



# SOUTH DOWNS LOCAL PLAN PROPOSED SUBMISSION

(Regulation 19) May 2026

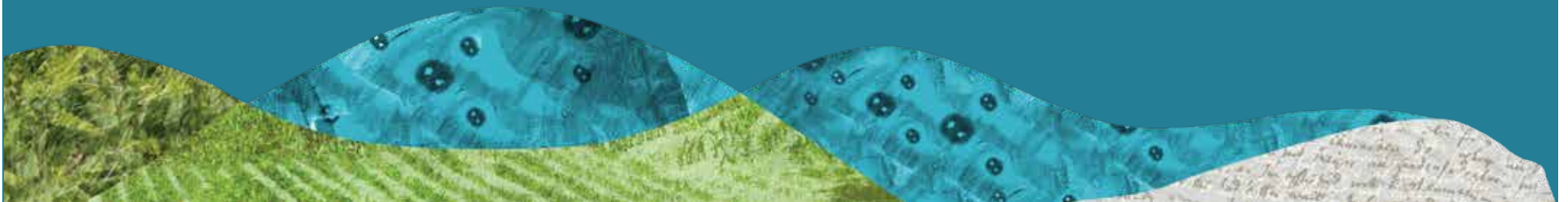


**South Downs Local Plan –  
Proposed Submission**  
(Regulation 19) May 2026

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# FOREWORD

**This is a hugely important time for the South Downs as we plan for the future of this vibrant and much-loved National Park. We are now getting to the final stages with our new Local Plan, which guides how and where development takes place in the National Park over the next two decades.**

We recognise places need to evolve and respond to local needs, as well as wider issues the nation faces amid changing, and potentially uncertain, times.

Last year we reviewed our Partnership Management Plan, which sets out the priorities for the National Park for the next five years. The policies and allocations in this Local Plan are key in supporting and delivering some of those priorities.

Landscapes and communities are dynamic and our new Local Plan addresses vital issues such as the need for quality development, affordable housing, nature recovery, climate change, and helping local communities thrive. It's an opportunity to protect and enhance the things we all love most – our landscapes, communities, cultural heritage, dark skies, wildlife, water courses and much more.

Amid these changing times, the Local Plan gives us a solid, innovative framework and a springboard to achieve great things for the National Park and its local communities while continuing to evolve and adapt.

We want the National Park to continue to inspire, restore and welcome all who live, work and visit here. Ultimately, it's about ensuring the South Downs remains special – thriving and nature-rich – for everyone, for many generations to come.

This new Local Plan has been shaped by the responses we received to the public consultation in early 2025. Thank you to all those who inputted their thoughts to us. We want to encourage more participation. The Local Plan has now reached an

important stage where we are asking for final comments before we submit the Plan for examination by an independent Planning Inspector.

Your comments, both in support of, or expressing concern about the Local Plan, will be submitted with the Local Plan and all its supporting documents. In this way the Inspector can see all the relevant information and views before deciding whether the Local Plan should be adopted.

This important consultation will run until 23 June 2026, and I encourage you to get involved and have your say.

You can find out more here: [Southdowns.gov.uk/new-local-plan](https://southdowns.gov.uk/new-local-plan)



**VANESSA ROWLANDS,  
CHAIR, SOUTH DOWNS NATIONAL PARK AUTHORITY**



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# 1 INTRODUCTION

**1.1 This is a completely new South Downs Local Plan and will replace the 2019 Local Plan in its entirety upon its adoption.** The whole Plan is being published for comments under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 before it is submitted to the Secretary of State for independent examination by a Planning Inspector. This is so the community, organisations and site promoters can tell the Inspector whether they believe the Local Plan meets the legislative and policy requirements for such plans. Details of how to do this are at [Southdowns.gov.uk/new-local-plan](https://southdowns.gov.uk/new-local-plan)

**1.2** Planning powers have been given to National Park Authorities for a reason. Since the 1940s, it has been clear that National Parks are special places that need special treatment via the planning system. This Local Plan continues that legacy, and that of the award winning first Local Plan, ensuring that this National Park remains a source of inspiration and wellbeing for generations to come. This Local Plan is built around a bold and inspiring vision of a vibrant place and a climate resilient landscape where nature thrives, wildlife flourishes, clean water flows, and starry skies shine above. It is a place shaped by stories old and new, where people feel connected, inspired, and at home. We want to create special places inspired by this nationally important landscape, with well-designed homes, buildings and spaces for local communities and visitors, and a thriving rural economy that supports climate action. The goal is to grow sustainably and regeneratively within the context and capacity of the landscape – so that both people and nature can flourish together.

## THE PARTNERSHIP MANAGEMENT PLAN CONTEXT

**1.3** The South Downs National Park's Partnership Management Plan 2026-2031 is for the National Park as a whole. It sets out what the National Park Authority, and partners across the National Park, will deliver together up to 2031. It includes an overarching Vision for 2060 (see Chapter 2).

**1.4** The South Downs Local Plan is a spatial plan for development (such as housing, economic activity, and renewable energy) in the National Park. The Local Plan sets out where development should happen, what it should look like, and how it will contribute to the purposes of the National Park. The Local Plan is an important means of delivering aspects of the Partnership Management Plan which is a material consideration in planning decisions.



## THE LOCAL PLAN

**1.5** The South Downs National Park Authority became the local planning authority for the National Park in 2011 and adopted its first Local Plan in 2019 after a series of joint core strategies with partner local authorities. This new *Local Plan* replaces that 2019 Plan, and forms part of the statutory development plan for the whole National Park, along with the minerals and waste plans and neighbourhood development plans. Its policies are shown spatially in an updated Policies Map [insert link](#). Along with the rest of the development plan, the Local Plan is used to help determine planning applications for development in the National Park. It is important that the new Local Plan is read as a whole as key issues are not repeated in each policy.

**1.6** This Local Plan seeks to further the two statutory purposes of the National Park as required under the National Parks and Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023. Where there is conflict between these two purposes that cannot be reconciled, greater weight should be given to the first purpose (known as the Sandford Principle). These purposes – and the accompanying duty placed on National Park Authorities – are set out in the diagram below.

**FIGURE 1.1: NATIONAL PARK PURPOSES AND DUTY**

## THE NATIONAL CONTEXT

1.7 The national planning policy context for the Local Plan comprises the **English national parks and the broads: UK government vision and circular 2010 – GOV.UK** and the **National Planning Policy Framework – GOV.UK** (NPPF), as well as other Government and Written Ministerial Statements. This Local Plan was examined against the December 2024 version of the NPPF. The Government also provides Planning Practice Guidance which includes further advice and information about how to interpret and implement national planning policies and policy statements.

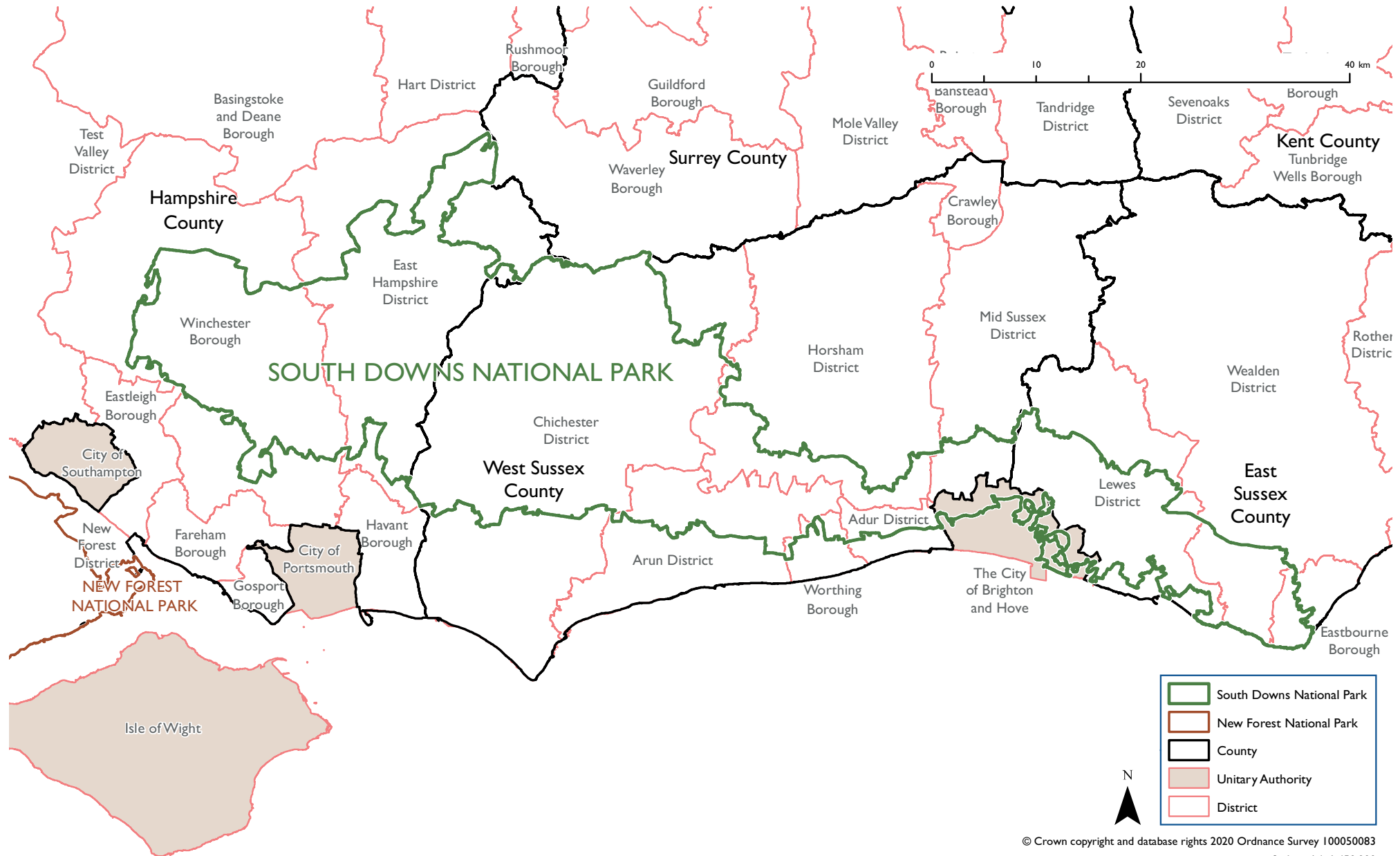
1.8 Key to planning in a National Park is the Government's ambitions to achieve 30% of land managed for nature by 2030 and its **Protected Landscapes Targets and Outcomes Framework**, which establishes ambitious targets for National Parks and National Landscapes (the latter are legally known as Areas of Outstanding Natural Beauty). This recognises the crucial role protected landscapes play in achieving positive changes for nature, climate, people and place.

## THE SUB-REGIONAL CONTEXT

1.9 The preparation of this Local Plan has included close cooperation with existing local authority partners, including the 15 county, district, borough and unitary councils with land within the National Park, and 14 neighbouring authorities. It has also included engagement with other statutory partners such as Natural England, Historic England, the Environment Agency, Water Authorities and Utilities. This engagement was guided by the **Appendix C – South Downs Local Plan Review – Cooperation and Alignment Strategy**. This intensive work with many partners, due in part to our geography, meets the requirement to maximise effective working on strategic matters throughout the preparation of Local Plans, by engaging constructively, actively and on an ongoing basis. The Authority has identified the following strategic matters (those affecting more than one local planning authority):

- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting;
- Biodiversity restoration at all scales and making nature bigger, better and more joined up;
- Protection and mitigation of impacts on European designated nature sites including nutrient neutrality;
- Mitigation and adaptation to climate change, including nature based solutions and coastal planning;
- Sustainable travel into, within and across the National Park;
- The local economy and jobs particularly in land management and the visitor economy;
- New homes including accommodation for Travellers, focusing on affordable homes for local communities;
- Green and grey infrastructure serving communities in and around the National Park.

**FIGURE 1.2: ADMINISTRATIVE BOUNDARIES AFFECTING THE SOUTH DOWNS NATIONAL PARK 2026**



**1.10** Significant changes will occur to local structures and partnerships during the life of this Local Plan. Devolution and local government reorganisation are set to have a significant impact on the area. The National Park falls under two proposed strategic authorities – Sussex and Brighton, and Hampshire and the Solent – and Combined County Authorities will be set up for these areas in 2026 with a Mayor being elected for each in 2027. The current two-tier system of boroughs/districts and counties will be replaced by a new geography of unitary councils with shadow councils being created in 2027 and invested in 2028. Close partnership working with existing and emerging bodies will be needed to ensure delivery of the Local Plan and to secure the positive future of the National Park. Early work has commenced on the evidence base for the Spatial Development Strategies that the strategic authorities will produce, and the National Park Authority is fully engaged in this work.

## THE LOCAL CONTEXT

**1.11** The National Park is home to some 113,000 people and nearly 6,000 businesses. It is a living and working landscape, formed by geology, topography and soils but influenced by interaction with people over many millennia. This is reflected in our first ‘special quality’ of “distinctive towns and villages, and communities with real pride in their areas” (see diagram in paragraph 3.1). There are 176 town and parish councils and some small un-parished areas. Local communities are rightly proud of their areas and want to engage proactively in the future of their places. Many have engaged in community-led plans such as neighbourhood development plans and parish/village design statements. As part of the preparation of this Local Plan, the Authority encouraged communities to produce **Parish Priorities Statements – South Downs National Park Authority** – a pilot of the neighbourhood priorities statements introduced in the Levelling Up and Regeneration Act 2023. These have provided communities with a ‘light touch’ opportunity to set out their aspirations for the future of their places, identify any local issues in relation to planning matters and, alongside the other community plans, have formed an important evidence base for the Local Plan. The allocations chapter in this Local Plan includes a short introduction to each settlement that has allocations, including which community plans are relevant.

## THE SOUTH DOWNS NATIONAL PARK AUTHORITY

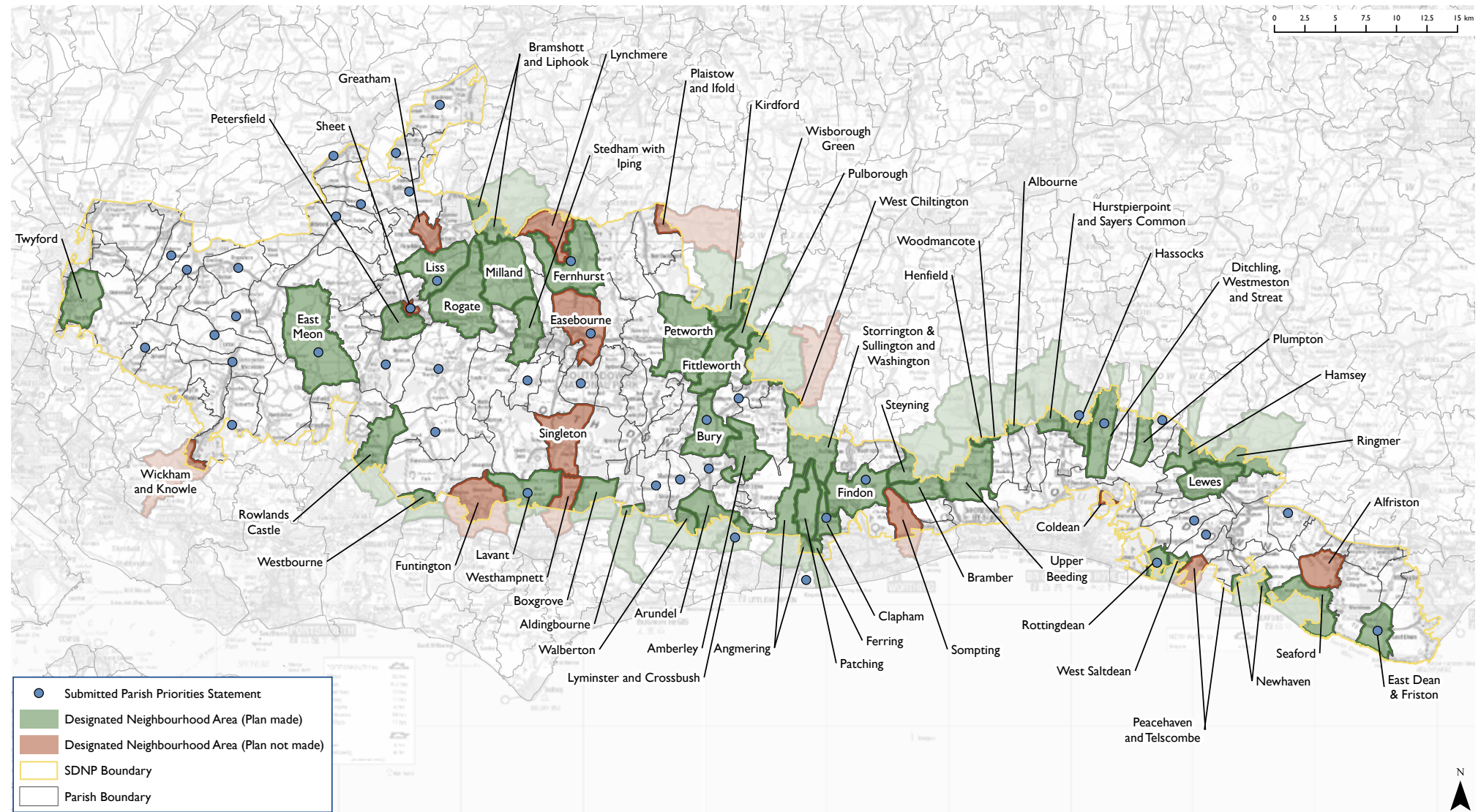
**1.12** The South Downs National Park Authority is a small, dedicated and passionate team, that is part of a family of incredible protected landscapes across the UK. Our

Corporate Plan 2026-31 sets out how, through innovation, ambition and partnership, we will lead vital action to turn the tide on climate change, biodiversity loss and rising mental health issues, and inspire others to deliver our shared vision and the seven ambitious aims of the Partnership Management Plan. Our role as a local planning authority is a vital component of that mission.

**1.13** The Authority has a proven track record of working proactively with landowners, farmers and local businesses to achieve benefits for nature, climate and landscape whilst supporting those who live and work here. An example of this is the work undertaken to help landowners bring forward large areas of the National Park for nature recovery, seeking to increase the amount of land in the National Park managed for nature to 33% by 2030. This includes pioneering a green financing brokerage service for developers looking to buy “ReNature Credits” for mitigation of phosphates, nitrates, climate resilience and Biodiversity Net Gain – allowing development for housing and visitor accommodation to go ahead whilst providing much needed income for farm businesses. As Government moves forward with its plans to introduce Environmental Delivery Plans and a Nature Restoration Fund, we look forward to sharing our experience and strong relationships with landowners to help Natural England make a success of this new venture and deliver enhancements to nature in the National Park.

**1.14** As an organisation we excel in combining our work as a local planning authority with that as a statutory body seeking to further the purposes of the National Park. We commit to accountability, transparency, and excellence; we set clear, measurable targets and report openly on our progress; and we act with integrity and ambition, ensuring that every decision we take strengthens the long-term health and value of the National Park.

**FIGURE 1.3: NEIGHBOURHOOD AREAS, PLANS AND PARISH PRIORITIES STATEMENTS**



# 2

## VISION AND OBJECTIVES



## VISION

**2.1** The Vision for the South Downs National Park is set out in the Partnership Management Plan 2026-2031. It describes where we want to be in 2060, and is the overarching vision for this Local Plan, which covers the period 2024-2042.

**The South Downs National Park is a vibrant place with nature everywhere, for everyone, where wildlife flourishes, clean water flows and stars fill the dark night skies. Together we care for a climate-resilient landscape with thriving communities and a dynamic green rural economy at its heart. Shaped by stories old and new, this place inspires everyone to connect, enjoy, belong and take action.**

**2.2** The above overarching vision for the National Park has informed the following **Planning Vision for 2060**:

**Creating special places inspired by this nationally important landscape, enabling people and nature to flourish. Providing well designed homes, buildings and spaces for local communities, and a thriving rural economy, that supports climate action.**

**2.3** The Partnership Management Plan has 'Principles for Delivery' which include planning principles that cover the Authority's planning functions. These planning principles have been re-purposed as the objectives for the Local Plan to ensure that there is a tangible and effective link between these two important Plans for the National Park. These planning principles (or objectives) are grouped under the themes and aims of the Partnership Management Plan, and are cross-referenced throughout the Local Plan.

## OBJECTIVES

### THEME: NATURE & CLIMATE

**Aim 1: The South Downs National Park is a nature-rich, resilient working landscape where wildlife flourishes.**

**Local Plan Objective 1:** We will support development that is landscape-led, follows regenerative development and design principles and has an overall

positive impact on natural beauty, landscape and townscape character, natural ecosystems and biodiversity.

**Local Plan Objective 2:** We will support development proposals that protect and take opportunities to enhance designated sites, protect ancient woodland and ancient and veteran trees, support protected species, follow the mitigation hierarchy and take opportunities to deliver bigger, better and more joined up nature.

**Local Plan Objective 3:** In implementing biodiversity net gain, we will seek to ensure that enhancements to biodiversity are appropriate to their landscape, cultural and ecological context, and that any off-setting of negative impacts takes place within the National Park to ensure that it meets the Purpose 1 requirement to conserve and enhance the wildlife.

**Aim 2: The South Downs National Park is on track to become net zero by 2040 by mitigating and adapting to the impacts of climate change.**

**Local Plan Objective 4:** We will support proposals for small-scale renewable energy schemes that are appropriately located and designed, especially where such proposals are community-led and serve communities and businesses within the National Park.

**Local Plan Objective 5:** We will support new development, and the retrofitting of existing development, that achieves net zero operational carbon, minimises embodied whole life carbon, utilises sustainable materials that support the circular economy, and is resilient to the impacts of climate change.

**Aim 3: Clean, abundant water supports nature and communities in the South Downs National Park and beyond.**

**Local Plan Objective 6:** We will support a catchment-based approach to water and wastewater management that protects and enhances surface and groundwater quality, restores natural functions and processes, uses nature-based solutions to manage flood risk and improve water supply, and enhances public access to blue infrastructure.

**Local Plan Objective 7:** We will support water efficiency measures and more sustainable patterns of water use and new water infrastructure to protect our water supply, aquifers, rivers and the habitats and species that depend on them.

## THEME: PEOPLE & PLACE

**Aim 4: Young people will have opportunities to access training and skills to enable them to take action to care for and enhance the South Downs National Park.**

**Local Plan Objective 8:** We will support the provision of necessary facilities and infrastructure that enable the delivery of training and education, especially for young people.

**Aim 5: A valued South Downs National Park is welcoming and accessible to all.**

**Local Plan Objective 9:** We will support development that improves the accessibility of the National Park, reduces car travel and facilitates sustainable modes of transport including active travel through better and new public rights of way and access land, safe and attractive pedestrian, equestrian and cycle routes and improved public transport.

**Local Plan Objective 10:** We will protect and enhance the tranquillity and dark skies of the National Park by supporting development that avoids unnecessary light pollution and utilises good design to mitigate the impact of any lighting and glazing, conserves relative tranquillity and safeguards key views.

**Aim 6: Cultural Heritage in the South Downs National Park is conserved, understood, valued, created and passed on for future generations.**

**Local Plan Objective 11:** We will support development that recognises the significance of the cultural heritage of the National Park, conserves and enhances heritage assets, encourages their optimum viable use and improves their ongoing management, especially where they are 'at risk'.

**Aim 7: A thriving rural economy and local communities sit at the heart of the South Downs National Park.**

**Local Plan Objective 12:** We will support green economic growth that enables regenerative land management, particularly farming and forestry, provides local employment, and supports the production and sale of sustainable food, drink and other products of the National Park.

**Local Plan Objective 13:** We will support development that provides visitor experiences and access that benefit our communities inside and outside the National Park, and enhances the landscape, encourages the use of the National Park as a place for healthy outdoor activity and relaxation and supports a regenerative visitor economy.

**Local Plan Objective 14:** We will support development that enhances the role of towns and villages as social and economic hubs, and improves access to essential community services, infrastructure, including digital and EV infrastructure, and facilities, especially where this is community-led.

**Local Plan Objective 15:** We will support development that provides genuinely affordable housing, particularly social rented housing, that meets the needs of local communities in perpetuity and explore innovative ways of increasing delivery including through community-led development, exception sites and Whole Estate Plans.

**Local Plan Objective 16:** We will support new homes that increase the stock of smaller dwellings, support essential local workers, improve people's health and opportunities, are accessible and adaptable, and meet the diverse needs of our communities throughout all life stages.

# 3

## SPATIAL PORTRAIT AND STRATEGY

## OUR SPECIAL QUALITIES

3.1 As part of the preparation of the first Partnership Management Plan, over 1,500 people helped the National Park Authority to define what is special about the South Downs National Park. These 'special qualities' – and how people

connect and interact with them – are what give the National Park its unique sense of place and define its natural beauty. [southdowns.gov.uk/wp-content/uploads/2015/03/SDNP-Special-Qualities.pdf](https://southdowns.gov.uk/wp-content/uploads/2015/03/SDNP-Special-Qualities.pdf)

**FIGURE 3.1: SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK**



## OUR LANDSCAPE

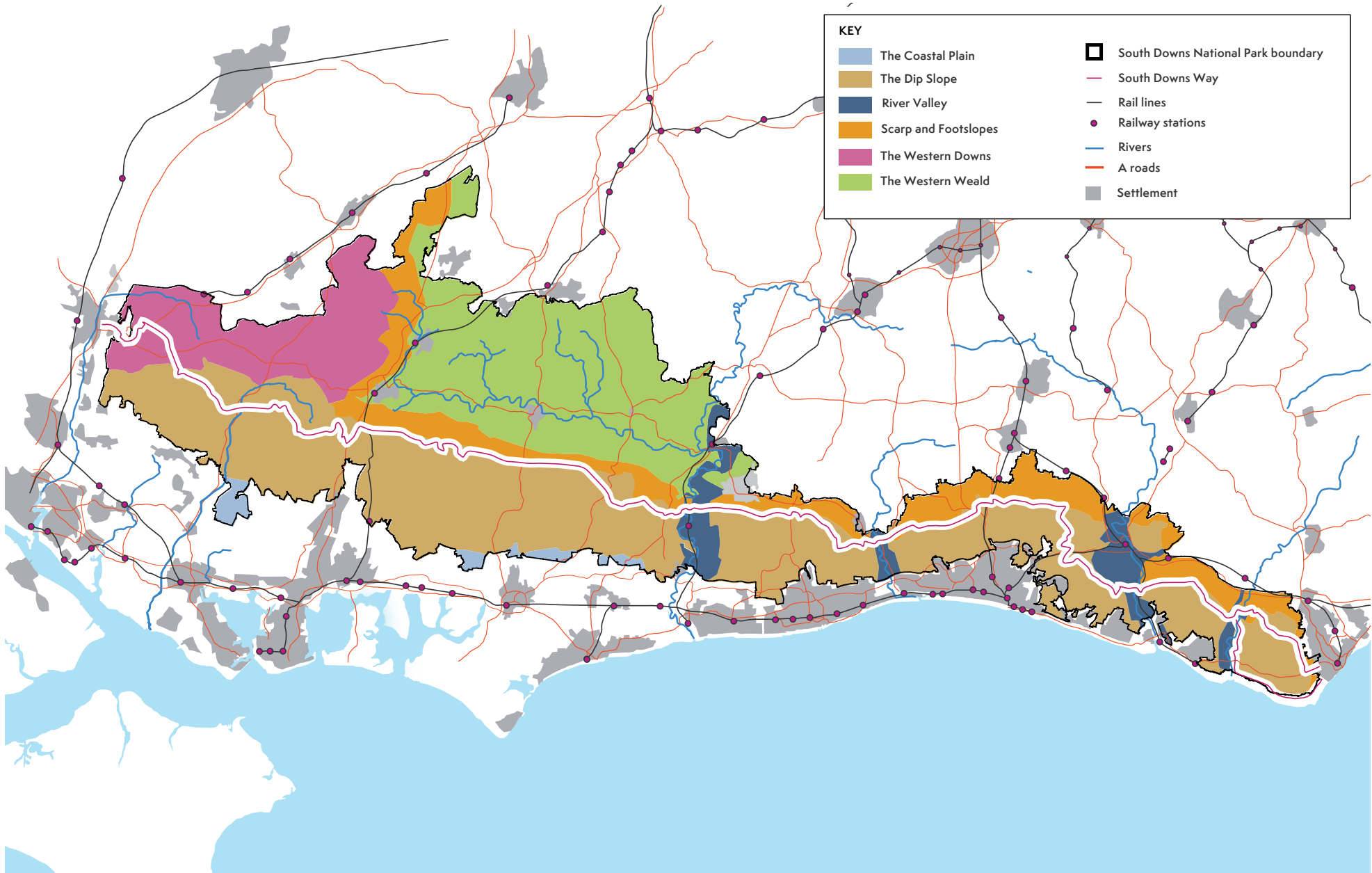
**3.2** Landscape is the key to all of the special qualities. The South Downs was designated as a National Park in recognition of its exceptional natural beauty. As a landscape of national importance, close to significant centres of population, it provides opportunities for people to learn about and appreciate its special qualities. The National Planning Policy Framework states that great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to landscape and scenic beauty along with National Landscapes and the Broads. Therefore, it is entirely appropriate to continue to take a landscape-led approach to planning in the National Park. This means that we put the landscape at the forefront of every decision we make.

**3.3** The landscape of the South Downs National Park is based on its geology, geography, hydrology and settlement pattern. There are five broad areas: the Western Downs, the Western Weald, the Scarp and Foothills, the Dip Slope, and the Coastal Plain; and four major river valleys: the Arun, Adur, Ouse and Cuckmere. The four river valleys all flow north to south bisecting the National Park. There are also several other important rivers (such as the Itchen, Meon and Rother) whose whole catchment areas lie within the National Park. These broad areas and major river valleys are shown on the map below. The detailed characteristics of the landscape are defined in the **South Downs Landscape Character Assessment (LCA) 2020 – South Downs National Park Authority**.



Swanborough Hill, Lewes © SDNPA/Paul Devine

FIGURE 3.2: BROAD LANDSCAPE AREAS



**3.4** It is important to stress that we define ‘landscape’ in its broadest sense – to include not just open countryside and green and blue elements, but the human influences such as our towns, villages and farmsteads. It is also not just the physical elements of the landscape that are important, but also how they are perceived and experienced by people. This follows the European Landscape Convention definition of landscape as “An area perceived by people whose character is the result of the action and interaction of natural and/or human factors”.

## OUR CHALLENGES

**3.5 Climate change** is already impacting many aspects of the National Park. This includes its habitats and species diversity, its essential natural resources such as water and soils, and its businesses and communities. Working together with the other National Parks, we have ambitious targets to reach net zero in the South Downs National Park by 2040, and there is a growing swell of community-based climate action which is vital to achieving this goal. A local organisation *Energise South Downs* has been a key partner in coordinating this action, see [esd.energy](#).

**3.6 Nature** remains under huge pressure. The Government has set ambitious targets for nature recovery, and National Parks and other protected landscapes want and need to lead the way. The development of Local Nature Recovery Strategies provides real opportunities to bring partners together to deliver nature recovery at a landscape scale. Working with new partners and grant bodies will be crucial if we are to deliver nature everywhere, for everyone in the South Downs National Park. These aspirations are reflected in our Local Plan policies.

**3.7 Health and wellbeing.** While the pandemic may seem like a distant memory, its impacts and lessons are still being felt. The need to improve physical and mental health and wellbeing – and address health inequalities – are nationally important issues. The links between planning and health are long-established, with aspects of the built and natural environments being major determinants of human behaviour, health, and wellbeing. The health and wellbeing benefits of connecting people with nature are also well documented, yet many parts of our communities do not have the opportunity or means to access the National Park. The lack of public transport is a challenge. While the South Downs is served by several railway stations, many areas are without regular bus routes or without any railway stations or bus routes at all. This means it can be a challenge to achieve that “last mile” into the National Park, including green spaces and wider countryside. Active travel

(walking, wheeling, cycling, and horse riding) is key to the physical and mental health and wellbeing of individuals and in tackling the climate crisis. However, safe active travel routes are fragmented and often inaccessible to those with mobility issues. Furthermore, the National Park has a growing and ageing population, with the proportion of residents aged over 65 years old exceeding both national and regional averages. As this demographic continues to grow, so too do their associated care, health, and wellbeing needs. Key factors are neighbourhood design, housing design, healthy food, natural and sustainable environments, and transport.

**3.8 Economy and funding.** The economy and communities of the National Park continue to be impacted by growing economic uncertainty and cuts to funding at a national and regional scale. This is affecting the resourcing of the National Park Authority and our partners large and small. Farming is continuing to experience its biggest changes in decades, with changes to farming practices and pressures on farmers and land managers to deliver more – more food production, more for nature, and more for climate.

**3.9 Growth and affordability pressures.** The South Downs is the most populated National Park and situated in the busiest part of the UK. It is experiencing major housing development around its borders and neighbouring areas are increasingly struggling to meet housing demand. Housing within the National Park is more expensive than in surrounding areas, and there is clear evidence of an acute need for affordable homes. This demand is driven by high property prices, rising rents, and comparatively low local incomes. The communities and businesses of the National Park need affordable and accessible housing if they are to continue to thrive and to ensure that those who work in the National Park can afford to live here. Continued housing demand is also placing increasing pressures on the water available, and this has implications for people, nature, and agriculture.

## OUR APPROACH TO DEVELOPMENT

**3.10** The National Park is designated for its landscape. Development within the National Park should therefore be ‘**landscape-led**’, in that it should be strongly informed by understanding the essential character of a site and its context, and create development which speaks of its location, responds to local character, and fits well into its environment. Traditional or contemporary – new development must be characteristic and locally distinctive. It should be inspiring and uplifting, and deliver benefits to the designated status of the National Park by conserving and enhancing

the natural beauty, wildlife and cultural heritage of the area and creating sustainable and successful places for people. This is consistent with the approach taken in the 2019 Local Plan and tested at the previous examination.

**3.11** The 2019 Local Plan introduced the concept of **‘Ecosystems Services’** – the natural assets which provide valuable resources to people in a range of different ways, such as the soils that provide our food, the rivers and aquifers that provide our drinking water, and the fresh air and tranquillity that is so essential to our health and wellbeing. We want to continue to ensure that new development brings positive benefits to ecosystems and the services they provide.

**3.12** However, there is a growing movement which suggests that we should not think of nature in such a human-centric way, and that we should seek to conserve and enhance it for its own intrinsic value. The **‘Rights of Rivers’** movement has its origin in Lewes (through the Love Our Ouse project) and, along with other similar campaigns across the country, seeks to persuade Government to give rivers, and nature in general, its own legal rights to ensure that it is considered fully in all decisions that affect it.

**3.13** Similarly, the growing movement of **‘Regenerative Development’** seeks to move beyond sustainable development into positively restoring and creating new ecosystems to support planetary health and address the climate crisis. Further details about this concept are provided in Chapter 4 Core Policies in the supporting text for SDC3 Regenerative Development and Ecosystems Services.

**3.14** These concepts are innovative and still evolving, and many aspects go beyond what the planning system can achieve on its own. However, the National Park Authority wants to support development within the National Park that contributes to meeting these aspirations. Our primary statutory purpose is to conserve and enhance the natural beauty, wildlife and cultural heritage of our area, and regenerating our landscapes, nature and ecosystems is fundamental to achieving that purpose. If not in a National Park, then where can we pioneer these concepts in the planning system?

## DEVELOPMENT NEEDS

**3.15** 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. This includes conserving and enhancing the natural beauty, wildlife and cultural heritage of the area, and promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The National Park Authority, along with other public bodies, also has a strengthened duty to seek to further these statutory purposes, as introduced through the Levelling Up and Regeneration Act 2023.

**3.16** These purposes and duties are fundamental to how the Local Plan has been prepared, including its spatial strategy, thematic policies, and site allocations. These are supported by national policies and guidance which makes it clear that National Parks are not suitable locations for unrestricted housing (Paragraph 78 of the 2010 Circular for English National Parks and the Broads) and that National Parks are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas (Planning Practice Guidance 8-041-20190721). Paragraph 11b of the 2024 National Planning Policy Framework sets out the starting point that Local Plans should meet their development needs, but caveats this by saying “unless (i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”. National Parks are named in footnote 7 as such an area or asset, and paragraphs 189 and 190 set out that great weight must be given to conserving and enhancing the landscape and scenic beauty in National Parks, the scale and extent of development within National Parks should be limited, and major development should be refused in National Parks other than in exceptional circumstances where it can be demonstrated that development is in the public interest.

**3.17** The Planning Practice Guidance also allows National Park Authorities to establish housing needs using ‘an alternative approach’ to the Standard Method mandated for most local planning authorities (2a-014-20241212). The ten English National Park Authorities and the Broads Authority have agreed 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;
- 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.

**3.18** The Planning Practice Guide says that, in using an alternative approach to calculating housing need, “authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications of using the median workplace-based affordability ratio for the relevant wider local authority area(s)”.

**3.19** The AECOM study **Report South Downs National Park Standard Method Apportionment Study 2025-06-18** 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 incorporated the medium workplace-based affordability ratios for the council areas which are ‘baked in’ to the Standard Method. The study also investigated whether a National Park specific affordability ratio could be applied, but concluded that it relied on too many assumptions to be considered accurate. This approach resulted in a figure of 1,048 dpa for the National Park.

**3.20** IcenI Projects was commissioned by the Authority to update its 2023 Housing and Economic Development Needs Assessment with an Addendum – see **Housing and Economic Development Needs Assessments – South Downs National Park Authority**. This takes into account the findings of the AECOM report on housing stock and affordability ratios, but goes further to consider other relevant factors. It notes that the assessment of housing needs is ‘policy off’ – in that it does not take account of any environmental or other constraints. The IcenI Addendum looks at the following:

- Demographics – including 5- and 10-year trends and population growth needed to maintain the economically active population. These population projections are translated into household projections by taking account of household formation rates;
- The implications of the Standard Method – drawing on the AECOM report to examine the resultant population growth if this level of housing need were delivered and occupied; and

- Affordable housing need – By updating the previous assessment within the HEDNA, considering more recent house prices and income data. In addition, and in line with the latest NPPF, it provides further commentary on the most suitable split of affordable tenures for the National Park.

**3.21** The IcenI Addendum concludes the following:

- 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.

**3.22 323 homes per year (or 6,137 new homes between 2024 and 2042)** is therefore considered to be the appropriate level of housing need within the National Park. This level of growth would support **2,011** additional jobs across the National Park and would exceed the amount needed to maintain the current proportion of the economically active population. It would therefore support the duty of the National Park Authority, in carrying out its statutory purposes, to seek to foster the economic and social wellbeing of its local communities.

**3.23** However, this housing need figure has not been viewed as a ceiling. Through a robust process described below, the Authority has considered all known potential development sites and has proposed a housing supply figure which exceeds the demographic-driven housing need figure. This is based on the landscape capacity of

the National Park to accommodate development without conflicting with its statutory purposes.

## SPATIAL STRATEGY

**3.24** 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.

**3.25** The 2019 Local Plan identified the most sustainable settlements and provided them with ‘settlement policy boundaries’ within which development is acceptable in principle. These were validated when updating the **Settlement Facilities – South Downs National Park Authority** in 2023. The Study identified the presence of facilities within or adjacent to settlements and provided a sustainability score for each settlement. These scores then informed the list of primary and other sustainable settlements where most development would be directed.

**3.26** The 2023 Settlement Facilities Study has established that the settlements listed in the 2019 Local Plan remain the most sustainable within the National Park. In addition, the Study also identified sustainable settlements outside of the National Park which abut its boundary. As these settlements also provide day to day services and facilities, sites in these boundary areas have been assessed to see if these settlements could be extended into the National Park.

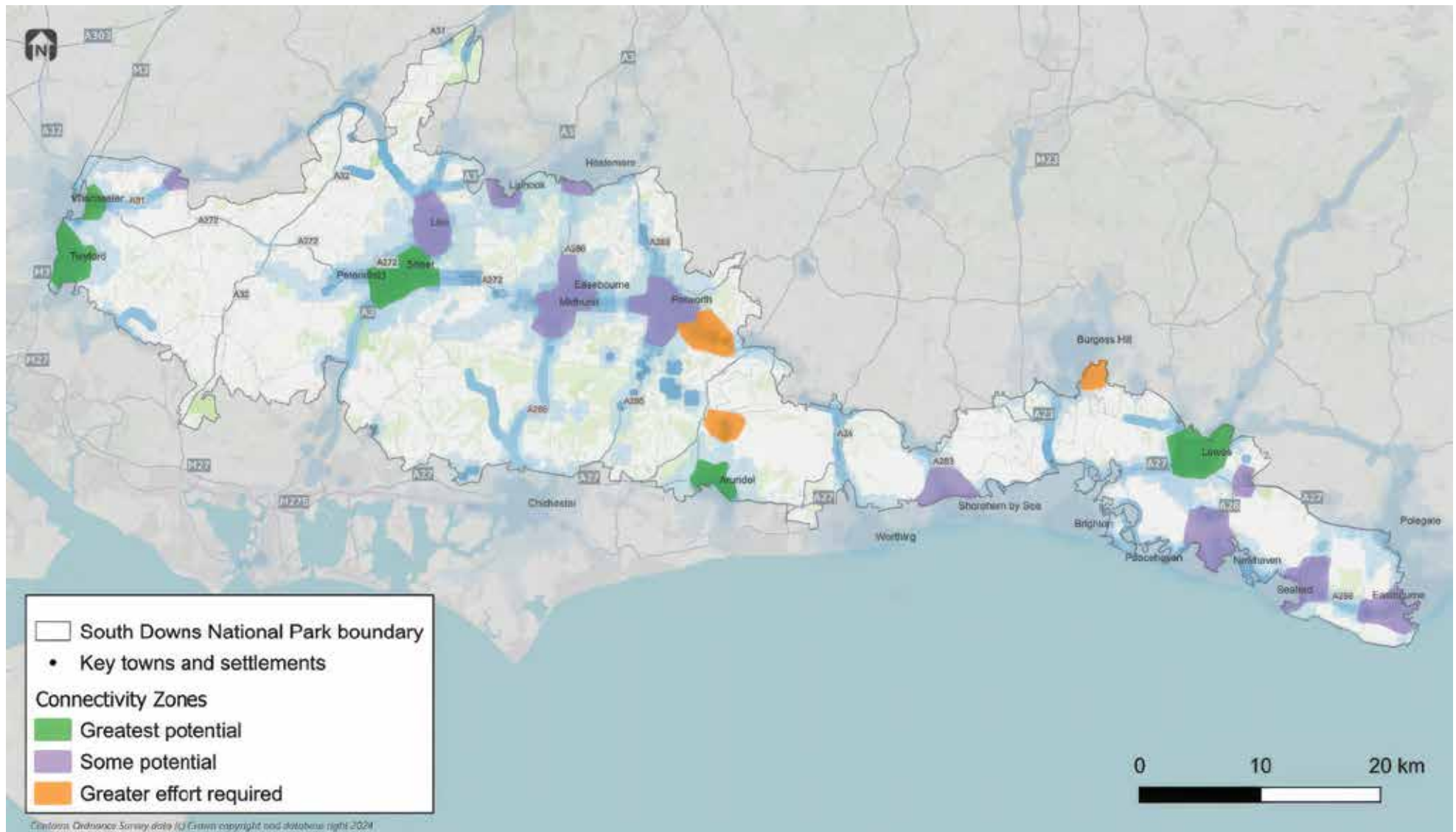
**3.27** The findings of the 2023 Settlement Facilities Study were further tested through the South Downs Transport Study – see **TP1114-MI-RP-0001-South-Downs-Transport-Study-Stage-2-TA-V3-0.pdf** – which assessed the accessibility of locations across and on the boundary of the National Park, looking at active travel opportunities alongside public transport provision. The map below highlights its recommendations related to the key locations within the National Park that are more or less likely to achieve more sustainable mobility outcomes, which it calls ‘connectivity zones’. These are identified as follows:

- The **green areas** are those with the greatest potential to deliver sustainable mobility outcomes, and include Petersfield, Lewes and the edge of Winchester and Arundel. These areas have been identified due to walking distance to railway

stations with higher rail frequencies; higher frequency bus corridors; and walking and cycling distance to larger settlements.

- The **amber areas** are locations with some potential to achieve sustainable mobility outcomes, and include Liss, Midhurst, Easebourne, Petworth and on the edge of Twyford, Liphook, Haselmere, Newhaven/Peacehaven, Seaford and Eastbourne. These areas have been identified due to higher frequency bus corridors, or proximity to railway stations; and walking and cycling distance to larger settlements.
- The **red areas** are locations that have some potential to achieve more sustainable outcomes if greater effort is applied. These include east of Petworth and south east of Burgess Hill. These areas have been identified due to proximity to larger settlements by bike; and lower frequency bus corridors. Other areas with similar proximity to settlements and bus services include west of Petersfield (A272 corridor) and north west of Liss (B3006 corridor). These locations were discounted due to the proximity of significant severance caused by the A3, which would make it difficult to deliver more sustainable mobility outcomes without significant investment for large scale growth.
- The remaining **white areas** are the most challenging in achieving sustainable mobility outcomes. These locations share similar characteristics including very limited to no connectivity with the main public transport network; and being physically remote and separated from existing urban areas. This doesn’t mean that they should take no growth, but that the scale of development should be limited to that needed to support the sustainability of existing communities.

**FIGURE 3.3: CONNECTIVITY ZONES – INTEGRATED TRANSPORT PLANNING (2024) SOUTH DOWNS TRANSPORT STUDY**



**3.28** The Transport Study also considered the potential impacts of the proposed growth in this Local Plan, focusing on the larger clusters of proposed allocations. It identified a package of measures required alongside development to achieve the most sustainable outcomes. These have been included within the Infrastructure Business Plan – see **Spending CIL – South Downs National Park Authority**.

**3.29** The 2025 **Land Availability Assessment – South Downs National Park Authority** considered nearly **800** sites for residential and/or economic development. **334** were excluded at Stage 1 because they were located within designated sites (such as Sites of Special Scientific Interest), on greenfield sites that were not adjacent to settlement boundaries, or were incapable of meeting the minimum threshold of 5 dwellings. Unlike the previous Local Plan, sites adjacent to sustainable settlements outside (but on the boundary of) the National Park were not excluded at Stage 1 but were taken forward to be assessed at Stage 2 (see below) and several have been identified as allocations – the largest of which is a strategic site adjacent to Liphook (the main settlement being within the East Hampshire Local Planning Authority Area). This represents a significant shift away from the 2019 Local Plan approach, which avoided allocating sites on the boundary due to concerns about creep and degradation of a new, carefully considered, designation boundary. The consideration of such boundary or “edge” sites for this Local Plan recognises that time has moved on since the designation, and development needs have significantly increased such that they justify including suitable sites on the edge of the National Park. However, the selection of these sites has been very challenging and there remain concerns around how developing on the edge of the National Park could erode its special qualities and setting. We would not therefore expect further sites on the boundary to be developed where they have not been allocated in this Plan.

**3.30** The 2025 Land Availability Assessment then assessed and considered the remaining **465** sites at Stage 2 in terms of suitability, availability, and achievability. Given the national landscape designation, the suitability element included a landscape appraisal for all these sites, which has been validated by external consultants for all proposed new allocations. It also considered other relevant evidence, including that relating to heritage, biodiversity and flood risk – see **Evidence Base – South Downs National Park Authority**. **342** sites were “rejected” as being unsuitable, unavailable and/or unachievable for development, leaving **123** assessed as “has potential” for development. This included 42 unimplemented allocations in made Neighbourhood Development Plans and sites subject to extant planning permission, which are existing ‘commitments’. 5 of the

remaining sites were not proposed for allocation because they could come forward under existing thematic policies, or were considered more appropriate for other uses, and 1 was subsequently found to be unavailable. This left **75** residential/employment sites proposed for allocation in the new Local Plan.

**3.31** Proposed allocations and in combination effects were then tested through the **Integrated Impact Assessment (IIA) and Scoping Report – South Downs National Park Authority** and the **Habitats Regulations Assessment (HRA) – South Downs National Park Authority**. It should be noted that, because this Local Plan proposes to allocate all sites found to have “potential” for residential development in the Land Availability Assessment, this means that there were no ‘reasonable alternatives’ identified for individual site allocations. However, the Integrated Impact Assessment does identify reasonable alternatives for levels of growth and spatial strategies. It concludes that the option of 323 dpa is the most appropriate in growth scenarios, and the preferred spatial strategy is an option combining growth at primary settlements, those with good transport links, brownfield and small sites and sites on the edge of the National Park.

**3.32** The 2026 **Site Selection & Major Development – South Downs National Park Authority** summarises the above process and outcomes and includes a major development test for those sites considered to come under the definition in footnote 67 of the 2024 National Planning Policy Framework (whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated).

**3.33** This site selection process has resulted in a housing supply of **6,735 new homes between 2024 and 2042**, which provides for the identified needs of **323** homes a year and includes headroom of **598** homes or 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. The distribution of this development is shown in the key diagram below.

FIGURE 3.4: KEY DIAGRAM

