or no comments. Policies that align with the new NPPF’s direction of travel are likely to carry more weight.

- 9.3 We will log and summarise the main issues arising from the representations on the Proposed Submission Local Plan. Where necessary, as a result of the representations or other changes, modifications to the Plan will be proposed by officers and discussed with Members at a Workshop in the autumn. Providing that no substantial issues are raised regarding soundness and legal compliance of the Local Plan that cannot be addressed through modifications, it will be submitted for examination alongside any representations received, any proposed modifications and the suite of supporting documents.
- 9.4 The examination of the new Local Plan will commence on submission of the Plan. The examination will include public hearings, but the majority of matters arising will be addressed through written representations.
- 9.5 The examination will focus on matters of soundness. In most cases an Inspector will recommend main modifications to make the plan sound and legally compliant. These will be brought back to Planning Committee and the National Park Authority for consideration and will be consulted on for a further 6 weeks. The Inspector will consider any further representations on these modifications before issuing their final report. If the new Local Plan is found sound, this will be reported to Planning Committee and the National Park Authority, and the latter will then decide whether to adopt the new Local Plan.
- 9.6 The new Local Plan will then replace the 2019 South Downs Local Plan, and form part of the development plan alongside neighbourhood development plans and minerals and waste plans.

10. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Yes. The Local Plan will come to the NPA for adoption once the examination is completed provided it has been found to be sound and legally compliant.
Does the proposal raise any Resource implications?	No, budget is as agreed and is being built into the 26/27 budget and Medium Term Financial Strategy.
How does the proposal represent Value for Money?	The proposal presents value for money by progressing the project in a timely way taking account of the changing national context. It will provide much needed stability and certainty for investment into the National Park, including affordable homes.
Does the proposal seek to further National Park Purposes as required under Section 11A(2) duty of the National Parks and Access to the Countryside Act 1949 as amended by Section 245 of the Levelling Up and Regeneration Act 2023?	Yes, the Proposed Submission South Downs Local Plan seeks to address this legal duty by ensuring that the strategy, policies and allocations seek to further the purposes of the National Park.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	All corporate priorities and PMP outcomes as relevant to the planning system.

Implication	Yes*/No
Links to other projects or partner organisations	Partnership Management Plan and other Local Plans being prepared by constituent and neighbouring authorities.
How does this decision contribute to the Authority's climate change objectives	The new South Downs Local Plan will include policies and allocations which will support the Authority's climate change objectives.
Are there any Social Value implications arising from the proposal?	N/A
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Yes. The approved Community Involvement Plan sets out how we will make the consultation as inclusive as possible and the contents of the Proposed Submission Local Plan has been subject to an Equalities Impact Assessment as part of the Integrated Impact Assessment (IIA).
Are there any Human Rights implications arising from the proposal?	No.
Are there any Crime & Disorder implications arising from the proposal?	None.
Are there any Health & Safety implications arising from the proposal?	No.
Are there any Data Protection implications?	No.

II. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
If members do not agree with the recommendations - delay to Local Plan which is likely to prevent submission by 31 December 2026. The Authority would then be required to start the process again under the new plan-making system	Possible 3	Major	Member approval of the documents as set out in this report and its appendices, following numerous workshops and previous Committee reports.

Tim Slaney
Director of Placemaking
South Downs National Park Authority

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Appendices:
1. Regulation 18 Consultation Report
2. The Proposed Submission (Regulation 19) South Downs Local Plan
3. Policies Map changes arising from policies in the Proposed Submission (Regulation 19) South Downs Local Plan
4. Integrated Impact Assessment
5. Habitats Regulations Assessment
SDNPA Consultees: Director of Placemaking; Head of Governance & Monitoring Officer; Legal Services.
External Consultees: None
Background Documents: [Agenda Item 6 - 12 February 2026 Planning Committee](#)

