

4

STRATEGIC POLICIES

POLICIES

CORE POLICIES 23

Strategic Core Policy SDC1: Furthering National Park Purposes	23
Strategic Core Policy SDC2: Development Strategy	24
Strategic Core Policy SDC3: Regenerative Development and Ecosystem Services	26
Strategic Core Policy SDC4: Major Development	29

LANDSCAPE AND HERITAGE 31

Strategic Policy SDL1: Landscape Character	32
Strategic Policy SDL2: Design	34
Strategic Policy SDL3: Safeguarding Views	37
Strategic Policy SDL4: Relative Tranquillity	38
Strategic Policy SDL5: Dark Night Skies	39
Strategic Policy SDL6: Historic Environment and Cultural Heritage	41
Strategic Policy SDL7: Listed Buildings	44
Strategic Policy SDL8: Conservation Areas	45
Strategic Policy SDL9: Archaeology	46

NATURE AND CLIMATE 48

Strategic Policy SDN1: Nature Recovery	49
Strategic Policy SDN2: Designated Sites Hierarchy	52
Strategic Policy SDN3: The Sussex Bats Special Areas of Conservation (SACs)	55
Strategic Policy SDN4: The Arun Valley Special Protection Area (SPA)	56
Strategic Policy SDN5: Wealden Heaths Complex	57
Strategic Policy SDN6: The Solent Coast Special Protection Areas (SPAs)	59
Strategic Policy SDN7: Nutrient Neutrality	60
Strategic Policy SDN8: Trees, Woodland, Hedgerows and Scrub	62
Strategic Policy SDN9: Sustainable Construction	65
Strategic Policy SDN10: Renewable Energy	68

WATER AND POLLUTION 71

Strategic Policy SDW1: Protection of the Water Environment	72
Strategic Policy SDW2: Flood Risk Management	75
Strategic Policy SDW3: Sustainable Drainage	77
Strategic Policy SDW4: The Coast	79
Strategic Policy SDW5: Pollution and Air Quality	82
Strategic Policy SDW6: Contaminated Land	83

HOUSING 84

Strategic Policy SDH1: Housing Supply	85
Strategic Policy SDH2: Mix of Homes	87
Strategic Policy SDH3: Accessible & Adaptable Homes	89
Strategic Policy SDH4: Specialist and Older Persons' Accommodation	90
Strategic Policy SDH5: Affordable Homes	92
Strategic Policy SDH6: Rural Exception Sites and Rural Estates Housing	95
Strategic Policies SDH7 and SDH8 for Replacement and Subdivision of Dwellings and Householder Development	97
Strategic Policy SDH9: New Rural Workers' Dwellings	100
Strategic Policy SDH10: Gypsies, Travellers and Travelling Showpeople	101

ECONOMY 103

Strategic Policy SDE1: Economic Development	104
Strategic Policy SDE2: Agricultural Development, Diversification and Conversion of Rural buildings	105
Strategic Policy SDE3: Winemaking and Wine Tourism	107
Strategic Policies SDE4, SDE5 and SDE6: Town and Village Centres and Shops in the Countryside	109
Strategic Policies SDE6: Shops Outside Centres	110
Strategic Policy SDE7: Regenerative Tourism	112
Strategic Policy SDE8: Equestrian Development	114
Strategic Policy SDE9: Shop Fronts & Advertisements	115

GREEN, BLUE AND COMMUNITY SPACES 117

Strategic Policy SDG1: Community Facilities	118
Strategic Policy SDG2: Green and Blue Infrastructure	120
Strategic Policy SDG3: Public Open Space, Sports and Recreational Facilities	121
Strategic Policy SDG4: Local Green Spaces	124

TRANSPORT AND INFRASTRUCTURE 127

Strategic Policy SDT1: Vision-led Transport Approach	128
Strategic Policy SDT2: Active Travel Routes	130
Strategic Policy SDT3: Highway and Public Realm Design	132
Strategic Policy SDT4: Parking Provision	133
Strategic Policy SDT5: Infrastructure	135
Strategic Policy SDT6: Telecommunications Infrastructure	136

INTRODUCTION

4.1 To help deliver our vision and objectives in Chapter 2 and the Partnership Management Plan we want to be explicit about our expectations from development and land use. The following policies are strategic and set out our spatial strategy and provision for appropriate growth within a landscape-led context. This complies with National Planning Policy Framework (NPPF) paragraph 17 which says that development plans “must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area”, reflecting the legal requirements in section 39(2) of the Planning and Compulsory Purchase Act 2004. Paragraph 20 sets out the matters that should be covered, and paragraph 21 says that plans should be explicit which policies are strategic. Non-strategic policies can be either in Local Plans or Neighbourhood Development Plans.

4.2 The South Downs National Park covers a very large area with 45 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.

4.3 These strategic policies 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 resilience 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** – sustainable 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).

4.4 The Local Plan policies must be considered as a whole, taking into account their purpose and place within the Local Plan. Repetition between the policies has been avoided so cross-references to other relevant policies in this Local Plan have been included to aid the user. However, these should not be taken as a closed list as others may be relevant to the specific proposal, including Neighbourhood Development Plan policies. Key material considerations such as the National Planning Policy Framework, Planning Practice Guidance and the Partnership Management Plan will also be relevant. Key evidence is listed under each policy, but other evidence may also be applicable.

CORE POLICIES

Strategic Core Policy SDC1: Furthering National Park Purposes

Purpose of the Policy

Government policy in the NPPF (Chapter 2) states that the purpose of the planning system is to contribute to the achievement of sustainable development. This policy clarifies what that means in this National Park and how it relates to the statutory purposes and duties of this protected landscape.

Local Plan Objective

Planning Vision: 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.

Policy SDC1: Furthering National Park Purposes

- 1 The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.
- 2 When considering development proposals that further National Park purposes and accord with relevant policies in this Local Plan, the Authority will take a positive approach that reflects the presumption in favour of sustainable development. It will work with applicants to find solutions to ensure that those development proposals can be approved without delay, unless material planning considerations indicate otherwise.
- 3 When determining any planning application, the Authority will consider the cumulative impacts of development, including those outside its boundary where relevant.
- 4 Where the Authority considers that development proposals fail to further the purposes of the National Park, planning permission will be refused unless:

- a) the extent and severity of the conflict is limited; and
- b) the impact on the purposes of the National Park can be mitigated or compensated for, such that a quantifiable overall enhancement is achieved, and these measures are secured by condition or legal obligation.

SUPPORTING TEXT

4.5 Section 11A(1A) of the National Parks and Access to the Countryside Act 1949, was amended by section 245 of the Levelling Up and Regeneration Act 2023 and now states that, in exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, a relevant authority must **seek to further the purposes** of the National Park. A 'relevant authority' includes the National Park Authority and other public body decision makers such as the Planning Inspectorate and Mayors of Strategic Authorities.

4.6 Since this requirement came into force in December 2023 Government has published guidance on how to apply the strengthened duty and is considering secondary legislation. There has also been a number of court cases on this matter. The wording of this policy takes into account that guidance and caselaw. This includes confirmation that planning is an evaluative process and determination of a planning application must be made in accordance with the development plan unless material considerations indicate otherwise.

GUIDANCE

- **Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes – GOV.UK**

EVIDENCE

- Section 70 of the Town and Country Planning Act 1990; section 38(6) of the Planning and Compulsory Purchase Act 2004; and section 11A(1A) of the National Parks and Access to the Countryside Act 1949, as amended by section 245 of the Levelling Up and Regeneration Act 2023.
- *New Forest NPA v Secretary of State* [2025] EWHC 726 (Admin) and *Campaign for National Parks/CPRE Kent v Secretary of State* [2025] EWHC 1781 (Admin)

SEE OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy and SDC3 Regenerative Development and Ecosystems Services.

Strategic Core Policy SDC2: Development Strategy

Purpose of the Policy

The purpose of this policy is to set out the development strategy for the National Park, which focuses development on sustainable settlements which have settlement boundaries identified on the Policies Map. The policy also indicates where development may be acceptable outside of these boundaries to meet specific needs or to provide the Plan with flexibility in land supply.

Local Plan Objectives

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.

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.

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.

Policy SDC2: Development Strategy

The development strategy is for a level of growth led by landscape capacity, dispersed across the National Park, focusing on settlements which enable occupiers to access day-to-day services and facilities. It also allows for more limited growth outside of these settlements to support rural communities and economies.

1. The principle of development within the settlement boundaries of the following settlements, as defined on the Policies Map, will be supported, provided that development:

- a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context;
- b) Makes best use of suitable and available previously developed land in the settlement; and
- c) Makes efficient and appropriate use of land.

Western Downs

Chawton	Cheriton/Hinton Marsh	Farringdon (Lower and Upper)	Itchen Abbas
---------	-----------------------	------------------------------	--------------

Western Weald

Easebourne Fernhurst Fittleworth Greatham Liphook (where within the SDNP)	Liss (including Liss Forest and West Liss) Lodsworth Midhurst Milland	Northchapel Petersfield Petworth Rogate	Sheet Stedham Stroud Watersfield
---------------------------------------------------------------------------------------	--------------------------------------------------------------------------------	--------------------------------------------------	-------------------------------------------

Scarp and Footslopes

Binsted Buriton Bury Cocking	Cooksbridge (where within the SDNP) Ditchling East Meon Graffham	Keymer (where within the SDNP) Poynings Selborne South Harting	Steep Steyning (where within the SDNP) Washington
---------------------------------------	---------------------------------------------------------------------------	-------------------------------------------------------------------------	---------------------------------------------------------

Dip Slope

Compton Corhampton and Meonstoke Droxford East Dean and Friston	Findon Hambleton Lancing (where within the SDNP) Owslebury	Pyecombe Rowlands Castle (where within the SDNP) Singleton Slindon	Sompting (where within the SDNP) Swanmore (where within the SDNP) Twyford West Meon
--------------------------------------------------------------------------	---------------------------------------------------------------------	-----------------------------------------------------------------------------	----------------------------------------------------------------------------------------------

Coastal Plain

Funtington	Lavant (including Mid Lavant and East Lavant)	West Ashling	
------------	-----------------------------------------------	--------------	--

River Adur Corridor

Shoreham Cement Works	Bramber (where within the SDNP)		
-----------------------	---------------------------------	--	--

River Arun Corridor

Amberley	Arundel (where within the SDNP)	Coldwaltham	
River Ouse Corridor			
Kingston near Lewes	Lewes	Newhaven (where within the SDNP)	Rodmell
River Cuckmere Corridor			
Alfriston			

2. Development will be permitted outside of settlement boundaries where it complies with the locational requirements of relevant Development Plan policies or, exceptionally:

- There is an essential need for a countryside location; or
- In the case of community infrastructure, there is a proven need for the development that demonstrably cannot be met elsewhere; or
- It is community-led development as defined in the National Planning Policy Framework; or
- It is an appropriate reuse of a previously developed site, excepting residential gardens, which is in a sustainable location and conserves and enhances the special qualities of the National Park; or
- The proposed development is for fewer than 10 dwellings, the site is contiguous with an adopted settlement boundary, and the development reflects the landscape character and settlement pattern of the area.

3. In considering development proposals outside settlement boundaries significant weight will be given to those which deliver multiple benefits in line with the purposes and special qualities of the National Park in accordance with either:

- a Whole Estate Plan that has been endorsed by the National Park Authority; or
- an alternative holistic long-term strategy for the holding.

Such benefits will only be given weight where they are secured through a legally binding agreement.

SUPPORTING TEXT

4.7 Part 1(c) refers to efficient and appropriate use of land. This is to ensure that development makes best use of land whilst being in character with its surroundings.

4.8 Part 2(d) refers to a sustainable location. This is to make it clear that previously developed sites that are remote from services and facilities, increasing dependency of occupants on transport by private car, will not be considered appropriate for reuse.

4.9 Part 2(e) allows for developments of 1-9 dwellings where the site is contiguous with an adopted settlement boundary. This could be for general housing, with an affordable housing mix as per SDH2, but it could also be for self-build or custom-build housing or other specialist housing types.

4.10 Part 3 of the policy refers to Whole Estate Plans. These are prepared by landowners, in consultation with the SDNPA and other interested parties, to look holistically at their land holdings; establish a baseline; identify opportunities and threats and describe their long-term plans so that individual projects can be considered in context. Whole Estate Plans should help to identify mutually acceptable and proactive solutions which serve the wider purposes of the National Park. Further information about such plans and the process for preparing them is at southdowns.gov.uk/planning-policy/whole-estate-plans/ Legally binding commitments could include s106 obligations, Conservation Covenants, and new dedicated Public Rights of Way that secure the benefits to the National Park that are relied upon to justify the development. These benefits should reflect the aims and objectives of the Partnership Management Plan.

GUIDANCE

- Topic Paper on Development Strategy

EVIDENCE

- Integrated Impact Assessment; Settlement Facilities Study; Transport Study

SEE OTHER RELEVANT POLICIES INCLUDING

SDH4 Specialist and Older Persons Housing, SDH6 Rural Exception Sites, SDH7 Replacement and Subdivision of Dwellings, SDH9 New Rural Workers' Dwellings, SDH10 Gypsies, Travellers and Travelling Showpeople, SDE2 Agricultural Development, Diversification and Conversion of Rural Buildings, SDE3 Winemaking and Wine Tourism, SDE6 Shops Outside Centres, SDE7 Regenerative Tourism, SDE8 Equestrian Development, SDG1 Community Facilities, SDG2 Green and Blue Infrastructure, SDG3 Public Open Space, Sports and Recreational Facilities, SDG4 Local Green Space, SDT5 Infrastructure, SDT6 Telecommunications

Strategic Core Policy SDC3: Regenerative Development and Ecosystem Services

Purpose of the Policy

The purpose of this policy is to embed a holistic and regenerative approach to development for the benefit of nature, climate, people and place.

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.

Policy SDC3: Regenerative Development and Ecosystem Services

1 Development proposals will be permitted where they demonstrate use of regenerative design principles to sustain, restore and enhance ecosystems and ecosystem services and have an overall positive impact on biodiversity, and human health, and the environment. Development proposals should:

- a) apply the following principles proportionately and as relevant to the nature and scale of the proposal:
 - i. Nature and place-based design;
 - ii. Enhancing how natural and human systems work together; and
 - iii. Creating healthy and equitable communities; and,
- b) through the application of the above principles, sustainably manage and contribute to the regeneration of land and water environments, taking all opportunities to:
 - i. Contribute to nature recovery by protecting, restoring, and providing more, better and joined up natural habitats, including through Biodiversity Net Gain where applicable, and informed by and responding to likely climate change impacts;
 - ii. Conserve water resources, enhance water quality, and regenerate water resources and flows to be 'water positive' where possible;
 - iii. Manage and mitigate the risk of flooding;

- iv. Improve the National Park's resilience to, and mitigation of, and adaptation to climate change, and improvements in water and energy efficiency across the wider planning unit are encouraged;
- v. Increase the ability to store carbon through new planting or other means;
- vi. Conserve and enhance soils including through regenerative soil management techniques, use soils sustainably and protect the best and most versatile agricultural land;
- vii. Support regenerative agriculture and the sustainable production, distribution, and use of food, forestry and raw materials;
- viii. Contribute to reduced levels of pollution;
- ix. Support a circular economy through local and regional supply chains and produce;
- x. Support the creation of a healthy environment for health and wellbeing including through design and layout of buildings, spaces, and neighbourhoods, the design of homes, a healthier food environment, provision and access to green and blue spaces, and prioritisation of active travel as appropriate to the location, type and scale of development; and
- xi. Provide opportunities for access to the natural and cultural resources which contribute to community health and the special qualities of the National Park.

2 Development proposals must be supported by a statement that sets out how the development proposal has used regenerative design principles, and achieves an overall positive impact on the environment, including how the proposal impacts both positively and negatively on ecosystem services.

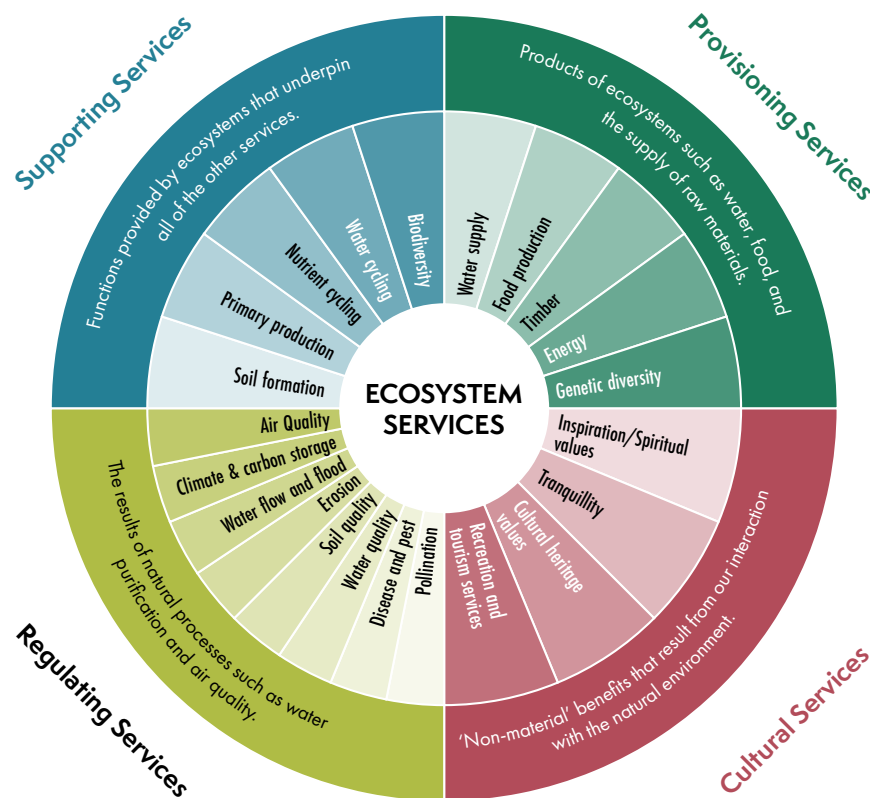
SUPPORTING TEXT

4.11 This policy seeks to move beyond sustainable development, which in essence means a 'neutral' impact on the environment and communities, towards regenerative development, which is a net positive impact on the environment and communities. Regenerative development recognises our role as part of nature, and replenishes and aligns with the needs and characteristics of thriving ecosystems and a thriving society. Regenerative design is not about restoration to a time before human influence, rather it is about realigning human systems with natural systems to create thriving

living systems that ultimately have the capacity to coexist and coevolve over time to increasing states of vitality.

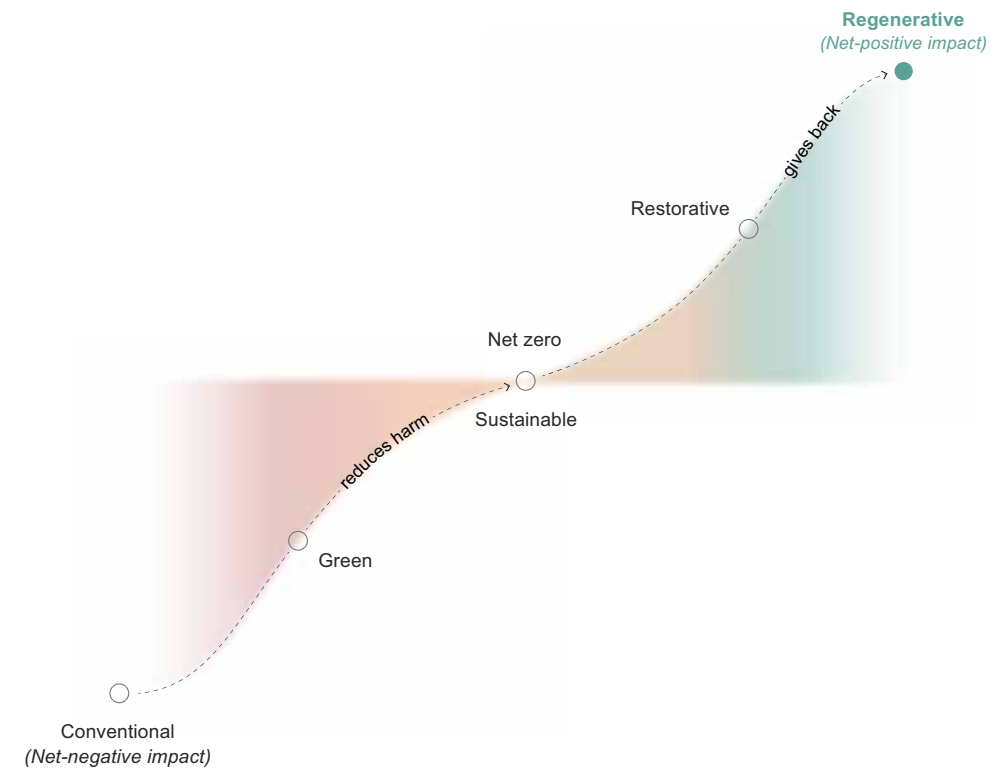
4.12 Regenerative development is a natural evolution of the award-winning Ecosystems Services approach taken in the 2019 Local Plan. Ecosystem services are the benefits that people and society get from the natural environment. Through the application of regenerative development principles, development proposals should take a positive approach to creating more vital and viable ecosystems and to support the ecosystem services arising and take adequate account of the benefits (including social and economic) of enhancing ecosystems and ecosystem services. Figure Y – The Four Aspects of Ecosystem Services illustrates how the landscapes of the South Downs provide a multitude of ecosystem services.

FIGURE 4.1: THE FOUR ASPECTS OF ECOSYSTEM SERVICES



4.13 A regenerative approach can contribute to addressing the interconnected challenges facing society, from climate change and the nature crisis to social challenges of health and wellbeing, the economy and affordability. It also supports the first purpose of the National Park to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park.

FIGURE 4.2: TRANSITIONING TOWARDS REGENERATIVE OUTCOMES



(Arup (2024), adapted from Reed and Mang (2007))

4.14 The concept of regenerative development is innovative and still evolving, and many aspects go beyond the what the planning system can do. Development can, however, contribute to moving along the continuum in Figure 4.2 above towards a regenerative future. It can do so by using regenerative design principles to inform development proposals. These principles should be applied proportionately to the nature and scale of the development and its context.

4.15 The policy seeks applications of the following **regenerative design principles**:

- **Nature and placed based design** – An approach which is holistic, that designs for and with nature to support the evolution, and replenishment of nature and natural environment functions and cycles, including resilience and adaptation to climate change, and provide a distinct added value. This can include enhancing and creating new habitats, facilitating natural regeneration of habitat, restoring or creating new habitat connections in the landscape, taking inspiration and cues from the natural environment in design, and partnering with nature as infrastructure via nature-based solutions. The approach is informed by and rooted in a strong understanding of the place through a landscape-led approach. More information about the landscape-led approach is found in the policies and supporting text for SDL1 Landscape Character and SDL2 Design.
- **Enhancing how natural and human systems work together** – These systems should not be viewed as isolated. Human activities and natural systems are part of a shared wider ecosystem. Measures to address this include nature-based solutions that provide multiple benefits from these interconnections and relationships such as sustainable drainage systems, designing development that ages well in the environment, understanding material/resource flows in development through sustainable construction measures such as minimising waste and addressing embodied carbon, and design that supports local regenerative economies. To be effective, engagement with service providers (such as water companies), regulatory bodies (such as Natural England, or the Lead Local Flood Authorities) and communities is key.
- **Healthy and equitable communities** – Tackling the climate and biodiversity crises is only likely to be successful if healthy communities are a key part of the approach. Communities shaping their places, (such as through neighbourhood development plans and parish/village design statements), and actions in relation to the following key aspects of the built and natural environment that can promote positive human health and wellbeing outcomes, are part of this:
 1. Neighbourhood design that provides inclusive, safe and secure access to nature, employment, facilities and services; and creates attractive and distinctive places which promote social cohesion and interactions, and enhance experiential qualities of the landscape;

2. Design of homes including high quality affordable, accessible and adaptable homes and reduced energy bills through sustainable construction;
3. Access to healthy food including local food growing opportunities;
4. Creation of natural and sustainable environments free from pollution and hazards, adaptive and resilient to impacts of climate change and flood risk, and with provision and access to public green and blue spaces for outdoor play and recreation; and
5. Accessibility, connectivity and mobility through and between places via active travel and public transport.

4.16 The preparation of the accompanying statement required by criterion 2 should be proportionate to the development and the impact. Decisions made throughout the design process should demonstrate regenerative design through the use of evidence such as the South Downs Landscape Character Assessment 2020 and the EcoServe GIS maps. Revised Technical Advice Notes are being developed by the National Park Authority, which provide checklists and further guidance to help applicants meet the requirements of Policy SDC3.

4.17 This core policy should not be read in isolation but instead linked to all other Local Plan policies, many of which are relevant to health. The principles of criterion 1 (a) should be applied in conjunction with the landscape-led approach set out in SDL1 Landscape Character and SDL2 Design; these complementary policies taken together require development proposals to be informed by good contextual analysis to enhance landscape character and have an overall positive impact on the environment. In addition, criterion 2 also links to various Local Plan policies, for example criteria (b)(iii) and (iv) of this policy, about water and flooding should be read alongside policies such as SDW1 Protection of the Water Environment and SDG2 Green and Blue Infrastructure. It should be noted that where more detailed applicable criteria are contained in other policies within the Plan, SDC3 should be read as supporting those detailed criteria.

GUIDANCE

- Regenerative Design and Ecosystem Services Technical Advice Note (SDNPA, update of the current Ecosystem Service TANs is in preparation)
- South Downs Design Guide Supplementary Planning Document

EVIDENCE

- Regenerative Design: towards living in harmony with nature (ARUP, 2024) arup.com/insights/regenerative-design/
- The Really Regenerative Centre reallyregenerative.org/
- Mapping Ecosystem Services in the South Downs National Park (SDNPA, 2016) southdowns.gov.uk/wp-content/uploads/2016/12/EcoServ-GIS-Mapping-Tool-Evidence-Report-Draft.pdf

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment and Cultural Heritage, SDN1 Nature Recovery, SDN8 Trees, Woodlands, Hedgerow and Scrub, SDW1 Protection of the Water Environment, SDG2 Green and Blue Infrastructure.

Strategic Core Policy SDC4: Major Development

Purpose of the Policy

The purpose of this policy is to clarify what major development means in the context of this National Park, how the presumption against such development, and the need for exceptional circumstances in the public interest, will be applied together with the approach to taking opportunities to conserve and enhance the National Park if permission is to be granted.

Local Plan Objectives

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.

Policy SDC4: Major Development

- 1** In determining what constitutes major development the National Park Authority will consider whether the development, including temporary events, by reason of its scale, character or nature, has the potential to have a significant adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for significant adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.
- 2** Planning permission will be refused for major developments in the National Park except in exceptional circumstances, and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

3 If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities should be sought.

4 Major development proposals will be required to demonstrate through a Health Impact Assessment and Equalities Impact Assessment how they will result in an inclusive, healthy and sustainable place that improves health and wellbeing outcomes for everyone.

SUPPORTING TEXT

4.18 Paragraph 190 of the NPPF sets out national policy for major development in protected landscape, which in summary is that permission should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Footnote 67 states that ‘For the purposes of paragraphs 190 and 191, 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 or defined’. This means that ‘major development’ in National Parks does not have a specific threshold, but is rather an exercise in planning judgment based on all the circumstances, and taking into account the potential impact that the development may have on the National Park by reason of its scale, character or nature. For example, an application for 50 dwellings within a larger town in the National Park may not be considered major development, whereas the same sized development in the countryside would be considered major development.

4.19 This policy includes a requirement for the preparation and submission of a Health Impact Assessment (HIA) and Equalities Impact Assessment to demonstrate how major development will result in an inclusive, healthy and sustainable place that improves health and wellbeing outcomes for everyone. The National Park is currently covered by four Public Health Authorities who have published their own advice, guidance, templates and/or toolkits on health and wellbeing considerations in planning, including HIA. Applicants for major development are strongly encouraged to engage in pre-application discussions with the National Park Authority and relevant Public Health Authority so that HIA – including type, scoping opinion, and identification of vulnerable groups – is considered at the start of the planning process, before the submission of a formal planning application.

GUIDANCE

- East Sussex Health Impact Assessment Toolkit Equality Impact Assessment (EqIA) Toolkit | ARC EM

EVIDENCE

- Legal Opinions from James Maurici KC available to view at southdowns.gov.uk/planning-policy/south-downs-local-plan/local-plan-evidence-base/evidence-and-supporting-documents/

SEE OTHER RELEVANT POLICIES

Including SDC2 Development Strategy, SDT1 Vision-led Transport Approach, SDN9 Sustainable Construction

LANDSCAPE AND HERITAGE

Strategic Policy SDL1: Landscape Character

Purpose of the Policy

The purpose of this policy is to set out how development proposals will be expected to conserve and enhance landscape (including townscape) character in the National Park. This policy, together with SDL2 Design, sets out the policy principles for a landscape-led approach.

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.

Policy SDL1: Landscape Character

1 Development proposals will only be permitted where they conserve and enhance landscape (including townscape) character by demonstrating that:

- They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
- The proposed use, design, layout, scale and materials conserve and enhance existing landscape and seascape character of the site and its wider context, contributing to the distinctive character, pattern of elements and evolution of the landscape;
- They will safeguard the sense of place, perceptual and amenity qualities resulting from landscape character of the place; and
- Planting is informed by and contributes to landscape character, uses native species unless there are appropriate and justified reasons to select non-native species, is suitable for site conditions, and contributes to nature recovery and climate change adaptation;

2 Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the *Historic England Register of Historic Parks and Gardens*) they should be based on a demonstrable understanding of the designed landscape in order to produce bespoke and complementary design principles which inform the development proposal;

3 The settlement pattern and individual identity of settlements, and the integrity of predominantly open and undeveloped land between settlements, will not be undermined;

4 Characteristic green and blue assets, corridors and links will be safeguarded, and development proposals should identify and take opportunities to create characteristic enhancements and connections; and

5 The restoration of landscape character where positive elements and features have been lost or degraded will be supported.

SUPPORTING TEXT

Understanding landscape character

4.20 Landscape is made up of everything we see, hear and experience and includes all types and forms, including townscape, historic landscape and seascape. Landscape character is what makes an area unique, resulting from the action and interaction of natural and/or human factors; it is the combination of distinct, recognisable and consistent **patterns** of elements and features. Townscape refers to denser areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.

4.21 Landscape **elements** are the individual components which make up the landscape, such as geology, landform and water, woodlands and trees, fields and heathlands, routes (highways, roads, tracks, paths and green corridors), settlements, buildings and spaces around them. Each element has a pattern and a relationship with other elements. Landscape **features** are particularly prominent or eye-catching elements, such as tree clumps, church towers, or wooded skylines, and, along with the pattern of landscape elements, these contribute to the distinctive character of a place.

4.22 Together the pattern and relationship of elements and features provide the foundation for creating perceptual qualities such as tranquillity, dark night skies and sense of place.

4.23 Landscape features and elements will have a history or a 'time depth', contribute to ecological richness and shared cultural heritage, and may have coherence across an area. Reference should be made to the Pan Sussex Historic Landscape Characterisation, the Hampshire Historic Landscape Characterisation and other appropriate research material to identify the relevant natural and historic key features that should be used to inform development proposals.

Landscape and development proposals

4.24 It is important that development proposals are based on a meaningful understanding of landscape character. This policy should be read together with Policy SDL2 Design with sets out a landscape-led approach to design, and SDC3 Regenerative Development and Ecosystem Services which seeks a regenerative approach to development design. These complementary policies taken together require development proposals to be informed by good contextual analysis to enhance landscape character and have an overall positive impact on the environment. Landscape-led design is about designing new places in a way which is sensitive to and integrates with existing landscape character creating places of interest; it is good contextual design. Landscape is required to be considered first, right at the start and then used as the basis for developing a development proposal. The elements and features that comprise a landscape are the same elements that need to be considered in the design of new developments.

4.25 The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting.

4.26 Proposals should be informed by the South Downs Landscape Character Assessment, community-led planning documents/local landscape character assessments (such as Neighbourhood Development Plans, Parish or Village Design Statements) and appropriate site-based investigations.

4.27 Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment and any successor or accompanying documents. For major development, or if the proposals require a full Environmental Impact Assessment (EIA) then a Landscape and Visual Impact Assessment (LVIA) undertaken by a Chartered Landscape Architect will be required. Applicants are advised to consult the Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the Landscape and Biodiversity Baseline Checklist which is available on the Authority's website in the first instance. Further assessment may be required following on from completion of the checklist which the Authority would advise on.

4.28 The ability of proposals to meet the requirements to enhance landscape character will be considered in proportion to the size, scale and likely impacts of the proposals. Restoration of lost positive elements and features is generally supported. Positive elements and features are those which contribute to rather than detract from the coherence and characteristics of the landscape character.

Planting

4.29 Characteristic and suitable native species should be used in planting schemes, however the use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

Designed landscapes

4.30 Proposals which may affect designed landscapes, gardens and parkscapes, whether these are of local or national significance, should be informed by a design process which understands and identifies the key features within the designed landscape.

The individual identity of settlements

4.31 The gaps between settlements protect the individual character and identity of towns and villages. They retain the open nature and the physical and, either real or perceived, visual separation between settlements. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Active travel routes can often provide access to these areas and connections to the open landscape of the National Park beyond.

GUIDANCE

- Adopted Design Guide SPD– South Downs National Park Authority
- South Downs National Park Authority 'Landscape and Planning' webpages: southdowns.gov.uk/landscape-design-conservation/landscape-and-planning/
- Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (Landscape Institute and IEMA, 2013) and subsequent updates landscapeinstitute.org/policy-practice/technical/assessments-standards/glvia3-panel/

- An Approach to Landscape Character Assessment (Natural England, 2014) assets.publishing.service.gov.uk/media/5aabd31340f0b64ab4b7576e/landscape-character-assessment.pdf

EVIDENCE

- South Downs Landscape Character Assessment (2020)
- South Downs National Park Authority 'Landscape and Planning' webpages: southdowns.gov.uk/landscape-design-conservation/landscape-and-planning/
- Pan Sussex Historic Landscape Characterisation, the Hampshire Historic Landscape Characterisation
- Neighbourhood Development Plans
- Parish / Village Design Statements
- Local Landscape Character Assessments

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL2 Design, SDL3 Safeguarding Views, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDN8 Trees, Woodlands, Hedgerow and Scrub, SDW1 Protection of the Water Environment, SDG2 Green and Blue Infrastructure.

Strategic Policy SDL2: Design

Purpose of the Policy

The purpose of this policy is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park.

Local Plan Objectives

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.

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.

Policy SDL2: Design

1 Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high-quality design that enhances the overall character and appearance of the area. The following design principles should be adopted as appropriate:

- a) Integrate with, respect and sympathetically complement the landscape (including townscape) character by ensuring development proposals are demonstrably informed by an assessment of the landscape and townscape context and capacity;
- b) Achieve an effective and high-quality layout that:
 - i. is adaptive to climate change and prioritises characteristic green infrastructure,
 - ii. makes space for above ground multifunctional Sustainable Drainage Systems, and
 - iii. has a characteristic street hierarchy and design that prioritises active travel and access to public transport, and sensitive integration of vehicle parking to avoid car and highway design dominance and street clutter;

- c) Contribute to local distinctiveness and sense of place through its relationship to, including views of, adjoining buildings, spaces and landscape features, including topography and historic settlement pattern, and enhance settlement edges where relevant;
- d) Create high-quality, clearly defined and well-managed public and private spaces that contribute positively to the public realm. Deliver high-quality outdoor spaces that support physical and mental health and wellbeing, and social interaction;
- e) Incorporate hard and soft landscape treatment that reinforces local character, promotes habitat connectivity, and respects the site's perceptual qualities, including night-time darkness;
- f) Utilise design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, fenestration, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
- g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, energy infrastructure, and transport related equipment, minimising visual clutter;
- h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
- i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
- j) Demonstrate resilience to future climate conditions, particularly risk of overheating, by:
 - i. avoiding overheating through passive design measures (e.g. orientation, shading, ventilation and thermal mass) and minimising reliance on mechanical cooling; and
 - ii. providing external shade and protection from sun and ultraviolet exposure, particularly for vulnerable users e.g. care homes, schools, and playgrounds.
- k) Give regard to improving safety and perceptions of safety, with well-defined access and natural surveillance of public realm, and be inclusive and accessible for all; and

- l) Avoiding harmful impact upon, or from, any surrounding uses and amenities, including outlook, overlooking, privacy, light, overshadowing, noise and odour.
- 2** Residential development proposals (including conversions of existing buildings such as changes of use and houses converted into flats) should meet the following minimum standards for the quality of their living environment:
- a) Adequate minimum internal space in line with the Nationally Described Space Standards in all regards; and
 - b) Adequate daylight and sunlight according to BRE Guide to Good Practice 2022 (or future update) standards for daylight and sunlight, and older person's accommodation shall meet at least the BRE Guide medium target daylight factor.

SUPPORTING TEXT

4.32 Proposals should adopt a landscape-led and regenerative approach to development design to have an overall positive impact on the environment, enhance local character and distinctiveness of the area, and create places of interest where people want to live and work now and in the future.

4.33 This policy should be read together with Policy SDL1 Landscape Character which sets out a landscape-led approach to design, and SDC3 Regenerative Development and Ecosystem Services which seeks a regenerative approach to design. These complementary policies taken together require development proposals to be informed by good contextual analysis to enhance landscape character and have an overall positive impact on the environment.

4.34 Development proposals should be informed by contextual analysis of the landscape (including townscape and seascape) character. This contextual analysis should consider landscape elements and features and their function, as relevant, such as topography, heritage, water, biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportion, pattern and vernacular architecture and materials. The surrounding mix of uses should also inform proposals. Development proposals within and on the edge of existing settlements should respect and complement the existing urban form and it may be appropriate to undertake an assessment of the development proposals and the existing townscape. Individual design elements, such as use of materials and detail of elements such as

windows, are critical to the success of the overall design and should be considered once the character of the area has been assessed.

4.35 The Authority will seek the highest quality design for development proposals in line with the first purpose of the National Park. This includes truly outstanding or innovative design and contemporary design which reinforce local distinctiveness, taking reference and visual cues from the landscape and local settlement identity and character. The Authority will encourage the use of locally sourced materials to support local character and distinctiveness, and to reduce the cost both financially and environmentally of transporting materials long distances.

4.36 Layout and arrangement of development where there are adjoining buildings can contribute to local distinctiveness and sense of place, particularly views of landmark buildings. However, this does not imply a right to a view from a private property.

4.37 Where development is located at the edge of settlements, proposals should take opportunities to enhance the settlement edge. This could mean improving an existing settlement edge by restoring lost elements or creating a new settlement edge comprised of elements that make a positive contribution to the character of the edge of the settlement.

4.38 Supporting information accompanying planning applications should be proportionate to sensitivity of the location and the scale of what is being proposed. Proposals should be informed by the Design Guide SPD and local evidence such as Neighbourhood Plans and Village Design Statements. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Some schemes may be asked to go through the National Park Authority's Design Review Panel Process. Depending on the scale of development, a comprehensive masterplan outlining the principles for a site should address all these elements and any other site-specific issues, to achieve an exemplary design.

4.39 There may be some flexibility in the application of the standards set out in Criterion 2 in certain circumstances such as the conversion of listed buildings.

GUIDANCE

- South Downs Design Guide Supplementary Planning Document (SPD)
- National Model Design Code

- Secured By Design ([securedbydesign.com](https://www.securedbydesign.com)), which is a Police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice given in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure, and sustainable environments
- Planning Noise Advice Document: Sussex (November 2023)
- BRE Site Layout Planning for Daylight & Sunlight: A Guide to Good practice (2022)

EVIDENCE

- South Downs Landscape Character Assessment (2020)
- Parish and Village Design Statements
- Neighbourhood Development Plans
- Local Landscape Character Assessments
- Conservation Area Appraisals
- Conservation Area Management Plans
- Parish Priority Statements
- County Strategic Stone Studies

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services and SDL1 Landscape Character.

Strategic Policy SDL3: Safeguarding Views

Purpose of the Policy

The purpose of this policy is to ensure that development does not harm key views or views of key features of the landscape, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

Local Plan Objectives

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.

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.

Policy SDL3: Safeguarding Views

- 1** Development proposals will only be permitted where they preserve the visual integrity, identity and perception of natural beauty of the National Park, in particular by conserving and enhancing key views and views of key features.
- 2** Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the *Viewshed Characterisation & Analysis Study*:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those

identified in Appendix 2 of the *Viewshed Characterisation & Analysis Study*, heritage assets (either in view or the view from) and biodiversity features.

Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

SUPPORTING TEXT

4.40 The View Characterisation & Analysis Study provides baseline information about the major view types, and about possible and likely ranges of visibility within, to and from the National Park. Proposals should take into account the View Characterisation and Analysis Study, the Seascape Assessment for the South Marine Plan, and locally significant and important views are identified in community planning documents as set out in the 'evidence' section below.

4.41 However, representative views and landmarks set out in the View Characterisation & Analysis Study or other documents do not provide an exhaustive list and reference to these studies will not be a substitute for appropriate site-based assessment in accordance with the Landscape Institute & IEMA's Guidelines for Landscape and Visual Impact Assessment (LVIA). A LVIA should be carried out in accordance with these guidelines and should be proportionate to the size and likely impacts of the scheme. If the applicant can demonstrate to the satisfaction of the Authority that an LVIA is not required, a simple landscape assessment may be appropriate.

4.42 For large scale applications, it is recommended that digital Zone of Theoretical Visibility (ZTV) data is used to determine potential visibility in the surrounding landscape and to demonstrate areas of zero visibility, based on topography.

4.43 Sequential views are the series of views which we see unfold when moving through the landscape, for example, when walking along a footpath or travelling along a road. Impacts on these views can arise frequently or occasionally and may be generated by periodic views of the same development or by more than one development.

GUIDANCE

- Landscape Institute & IEMA Guidelines for Landscape and Visual Impact Assessment

EVIDENCE

- South Downs National Park: View Characterisation and Analysis (LUC, 2015)
- Seascape Assessment for the South Marine Plan (Marine Management Organisation, 2016)
- South Downs Landscape Character Assessment 2020
- Parish and Village Design Statements
- Neighbourhood Development Plans
- Conservation Area Character Appraisals
- Conservation Area Management Plans
- Local Landscape Character Assessments
- Neighbourhood Development Plans

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL4 Relative Tranquillity.

Strategic Policy SDL4: Relative Tranquillity

Purpose of the Policy

The purpose of the policy is to ensure that development does not harm the tranquillity of the countryside so that people can enjoy this special quality of the National Park.

Local Plan Objectives

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.

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.

Policy SDL4: Relative Tranquillity

1 Development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider the following impacts:

- a) Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;
- b) Indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements; and
- c) Experience of users of the active travel network and other publicly accessible locations.

2 Development proposals in highly tranquil and intermediate tranquillity areas should conserve and enhance, and not cause harm to, relative tranquillity.

3 Development proposals in low tranquillity areas should take opportunities to enhance relative tranquillity where these exist.

SUPPORTING TEXT

4.44 Tranquillity is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence

that it also helps to promote health and well-being. It is a perceptual quality of the landscape and is influenced by things that people can both see and hear in the landscape around them. Tranquillity is not just about noise.

4.45 The tranquillity scores apply specifically to the South Downs National Park; they are therefore to be considered relative to the National Park area only. They are not intended to be comparative or considered in relation to tranquillity scores for other national parks or other areas of the country.

4.46 Development proposals should take into account the evidence of the South Downs National Park Tranquillity Study which should be used as a baseline from which to assess changes in the aural and visual environment which are likely to result from the proposals, including considerations of temporary/permanent or varying nature of the impact.

4.47 Opportunities to enhance relative tranquillity should be taken wherever possible. The ability of proposals to conserve and enhance relative tranquillity will be considered proportionally to the scale and expected impact of the development in relation to the surrounding context.

EVIDENCE

- South Downs Tranquillity Study 2017

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Design, SDL1 Landscape Character, SDL2 Design, SDL3 Safeguarding Views, SDL5 Dark Night Skies.

Strategic Policy SDL5: Dark Night Skies

Purpose of the Policy

The purpose of this policy is to ensure that development does not harm the quality of dark night skies and that the integrity of the dark sky core and the status of the International Dark Sky Reserve is protected and where possible enhanced for people and wildlife.

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.

Policy: SDL5 Dark Night Skies

- 1** Development proposals will be permitted where they conserve and take opportunities to enhance the intrinsic quality of dark night skies for people and wildlife and the integrity of the Dark Sky Core as shown on the Policies Map.
- 2** Development proposals must demonstrate that all opportunities to reduce light pollution – from internal and external sources – have been taken, and must ensure that the measured and observed sky quality in the surrounding area, and habitats especially dark corridors, are not negatively affected, having due regard to the following hierarchy:
 - a) The installation of lighting is avoided; and
 - b) If lighting cannot be avoided:
 - i. The lighting is demonstrated to be necessary and appropriate for its intended purpose or use; and
 - ii. Any adverse impacts are avoided. Where this is not achievable, then adverse impacts are mitigated to the greatest reasonable extent.
- 3** Lighting which is proposed to be installed must meet or exceed the level of protection appropriate to the environmental zone, as shown on the Policies Map, as set out in the table below.

Location Dark Sky Zone description	Requirements for level of protection				
	Institute of Lighting Professionals guidance	Landscape and biodiversity impact	Maximum Lux level (suggested 10 Lux)	Preferred lights-off curfew	Preferred astronomical darkness curfew
E0 Dark Sky Core and areas outside this zone with a Sky Quality Measurement (SQM) of 20.5+	✓	✓	✓		
E1 (a) 2km Buffer Zone and areas outside this and the above zone which are of intrinsic rural darkness with a SQM range of 20 to 20.5	✓	✓	✓	✓	
E1 (b) Transition Zone and areas outside this and the above zones with a SQM range of ~15 to 20	✓	✓	✓		
E3/4 Urban zone with an SQM of <15	✓	✓			

4 Outdoor lighting proposals are required to provide a statement to justify why the proposed lighting is required and demonstrate how they comply with the Dark Sky International Five Principles for Responsible Outdoor Lighting: useful, targeted, low-level, controlled, and warm-coloured.

SUPPORTING TEXT

4.48 The policy applies across the International Dark Sky Reserve which covers the entirety of the National Park. It applies to any development proposals which will involve the installation of external / outside lighting, or where there may be light spill from internal lighting within buildings or other structures. It will also apply to

the following specific lighting schemes which require planning permission or listed building consent:

- A lighting scheme of such nature and scale that it would represent an engineering operation (such as requiring a separate structure and typically be undertaken by specialist lighting engineers);
- Lighting such as the floodlighting of sports pitches, car parking or manèges; and
- A lighting scheme on a listed building that would significantly affect its character.

4.49 Although some areas of the National Park are outside of the core and buffer zones; this policy is looking to conserve and enhance all areas of intrinsic dark sky within the National Park.

4.50 In the darkest areas, where control is more important, the overall impact of the lighting should not harm the continuity of the dark landscape and ideally not be visible in any direction or in any form such as glare, skyglow, spill and reflection. It also should not reduce the measured and observed quality of easily visible astronomical features such as the Milky Way and Andromeda Galaxy.

4.51 Proposals within the Dark Sky Core and 2km Buffer Zone will be subject to maximum protection using the full weight of mitigation options, with a relaxation as light quality decreases further into urban areas. Any Dark Sky that has a Sky Quality Measurement of 20.5 and above, should be considered as core quality, irrespective of whether it is within or outside the Dark Sky Core. The latest version of the Sky Quality Measurement map should be used as the Dark Sky Reserve is subject to ongoing measurement.

4.52 Proposals should take due consideration of the overall visual impact that the lighting will have on the landscape. It is also necessary to consider the visibility of the lights from the surrounding landscape particularly from viewpoints in accordance with Policy SDL3: Safeguarding Views. The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Habitats, particularly woodlands, should not be considered as a 'natural shield' to lighting, because of the impact on an unlit habitat.

4.53 Lighting should be subject to design and control measures to reduce unnecessary light pollution from direct lighting or light spill and address landscape and biodiversity impacts. Examples include:

- Design of buildings should seek to reduce light spill from internal lighting;

- Minimise number of lights and general overall footprint of lighting;
- Proximity 'PIR' sensors, timers or any additional shielding or coving, including angling the front surface of lights to the horizontal;
- Different surface types to reduce the amount of reflectivity;
- Use of lower colour temperatures of 2400K and additional shielding to prevent spill into sensitive wildlife areas;
- Lighting that would spill into adjacent sensitive habitats should be shielded or removed particularly if nocturnal species are present;
- Direct illumination of bat roosts must be avoided;
- Appropriate use of glazing to reduce light transmittance and automated blackout blinds; and
- Screening or shielding to reduce the impact of reflectivity.

4.54 More information on how development proposals can address these policy requirements, including guidance on lighting assessments, can be found in the Dark Night Skies Technical Advice Note.

GUIDANCE

- South Downs Dark Night Skies Technical Advice Note
- Dark Sky International Five Principles for Responsible Outdoor Lighting
- Institute of Lighting Professionals (ILP) guidance GN01 2021 Guidance Notes for the Reduction of Obtrusive Light, or any future update.

EVIDENCE

- South Downs Dark Skies Reserve – Dark Skies Map

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL3 Safeguarding Views, SDL4 Tranquillity, SDN1 Nature Recovery, SDN8 Trees, Woodland, Hedgerow and Scrub, SDG2 Green and Blue Infrastructure.

Strategic Policy SDL6: Historic Environment and Cultural Heritage

Purpose of the Policy

The purpose of this policy is to set out a positive strategy for the conservation and enhancement of the historic environment and cultural heritage of the National Park for the 21st century, including the safeguarding of heritage assets.

Local Plan Objectives

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.

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'.

Policy SDL6: Historic Environment and Cultural Heritage

- 1** Development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting;
- 2** Applicants will be required to provide a Heritage Impact Statement sufficient to allow an informed and evidenced assessment of the significance of heritage assets and their setting, the impact of the proposed development and any mitigation strategies, on the significance of the heritage asset(s). The Heritage Impact Statement should, where relevant:
 - a) Draw from up-to-date historic environment data, research and information which may include the local Historic Environment Record, South Downs Landscape Character Assessment and Historic Landscape Characterisation; and
 - b) Take account of current best practice guidance including guidance produced by Historic England and any relevant Conservation Area Character Statements, Appraisals and Management Plans;

3 Development proposals which affect heritage assets (whether designated or non-designated) or their setting will be determined with regard to the significance of the asset, including its contribution to cultural heritage, local distinctiveness and landscape character, and the historic environment. Consideration will also be given to the long-term conservation and enhancement of that asset;

4 Development proposals will be permitted where they conserve, enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss;

5 Development proposals that appropriately re-use redundant, under-used or at-risk heritage assets with an appropriate use which secures their long-term conservation and enhancement, including of their setting, will be supported;

6 Proposals that improve accessibility to heritage assets will be supported where these are appropriate and sensitively designed;

7 Development proposals will be permitted for works to heritage assets for renewable energy generation, energy efficiency measures, and measures to address the impacts of climate change on heritage assets, where it can be demonstrated that this is consistent with the following:

- a) The preservation of the historic fabric;
- b) The preservation of the heritage asset's significance;
- c) The preservation of the heritage asset's special architectural or historic interest;
- d) The curtilage and setting of the heritage asset;
- e) Use of design and materials appropriate for the character and appearance of heritage asset; and
- f) For thermal efficiency, a Whole Building Approach;

8 Development proposals for enabling development that would otherwise conflict with other planning policies, but which would secure the future conservation of a heritage asset will be permitted provided:

- a) The proposals will not materially harm the heritage significance and special architectural or historic interest of the asset or its setting;
- b) It can be demonstrated that all other options have been exhausted;

- c) The proposed development is the minimum necessary to protect the significance of the heritage asset;
- d) It meets the tests and criteria set out in Historic England guidance *Enabling Development and Heritage Assets*;
- e) It is subject to a legal agreement to secure the restoration of the asset in a timely manner; and
- f) It enables public appreciation of the saved heritage asset.

SUPPORTING TEXT

4.55 The term 'cultural heritage', which is part of the first purpose of the National Park, is defined in the Levelling Up and Regeneration Act 2023 as 'any building, structure, other feature of the natural or built environment or site, which is of historic, architectural, archaeological or artistic interest'. This includes heritage assets such as listed buildings, scheduled monuments, and conservations areas, as well as other features of the historic environment and landscape which are of artistic interest such as through literature, art, film, music, folk traditions, customs and crafts, and industry.

Heritage Impact Assessments

4.56 The National Park has a rich and varied historic environment and cultural heritage. It is important that proposals are based on a meaningful understanding of the historic context and landscape (including townscape) character of the area. All planning applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential, must be supported by a Heritage Impact Statement (HIS). The level of detail should be proportionate to the significance of the heritage asset and the impact of the development and sufficient to understand the impact of the proposal on the asset. The information should enable the local planning authority to assess the impact of the proposal on the heritage asset's significance.

4.57 The HIS should include (1) a description of the asset and a statement of existing significance, which should include description of the historic structure of the asset, including age, fabric, significance, and setting, and (2) an assessment of the impact of the proposed development on the asset, and any mitigation strategies to demonstrate that the proposals are informed by the significance of the asset, would preserve the asset and any features of special architectural or historic interest, and would not harm its significance. Detailed condition surveys may need to be undertaken, and

technical methodologies and specifications used for the works. All methodologies and specifications should present a conservation-based approach to the, informed by a thorough understanding of the significance of the asset, and employing traditional techniques and materials as relevant. Where harm arises to the asset the applicant would need to demonstrate that the works can be outweighed by public benefits, and the authority will take this into consideration when assessing the proposal.

4.58 Development proposals can affect the significance of heritage assets in a range of ways, from minor alternations to complete loss of the asset. In order to assess significance, it is essential to have a sound understanding of the original purpose, development, use, history of the heritage asset. The contribution of the heritage asset to its landscape and townscape character context, including the local distinctiveness of the area may also be relevant to understanding the significance of heritage asset.

4.59 In cases where harm on significance is assessed to be substantial, but justified by considerations of continued use, re-use or wider public benefits, mitigation by recording will be required as a condition of consent. This can include deposition of the record including artefacts and ecofacts in a publicly accessible museum or record office, as well as the relevant Historic Environment Record. However, the ability to record evidence should not be a factor in deciding whether such a loss should be permitted. In instances where some degree of harm to heritage assets or the role of their setting is considered justified when balanced against public benefits, these benefits must be compelling, measurable, realistic and capable of assured delivery.

Climate change mitigation and adaptation of historic buildings

4.60 Opportunities to improve energy efficiency or improve low carbon performance of existing buildings are in principle to be welcomed subject to the criteria set out in this policy. These must be carefully considered when proposed for historic buildings or other heritage assets. Adaptations could include insulation to walls and roofs, solar panels and alterations to windows. These alterations and adaptations can significantly impact the features and subsequently the overall character, historic interest and integrity of built fabric historic building, and must be considered in assessing the significance of the historic asset. More guidance is set out in the South Downs Retrofitting Historic Buildings Technical Advice Note (2026).

Enabling development

4.61 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. This is a result of the disparity between the costs of

renovating the asset in a suitable manner and the final end value. This disparity is known as the 'conservation deficit'. In extreme cases, a recognised way of addressing this is to allow development in a location, or of a nature or form, that would normally be considered unacceptable in planning policy terms, which would generate sufficient funds to cover the shortfall in the renovation costs, where it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. This approach is known as 'enabling development.' Enabling development should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted.

4.62 Development should constitute the minimum required to cover the conservation deficit. It should also not materially harm the heritage significance of the place (including its setting where relevant) and should produce public benefits which outweigh the dis-benefits of conflicting with other policies. Enabling development should contribute to the special qualities of the National Park and allow public appreciation of the saved heritage asset. The Authority will use the detailed and rigorous tests set out by Historic England to determine planning applications that propose enabling development.

GUIDANCE

- Design Guide Supplementary Planning Document (South Downs, 2022)
- Retrofitting Historic Buildings for Energy Efficiency & Carbon Reduction, Technical Advice Note (South Downs, 2026)
- Conservation Area Appraisals
- Conservation Area Management Plans
- Guidance notes produced by Historic England such as:
 - Enabling Development and Heritage Assets (Historic England, 2020),
 - Historic England Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets, and
 - The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017).
 - Historic England Advice Note 18 Adapting Historic Buildings for Energy and Carbon Efficiency (Historic England, 2024)

EVIDENCE

- South Downs Landscape Character Assessment (2020)
- Historic Landscape Character Assessments
- Historic England South East Farmsteads Character Statement (October 2014)
- Historic England Farmstead and Landscape Statement South Downs National Character Area 125 (February 2020)
- Local Historic Environment Record
- Relevant County Extensive Urban Surveys

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL7 Listed Buildings, SDL8 Conservation Areas, SDL9 Archaeology.

Strategic Policy SDL7: Listed Buildings

Purpose of the Policy

The purpose of this policy is to set out more detailed criteria for development proposals affecting listed buildings.

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'.

SDL7: Listed Buildings

- 1** Development proposals which affect a listed building or its setting will only be permitted and listed building consent granted where:
 - a) They preserve and enhance the significance of the listed building and its setting by demonstrating that harm to local distinctiveness and landscape character and loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or
 - b) Harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Authority, when appropriate mitigation measures will be expected, including archaeological investigation (including a written report) or recording.
- 2** Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.

SUPPORTING TEXT

4.63 Listed buildings and structures within the National Park form an important part of the historic character, sense of place, and wider cultural heritage of the National Park. It is necessary to consider the character and significance of listed structures in a holistic manner; this includes the relationship with and contribution to the landscape, townscape and local distinctiveness context of the listed structure, setting, as well as both internal and external features of the listed structure as relevant. The protection

and enhancement of all aspects of significance should be considered, and great weight will be given to their preservation, and where appropriate their restoration to optimal condition.

4.64 In instances where harm of significance is unavoidable and outweighed by public benefits, the record of lost or altered fabric or features should be deposited at the relevant County Record Office to facilitate access by the general public.

4.65 The Authority will seek solutions for assets at risk of loss or harm through decay, neglect or other threats. This will be pursued through proactive discussion with owners and a readiness to engage with development proposals with the potential to secure repair and continued maintenance. Where appropriate the Authority may resort to the use of its statutory powers, Urgent Works or Repair Notices, to arrest decay of the asset.

GUIDANCE

- See Policy SDL6 Historic Environment and Cultural Heritage

EVIDENCE

- See Policy SDL6 Historic Environment and Cultural Heritage

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment and Cultural Heritage, SDL8 Conservation Areas, SDL9 Archaeology.

Strategic Policy SDL8: Conservation Areas

Purpose of the Policy

The purpose of this policy is to set out more detailed criteria for development proposals within or affecting conservation areas.

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'.

SDL8: Conservation Areas

1 Development proposals within a conservation area, or within its setting, will only be permitted where they conserve and enhance the special architectural or historic interest, character or appearance of the conservation area. Sufficient information to support an informed assessment should be provided including the following matters:

- The relevant conservation area appraisal and management plan;
- Overall settlement layout and relationship to established landscape setting;
- Historic pattern of thoroughfares, roads, paths and open spaces, where these provide evidence of the historic evolution of the settlement, and the historic street scene;
- Distinctive character zones within the settlement;
- Mix of building types and uses, if significant to the historic evolution of the settlement;
- Use of locally distinctive building materials, styles or techniques;
- Historic elevation features including fenestration, or shop fronts, where applicable;
- Significant trees, landscape features, boundary treatments, open space, and focal points; and
- Existing views and vistas through the settlement, views of the skyline and views into and out of the conservation area.

2 Within a conservation area, development proposals which involve the total or substantial demolition of buildings or structures will only be permitted where it is sufficiently demonstrated that:

- a) The current buildings or structures make no positive contribution to the special architectural or historic interest, character or appearance of the conservation area; and
- b) The replacement would make an equal or greater contribution to the character and appearance of the conservation area.

SUPPORTING TEXT

4.66 Information required to support a planning application should be proportionate to the nature of the development proposal and likely impact to be sufficient for the case officer to understand the impact of the proposals on the conservation area.

4.67 Reference to character zones relates to discrete character areas described within some individual conservation area appraisals.

4.68 Some historic settlements within the National Park are small or diffuse in nature. The conservation areas boundaries of these diffuse settlements may not reflect the broader heritage interest of their surrounds. This policy reflects the importance of setting and extends consideration to such locations.

GUIDANCE

- See Policy SDL6 Historic Environment and Cultural Heritage

EVIDENCE

- See Policy SDL6 Historic Environment and Cultural Heritage

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment and Cultural Heritage, SDL7 Listed Buildings, and SDL9 Archaeology.

Strategic Policy SDL9: Archaeology

Purpose of the Policy

The purpose of this policy is to set out more detailed criteria for development proposals affecting heritage assets with archaeological interest.

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'.

Policy SDL9: Archaeology

1 Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting (whether designated or undesignated). Sufficient information in a Heritage Impact Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development and any mitigation strategies on that significance;

2 There will be a presumption in favour of preservation in-situ for archaeological heritage assets and their setting of equivalent significance to Scheduled Monuments;

3 Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, and their setting, will only be permitted where there is a clear justification in terms of the significance of the asset, the scale of the harm, and public benefits arising from the development which outweigh that harm and, in the case of substantial harm/loss, also meet the following requirements:

- a) There is no less harmful viable option; and
- b) The amount of harm has been reduced to the minimum possible;

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required which must set out appropriate investigation, assessment, analysis, publication and archiving

of findings following any archaeology work, including appropriate public engagement.

SUPPORTING TEXT

4.69 Archaeological sites are part of the cultural heritage of the National Park, and are finite, irreplaceable and fragile resources which are vulnerable to damage, either from specific works or from gradual degradation over time. The most significant known archaeological heritage assets are usually designated as scheduled monuments and are of national or international importance. It should be noted that development which affects a scheduled monument and its setting will require permission from the Secretary of State.

4.70 It is widely recognised that there are sites which have equal significance, but which are non-designated heritage assets. In addition, there are many other archaeological sites which may not have significance equivalent to scheduled monuments, but which still form a valuable part of the National Park's historic environment and cultural heritage. There may also be archaeological sites of which nothing is presently known, which may be revealed during development works.

4.71 More information about Heritage Impact Statement requirements is set out in the supporting text for Strategic Policy SDL6: Historic Environment and Cultural Heritage. Planning decisions will take into account the significance of remains including the wider benefits that the conservation of the historic environment and cultural heritage can bring.

4.72 Preservation of archaeological assets in situ is the preferred position. Scheduled monuments and undesignated assets of equivalent significance are usually required to be preserved in situ. Where unavoidable harm or loss of archaeology is determined by the Authority to be justified as per criterion 3, it is required to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. Depending on the significance of the archaeology, public engagement to promote a wider understanding and appreciation of the site's archaeological heritage may be appropriate. However, the ability to record evidence of our past will not be a factor in deciding whether such loss should be permitted.

4.73 Case-by-case consideration will be given where heritage assets sit in areas which may experience impacts of climate change, such as cliff edges or flood zones. Where loss is inevitable, a managed process of recording and engagement should be undertaken.

4.74 The Written Scheme of Investigation (WSI) and all archaeological works is required to be undertaken to proper professional standards as defined by the Chartered Institute for Archaeologists (CIfA).

GUIDANCE

- Planning Practice Guidance
- Analysing Significance in Heritage Assets Historic England, Advice Note 12.
- Planning and Archaeology: Historic England Advice Note 17
- Historic England Collection 'Preservation in Situ' historicengland.org.uk/advice/technical-advice/archaeological-science/preservation-in-situ/
- Standard and guidance, for the creation, compilation, transfer and deposition of archaeological archives (Chartered Institute for Archaeologists, 2014) archaeologists.net/sites/default/files/2023-11/CIfA-SandG-Archaeological-Archives-2020.pdf
- Standards and Guidance in the Care of Archaeological Collections (Collections Trust, 2020) collectionstrust.org.uk/resource/standards-and-guidance-in-the-care-of-archaeological-collections/
- Professional Practice Paper: Delivering public benefit (Chartered Institute for Archaeologists, 2021) archaeologists.net/sites/default/files/2024-11/CIfA-Delivering-Public-Benefit_2021.pdf
- See also Policy SDL6 Historic Environment and Cultural Heritage

EVIDENCE

- See Policy SDL6 Historic Environment and Cultural Heritage

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment & Cultural Heritage, SDL7 Listed Buildings, SDL8 Conservation Areas.

NATURE AND CLIMATE

Strategic Policy SDN1: Nature Recovery

Purpose of the Policy

The purpose of this policy is to set a positive strategy for nature recovery across the National Park, aligning with Government's ambitions to deliver 30% of land managed for nature by 2030.

Local Plan Objectives

- 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.
- 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.
- 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.

Policy SDN1: Nature Recovery

- 1** Development proposals will be permitted where they conserve and enhance biodiversity, geodiversity, and soils, having particular regard to ecological networks and areas with high potential for priority habitat restoration or creation.
- 2** Prior to determination, an assessment informed by up-to-date ecological and/or other relevant information must be provided which demonstrates that development proposals:
 - a) Retain, protect and enhance features of biodiversity and geological interest (including green, blue and dark corridors, and other supporting habitat and commuting routes through the site), taking due account of any use by migratory species;
 - b) Contribute to nature recovery and climate change resilience through the restoration and enhancement of existing habitats, the creation of wildlife

rich habitats, and the creation of corridors through the development site. This should include linkages between habitats to create and enhance local and regional ecological networks, addressing habitat fragmentation and isolation effects. This should include consideration of artificial lighting constraints and opportunities. Such proposals should be suitable for the site conditions, be informed by and contribute to landscape and historic environment character and climate change adaptation;

- c) Conserve and support recovery of protected, priority, rare and notable species and habitats;
 - d) Protect the quality, integrity, biodiversity and carbon store of soils, with due regard to historically undisturbed soils, including avoiding and minimising significant disturbance of soils through site levelling or import or export of soils;
 - e) Seek to eradicate or control any invasive non-native species present on site;
 - f) Contribute to the delivery of and are consistent with relevant biodiversity plans, strategies and targets including Local Nature Recovery Strategies (LNRS), Species Recovery Strategies, Protected Sites Strategies, and Biodiversity Opportunity Areas (BOA) and are informed by the South Downs Landscape Character Assessment (LCA);
 - g) Ensure appropriate long-term management and maintenance of measures for biodiversity, geodiversity and soils; and
 - h) Comply with the mitigation hierarchy as set out in national policy.
- 3** Development proposals with the principal aim to conserve, enhance, restore or create biodiversity will be supported where consistent with landscape character.

Biodiversity Net Gain

- 4** Development proposals will be permitted where it is demonstrated that the proposals for Biodiversity Net Gain:
- a) Achieve a minimum of 20% Biodiversity Net Gain or a minimum of 33% Biodiversity Net Gain on Strategic Greenfield Sites;
 - b) Follow the mitigation hierarchy and ensure that the biodiversity net gain proposed is in addition to this;
 - c) Contribute to the delivery of ecological networks, green and blue infrastructure and nature recovery;

- d) Respond to the landscape, cultural heritage and ecological context of the site, and are informed by the South Downs Landscape Character Assessment (LCA)
- e) Seek to align with and meet the objectives and priorities of the relevant Local Nature Recovery Strategy; and
- f) Are feasible for the site and well designed for ecological functionality.

5 Development proposing the use of off-site biodiversity net gain should be delivered as close to the development site as possible, selecting locations within the South Downs National Park and preferably within the same landscape character type, as reflected in the South Downs Landscape Character Assessment (LCA).

6 For significant biodiversity net gain proposals, it must be demonstrated through a Habitat Management and Monitoring Plan, or equivalent document, that biodiversity net gain will be appropriately managed, maintained and funded for a minimum of 30 years after the completion of the development. This will be secured through a planning condition and/or planning obligation and will include a financial payment to cover the Authority's costs associated with the long-term compliance monitoring of the biodiversity net gain proposals.

SUPPORTING TEXT

4.75 Conserving and enhancing wildlife is integral to the first purpose of the National Park, and biodiversity and geodiversity of the National Park is a fundamental part of its landscape. Nature recovery also has a vital role in addressing climate change. It is therefore important that the integrity of the natural function of these features is conserved and enhanced. The SDNPA is committed to supporting delivery of the UK's international commitment to 30x30 as agreed at the UN Biodiversity Summit (COP15) in 2022 and enshrined in the 2023 Environmental Improvement Plan.

4.76 Development has an important role in contributing to nature recovery. Meaningful nature recovery in a protected landscape context can do this through a landscape-led (see policies SDL1 and SDL2) and regenerative approach (see policy SDC3). This means that the approach to nature in development, including Biodiversity Net Gain, uses good contextual design to enhance landscape character and has an overall positive impact on the environment by contributing to replenishing ecosystems and supporting self-sustaining and thriving ecosystems.

4.77 The South Downs National Park is covered by two Local Nature Recovery Strategies – one for Sussex (East and West combined) and one for Hampshire. These set out areas of current importance for biodiversity, and areas that could be important for biodiversity where nature could be both created and restored, along with measures for nature recovery. Where present other local strategies should inform development proposals such as the Brighton and Lewes Downs Biosphere Reserve and the South Downs Way Ahead Nature Improvement Area. Strategies in areas adjacent to the National Park that support landscape scale connectivity are also relevant, such as the Chichester Wildlife Corridors.

4.78 Some species have special protection under international and national legislation (such as the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017). Legally protected species which are prominent in the National Park, and which could be affected by new developments include but are not restricted to all wild birds, all native species of bat, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and licenses to be sought where necessary.

4.79 Great Crested Newts are fully protected under UK law, which makes it illegal to harm or move them, or damage their habitat, unless a licence is in place. South Downs National Park Authority holds a Great Crested Newt Organisational (or 'District') Licence granted by Natural England. The associated District Licensing Scheme, which is currently administered and managed by NatureSpace Partnership, provides an alternative licensing option for developers to address impacts on protected great crested newts by enabling a 'conservation payment' towards high quality habitat creation and long-term management and monitoring. In the District Licensing Scheme, developers can engage with NatureSpace at the pre-application stage or at the planning application stage. It is based on a great crested newt landscape-scale conservation strategy, which aims to focus the creation of new habitats where they will be of maximum benefit to the species, whilst also reducing risk and uncertainty through the planning process for developers and planning authorities. The strategy results in a range of other biodiversity benefits and contributes towards nature recovery at the landscape scale.

4.80 In the Planning and Infrastructure Act 2025 Government introduced the ability for Natural England to prepare Environmental Delivery Plans (EDPs) to address any impacts on habitats and species, and mitigation for Great Crested Newts is in scope for a future EDP. A Nature Restoration Fund is being set up to fund the actions required under the EDPs. If an EDP is approved for Great Crested Newts, and a developer commits to paying a Levy into the Fund, then this will replace the requirements of the District Licensing Scheme.

4.81 Priority species are identified under Section 41 of the Natural Environment & Rural Communities (NERC) Act as of principle importance for the purpose of conserving biodiversity in England. The Sussex Biodiversity Records Centre and Hampshire Biodiversity Information Centre also hold information for rare and notable species in the National Park.

4.82 Integrated wildlife spaces such as bat boxes, swift bricks, and bee bricks can make a valuable contribution in conserving and enhancing biodiversity for a variety of species. Provision of integrated wildlife spaces for species appropriate to the area and well designed for the relevant species are encouraged. Any new habitat creation on development needs to be complemented by suitable nearby foraging habitat for birds and bats, as well as lighting schemes that avoid disrupting behaviours.

4.83 If eradication of non-native invasive species is demonstrably not feasible then proposals should show how the invasive non-native species will be suitably managed on an ongoing basis. Working practices shall also ensure that the spread of invasive non-native species is prevented.

4.84 The Government has produced considerable guidance on the statutory requirements for Biodiversity Net Gain (BNG). In addition, the SDNPA has produced a BNG Technical Advice Note (TAN) about how meaningful BNG should be achieved the protected landscape context of the National Park.

4.85 It is possible that interventions for nature on a site can deliver more than one requirement, for example mitigation as well as BNG enhancements. This is sometimes known as ‘stacking’ or ‘additionality’. It is important to note that any mitigation and/or compensation requirements for ‘Habitats Sites’, other statutory designated sites or irreplaceable habitats must be addressed fully in addition to biodiversity net gain provision.

4.86 Some forms of environmental improvement or enhancement may not be compatible with aviation safety. This can include the introduction of tall structures

(whether temporary or permanent), the introduction of open water that could increase the risk of bird strike, or the position of plants or trees including creating a dense canopy. Where these falls within statutory safeguarding zones, the Ministry of Defence should be consulted.

GUIDANCE

- Biodiversity Net Gain Technical Advice Note (SDNPA, 2025)
- Defra Guidance – Biodiversity Net Gain – [gov.uk/government/collections/biodiversity-net-gain](https://www.gov.uk/government/collections/biodiversity-net-gain)
- Hampshire LNRS hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy
- Sussex LNRS sussexnaturerecovery.org.uk/
- Government Guidance on Biodiversity Net Gain [gov.uk/government/collections/biodiversity-net-gain](https://www.gov.uk/government/collections/biodiversity-net-gain)
- List of priority habitats and species in England (‘Section 41 habitats and species’) for public bodies, landowners and funders to use for biodiversity conservation (Defra and Natural England) [gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england)
- The Environmental Targets (Biodiversity) (England) Regulations 2023 Schedule 1 [legislation.gov.uk/uksi/2023/91/schedule/1/made](https://www.legislation.gov.uk/uksi/2023/91/schedule/1/made)
- South Downs Nature Recovery advice webpages southdowns.gov.uk/nature-recovery-information-for-delivery-partners/
- South Downs Nature Recovery by Landscape Type southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/
- NatureSpace Partnership naturespaceuk.com/
- Defra Policy Paper ‘30by30 on land in England: confirmed criteria and next steps’ (Defra, 2024) [gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps](https://www.gov.uk/government/publications/criteria-for-30by30-on-land-in-england/30by30-on-land-in-england-confirmed-criteria-and-next-steps)

EVIDENCE

- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-

[conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/](#)

- Whole Plan Viability Study (2026)
- Hampshire Biodiversity Information Centre hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre
- Sussex Biodiversity Records Centre sxbrc.org.uk/home/
- Chichester Wildlife Corridors Background Paper (Chichester District Council, 2018) chichester.gov.uk/media/31016/Local-Plan-Review-Background-Paper-Strategic-Wildlife-Corridors/pdf/Local_Plan_Review_Background_Paper.pdf?m=1603298085947
- Defra Environment Improvement Plan (2025) gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025#chapter-1-restored-nature
- South Downs State of the Park Report (SDNPA, 2024) southdowns.gov.uk/national-park-authority/our-work/partnership-management/state-of-the-park-report-2024/

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development and Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL5 Dark Night Skies, SDN2 Designated Sites Hierarchy, SDN3-SDN7 Specific International Sites policies, SDN8 Trees, Woodlands and Hedgerows, SDW1 Protection of the Water Environment, SDG2 Green Infrastructure.

Strategic Policy SDN2: Designated Sites Hierarchy

Purpose of the Policy

The purpose of this policy is to set out the hierarchy of designated sites and how these will be appropriately assessed and protected.

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.

SDN2: Designated Sites Hierarchy

1 Development proposals that could impact on designated sites or irreplaceable habitats will be permitted where it is demonstrated where there will be no adverse impact on the conservation status of designated sites, and no net loss or deterioration of key habitats that form part of the designation and enhancement of the relevant habitats achieved, taking into account relevant Local Nature Recovery Strategies, Species Recovery Strategies and Protected Sites Strategies. The following hierarchy of site designation will apply in the determination of development proposals:

- a) Internationally Protected Sites, as shown on the Policies Map (SPAs, SACs and Ramsar Sites, candidate and formally proposed versions of these designations, and including compensatory habitats for internationally protected sites). Development proposals with the potential to impact on one or more international sites(s), including compensatory habitat for internationally protected sites, will be refused unless;
 - i. A Habitats Regulations Assessment (HRA) has concluded that the proposal will not have likely significant effects (either individually or in combination with other developments); or
 - ii. An Appropriate Assessment has concluded there will be no adverse effect on the integrity of the site, including taking into account mitigation to address the impact such as that set out in policies SDN3-7; or

- iii. The impact of the development is being addressed through an approved Environmental Delivery Plan and the developer has committed to paying the Nature Restoration Levy; or
 - iv. It has been demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured.
- b) Nationally Protected Sites SSSI, NNRs, MCZ as shown on the Policies Map:
- i. Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an Environmental Impact Assessment (EIA);
 - ii. Development proposals should avoid impacts on these nationally protected sites. Development proposals where any adverse effect on the site's notified special interest features is likely and which cannot be either avoided or adequately mitigated will be refused, unless the benefits of the development, at this site clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites.
- c) Irreplaceable Habitats as defined by national policy (including ancient woodland as shown on the Policies Map, and ancient or veteran trees):
- i. Development proposals which result in the direct or indirect loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will be refused unless there are wholly exceptional reasons and a suitable and achievable compensation strategy exists;
 - ii. Development proposals must provide adequate protection zones and buffers for irreplaceable habitat.
- d) Locally Protected Sites (Sites of Nature Conservation Importance (SNCI)/ Local Wildlife Sites (LWS)/Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR) and Local Geodiversity Sites (LGS)) as shown on the Policies Map:
- i. Development proposals considered likely to have a significant potential positive or negative impact on local sites will be required to assess the impact by means of an Ecological Impact Assessment (EclA);

- ii. Development proposals should ensure that locally designated sites are safeguarded from harm or loss. Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the adverse effects are clearly demonstrated and the impacts can be adequately compensated.
- e) *Outside of designated sites*
- i. Development proposals should identify and incorporate opportunities to conserve, restore and recreate wildlife rich habitats including priority habitats and ecological networks.
 - ii. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies, including relevant Local Nature Recovery Strategies.

SUPPORTING TEXT

4.87 The National Park benefits from a large number of sites designated for the wildlife and biodiversity value and irreplaceable habitats. Irreplaceable habitats are defined in the National Planning Policy Framework and in the glossary to this Local Plan. In addition to the requirements set out in this policy, the requirements of SDN1 Nature Recovery are also relevant and should be read together.

4.88 Policies SDN3-7 set out specific requirements for development in the National Park in relation to particular Internationally Designated Sites. The areas of the National Park where these policies apply are shown on the Policies Map.

4.89 In the Planning and Infrastructure Act 2025 Government introduced the ability for Natural England to prepare Environmental Delivery Plans (EDPs) to address any impacts on habitats and species including Internationally Designated Sites. A Nature Restoration Fund is being set up to fund the actions required under the EDPs. Nutrient Neutrality areas are in scope for the first generation of EDPs, including The Solent and The Itchen area which covers the western part of the National Park. If an EDP is approved for this area, and a developer commits to paying a Levy into the Fund, then this will replace the requirement to carry out an Appropriate Assessment under the Habitats Regulations and any need for mitigation under SDN7.

4.90 In addition to the range of nature conservation designations and irreplaceable habitats, there are other areas of the National Park which are not subject to statutory

nature conservation designation or legal protection, but which form an important element of the collective nature conservation resource. These are crucial to the Government’s objective in the Environment Improvement Plan: ‘Goal 1 – Restored Nature– We will create a network of bigger, better and more resilient habitats to help nature thrive’ and contribute towards a net gain for biodiversity.

4.91 These include wildlife rich, priority habitats, non-statutory designations and areas of opportunity for nature such as areas identified in Local Nature Recovery Strategies, the Brighton and Lewes Downs Biosphere Reserve and the South Downs Way Ahead Nature Improvement Area. Strategies in areas adjacent to the National Park that support landscape scale connectivity are also relevant, such as the Chichester Wildlife Corridors. Features, like rivers, mature trees and hedgerows, extend across designated and non-designated areas and are also important in providing corridors or stepping stones for species and to allow species to adapt to climate change. The maintenance and enhancement of these networks will be encouraged. Brownfield land can also be of important ecological value. These undesignated biodiversity assets are important components of GI.

4.92 The term ‘wildlife-rich habitat’ is defined in the glossary. Areas with high connectivity and/or high potential for priority habitat restoration or creation will be given due weight in the planning process.

GUIDANCE

- Guidelines for Ecological Impact Assessment (EclA) (CIEEM, 2024) [cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/](https://www.cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/)
- CIEEM EclA Checklist (CIEEM and ALGAE, 2019) [cieem.net/resource/ecological-impact-assessment-ecia-checklist/](https://www.cieem.net/resource/ecological-impact-assessment-ecia-checklist/)
- MHCLG Guidance– Environmental Impact Assessment [gov.uk/guidance/environmental-impact-assessment](https://www.gov.uk/guidance/environmental-impact-assessment)
- Defra Guidance– Habitats regulations assessments: protecting a European site [gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site](https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site)
- Defra Guidance – Irreplaceable Habitats [gov.uk/guidance/irreplaceable-habitats](https://www.gov.uk/guidance/irreplaceable-habitats)
- Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Natural England and Forestry Commission) [gov.uk/guidance/](https://www.gov.uk/guidance/)

ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions

- List of priority habitats and species in England (‘Section 41 habitats and species’) for public bodies, landowners and funders to use for biodiversity conservation (Defra and Natural England) [gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england)
- The Environmental Targets (Biodiversity) (England) Regulations 2023 Schedule 1 legislation.gov.uk/uksi/2023/91/schedule/1/made

EVIDENCE

- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- Habitats Regulations Assessment (AECOM) for the South Downs Local Plan 2042.
- Hampshire LNRS hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy
- Sussex LNRS sussexnaturerecovery.org.uk/
- Hampshire Biodiversity Information Centre hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre
- Sussex Biodiversity Records Centre sxbrc.org.uk/home/
- Chichester Wildlife Corridors Background Paper (Chichester District Council, 2018) [chichester.gov.uk/media/31016/Local-Plan-Review-Background-Paper-Strategic-Wildlife-Corridors/pdf/Local_Plan_Review_Background_Paper.pdf?m=1603298085947](https://www.chichester.gov.uk/media/31016/Local-Plan-Review-Background-Paper-Strategic-Wildlife-Corridors/pdf/Local_Plan_Review_Background_Paper.pdf?m=1603298085947)
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/
- Defra Environment Improvement Plan (2025) [gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025#chapter-1-restored-nature](https://www.gov.uk/government/publications/environmental-improvement-plan-2025/environmental-improvement-plan-eip-2025#chapter-1-restored-nature)

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Design, SDL1: Landscape Character, SDN1 Nature Recovery, SDN3-7 International Sites, SDN8 Trees, Woodlands and Hedgerows.

Strategic Policy SDN3: The Sussex Bats Special Areas of Conservation (SACs)

Purpose of the Policy

The purpose of this policy is to set specific requirements relating to The Mens Special Area of Conservation (SAC), Ebernoe Common SAC and Singleton & Cocking Tunnels SAC as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of these habitats sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 (as amended).

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.

SDN3: The Sussex Bats Special Areas of Conservation (SACs)

1 Development proposals on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat (including grassland and mature vegetative linear features such as woodlands, hedgerows, riverine and wetland habitats) within the ranges of The Mens SAC, Ebernoe Common SAC and Singleton & Cocking Tunnels SAC set out in a) and b) and as shown on the Policies Map, should have due regard to the possibility that Barbastelle and Bechstein's Bats will be utilising the site. Such proposals will be required to undertake robust surveys and an ecological assessment of direct and indirect impacts to the key features (such as foraging habitat and commuting routes). This shall include details of the measures proposed to avoid and/or fully mitigate any identified harm to ensure these features are conserved and enhanced, provide a suitable buffer to safeguard against disturbance, and take opportunities for characteristic habitat creation to link flightlines and features.

a) *6.5km: Key conservation area – all impacts to bats must be considered given that habitats within this zone are considered critical for sustaining the populations of bats within the SACs; and*

b) *12km: Wider conservation area – significant impacts or severance to flightlines to be considered.*

2 Proposed use or development of the tunnels comprising the Singleton & Cocking Tunnels SAC will be required to demonstrate that there is no adverse effect on the interest features, including hibernation habitat for Barbastelle and Bechstein's Bats, or on the integrity of the site.

SUPPORTING TEXT

4.93 The approach to conservation mitigation, enhancement and habitat creation measures, including the scale of the buffer to safeguard against disturbance, will need to be determined on a case-by-case basis, informed by best practice, guidance and bat activity survey work. It shall take account of the species involved and their sensitivity to disturbance/artificial lighting, the natural screening provided by existing surrounding vegetation, and landscape character. It would need to be devised in consultation with the SDNPA (in addition to Natural England, as required). Further guidance on the zones outlined in the policy can be found in the Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol, also referred to as 'The Bat Protocol'.

4.94 All bats, and their breeding and resting places, irrespective of whether they fall within the boundary of the SAC of its buffer zone, are protected in their own right as a European protected species under the Conservation of Habitats and Species Regulations 2017 (as amended) and also the Wildlife and Countryside Act 1981 (as amended). Strategic Policy SDN1 includes a requirement to conserve and support the recovery of protected species. Further details can be found in Natural England's standing advice regarding bats.

GUIDANCE

- Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol 'The Bat Protocol' southdowns.gov.uk/wp-content/uploads/2018/04/TLL-15-Draft-Sussex-Bat-SAC-Protocol.pdf
- South Downs Habitats Regulations Assessment Technical Advice Note (to be updated).
- Natural England Standing Advice: Bats: advice for making planning decisions. gov.uk/guidance/bats-advice-for-making-planning-decisions

- Bat Conservation Trust Guidance bats.org.uk/resources/guidance-for-professionals including:
 - Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)
 - Landscape and Urban Design for Bats and Biodiversity (2012)
 - Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23
- Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield cieem.net/resource/uk-bat-mitigation-guidelines-2025/

EVIDENCE

- Habitats Regulations Assessment for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (AECOM, 2026)
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development and Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDN1 Nature Recovery, SDN2 Designated Sites Hierarchy, SDN8 Trees Woodlands Hedgerow and Scrub, SDW1 Protection of the Water Environment.

Strategic Policy SDN4: The Arun Valley Special Protection Area (SPA)

Purpose of the Policy

The purpose of this policy is to set specific requirements relating to The Arun Valley Special Protection Area (SPA) as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of this habitat site, in line with the requirements of the Conservation of Habitats and Species Directive 2017 (as amended).

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.

Policy SDN4: The Arun Valley Special Protection Area (SPA)

1 Development proposals on greenfield sites within 6.5km of the Arun Valley SPA, as shown on the Policies Map, must undertake an appraisal as to whether the land is suitable for wintering Bewick's swan. If it is suitable then appropriate surveys must be undertaken to determine whether the fields are of importance to the swan population. If so, and likely significant adverse effects on the designated site cannot be avoided, development proposals must demonstrate through a project-level Habitats Regulations Assessment that effects are adequately mitigated to ensure that no adverse effects on the integrity of the Arun Valley SPA and Ramsar site result.

2 Mitigation for the loss of functionally linked land in the form of appropriate alternative habitat is to be agreed with the Local Planning Authority and Natural England and delivered before development proceeds.

SUPPORTING TEXT

4.95 The Arun Valley SPA is designated for its wintering population of Bewick's swan. Bewick's swans frequently feed on suitable farmland up to 5km from the designated site and therefore suitable fields within 6.5km of the SPA could constitute important

supporting habitat if they support a large enough percentage of the SPA population on a regular basis. It is important that sites suitable for overwintering Bewick's swans are not avoidably lost. Should an alternative habitat be proposed to mitigate for the loss of the development site then it needs to be demonstrated as being suitable and be delivered before development commences so there is no period when Bewick's swans returning to overwintering grounds in the Arun Valley find that there is no suitable habitat to inhabit.

GUIDANCE

- South Downs Habitats Regulations Assessment Technical Advice Note (to be updated).
- Natural England Standing Advice: Wild birds: advice for making planning decisions [gov.uk/guidance/wild-birds-advice-for-making-planning-decisions](https://www.gov.uk/guidance/wild-birds-advice-for-making-planning-decisions)

EVIDENCE

- Habitats Regulations Assessment for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (AECOM, 2026)
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/

SEE OTHER RELEVANT POLICIES INCLUDING

SDN1 Nature Recovery and SDN2 Designated Sites Hierarchy

Strategic Policy SDN5: Wealden Heaths Complex

Purpose of the Policy

The purpose of this policy is to set specific requirements relating to the Wealden Heaths complex of international sites as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of these habitat sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 (as amended).

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.

Policy SDN5: Wealden Heaths Complex

- 1** Development proposals resulting in a net increase in residential units within the 0– 400m 'exclusion zone' from the boundary of the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC boundaries as shown on the Policies Map, will not be permitted unless in exceptional circumstances where an Appropriate Assessment demonstrates that development would not have an adverse effect on the integrity of the designated sites and has been agreed by the Local Planning Authority in consultation with Natural England.
- 2** Development proposals resulting in a net increase in residential units within the 400m– 5km zone from the boundary of the Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC as shown on the Policies Map must demonstrate that development would not have adverse effect on the integrity of the designations and recreational disturbance impacts are satisfactorily mitigated through:
 - a) A financial contribution to the delivery of strategic mitigation through the Wealden Heaths Strategic Access Management and Monitoring (SAMM) Strategy; and

b) Where development proposals are for a net increase in residential units of 50 or more, the provision of Suitable Alternative Natural Green Space (SANG), or a financial contribution to a strategic SANG, which is acceptable to provide mitigation for the development, is agreed with the Local Planning Authority and Natural England, in place prior to occupation, and provided in perpetuity.

3 In the absence of a financial contribution toward SAMM mitigation, an Appropriate Assessment is required to demonstrate that any 'in combination' impacts which are likely to have an adverse effect on integrity can be avoided or can be satisfactorily mitigated through a developer-provided package of measures as agreed with the Local Planning Authority and Natural England. The agreed measures shall be in place prior to occupation and provided in perpetuity.

SUPPORTING TEXT

4.96 The Wealden Heaths complex of international sites comprises the Thursley, Hankley and Frensham Commons (Wealden Heaths Phase I) Special Protection Area (SPA), Wealden Heaths Phase II SPA, Woolmer Forest Special Area of Conservation (SAC), Shortheath Common SAC, and Thursley & Ockley Bogs Ramsar. There are a range of potential impacts arising from urbanisation and recreation pressures from increases in residential development in the area. It is necessary for adverse impacts on the integrity of the designated sites arising from net increases in residential development to be avoided and suitability mitigated.

4.97 Two zones surrounding the Wealden Heaths complex of sites are identified and shown on the Policies Map. The zones are defined in a straight line from the edge of the designated sites. The 0 – 400m zone is an exclusion zone and development for new residential units will generally not be permitted because mitigation measures are unlikely to be capable of protecting the integrity of the designated sites. Evidence for the previous Local Plans for South Downs National Park Authority and East Hampshire District Council identified an allowance of development that could safely come forward. There is no more remaining in the allowance which has been fully utilised by planning permissions and an allocation which is carried forward in this Local Plan (SDA37). In the 400m – 5km zone, a net increase in development must provide mitigation as outlined in this policy.

4.98 The SDNPA, East Hampshire District Council, and Waverley Borough Council, with the input of Natural England, have developed this policy approach and are currently developing a Strategic Access Management & Monitoring Strategy

(SAMM). Footprint Ecology were commissioned jointly by the authorities to provide a report outlining a suitable SAMM for the Wealden Heaths Complex. This will inform ongoing work on governance arrangements and the development of a finalised strategy as Local Plans for the authorities are progressed. It is intended that a SAMM strategy will be finalised for submission of this Local Plan for examination.

4.99 The term 'residential units' also includes Gypsy, Traveller and Travelling Showpeople pitches or plots, student accommodation, and development which leads to a permanent residency such as hotels which have permanent staff accommodation. The definition may include residential institutions, such as care homes, and holiday dwellings may be within scope and will be considered on a case-by-case basis.

Insert development contributions for the mitigation strategy once known.

GUIDANCE

- South Downs Habitats Regulations Assessment Technical Advice Note (to be updated).
- Joint Wealden Heaths Phase II Special Protection Area' Supplementary Planning Document (East Hampshire District Council and South Downs National Park Authority, 2018) southdowns.gov.uk/wp-content/uploads/2018/08/Joint-Wealden-Heaths-Phase-II-SPA-SPD-July-2018.pdf

EVIDENCE

- Habitats Regulations Assessment for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (AECOM, 2026)
- Wealden Heaths Strategic Access Management and Monitoring (SAMM) Strategy (Footprint Ecology, 2026)
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/

SEE OTHER RELEVANT POLICIES INCLUDING

SDN1 Nature Recovery and SDN2 Designated Sites Hierarchy

Strategic Policy SDN6: The Solent Coast Special Protection Areas (SPAs)

Purpose of the Policy

The purpose of this policy is to set specific requirements relating to The Solent Coast Special Protection Areas (SPAs) as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan to ensure that development proposals will not have an adverse effect on the integrity of these habitat sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 (as amended).

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.

Policy SDN6: The Solent Coast Special Protection Areas (SPAs)

1 Development proposals resulting in a net increase in residential units, within the Solent Coast SPAs (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA) zone of influence shown on the Policies Map, defined as 5.6km from the boundary of these sites, will be permitted where 'in combination' effects of recreation on the Solent Coast SPAs are satisfactorily mitigated through the provision of an appropriate financial contribution to the delivery of strategic mitigation through the Bird Aware Solent Strategy. Some other types of development (such as care homes, student accommodation) may also need to address recreational disturbance both alone and in-combination and this development will be assessed on a case-by-case basis.

2 In the absence of a financial contribution toward mitigation, an appropriate assessment is required to demonstrate that any 'in combination' impacts which are likely to have a significant adverse effect can be avoided or can be satisfactorily mitigated through a developer-provided package of measures and agreed with the Local Planning Authority and Natural England, in place prior to occupation and provided in perpetuity.

SUPPORTING TEXT

4.100 The Solent Coast Special Protection Areas (SPAs) comprise Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA. These SPAs are designated for their bird species. Each winter, more than 125,000 waders and wildfowl travel thousands of miles to the Solent coast from their summer breeding grounds. During the summer, several protected species choose to breed and raise their chicks on these shores. These protected bird species are vulnerable to disturbance from recreation activity (such as dog walking).

4.101 The SDNPA is part of the Solent Recreation Mitigation Partnership. The SDNPA has worked with the Partnership to form the Bird Aware Solent Strategy which provides a strategic mitigation solution to address impacts associated with recreational pressure from increase in residential development within 5.6km (the 'zone of influence') of the Solent Coast SPAs. A small part of the SDNPA falls within this 5.6km zone. All new residential development in this zone will be required to mitigate the negative impact.

4.102 The Bird Aware Solent Strategy is well established having been in place for several years. The strategy is regularly reviewed and was most recently updated in 2024. Within the 5.6km area there are two zones and two corresponding charging schedules, reflecting the different costs for those developments needing to mitigate for overwintering and breeding birds, and those only needing to mitigate for overwintering birds. These zones are shown on the Policies Map.

4.103 The baseline developer contributions, payable to the South Downs National Park Authority, is charged on a sliding scale based upon bedroom numbers per dwelling. These figures are increased on 1 April each year in line with the Retail Price Index. The contributions payable from 1 April 2026 for 2026/27 are:

Bedroom Size	All Year	Winter Only 1	Summer Only 2
1	£501	£451	£201
2	£723	£651	£290
3	£942	£848	£377
4	£1108	£998	£444
5+	£1299	£1170	£520
Flat Fee3	£836	£753	£335

1 Homes within ‘winter only’ zone of SPA with winter only obligations – applies to less than 1% of all applications, and these will be based within a small section of Winchester, Fareham and Gosport only.

2 Applies to the likes of caravans and camp sites which seek only operate between 1st April and 30th September.

3 Usually only used in cases of caravans, tents or gypsy and traveller sites.

GUIDANCE

- South Downs Habitats Regulations Assessment Technical Advice Note (to be updated).
- South Downs webpage setting out the latest developer contributions requirements for Bird Aware Solent southdowns.gov.uk/community-infrastructure-levy/cil-and-s106-rates/solent-recreation-mitigation-strategy-developer-contributions/

EVIDENCE

- Habitats Regulations Assessment for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (AECOM, 2026)
- Bird Aware Solent Revised Strategy (September 2024) birdaware.org/solent/wp-content/uploads/sites/2/2025/02/BAS-five-year-strategy-proposals.pdf
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/

SEE OTHER RELEVANT POLICIES INCLUDING

SDN1 Nature Recovery and SDN2 Designated Sites Hierarchy

Strategic Policy SDN7: Nutrient Neutrality

Purpose of the Policy

The purpose of this policy is to set specific requirements relating to the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites of the Solent Coast and River Itchen, as recommended by the Habitats Regulations Assessment that accompanies the South Downs Local Plan, to ensure that development proposals will not have an adverse effect on the integrity of these habitat sites, in line with the requirements of the Conservation of Habitats and Species Directive 2017 (as amended).

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.

Policy SDN7: Nutrient Neutrality

1 Development involving an overnight stay (including dwellings, Gypsy, Traveller and Travelling Showpeople plots and pitches, and all forms of holiday accommodation), and tourism attractions that could bring visitors from outside the catchment, will be required to demonstrate that there will be no adverse effect on the integrity of the SPAs, SACs and Ramsar sites of the Solent and River Itchen. They shall do this by being nutrient neutral for the lifetime of the development, in accordance with guidance provided by Natural England and supported by a nutrient budget using the most up-to-date Natural England calculator, through:

- a) A financial contribution towards a strategic mitigation scheme, and/or
- b) A developer-provided on-site solution agreed with Natural England.

2 Other development proposals may impact the water quality of the SPAs, SACs and Ramsar sites of the Solent and River Itchen and these must demonstrate that adverse effects on the integrity of these designated sites are avoided, suitably mitigated, or as a last resorted compensated for. Such development proposals will be assessed on a case-by-case basis.

3 A project-level Habitats Regulations Assessment is required for development proposals in the River Meon catchment, as shown on the Policies Map, to establish whether phosphorous mitigation is required on a case-by-case basis.

4 Development proposals for mitigation must be agreed with the Local Planning Authority and Natural England and will be supported where they are located in the relevant catchment in relation to the development they are to serve, conserve and enhance landscape character, and take opportunities to deliver wider environmental benefits such as for biodiversity, making a positive contribution to the ecological network.

SUPPORTING TEXT

4.104 In 2019 Natural England advised that there was a risk of significant effects to international designated habitat sites in the Solent and Itchen catchments from development sites. Poor water quality due to nutrient enrichment from elevated nitrogen and phosphorus levels is one of the primary reasons for these sites being in unfavourable condition. Residential development, including new homes and other uses that provide overnight accommodation, can potentially have an adverse impact because of the wastewater they generate. As shown on the Policies Map, three river catchments are affected in the South Downs National Park: the Test & Itchen Catchment, the East Hampshire Catchment and the Western Streams Catchment.

4.105 Mitigation through nutrient neutrality is where developers offset calculated increase in nutrient load from their developments by providing or contributing to measures that reduced nutrients going into watercourses in other areas, typically by reducing chemical inputs on farmland by changing the management and/or use of that land, and can include suitable Sustainable Drainage Systems (SuDS) on site. There are a range of offsetting schemes that are active and providing mitigation for development across the catchments. These can be found the South Downs National Park website and the Partnership for South Hampshire website.

4.106 The latest Natural England guidance on achieving nutrient neutrality for new housing development and the latest nutrient calculators for the relevant catchment should always be used to ensure the most recent information and requirements are addressed by development proposals. A bespoke method to calculating nutrient neutrality may be required in circumstances where the Natural England calculators are not appropriate for the nature of the development proposals.

4.107 On 19 December 2025, Natural England notified the Secretary of State that it has decided to prepare 23 Environmental Delivery Plans (EDPs) in England. This includes the preparation of 16 EDPs relating to catchments of habitat sites which are being adversely affected by nutrient pollution, including The Solent and The Itchen. The SDNPA supports joint work on EDPs, and it is important that any EDP for the Solent and The Itchen catchments supports the existing mitigation strategies that are successfully mitigating new development in this area.

4.108 There may be individual cases where planning applications for new commercial or industrial development such as waste management facilities, road schemes or changes in agricultural practices could have other (non- sewerage) water quality implications. In these situations, a case-by-case approach will be adopted. Early discussions with Natural England via their chargeable Discretionary Advice Service (DAS) are recommended.

4.109 Southern Water is delivering compensatory measures for the adverse effects on the integrity of the River Itchen Special Area of Conservation (SAC) that abstraction in their Drought Plan is predicted to have. This is compensatory habitat for Atlantic salmon and the chalk stream habitat within and around the River Meon, which sits within the South Downs National Park and meanders through East Meon, West Meon, down through Warnford, Droxford and out of the SDNP at Wickham. The role of the River Meon as compensatory habitat for the River Itchen SAC means that it must also be considered as if it was an SAC. Although the Meon catchment is already included within the Solent nitrogen nutrient neutrality framework, there is presently no equivalent requirement for phosphorus neutrality. The Habitats Regulation Assessment recommends that a project-level Habitats Regulations Assessment is undertaken for development proposals in the River Meon catchment to establish on a case-by-case basis whether phosphorous mitigation is required.

GUIDANCE

- South Downs Habitats Regulations Assessment Technical Advice Note (to be updated).
- NE Collection: Tools and resources for calculating nutrient neutrality [gov.uk/government/collections/tools-and-resources-for-calculating-nutrient-neutrality](https://www.gov.uk/government/collections/tools-and-resources-for-calculating-nutrient-neutrality)
- NE and Defra Guidance: Using the nutrient neutrality calculators [gov.uk/guidance/using-the-nutrient-neutrality-calculators](https://www.gov.uk/guidance/using-the-nutrient-neutrality-calculators)

- Nutrient Neutrality Principles (TIN186) publications.naturalengland.org.uk/publication/5031421117988864
- Natural England Water Quality and Nutrient Neutrality Advice (16 March 2022) (NE785) publications.naturalengland.org.uk/publication/4792131352002560

EVIDENCE

- Habitats Regulations Assessment for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (AECOM, 2026)
- Nutrient Budget for the Proposed Submission (Regulation 19) South Downs Local Plan 2042 (Partnership for South Hampshire, 2026)
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/
- South Downs Landscape Character Assessment (South Downs National Park Authority, 2020) southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/south-downs-landscape-character-assessment-2020/
- South Downs Green Finance brokerage service for developers looking to buy credits for nutrient neutrality and biodiversity net gain. southdowns.gov.uk/renature-credits/buy-renature-credits/
- Partnership for South Hampshire webpages on Nutrient Neutrality push.gov.uk/our-partnership-and-nutrient-neutrality/

SEE OTHER RELEVANT POLICIES INCLUDING

SDN1 Nature Recovery and SDN2 Designated Sites Hierarchy

Strategic Policy SDN8: Trees, Woodland, Hedgerows and Scrub

Purpose of the Policy

The purpose of this policy is to ensure the management, including conservation and enhancement, of existing trees, woodlands, hedgerows, and, where it is consistent with and makes a positive contribution to landscape and biodiversity, scrub. It also seeks to ensure that opportunities for restoration and establishment of new trees, woodland, hedgerow and scrub is realised to support nature recovery and local character.

Local Plan Objectives

- 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.
- 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.

SDN8: Trees, Woodland, Hedgerows and Scrub

- 1** Development proposals will be permitted where they conserve and enhance trees, hedgerows, woodlands and, where it makes a positive contribution, scrub.
- 2** Development proposals that affect trees, hedgerows, woodland must demonstrate that they have been informed by a full site survey, including an appropriate Ecological Survey, Tree Survey and Arboricultural Impact Assessment, and associated Arboricultural Method Statement and Tree Protection Plan according to BS5837, and include a management plan.
- 3** Where scrub is present on site, a suitable assessment must be made of the quality and importance of that scrub for biodiversity and landscape character. Loss or harm to scrub which makes a positive contribution to biodiversity and is consistent with landscape character should be avoided in accordance with the mitigation hierarchy. Where it is evidenced that removal of scrub would be desirable for nature conservation and landscape character reasons, this will be supported.

4 The removal, loss or deterioration of protected trees, groups of trees, woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy, and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.

5 Development proposals must demonstrate provision of adequate protection zones and buffers around hedgerows, woodland and trees to prevent damage to root systems and taking account of future growth, including:

- a) A minimum buffer of 15 metres will be required between the development and ancient woodland or other priority habitat woodland. For ancient trees, or veteran trees including those on a woodland boundary, the buffer zone should be at least 15 times larger than the diameter of the tree at 1.5 metres height above ground, or at least 5 metres from the edge of the canopy, whichever is greater.
- b) It must be demonstrated that any buffer is suitable to retain the natural growing processes and minimise indirect impacts throughout the life of the proposal. Where assessment shows other adverse impacts are likely to extend beyond this distance during or following works, the proposal is likely to need a larger buffer zone.
- c) The area within 50 metres of ancient woodland will be considered as an ancient woodland vulnerability zone, and development proposals within this area must have special regard to ancient woodland and demonstrate how proposals will avoid and mitigate impacts on the ancient woodland.

6 A proposed loss or damage of non-protected trees, woodlands, community orchards, or hedgerows, should be avoided, especially those identified as Category A in a BS5837 tree survey. If demonstrated as being unavoidable, appropriate replacement or compensation will be required, including an overall net gain where feasible, and opportunities should be taken to reuse wood on site as part of the public realm or deadwood for biodiversity. Opportunities should be taken to retain existing deadwood, especially standing deadwood, on site, except where an unacceptable level of wildfire risk is identified by an authoritative agency such as the Fire & Rescue Service.

7 Development proposals must demonstrate that appropriate protection measures for existing and proposed trees, woodlands, and hedgerows are in

place prior to any work on site throughout the development process as part of a comprehensive landscaping comprehensive landscaping plan, arboricultural impact assessment, and tree protection plan according to BS5837, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, hedgerows are identified and incorporated.

8 Opportunities should be identified and incorporated for natural regeneration, restoration or planting of new trees, woodlands, and hedgerows that increase tree canopy or enhancement of ecological connectivity with the surrounding landscape. Establishment of new planting, including species selection and design, should be suitable for the site conditions, and those predicted to occur in the future due to climate change, use native species where appropriate, contribute to climate change adaptation, be informed by and contribute to local character and the historic environment, and enhance or create new habitat linkages. New streets should be tree-lined.

SUPPORTING TEXT

4.110 The South Downs is the most wooded national park in England and Wales. The trees and woodland are significant features of the landscape (including townscape) of the National Park, with a high proportion of ancient and veteran trees. Trees and woodland are a significant asset for ecosystem services and for adaptation to climate change, for example, trees can moderate summer temperatures and when planted in well-chosen locations can stabilise slopes and reduce the impacts of flooding.

4.111 All development must be undertaken in line with the British Standard 5837 and all tree works must be carried out in accordance with British Standard 3998.

4.112 All development proposals are required to demonstrate adequate protection zones and buffers around hedgerows, woodland and trees to prevent damage to root systems and taking account of future growth. However, as ancient woodland and ancient and veteran trees are recognised as an irreplaceable habitat, some specific requirements are set out. Development is expected to, in the first instance, avoid any negative effects on ancient woodland or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. To mitigate negative impacts, a buffer zone of a minimum of 15 metres, consisting of semi-natural habitat should be employed between the development and the ancient woodland or veteran tree. A 50 metre vulnerability zone is specified because direct and indirect harmful impacts from development may be a risk to ancient woodland in this wider area,

such as impacts to water flow and quality. The distance of the buffer zone should be determined to ensure the protection and vitality of the ancient woodland ecosystem; ancient woodland comprises the habitat as a whole, including the soil, plants and animals, and therefore the function of the buffer is not only for root protection of the trees. Compensation measures will only be considered as a last resort. Further detailed guidance for applicants on ancient woodland and veteran trees is found in the Forest Commission and Natural England Joint Standing Advice.

4.113 Hedgerows are a priority habitat and provide an important function as wildlife corridors. Some hedgerows are protected under the Hedgerow Regulations 1997.

4.114 Scrub is an often overlooked but vitally important habitat. Scrub is often described as a ‘successional habitat’, meaning that it is temporary and in transition between one habitat (more open areas such as grassland and heathland) and another (generally woodland). Scrub can consist of hawthorn, bramble and nettle patches, or patches of other young shrubs and trees. These provide shelter, nesting sites, and food sources for species that rely on both open and covered habitats. If unmanaged, scrub can rapidly take over and harm open habitats such as chalk grasslands. An appropriate balance of habitat that is consistent with landscape character and make a positive contribution to biodiversity is therefore key.

4.115 The role of deadwood is also often overlooked. Deadwood can be fallen branches, felled wood, standing deadwood, decaying stumps or roots or rotting wood at the centre of trees (‘heartwood’). Deadwood is an ecosystem in its own right. The dead and decaying wood provides nutrients and home for an incredibly high diversity of fungi, plants, insect and other animal species.

4.116 Species selection for new planting should be appropriate for the site conditions such as soil type and microclimate. Responsibly sourced provenances and other species that are shown to offer enhanced ecosystem services, without being detrimental to the local environment, may also be acceptable in planting schemes. When selecting species and sources of trees, due regard must be had to the expected impacts of climate change, genetic variability and disease. New planting should be appropriate to and contribute to the character of the location and should also support and enhance green links and ecological networks, maximising opportunities for nature recovery and part of regenerative and landscape-led design. Site conditions also include consideration of infrastructure requirements to ensure that potential conflicts between planting and grey infrastructure are avoided. Pest protection for

tree planting should be biodegradable fencing, poles, or tree tubes – as left plastic material is a hazard for people and nature.

GUIDANCE

- British Standard 5837:2012 Trees in relation to design, demolition and construction
- British Standard 3398:2010 Tree Work Recommendations
- Forestry Commission Standing Advice
- Natural England Standing Advice
- Woodland Trust Guidance on Root Protection Areas
- Woodland Trust Guidance on Ancient Woodlands
- Natural England and Defra Guidance – Countryside Hedgerow Protection [gov.uk/guidance/countryside-hedgerows-regulation-and-management](https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management)

EVIDENCE

- South Downs Landscape Character Assessment 2020 [southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/](https://www.southdowns.gov.uk/landscape-design-conservation/south-downs-landscape-character-assessment/)
- South Downs Nature Recovery advice webpages [southdowns.gov.uk/nature-recovery-information-for-delivery-partners/](https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/)
- South Downs Nature Recovery by Landscape Type [southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/](https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/)
- Sussex and South Downs National Park Woodland Opportunity Mapping [southdowns.gov.uk/wildlife-habitats/habitats/healthy-woodlands/woodland-opportunity-mapping/](https://www.southdowns.gov.uk/wildlife-habitats/habitats/healthy-woodlands/woodland-opportunity-mapping/)

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Design and Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDN2 Designated Sites Hierarchy, SDN1 Nature Recovery, SDG2 Green and Blue Infrastructure.

Strategic Policy SDN9: Sustainable Construction

Purpose of the Policy

The purpose of this policy is to ensure that all new development contributes to the achievement of net zero carbon, minimises environmental impacts, and supports the transition to a sustainable built environment.

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.

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.

Policy SDN9: Sustainable Construction

1 All new build development proposals will be required to achieve net zero operational carbon by applying the minimum standards below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable. The following standards will apply:

- a) For all new residential development of one dwelling or more:
 - i) Maximum standards for space heating demand to be $\leq 20\text{kWh}/\text{m}^2/\text{yr}$ and total energy consumption (energy use intensity) to be $\leq 40\text{kWh}/\text{m}^2/\text{yr}$; and
 - ii) A nationally recognised predictive energy model must be used to demonstrate compliance with this standard, such as Passive House Planning Package (PHPP) (or accepted equivalent);
- b) For all major non-residential and multi-residential development:
 - i) Maximum standards for space heating ($\leq 20\text{kWh}/\text{m}^2/\text{yr}$) and total energy consumption (energy use intensity) to be benchmarked against

the 2025 UK Net Zero Carbon Building Standard Pilot limits for the relevant building typology; and

- ii) A nationally recognised predictive energy model must be used to demonstrate compliance with this standard, such as Passive House Planning Package (PHPP) or the Chartered Institution of Building Services Engineers (CIBSE TM54) (or accepted equivalent);
 - c) For all residential and major non-residential and multi-residential development:
 - i) Fossil fuels should be avoided for operational energy and measures to reduce the burden on the National Grid should be maximised;
 - ii) Net zero carbon should be achieved on-site by energy from renewables matching total energy consumption; and
 - iii) Where, for agreed technical reasons, there is a shortfall in reaching net zero operational carbon on-site, exceptionally this should be made up through financial contributions to an Energy Transition Fund administered by the Authority @ $\pounds 1.82/\text{kWh}^*$ of energy consumption not matched by renewable energy;
 - d) All residential extensions of 50 sqm and above and non-residential and refurbishment projects of 250 sqm or above must achieve passive house metrics for insulation;
 - e) Where there is a reasonable prospect of a local heat network all major development should be compatible with any future connection to it, including provision of safeguarded routes and plant space; and
 - f) All new build residential developments of 50 homes or more or 2,500 sqm of commercial development must undertake a Building Performance Evaluation to a brief agreed with the Authority.
- 2.** Development proposals must consider reducing high embodied carbon materials, and maximising the use of low embodied carbon materials, and the re-use of reclaimed materials, including by:
- a) Considering the re-use of existing site buildings, structures, hard surfaces and infrastructure;
 - b) Where demolition and replacement are proposed, justification must be provided as to why the loss of embodied carbon is outweighed by other public benefits; and

- c) All major development must provide a design stage strategy for lowering embodied carbon in construction and must achieve the upfront carbon targets listed below for the relevant building typologies:
- For residential buildings <11 m in height: $\leq 500 \text{ kgCO}_2/\text{m}^2\text{GIA}$
 - For residential buildings $\geq 11 \text{ m}$ in height: $\leq 700 \text{ kgCO}_2/\text{m}^2\text{GIA}$
 - For Use class E commercial (shell and core and Cat A): $\leq 700 \text{ kgCO}_2/\text{m}^2\text{GIA}$.
- 3 New development proposals will be required to meet the following internal maximum water consumption standards:
- a) Residential and visitor accommodation: predicted internal mains water consumption $\leq 90 \text{ litres/person/day}$; or
 - b) Major non-residential development: Achieve equivalent of at least 70% of available BREEAM Water credits;
4. All development proposals should use sustainable materials such as:
- a) Timber from sustainably managed sources (preferably locally grown);
 - b) Insulation products which avoid HCFC-based materials; and
 - c) Minimising construction and operational waste;
5. For all development proposals, including the change of use or redevelopment of a building, or an extension to an existing building, the applicant must consider all opportunities to improve the energy efficiency, overall carbon emissions, water consumption and embodied carbon across the planning unit.

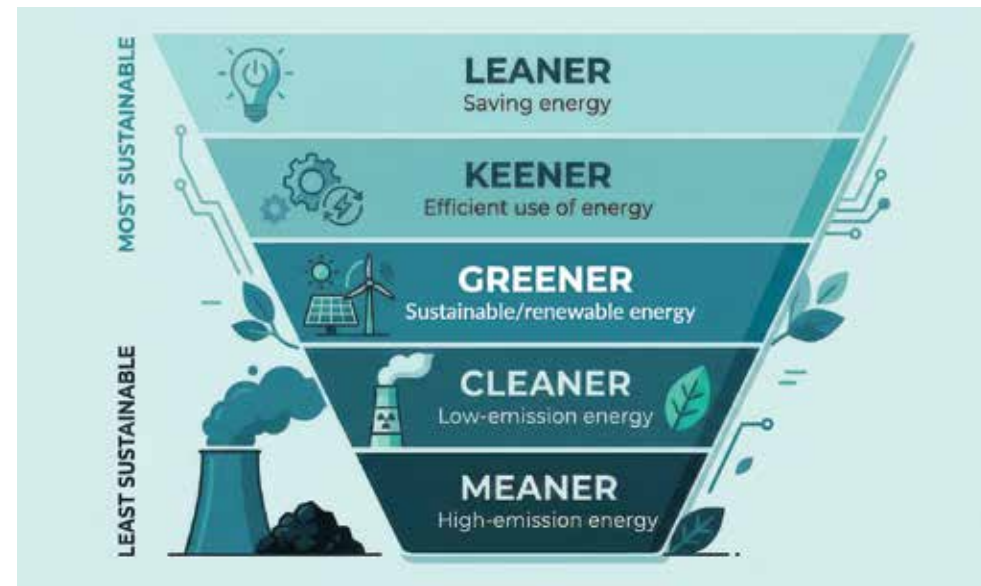
SUPPORTING TEXT

4.117 Within the National Park, the built environment is a major source of carbon emissions, and residents' carbon footprint significantly exceeds the national average. In response, this policy sets ambitious requirements to reduce the impact of new development while also promoting opportunities to enhance the performance of the existing building stock.

Reducing energy consumption

4.118 To reduce energy consumption, all new development should follow the energy hierarchy, starting with energy saving and energy efficiency measures ('leaner' and 'keener') followed by use of renewables ('greener'); low carbon generation ('cleaner') and only as a very last resort, offset to compensate for any shortfall ('meaner').

FIGURE 4.3: THE ENERGY SAVING HIERARCHY



Source: www.skillsyouneed.com

4.118 Space heating is commonly the largest source of emissions in buildings. The passive house approach— using high levels of insulation, airtightness, and careful control of thermal bridges— can cut these emissions significantly. Heating demand should ideally meet the Low Energy Transition Initiative (LETI) target of less than $15 \text{ kWh}/\text{m}^2/\text{yr}$ and must not exceed $20 \text{ kWh}/\text{m}^2/\text{yr}$ when applying efficient fabric and passive house design principles. In addition to reducing emissions, this fabric first approach has many benefits for the occupant, including lower energy bills and less need for expensive retrofit.

4.119 Energy Use Intensity (EUI) is a measure of the total energy consumption in a building over a year, including from regulated and unregulated sources. It is expressed in $\text{kWh}/\text{m}^2/\text{yr}$ and is calculated with predictive energy modelling. The lower the EUI, the easier it will be to match this with renewable energy generation on site and achieve net zero operational energy. The UK Net Zero Carbon Buildings Standard March 2026 – see **UK NZCBS Version 1** – includes relevant limits in table OE-1 Energy Use Intensity Limits, New Buildings in Appendix A, ps. 117 & 118.

4.120 The accurate measurement of the predicted space heating demand and EUI requires the design to be modelled using Passivhaus Planning Package (PHPP)

or Chartered Institute of Building Service Engineers (CIBSE) TM54 Evaluating Operational Energy Performance of Buildings at the Design Stage, or an agreed alternative (which does not include SAP/SBEM). The outputs (in kWh) can be measured subsequently post-completion to check compliance.

Net zero development

4.121 New development should be net zero carbon for all operational energy. This is achieved where the renewable energy generated on the plot matches the predicted energy use by the building (the EUI). In most cases this will be achieved by photovoltaic (PV) panels mounted on the roof of the building, associated storage buildings or even ground mounted. Other forms of renewable energy may also be appropriate. To maximise opportunities for solar collection, scheme design should take account of building and roof orientation (south-facing being the most efficient orientation with east and west-facing aspects still feasible) as well as avoiding overshadowing of potential solar collection locations, wherever possible.

Energy Transition Fund

4.122 If the EUI cannot be fully matched with on-site renewables, for agreed technical reasons, the shortfall will be used by the Authority to calculate a contribution to the Authority Energy Transition Fund which will fund local carbon reduction projects. The approved energy model will predict both the EUI and the energy that any renewable energy on site will generate in kWh. Where there is a shortfall in kWh the financial contribution will be at a price proportionate to the cost to the Authority for providing an equivalent level of energy generation within the Authority area. *The current estimate is £ 1.82/kWh for energy consumption not matched by renewable energy.

Extensions and refurbishment projects

4.123 The typical passive house standard insulation metric for opaque surfaces of $\leq 0.15W/(mK)$ should be targeted:

- Airtightness should be ≤ 0.6 air changes per hour at at 50 Pascals.
- Overheating (above 25o) should not occur more than 10% of annual hours.

Building Performance Evaluation

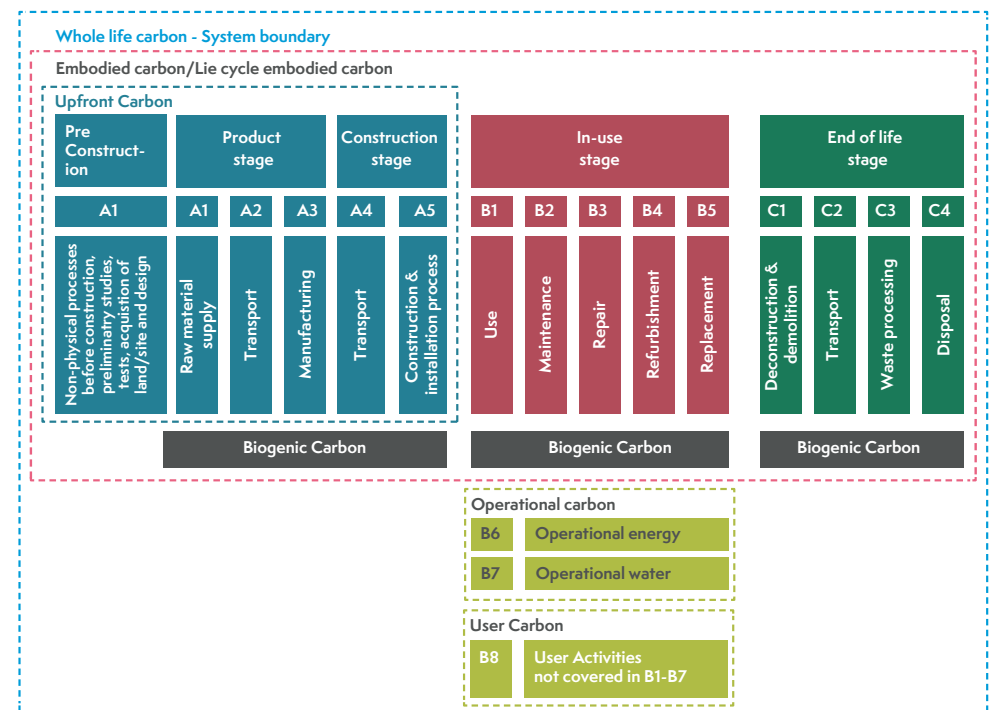
4.124 Building Performance Evaluation (BPE) provides evidence on how a development performs against its design aims, helping improve future design and highlighting issues for applicants or owners to address. It must follow British Standard 40101 to ensure consistent and comparable data, covering energy use, water consumption,

environmental conditions, and occupancy feedback. A qualified assessor will carry out the BPE, and applicants must provide access for meter readings and data collection. BPE will be secured as part of a S106 agreement for qualifying development.

Embodied Carbon

4.125 As operational energy emissions fall towards net zero, embodied carbon from building materials and construction becomes the main source of emissions. These can be reduced by retaining existing buildings, re-using reclaimed materials, and choosing low-carbon options such as timber. Organic materials store “biogenic carbon” absorbed during growth, which can remain locked in the building if recycled rather than released at end of life.

FIGURE 4.4: RICS MODULES FOR WHOLE LIFE CARBON ASSESSMENT STAGES



Source: LETI Embodied Carbon Primer, Supplementary guidance to the Climate Emergency Design Guide

4.126 Planning has most influence over “upfront” embodied carbon– the emissions from construction processes, measured under RICS modules A0–A5. Assessments must follow the RICS Whole Life Carbon Assessment for the Built Environment (2017, or later updates) for these modules.

Reducing Water consumption

4.127 The South Downs lies within an area of ‘serious water stress’, where high levels of river extraction have significant impacts on natural systems and the biodiversity they support. To address this, internal mains water consumption should be reduced to below 90 litres per person per day through best practice fittings and appliances, or by incorporating rainwater harvesting or greywater recycling for appropriate uses such as flushing toilets. In non-residential buildings, additional measures such as water monitoring and leak detection can further reduce consumption.

Sustainable materials

4.128 The construction industry accounts for around 55% of annual material use (BRE 2018). Under policy SDN9.2, embodied carbon must be addressed, including avoiding plastic products where possible. HCFC-based plastics used in insulation are especially harmful, with HCFC in extruded polystyrene 550 times more impactful by weight than CO₂. Material choices should also ensure timber is certified from well-managed forests. The National Park supports the ‘Grown in Britain’ initiative, which certifies British-grown timber for uses such as cladding, helping manage local woodlands and reducing transport-related embodied carbon.

GUIDANCE

- Sustainable Construction SPD

EVIDENCE

- Whole Plan Viability Study 2026
- A greenhouse gas emissions assessment and target scenario for the South Downs National Park, Small World Consulting Ltd 2022

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development and Ecosystems Services, SDL2 Design

Strategic Policy SDN10: Renewable Energy

Purpose of the Policy

The purpose of this policy is to support the development of renewable energy schemes that are appropriate in scale and design, contribute to the National Park’s ambition of achieving net zero carbon by 2040, and deliver tangible benefits for local communities and businesses. At the same time, proposals must conserve and enhance the special qualities of the South Downs National Park.

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.

Policy SDN10: Renewable Energy

- 1 Development proposals for renewable energy schemes of an appropriate scale to meet the energy needs of local communities and businesses and contribute towards a carbon neutral National Park, will be permitted where it is demonstrated through suitable site-specific analysis that the proposal:
 - a) Is appropriate in location, scale and design to its National Park context and the statutory purposes and special qualities of the South Downs National Park;
 - b) Does not result in significant adverse impacts on the local environment that cannot be satisfactorily mitigated, including cumulative landscape and visual impacts;
 - c) Takes opportunities to retain agricultural use and other landscape functions on the site where relevant;
 - d) Takes opportunities to create new or conserve and enhance existing wildlife habitats;
 - e) Makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
 - f) Ensures existing public access is not impeded; and

- g) Does not result in the permanent loss in use of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 or 3a) unless exceptionally justified or significant sustainability benefits are demonstrated to outweigh any loss and follows a hierarchy that preferences the use of lower grade land (Grade 3b and below) onsite, above BMV land.
 - h) For battery energy storage system (BESS) proposals only, that it is not located in sensitive groundwater areas (i.e. Source Protection Zone 1 and areas with a shallow groundwater table) and demonstrates adequate risk controls will be in place, including control of risks to the local water environment.
- 2** In considering development proposals for small-scale renewable energy development serving individual properties or small groups of properties, significant weight will be given to the benefits of removing fossil fuel energy systems and will be supported where:
- a) They are suitably sited and clearly associated with the buildings that they are intended to serve and in the case of solar arrays, are suitably screened;
 - b) They are appropriate in scale to the buildings being served; and
 - c) There is no unacceptable adverse impact on local amenity or conflict with public safety
- 3** Support will be given to renewable and low carbon energy generation developments (including decentralised heat networks) that are led by or meet the needs of local businesses and communities. The positive benefits of community energy schemes will be an important material consideration in assessing renewable energy development proposals. The preference is for schemes that are in line with the hierarchy and project attributes below:
- Community Led Energy:
- a) Project part or fully owned by a local community group or social enterprise; or
 - b) Local community members have a governance stake in the project or organisation e.g. with voting rights.
- 4** Development proposals for solar panels on existing roofs, car parks within settlements and brownfield land will be supported in principle subject to landscape and heritage considerations.

- 5** Renewable energy projects on the following sites as identified on the Policies Map will be supported in principle where they provide demonstrable benefits to local businesses or communities, subject to further technical work on grid connections and impact on the National Park and neighbouring uses:
- a) Land east of Langrish Primary School – ground mounted solar arrays;
 - b) Tolmare Farm, Findon – rooftop solar;
 - c) Land at Longridge Avenue, Saltdean – ground mounted solar arrays;
 - d) Land between the A32 and Policeman’s Lane, Privett – ground mounted solar arrays; and
 - e) Lancing College – ground mounted solar arrays.

SUPPORTING TEXT

Assessing renewable energy schemes

4.129 Renewable energy proposals must be appropriate in location, scale, and design. Developments should be proportionate to the surrounding landscape and should not exceed the visual prominence of existing built or natural features. While some change to the landscape is anticipated, this will be balanced against the imperative to reduce carbon emissions.

4.130 Proposals should be of a scale that meets the needs of local communities or businesses, including those adjacent to the National Park, provided they do not result in significant adverse impacts on the Park’s special qualities. Assessments must consider effects on visual amenity, landscape character, noise, biodiversity, heritage assets, land use, rights of way, and transport.

Suitable screening

4.131 Part 2 of Policy SDN10 requires that small-scale freestanding solar arrays are suitably screened. Screening should be achieved by integrating arrays within existing building complexes or by using established landscape features such as hedgerows, walls, or trees. Where new screening is introduced, it must be context-specific and designed to blend with the landscape. For example, new hedgerows should be planted with locally native species, provide suitable wildlife habitat, and reinforce or restore historic field boundaries.

Community-led energy

4.132 There is growing interest and support for community-led renewable energy projects within the National Park. Community-led schemes will receive positive weight, especially where they deliver local benefits.

Suitable sites for renewable energy projects

4.133 A call for sites and the subsequent Renewable Energy Study formed part of the evidence base for the revised Local Plan. The study identifies a limited number of sites suitable for solar energy generation, each with potential to deliver direct benefits to residents or businesses. Further feasibility work is required, including grid connection studies and detailed impact assessments.

4.134 Support for renewable energy projects is not restricted to the identified sites; other proposals may be considered where they demonstrate feasibility, deliver local benefits, and avoid significant adverse impacts on the National Park and its setting.

GUIDANCE

- Small Scale Renewable Energy TAN

EVIDENCE

- Renewable Energy Study 2024 and 2025 addendum

SEE OTHER RELEVANT POLICIES INCLUDING

SDC4 Major Development, SDL1 Landscape, SDN1 Nature Recovery, SDT5 Infrastructure

WATER AND POLLUTION

Strategic Policy SDW1: Protection of the Water Environment

Purpose of the Policy

The purpose of this policy is to protect and enhance groundwater and surface water features; ensuring that the proposed development, either individually or cumulatively does not cause the quality of groundwater and surface water assets to deteriorate, and takes opportunities to enhance, regenerate or restore these assets by taking a catchment-based and landscape-led approach.

Local Plan Objectives

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.

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.

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.

Policy SDW1: Protection of the Water Environment

1 Development proposals affecting the water environment (existing features, or the creation of new features) must demonstrate a catchment and landscape-led approach, prioritising the delivery of nature-based solutions to mitigate or prevent adverse impacts to the water environment; both during and post development.

2 Development proposals that affect groundwater, aquifers, surface water features, and watercourse corridors will not be permitted unless they conserve, enhance, and where applicable, restore, the following:

- a) Water quality and quantity, and help achieve requirements of the *Water Framework Directive*, relevant catchment *River Basin Management Plans*, and where relevant the *Habitats Regulations*, or their replacement;

- b) Ability of groundwater, aquifers, surface water features and watercourse corridors to function by natural processes throughout seasonal variations taking account of and supporting resilience to climate change, within the immediate vicinity, and both upstream and downstream of the site of the proposal. Culverting of watercourses will not usually be supported, and development should wherever possible remove existing culverts. Opportunities should be identified and incorporated to reconnect rivers and watercourses to their floodplain, and promote natural flow; and
- c) Specifically for surface water features and watercourse corridors:
 - i. Habitat quality, biodiversity and contribution to nature recovery, including eradication and control of invasive non-native species. Special regard will be given to the conservation, enhancement and restoration of chalk stream priority habitat;
 - ii. Naturalness and flows which should follow natural flow patterns and be sufficient in quantity to maintain the health of the ecosystem and river system;
 - iii. Historic and cultural significance;
 - iv. Landscape (including townscape) character, appearance, and setting;
 - v. Appropriate levels of public access to and along the waterway for recreational opportunities whilst avoiding foreseeable conflict with sensitive or protected wildlife; and
 - vi. Ability for maintenance, including for flood risk management purposes.
- 3** Development proposals will be permitted where they demonstrate adequate wastewater treatment provision, including:
 - a) no surface water from new development will be discharged to the public foul or combined sewer system, other than in exceptional circumstances;
 - b) that foul water from the development will be discharged to the public foul sewer. Alternatives will only be considered if it is demonstrated that all options for connection to the public foul sewer have been explored and that such connection is not possible;
 - c) development is phased to align with the delivery and operation of new or improved wastewater infrastructure where this is required;

- d) the provision of water infrastructure is not considered detrimental to the water environment, including existing abstractions, river flows, water quality, fisheries, amenity and nature conservation; and
 - e) Small scale wastewater treatment infrastructure serving on site uses must avoid surface water pollution pathways and should not be located inside Source Protection Zone 1 or within 50 metres of a drinking water supply.
- 4 Development proposals should identify and incorporate opportunities to support the delivery of the relevant Catchment Management Plan and Local Nature Recovery Strategy.
 - 5 Development proposals must provide adequate protection zones and undeveloped buffers to watercourses. It must be demonstrated that the buffer is suitable to retain the natural function of the watercourse and its biodiversity and minimise direct and indirect impacts to the watercourse.
 - 6 Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided it can be demonstrated that there will be no adverse effect on the quality of the groundwater source and provided there is no risk to its ability to maintain a water supply or contribute to nature conservation.
 - 7 Development proposals must incorporate effective measures to eliminate risk of pollution to groundwater, surface water and watercourse corridor features and must not harm or degrade their ecological and/or chemical status or their habitat functionality.
 - 8 Development proposals for the provision of reservoirs or natural flood management measures that aid demand management, water efficiency and water storage, including supporting the health of aquifers and the wider environment, will be permitted where they are compatible with the National Park purposes.

SUPPORTING TEXT

4.135 This policy applies to any development proposals which may impact groundwater features or surface water features, including coastal waters.

4.136 The landscape-led approach means good contextual design that conserves and enhances the landscape (including historic landscape and landscape-seascape continuum) – see Policy SDL1 Landscape Character, SDL2 Design and SDW4 The Coast. A catchment-based approach means taking a holistic approach to

development proposals, informed by understanding of the function of the site within its wider catchment, and conserves, enhances, replenishes or restores functions that support water management on both the site and the wider catchment. This should be applied proportionately to the nature and scale of the proposals and their impact on the water environment.

4.137 The corridor of a watercourse is the width of the channel in which water flows, plus its extensive influence on its surrounding landscape that is necessary for its natural functioning. This is characterised by many natural interactions between topography, hydrology, flooding hazards, geology, soils, climate, flora and fauna. Where a watercourse is present on a development site, it should be retained or restored into a natural state and enhanced where possible. Any enhancements and mitigation should inform the earliest stages of the design process. The role of small scale, agricultural reservoirs in certain circumstances is understood for sustainable water management. The

4.138 The role of small scale, agricultural reservoirs in certain circumstances is recognised for sustainable water management. The design of any agricultural reservoirs will be carefully considered in relation to a range of considerations including reservoir safety, flood attenuation and risk, landscape character and biodiversity. Proposals for large scale reservoirs would be subject to the requirements of Policy SDC4 Major Development.

4.139 There are eleven main rivers flowing through the National Park and numerous other important watercourses, including iconic and internationally significant chalk rivers and streams and the River Rother, which is entirely within the National Park, plus other surface water features. These do not function in isolation and have complex and dynamic interactions with the landscape.

4.140 To protect the watercourse and its corridor from pollution, to allow for the natural function, to protect biodiversity and to support long term management, an undeveloped buffer zone around the watercourse and its corridor should be included in the overarching design of the site and arrangement should be made for its long-term management. The undeveloped buffer should be a minimum of 10 metres from the watercourse, however much larger buffer strips are likely to be necessary to respond to the nature of the topography or distribution or sensitivity of habitat. The area within 50 metres of a watercourse and its corridor should be considered a watercourse vulnerability area and special regard should be given to avoiding and mitigating potential impacts to the watercourse and its corridor.

4.141 Groundwater is a key part of the water cycle: it provides an important source for rivers, sustaining flows in dry periods, and thus supporting wildlife habitats. Two aquifers, one chalk and one greensand, supply people inside and outside of the National Park with high-quality drinking water. The quality of groundwater is easily polluted directly and indirectly from many types of development and is difficult to remediate. It is therefore better to prevent or reduce the amount of contamination at source.

4.142 The EA provides information on areas which are sensitive to groundwater pollution and on the presence of solution features (karst) in the chalk which are preferential pathways for pollutants. It defines SPZs for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. Maps of SPZs are available on the EA's website. These show three main zones (inner, outer, and total catchment) and a fourth zone of special interest to a groundwater source, which usually represents a surface water catchment that drains into the aquifer feeding the groundwater supply. There are also a number of private water supplies, which are not under the control of a licensed water undertaker. These supplies have their own SPZs, the details of which are held by local authorities who should be consulted on any development proposals that are in the vicinity.

GUIDANCE

- South Downs 'Nature Recovery by Landscape Type' southdowns.gov.uk/nature-recovery-information-for-delivery-partners/nature-recovery-by-landscape/
- Environment Agency South East river basin district river basin management plan: updated 2022 gov.uk/guidance/south-east-river-basin-district-river-basin-management-plan-updated-2022
- Natural flood management measures practical guide for farmers and landowners of the Solent and South Downs southdowns.gov.uk/wp-content/uploads/2021/07/SDNPA-Natural-Flood-Management-Measures.pdf
- Environment Agency South East river basin district flood risk management plan 2021-2027 Environment Agency gov.uk/government/publications/south-east-river-basin-district-flood-risk-management-plan
- Catchment Flood Management Plans gov.uk/government/collections/catchment-flood-management-plans#south-east-river-basin-district
- Environment Agency National flood risk standing advice for local planning authorities gov.uk/guidance/flood-risk-assessment-local-planning-authorities
- Environment Agency Preparing a Flood Risk Assessment: Standing Advice gov.uk/guidance/flood-risk-assessment-standing-advice
- The Environment Agency's approach to groundwater protection (2018) assets.publishing.service.gov.uk/media/5ab38864e5274a3dc898e29b/Environment-Agency-approach-to-groundwater-protection.pdf
- Hampshire Local Flood Risk Management Strategy hants.gov.uk/landplanningandenvironment/environment/flooding/strategies
- Hampshire Catchment Management Plans hants.gov.uk/landplanningandenvironment/environment/flooding/strategies
- Hampshire Groundwater Management Plan hants.gov.uk/landplanningandenvironment/environment/flooding/strategies
- West Sussex Local Flood Risk Management Strategy westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/local-flood-risk-management-strategy/
- West Sussex Surface Water Management Plans westsussex.gov.uk/fire-emergencies-and-crime/dealing-with-extreme-weather/flooding/flood-risk-management/flood-reports-projects-and-policies/
- Defra National Standards for Sustainable Drainage Systems gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds
- East Sussex Local Flood Risk Management Strategy eastsussex.gov.uk/environment/flooding/what-does-escs-do-to-manage-flood-risk/flood-risk-management-strategy
- East Sussex Surface Water Management Plans eastsussex.gov.uk/environment/flooding/what-does-escs-do-to-manage-flood-risk/surface-water-management-plans
- 'Water. People. Places. A guide for master planning sustainable drainage into developments' Prepared by the Lead Local Flood Authorities of the South East of England (2013)
- Shoreline Management Plans gov.uk/guidance/shoreline-management-plans

- West Sussex Culvert Policy [westsussex.gov.uk/media/10390/culvert_policy.pdf](https://www.westsussex.gov.uk/media/10390/culvert_policy.pdf)
- Hampshire LNRS [hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy](https://www.hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy)
- Sussex LNRS [sussexnaturerecovery.org.uk/](https://www.sussexnaturerecovery.org.uk/)
- Chalk Streams Restoration Strategy (Catchment Based Approach CaBA group, 2021) [catchmentbasedapproach.org/learn/chalk-stream-strategy/](https://www.catchmentbasedapproach.org/learn/chalk-stream-strategy/)
- CIRIA SuDs Manual [ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS](https://www.ciria.org/ItemDetail?iProductCode=C753F&Category=FREEPUBS)

EVIDENCE

- South Downs Landscape Character Assessment (2020)
- South Downs Nature Recovery advice webpages [southdowns.gov.uk/nature-recovery-information-for-delivery-partners/](https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/)
- South Downs 'Water in the Park' report (2025) [southdowns.gov.uk/south-downs-national-park-strengthens-commitment-to-water-as-new-report-is-published/](https://www.southdowns.gov.uk/south-downs-national-park-strengthens-commitment-to-water-as-new-report-is-published/)
- Environment Agency Flood Map for Planning [flood-map-for-planning.service.gov.uk/](https://www.flood-map-for-planning.service.gov.uk/)
- Environment Agency National Coastal Erosion Risk Mapping (2025)
- Hampshire Biodiversity Information Centre [hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre](https://www.hants.gov.uk/landplanningandenvironment/environment/biodiversity/informationcentre)
- Sussex Biodiversity Records Centre [sxbrc.org.uk/home/](https://www.sxbrc.org.uk/home/)
- The Aquifer Project [wearetap.org.uk/](https://www.wearetap.org.uk/)
- Main Rivers Map [gov.uk/government/collections/main-river-map-for-england-proposed-changes-and-decisions](https://www.gov.uk/government/collections/main-river-map-for-england-proposed-changes-and-decisions)

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment, SDN1 Nature Recovery, SDW2 Flood Risk, SDW3 Sustainable Drainage, SDW4 The Coast, SDG2 Green and Blue Infrastructure.

Strategic Policy SDW2: Flood Risk Management

Purpose of the Policy

The purpose of this policy is to reduce vulnerability to flood risk and the impacts of flooding associated with climate change, ensure that flood risk management measures are informed by landscape character and make an overall positive contribution to the environment.

Local Plan Objectives

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.

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.

Policy SDW2: Flood Risk Management

- 1** Development proposals shall, where required by national policy and guidance, be accompanied by a site-specific Flood Risk Assessment (FRA).
- 2** Development proposals will be permitted that avoid flood risk, reduce the impact and extent of all types of flooding, and utilise characteristic and effective flood management measures through:
 - a) Following a sequential approach to flood risk management, directing development to areas of lower flood risk wherever possible. Environment Agency or site-specific flood mapping and the Authority's Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from all sources. The cumulative impacts of all sources of flooding should be considered. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception Tests;
 - b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;
 - c) Flood protection, mitigation and adaptation measures that:

- i. are necessary, appropriate and effective for the specific requirements of the proposal, the development site and other areas potentially impacted;
 - ii. are informed by and positively contribute to landscape character by:
 - prioritising above ground, natural flood management and nature-based solutions; incorporating adaptive management measures where appropriate; and integrating measures into the layout and design of the development;
 - iii. are designed for the lifetime of the development taking into account of and resilient to the ongoing and predicted impacts of climate change;
 - iv. ensure there is no net loss of floodplain storage capacity or obstruction to flood flow routes;
 - v. are designed to maximise the benefit to flood risk management, ecosystem vitality including water quality and biodiversity, and amenity;
 - vi. are consistent with the Beachy Head to Selsey Shoreline Management Plan, or its replacement;
 - vii. have no adverse impact on and, where applicable, safeguard, enhance or restore designated sites, and
- d) Ensure that the integrity of existing coastal and river flood defences are not undermined.
- 3** Proposed flood protection, mitigation and adaptation measures should be supported with a delivery programme including any phasing, a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance for the lifetime of the development.

SUPPORTING TEXT

4.143 The Authority will seek to manage flood risk through avoidance wherever possible. The Authority will work with others to implement relevant flood and coastal protection strategies and plans.

4.144 A site-specific Flood Risk Assessment is required for proposals of one hectare or greater in Flood Zone 1; all proposals for new development in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the EA); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding. If there is any potential for tidal or fluvial flood risk issues, advice from the EA should

be sought before submitting an application. Advice from the Lead Local Flood Authority (LLFA), Local Authority and relevant water company should be sought on local sources of flooding. Development proposals must take account of any relevant existing plans or strategies, including those produced by the LLFAs, Environment Agency and Catchment Partnerships.

4.145 Proposed development within a flood zone will be assessed using the sequential and exception tests as set out in the National Planning Policy Framework supported by Planning Practice Guidance.

4.146 Natural flood management and nature-based solutions seek to use natural methods working with landscape features above ground to reduce the downstream maximum water height of a flood (the flood peak) or to delay the arrival of the flood peak downstream. This helps to increase the time available for people to prepare for floods and decrease the damaging impacts that these floods can have. Examples include slowing water by increasing resistance to its flow – for example, by planting floodplain or riverside woods, or blocking grips on heathland, and storing water by using and maintaining the capacity of, ponds, ditches, floodplain washlands or scrapes. Green roofs/walls, raingardens and swales also slow and store water. These measures have multifunctional benefits and the appropriate selection of measures and their design should be informed by landscape character (see Policy SDL1 Landscape Character and SDL2 Design) and take a regenerative approach (see Policy SDC3 Regenerative Development and Ecosystem Services). Proposals for hard engineering flood defences or attenuation will be expected to demonstrate why natural flood management and nature-based solutions are not feasible or appropriate.

4.147 In some instances, adaptive management measures may be appropriate. This means monitoring and adjustment of the flood management measures over time. This may be necessary where there is particular uncertainty or environmental sensitivity.

4.148 Criterion (1)(c)(vii) refers to nature and heritage designations.

4.149 Policy SDW3 Sustainable Drainage is applicable where surface water flooding is a relevant issue for a development.

GUIDANCE

- See SDW1 Protection of the Water Environment

EVIDENCE

- See SDW1 Protection of the Water Environment

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment, SDN1 Nature Recovery, SDW3 Sustainable Drainage, SDW4 The Coast, SDG2 Green and Blue Infrastructure.

**Strategic Policy SDW3:
Sustainable Drainage****Purpose of the Policy**

The purpose of this policy is to reduce vulnerability to surface water flooding through appropriate management and ensuring there is no net increase in surface water run-off from new development utilising characteristic, nature-based solutions that support natural processes.

Local Plan Objectives

- 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.
- 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.

Policy SDW3: Sustainable Drainage

- 1** Development proposals will be permitted where they ensure that there is no net increase in surface water run-off taking account of climate change. In addition, brownfield development shall reduce, and should aim to significantly reduce, runoff flow volumes and speeds to receiving surface waters and public sewers.
- 2** Development proposals shall include sustainable drainage management such as Sustainable Drainage Systems (SuDs) and shall be designed into the development layout to achieve the following criteria applied proportionately to the development proposals:
 - a) Prioritise and maximise use of above ground nature-based solutions that are characteristic to the landscape, and conserve, enhance and where possible restore, natural processes;
 - b) Maintain and improve water quality by reducing contamination of runoff through pollution prevention, controlling runoff at source, and treat runoff using an appropriate management train such as a sequence of drainage features. Water quality at the point of discharge to the environment should

demonstrably not negatively alter the baseline chemical, physical (e.g. temperature) or ecological parameters of the receiving water body;

- c) Manage water quantity by using surface water runoff as a resource, managed close to source and following the drainage hierarchy by facilitating rainwater to soak into the ground where feasible, and slowing and storing runoff to mimic natural runoff rates and volumes;
- d) Contribute to and connect with existing blue and green infrastructure by enhancing biodiversity and supporting the provision of open space, public amenity areas with sufficient room to provide a safe, naturalised system without the need for fencing or barriers;
- e) Be effective and informed by an assessment of evidence of the site and other areas potentially impacted, and minimise the need for pumping and other supporting infrastructure; and
- f) Where sustainable drainage is provided, arrangements must be put in place for their whole life management, monitoring and maintenance.

SUPPORTING TEXT

4.150 Proposals for sustainable drainage should be in accordance with the 'National standards for sustainable drainage systems (SuDS)'. The drainage hierarchy and range of other principles, standards and guidance are set out in the national standards.

4.151 Above ground nature-based solutions for sustainable drainage means using natural methods working with landscape features at the surface to facilitate surface water management and discharge rather than underground pipe, storage and hard engineering methods. This approach helps to deliver multiple benefits, including address all four pillars of SuDs: water quantity, water quality, biodiversity and amenity. In the National Park context, it is important that sustainable drainage takes a landscape-led approach to identify suitably characteristic features and to develop their design (see policies SDL1 Landscape Character and SDL2 Design). Contributing to and connecting with existing blue and green infrastructure by enhancing biodiversity, and conserving, enhancing and where possible restoring, natural processes contributes to a regenerative development approach (see Policy SDC3 Regenerative Development).

4.152 Sustainable drainage systems should be utilised proportionately to the nature and scale of the proposals and its likely impact. The type of system that would be

appropriate will vary from small scale interventions such as raingardens that can be used in very small developments to larger integrated schemes in major developments.

4.153 In considering a development that includes SuDS, the Authority will need to be satisfied that the proposed standards of operation are appropriate, taking into account the specific site and local area characteristics and the National Standards for Sustainable Drainage Systems, and in accordance with the The SuDS Manual.

4.154 Water quality needs to be managed using a robust and risk-based approach and the most effective surface water drainage systems use a well-designed series of drainage features working in a management train to provide a range of treatment processes. The design of this shall be effective filtration function to treat the water, plus provide an environmental buffer for accidental spills or other unexpected high pollutant loadings, and designed to cope with intense rainfall events to avoid and where necessary overcome any deterioration in water quality status. For example, for surface water features such as ponds and wetlands, inlets and outlets should be placed to maximise the flow path through the feature to ensure effective treatment.

4.155 In determining the suitability of SuDS for individual development sites, developers should seek advice from the relevant Local Lead Flood Authority.

4.156 Where infiltration is proposed, this should be supported by suitable evidence which demonstrates that annual high groundwater levels are below the base of infiltration. Development proposals for the construction and installation of deep borehole soakaways should be accompanied by an adequate risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design. Site promoters need to ensure that their design takes account of the construction, operation and maintenance requirements of both surface and sub-surface components. Suitable whole life management and maintenance will be secured through planning obligations and/or conditions. Any areas utilised for drainage measures may be safeguarded from further development that would impede their effectiveness.

GUIDANCE

- Defra National Standards for sustainable drainage systems (SuDS) [gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds](https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds)
- The SuDs Manual C753 (CIRIA, 2015)

- Natural England's Climate Change Adaptation Manual (NE751)
- Hampshire County Council Catchment Management Plans
- See also SDW1 Protection of the Water Environment

EVIDENCE

- See SDW1 Protection of the Water Environment

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development & Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDN1 Nature Recovery, SDL6 Historic Environment, SDW4 The Coast, SDG2 Green and Blue Infrastructure, SDW2 Flood Risk.

Strategic Policy SDW4: The Coast

Purpose of the Policy

The purpose of this policy is to protect the undeveloped nature, landscape character, biodiversity and heritage of the National Park coastline both within and outside the Sussex Heritage Coast and ensure the vulnerability of new development to coastal change is avoided, minimised and managed appropriately.

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.

Policy SDW4: The Coast

- 1** Development proposals within the Sussex Heritage Coast area and the undeveloped coastal zone of the National Park, as defined on the Policies Map, will not be permitted unless they:
- a) Meet one of the following two criteria:
 - i. Are appropriate to the coastal location and conserve and enhance the character of the Sussex Heritage Coast/undeveloped National Park coastline; or
 - ii. Are necessary for the operational needs of activities in support of the Sussex Heritage Coast; and
 - b) Are consistent with the Beachy Head to Selsey Bill Shoreline Management Plan, or its replacement;
 - c) Are consistent with the South Inshore and South Offshore Marine Plan as relevant;
 - d) Support sustainable access to/from the coast and along the coastline;
 - e) Cause no adverse impact on Beachy Head West Marine Conservation Zone (MCZ), Beachy Head East MCZ, Brighton to Newhaven Cliffs Site of Special Scientific Interest (SSSI) and Seaford to Beachy Head SSSI and should ensure their conservation and, where feasible, enhancement; and

- f) Seek to take opportunities to restore coastal and estuarine processes to support nature recovery and the conservation of designated sites.
- 2** New residential development, including proposals for change of use to residential development, will not be permitted in Coastal Change Management Areas as identified on the policies map.
- 3** Proposals for non-residential development in areas designated as Coastal Change Vulnerability Areas, as identified on the policies map, will be permitted where it can be demonstrated by a Coastal Vulnerability Assessment that:
- It is necessary in that particular location;
 - It would be safe over its planned lifetime without increasing risk to life or property and without requiring new or improved coastal defences;
 - It would not have an unacceptable impact on coastal change or exacerbate the rate of coastal change nearby or elsewhere;
 - It would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of a changing climate including the provision of future flood defences;
 - It would not restrict natural processes from responding to the impacts of climate change in Shoreline Management Plan units identified as 'no active intervention' and would not restrict the response to the impacts of climate change in Shoreline Management Plan units identified as 'managed realignment';
 - The character of the coast and any relevant designations would not be compromised;
 - The development provides wider sustainability benefits; and
 - The development would not hinder the creation or maintenance of coastal defense infrastructure.
- 4** Adaptation of existing buildings, infrastructure or land uses within the Coastal Change Vulnerability Area (CCVA) where it reduces vulnerability and/or increases resilience, or the decommissioning or relocation of existing development from the CCVA where it is demonstrated to be unsustainable and at risk of loss will be supported subject to compliance with other policies.
- 5** Development proposals must set out the process for managing the development at the end of its lifetime, including removal or relocation, and

restoration to a natural or semi nature condition before the site is threatened by shoreline changes. This must include funding for removal and demonstrable plans of how the development can be removed which may be secured through a legal agreement.

- 6** Proposals to provide or enhance essential infrastructure in the Coastal Change Management Area will be permitted provided they meet the requirements of this policy and there are clear plans to manage both any impact on coastal change arising from the development itself, and to safeguard the effectiveness of the infrastructure moving forward.

SUPPORTING TEXT

4.157 Landscape is made up of everything we see, hear and experience and includes all types and forms, including the continuum from the land to the sea to include the seascape. Natural England, in report NECR105 'An Approach to Seascape Character Assessment' defines seascape as 'an area of sea, coastline and land, as perceived by people, whose character results from the actions and interactions of land with sea, by natural and/or human factors'. The Marine Policy Statement defines seascape as 'landscapes with views of the coast or seas, and coasts and the adjacent marine environment with cultural, historical and archaeological links with each other'.

4.158 Policies SDL1 Landscape Character and SDL2 Design together set out the landscape-led approach to development. Sensitive design that relates to the relevant seascape and landscape character analysis is required for this iconic location. In particular, reference should be made to both the South Downs Landscape Character Assessment 2020 and South Coast Seascape Character Analysis.

4.159 The undeveloped coastal zone and the Sussex Heritage Coast are shown on the Policies Map. The undeveloped coastal zone outside the Heritage Coast, is a zone defined as 1km inland from the National Park coastal boundary extending east and west as far as the National Park's boundary for each section of coastline. Development proposals should be informed by and consistent with the Heritage Coast Strategy and Action Plan, and other land management and conservation strategies within the area, including the Seven Sisters super National Nature Reserve (sNNR).

4.160 Purpose 4 of Heritage Coasts provides the basis for Criterion (1)(a)(ii). Improvements to existing sea defence works are not usually subject to planning control although the National Park Authority would expect to be consulted on any

proposed changes. Planning permission is, however, required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area as well as coastal access, good design will be essential to ensure proposals conserve their surroundings visually and enhance coastal access, where possible.

4.161 Sustainable access to the coast will be supported, including safeguarding and, where possible, enhancing the King Charles III England Coast Path and public access to the shoreline, in accordance with the Marine and Coastal Access Act 2009, taking into account landscape character, impacts of climate change and public safety.

4.162 The NPPF and supporting Planning Practice Guidance (PPG) supports the local designation of Coastal Change Management Areas (CCMAs). These identify areas in the UK's coastal regions that are likely to experience significant changes to the shoreline over the next 100 years to help inform planning and development management decisions, protect key infrastructure and high-quality agricultural land, and balance the need for development with the risks associated with coastal erosion and flooding.

4.163 The CCMA set out on the Policies Map is informed by the Environment Agency's National Coastal Erosion Risk Mapping (NCERM) 2025. In order to support consistency along the coastline, the CCMA at Telscombe Cliffs and at Tide Mills is also informed by the CCMA identified by Lewes District Council in their Local Plan which adjoins the boundary of the National Park at either side of these locations.

4.164 The NCERM mapping does not take account of cliff top erosion and there are complexities and uncertainties in coastal erosion, and so it is considered appropriate to identify where development may be vulnerable to coastal erosion and therefore further consideration should be given to the issue of coastal erosion when determining planning applications. Therefore, this plan also designates a Coastal Change Vulnerability Area (CCVA). The CCVA fully overlaps with the CCMA, and typically extends landward by a further 50 metres. The main exceptions being at Telscombe Cliffs and Tide Mills where, like for the CCMA, it is informed by the CCVA identified in the Lewes District Local Plan. The CCVA does not preclude any particular type of development, but it does require consideration of development proposals that might be vulnerable to coastal erosion in more detail with a precautionary approach.

4.165 The requirements of a Coastal Vulnerability Assessment (CVA) are set out in NPPG. The CVA should be proportionate to the nature and scale of the proposal and

its likely impact. The policy will be applied proportionately according to the level of risk to its objectives. In particular, it will not resist minor developments without a built footprint, such as amendments to existing fenestrations, replacement boundary treatments on the same footprint, or advertisement consent / information boards.

GUIDANCE

- The Sussex Heritage Coast Strategy and Action Plan southdowns.gov.uk/our-landscape/sussex-heritage-coast/
- Shoreline Management Plan: Beachy Head to Selsey Bill SMP12 environment.data.gov.uk/shoreline-planning/shoreline-management-plan/SMP12
- Shoreline Management Plan: SMP11
- The South Inshore and South Offshore Marine Plan (Marine Management Organisation, 2018) gov.uk/government/publications/the-south-marine-plans-documents

EVIDENCE

- South Downs Landscape Character Assessment (SDNPA, 2020)
- Seascape assessment for the South marine plan areas (Marine Management Organisation, 2014) gov.uk/government/publications/seascape-assessment-for-the-south-marine-plan-areas-mmo-1037
- National Coastal Erosion Risk Mapping (NCERM) (Environment Agency, January 2025) environment.data.gov.uk/shoreline-planning/coastal-group/CG3
- Lewes Local Plan Climate Change Topic Paper (Lewes District Council, 2025) planningpolicyconsult.lewes-eastbourne.gov.uk/LDC_PO_2023/consultationHome
- Natural England Designated Sites Viewer designatedsites.naturalengland.org.uk/

SEE OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development and Ecosystem Services, SDL1 Landscape Character, SDL2 Design, SDL3 Safeguarding Views, SDL4 Tranquillity, SDW1 Protection of the Water Environment, SDW2 Flood Risk, SDG2 Green and Blue Infrastructure.

Strategic Policy SDW5: Pollution and Air Quality

Purpose of the Policy

The purpose of this policy is to set out how the National Park will be protected from air, noise, vibration, light, water, odour or other pollution arising from developments, and how enhancements will be supported.

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.

Policy SDW5: Pollution and Air Quality

1 Development proposals will be permitted provided that levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative affect on the health and wellbeing of people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation. Improvements to local environmental conditions such as air and water quality will be supported.

2 Development proposals that by virtue of their location, nature or scale could impact on an existing Air Quality Management Area (AQMA), as shown on the Policies Map, will be required to:

- a) Have regard to any relevant Air Quality Action Plan (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP; and
- b) Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

3 Development proposals will be required to provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.

4 Development proposals will be permitted where they follow best practice methods to reduce levels of dust and other pollutants arising during a development from demolition through to completion.

SUPPORTING TEXT

4.166 Evidence will need to be submitted with planning applications to establish the impacts of development and the effectiveness of any proposed mitigation. National policy is clear that planning should not attempt to control processes or emissions where these are subject to separate pollution control regimes (such as Environmental Health licensing). Planning decisions should assume that these regimes will operate effectively.

4.167 An Air Quality Management Area has been designated in the National Park at Lewes Town Centre. This includes a proposed objective of 30 µg/m³ NO₂ Annual Mean. There are also AQMAs adjacent to the National Park, for instance at Storrington and Hassocks, which could be affected by development within the National Park.

GUIDANCE

- Planning Noise Advice Document: Sussex (November 2023)
- Air quality and emissions mitigation guidance for Sussex (2021) Lewes Air Quality Action Plan
- DEFRA's 'PM^{2.5} Targets: Interim Planning Guidance' PM^{2.5} Targets: Interim Planning Guidance – Defra, UK

Strategic Policy SDW6: Contaminated Land

Purpose of the Policy

The purpose of this policy is to prevent unacceptable risk to human health or the environment by controlling the development of sites affected by or potentially causing land contamination.

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.

Policy: SDW6 Contaminated Land

1 Development proposals for sites:

- a) with known or potential legacy contamination;
- b) with the potential to contaminate land either on site or in the vicinity; or

c) that are adjacent to sites that have the potential to contaminate the development site;

must ensure that any unacceptable risk to human health or the health of the environment, surface water, groundwater and coastal water is removed and/or reduced to an acceptable level prior to development proceeding.

2 Such proposals will require the submission of robust evidence, including desk studies and intrusive investigations, to demonstrate that the proposed remedial measures will be effective.

SUPPORTING TEXT

4.168 Sources of contamination can be static or mobile (for example, old petrol stations or landfills sites where contamination might move in the soil or seep into adjacent watercourses).

GUIDANCE

- CLRM (contaminated land) guidance

EVIDENCE

- Contaminated Land Registers held by local authorities (Councils).

HOUSING



Strategic Policy SDH1: Housing Supply

Purpose of Policy

The purpose of this policy is to identify the housing requirement for this Local Plan and how it will be met.

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.

Policy SDH1: Housing Supply

1. The National Park Authority will make overall provision for approximately 6,137 net additional homes over a 19-year period between 2024/25 and 2042/43 (323 dwellings per year).

2. These will be delivered as set out in the table below:

Completions 1st April 2024 – 31st March 2025	247
Extant Planning Permissions*	788
Unimplemented allocations in made Neighbourhood Development Plans	957
Unimplemented allocations carried over from the 2019 Local Plan	1,660
Allocations in this Local Plan	1,899
Windfall Allowance	1,184
Total	6,735**

* Planning permissions that are completed or are unimplemented allocations are omitted from this figure to avoid double-counting. However, allocated sites that are under construction are included.

** This supply figure incorporates 598 homes 'headroom' for flexibility.

3. Emerging Neighbourhood Development Plans that accommodate higher levels of housing than this Local Plan will be supported by the National Park Authority providing that they are in general conformity with the strategic policies of the development plan.

4 Development proposals will be refused where they would result in the net loss of a C3 dwellinghouse unless that dwelling is re-provided elsewhere within the National Park or unless outweighed by other public benefits.

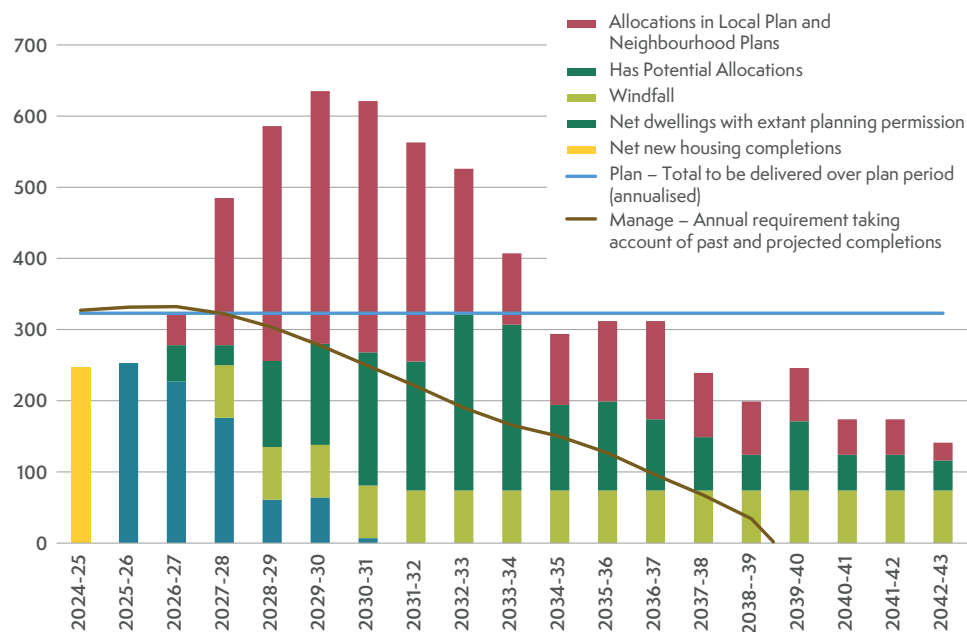
SUPPORTING TEXT

4.169 The housing requirement figure of 6,137 homes, annualised at 323 per year, will be used to calculate the five-year housing land supply. A trajectory is included below and demonstrates a 9.95 years supply of deliverable sites. This will be updated in the Authority Monitoring Report every year.

4.170 Unlike the 2019 Local Plan, this Plan does not rely on emerging Neighbourhood Development Plans to deliver part of the housing requirement (although allocations in existing made Neighbourhood Development Plans do contribute to the overall supply as per the table above). For this reason the Authority has not provided requirement figures for neighbourhood plan areas. However, if new or reviewed Neighbourhood Development Plans are brought forward by communities, and include additional housing allocations, there will be no in-principle objection to exceeding the housing figures in this policy.

4.171 The policy also safeguards existing dwellings, reflecting their important social function and the limitations on the supply of new dwellings due to their impacts on the statutory purposes of the National Park.

FIGURE 4.5: HOUSING TRAJECTORY 2026



HOUSING SUPPLY BY DISTRICT

Housing Supply by District	Windfall 16YRS	Completions 2024/25	SDLP Allocations	NDP Allocations	Permissions	New Allocations	TOTAL	Average Per Year
Adur	0	0	200	0	1	80	281	14.8
Arun	64	4	28	42	12	48	198	10.4
Brighton & Hove	0	0	0	0	64	0	64	3.4
Chichester	256	123	87	392	352	342	1,552	81.7
Eastbourne	0	0	0	0	0	0	0	0
East Hampshire	416	54	80	330	183	803	1,866	98
Horsham	32	3	230	0	20	80	365	19.2
Lewes	224	49	996	171	133	458	2,031	107
Mid Sussex	32	2	0	0	2	40	76	4
Wealden	16	2	7	0	3	11	39	2
Winchester	144	10	32	22	18	37	263	13.8
Worthing	0	0	0	0	0	0	0	0
Total	1,184	247	1,660	957	788	1,924	6,735	354

GUIDANCE

- Housing Need and Supply Topic Paper
- Site Selection Topic Paper

EVIDENCE

- Housing and Economic Development Needs Assessment and Addendum
- AECOM Housing Needs Assessment
- Land Availability Assessment
- Integrated Impact Assessment (informed by other evidence base studies).

Strategic Policy SDH2: Mix of Homes

Purpose of the Policy

The purpose of this policy is to ensure that development proposals provide a mix of homes that reflect the need and community aspirations, including for downsizing and family housing needs, by providing small and medium-sized homes and supporting self-build or innovative housing models where consistent with other Local Plan policies.

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.

Policy SDH2: Mix of Homes

1 Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.

- a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:

Affordable Rent

- 1 or 2 bedroom dwellings: 70%
- 3 bedroom dwellings: 25%
- 4 bedroom dwellings: 5%

Affordable Home Ownership

- 1 or 2 bedroom dwellings: 55%
- 3 bedroom dwellings: 35%
- 4 bedroom dwellings: 10%

- b) Proposals for market housing should provide the following mix of units:

- 1 bedroom dwellings: at least 5%
- 2 bedroom dwellings: at least 40%

- 3 bedroom dwellings: at least 40%
- 4+ bedroom dwellings: up to 15% (of which, no more than 5% would provide 5 or more bedrooms)

2 Planning permission will be granted for an alternative mix provided that:

- a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or
- b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.

3 Self-build and custom-build proposals that meet identified demand will be supported. On residential developments of 50 or more dwellings, developers must provide 10% fully serviced plots and market them to eligible self-builders and custom-builders for 12 months. If no interest is demonstrated after this period, the plots may revert to general market or affordable housing. Marketing requirements are set out in Appendix A1.

4 Innovative housing models such as co-living development, which provide an appropriate dwelling mix, space standards and proportion of affordable homes will be encouraged.

SUPPORTING TEXT

4.172 Evidence from the Housing and Economic Development Needs Assessment (HEDNA, 2023) highlights demographic trends within the South Downs National Park, including an ageing population and a shift towards smaller household sizes. The projected growth in older households is expected to drive demand for smaller, more manageable homes that support downsizing, as well as specialist accommodation (see also Policies SDH3 and SDH4). Providing local opportunities for downsizing can also release family-sized homes back into the community. Parish Priority Statements further demonstrate clear support for the delivery of small and medium-sized homes.

4.173 It is recognised that many housing sites are small and, in such instances, it may not be possible to achieve the exact proportions set out in Policy SDH2. Nevertheless, the requirements should be broadly met, and the onus will be on providing smaller homes. Excessively large dwellings that undermine the above mix will not be supported. The Authority will have regard to nationally described technical housing standards (NDSS) when assessing the appropriateness of proposed development. All new housing should meet and not significantly exceed these standards.

4.174 In recognition of the trend towards more homeworking, the Authority supports the provision of a home office or study space in properties of all sizes, however, those that meet or exceed the NDSS standard for a bedroom will be counted as a bedroom for the purposes of assessing housing mix. Any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and exceeds the NDSS dimensions for a bedroom, will be counted as a bedroom.

Alternative Mix of Homes

4.175 The Authority recognises that future development will need to respond appropriately to local needs. Policy SDH2 therefore allows for regard to be had to bespoke local housing need evidence relating to the parish. This would normally be in the form of a local (parish) housing needs assessment. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development. Where a made Neighbourhood Development Plan proposes an alternative housing mix, based on robust up-to-date local evidence, this should be used in place of the mix proposed in Policy SDH2.

4.176 The HEDNA 2023 identifies an annual demand for 39-44 self-build serviced plots and recommends that up to 10% of plots on larger housing sites be reserved for self or custom-build homes. The Authority will support the provision of self-build and custom-build housing in order to meet this identified demand, as recorded on the Authority's Self-Build and Custom Housebuilding Register. Demand will be monitored and addressed through site allocations (including those in Neighbourhood Development Plans), planning permissions, and serviced plots on sites of 50 or more dwellings. All plots should be appropriately serviced, with highway access and connections (or the ability to connect within the planning permission period) to electricity, water and wastewater services.

4.177 To address evolving housing needs, Policy SDH2 also supports the development of innovative housing models such as co-living schemes. Co-living developments can provide flexible, affordable, and community-oriented living arrangements that respond to changing household structures and affordability challenges. Support will be subject to meeting requirements regarding dwelling mix, affordability and design quality, including adherence to minimum space standards and the provision of appropriate communal facilities.

GUIDANCE

- Nationally Described Space Standards **Technical Housing Standards – nationally described space standards (MHCLG 2015)**

EVIDENCE

- Housing and Economic Development Needs Assessment
- Needs and aspirations for small dwellings in Neighbourhood Development Plans and Parish Priorities Statements

SEE OTHER RELEVANT POLICIES INCLUDING

SDL2 Design, SDH3 Accessible & Adaptable Homes and SDH4 Specialist and Older Persons Accommodation.

Strategic Policy SDH3: Accessible & Adaptable Homes

Purpose of the Policy

The purpose of this policy is to ensure new housing within the National Park is accessible, adaptable and inclusive, meeting the needs of an ageing population and residents with mobility or care needs. By requiring compliance with advanced Building Regulations accessibility standards, encouraging features such as wet rooms, and securing a proportion of wheelchair-adaptable dwellings in larger developments, the policy aims to promote independence, improve quality of life, and foster community well-being.

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.

Policy SDH3: Accessible & Adaptable Homes

- 1** Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile or have specialist needs or adult homecare requirements.
- 2** All new dwellings shall meet accessible and adaptable standards Part M4(2) of Building Regulations. The provision of wet rooms and/or accessible bathrooms will be encouraged.
- 3** Proposals for 20 or more dwellings shall provide 10% wheelchair adaptable homes Part M4(3)(2)a, unless it is demonstrated not to be practical to deliver onsite and an equivalent off-site contribution is provided.
- 4** Development proposals should also ensure external spaces, routes and parking provision (vehicle and cycle) are accessible for people who are less mobile.

SUPPORTING TEXT

4.178 Evidence from the Housing and Economic Development Needs Assessment (HEDNA) shows that people aged over 65 make up 26.5% of the National Park

population, significantly higher than regional and national averages. There is also a projected 20% increase in the 65+ population by 2033, accounting for most of the area's population growth. As the population of older persons increases, so do health needs, with an expected 25% rise in mobility problems. This policy therefore aims to ensure all new homes are adaptable for future residents' needs.

4.179 All new dwellings in the National Park are required to meet Building Regulations Part M4(2) standard homes which are aimed at the general public including elderly or less mobile residents. They are adaptable for future needs and provide a moderate accessibility level. The cost of meeting this standard has been tested in the *Whole Plan Viability Assessment 2026* and shown to have a minimal impact on viability. Provision of wet rooms and/or accessible bathrooms goes beyond Part M4(2) but saves on the need to adapt properties later, so these will be encouraged in all new homes.

Wheelchair adaptable homes

4.180 The *HEDNA 2023* highlights a specific need for wheelchair-accessible homes in the National Park. It estimates up to 750 dwellings should meet Building Regulations Part M4(3) standard by 2033. Evidence from local housing registers also demonstrates a clear need for wheelchair accessible homes in the affordable housing sector.

4.181 Wheelchair adaptable homes, designed to meet Building Regulations Part M4(3) 2a are aimed at future wheelchair users and can be adapted for wheelchair use in the future, as needed. They must provide larger circulation spaces, wider doors, and turning circles, but not all fittings (like lowered worktops) need to be installed initially. 10% of new dwellings on larger schemes (20 or more) will be expected to meet this standard.

In lieu contribution

4.182 Wheelchair adaptable homes require generous circulation space, step-free access, and specific design features. On constrained sites, such as steeply sloping land or flatted development, these requirements may be technically possible but not practical or proportionate. In these circumstances the Authority will accept an in lieu financial contribution to provide a wheelchair accessible home in partnership with a Housing Authority within the National Park. The cost of providing a wheelchair accessible home is taken to be £15,000 based on the Wheelchair Housing Design

Guide for a 3 bedroom house. This cost will be indexed over the lifetime of the Local Plan.

External spaces, routes and parking provision

4.183 The external environment of a development should be designed to be fully accessible and inclusive. Principal entrances must be reached via step-free routes, with external paths constructed in slip-resistant materials and gradients kept to a minimum. Where wheelchair adaptable homes are provided, appropriate accessible parking bays should also be included. Cycle parking should cater for non-standard cycles– such as tricycles, handcycles, cargo bikes, and adapted cycles– located conveniently with adequate spacing, step-free access, and secure storage that does not require lifting.

EVIDENCE

- Housing and Economic Development Needs Assessment 2023
- Whole Plan Viability Assessment 2026

SEE OTHER RELEVANT POLICIES INCLUDING

SDL2 Design, SDT1 Vision-led Transport

Strategic Policy SDH4: Specialist and Older Persons' Accommodation

Purpose of the Policy

The purpose of this policy is to make provision for a mix of specialist and older persons' accommodation to meet the needs arising in the National Park.

Local Plan Objective

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

SDH4: Specialist and Older Persons' Accommodation

- 1** The Authority will seek to protect existing fit for purpose specialist and older persons' accommodation from development proposals to other uses. Applications that would result in a loss of such accommodation will not be permitted unless:
 - a) It can be demonstrated that the accommodation is no longer required to meet local need, supported by up-to-date evidence; or
 - b) Equivalent or improved provision is made elsewhere; or
 - c) The accommodation is demonstrably unsuitable for continued use and cannot be viably adapted.
- 2** The Authority will support the appropriate refurbishment or expansion of existing specialist and older persons' accommodation.
- 3** Proposals for new well-designed specialist and supported accommodation (including older persons housing) will be supported in sustainable locations that allow integration into the local community and provide access to local facilities and services where appropriate.
- 4** The following sites are identified as suitable for providing either an element of specialist care accommodation as part of a mixed tenure development or sole specialist accommodation:
 - a) SDA11 Land south of Paddock Way, Petersfield
 - b) SDA23 Midhurst Community Hospital and 1-2 Rotherfield Mews, Easebourne

- c) SDA28 Land at Farnham and Station Roads, Liss
- d) SDA31 Land West of Liphook/ Land at Westlands Park, Liphook
- e) SDA34 Alfriston Court, Sloe Lane, Alfriston
- f) SDA58 Hoe Court, Lancing

SUPPORTING TEXT

4.184 The National Park has a significant and growing older population: 26.5% of residents are aged 65+, compared to 18% nationally. By 2033, the 65+ population is projected to increase by 20%, representing the majority of overall population growth. Within this, the number of residents aged 85+ is expected to rise sharply by 47%. These demographic changes are likely to be accompanied by increased health and mobility challenges, driving substantial demand for specialist housing and accessible homes. This policy works alongside Policy SDH3 to provide accessible and adaptable homes that are “homes for life”, suitable for all ages.

4.185 The Housing and Economic Development Needs Assessment (HED NA) provides detailed estimates of the scale and type of housing required in response to the demographic projections:

	Affordable	Market	Total
Year	2023-2033	2023-2033	2023-2033
Housing with support	382	1,237	1,619
Housing with care	213	588	801

Residential care bedspaces	224
Nursing care bedspace	369
Total bedspaces	593

4.186 There is an identified need for approximately 1,600 units of housing with support (commonly referred to as sheltered or retirement homes). In addition, around 800 units of housing with care (or ‘extra-care’ housing) are required to meet future demand. Alongside these, provision for approximately 600 additional residential and nursing bedspaces will be necessary to address the growing needs of the population. An overview of the different types of the specialist accommodation and their specific planning considerations is set out below:

Housing Type	Key Features	Care Level	Target Group	Planning & Location Considerations
Sheltered / Retirement Housing	Self-contained units, communal lounge, alarm system, visiting manager	Low (support only)	Independent older people	Usually C3 use class; may require communal space provision. Should have good access to shops and social hubs
Extra-Care Housing	Self-contained units, 24/7 care team, meals, activities, communal dining	Medium (care on-site)	Older people with higher care needs	Often C3 but can be C2; Sites with space for communal facilities and reasonable access to facilities; good transport links; near health services
Residential Care Home	Private rooms, shared spaces, personal care (washing, dressing, meals)	High (personal care)	People unable to live independently	C2 use class; good accessibility for staffing and visitors, sites with quiet surroundings; near hospitals or health centres for ease of medical visits.
Nursing Home	Similar to residential care but with qualified nurses for medical needs	Very High (nursing care)	People with complex health conditions	C2 use class; good accessibility for staffing and visitors, sites with quiet surroundings; near hospitals or health centres for ease of medical visits.

4.187 This policy seeks to address these needs, firstly by protecting and supporting the expansion of existing fit for purpose specialist accommodation. It is also recognised that new provision will be needed, and the policy sets out support for proposals in suitable locations with good access to local services and facilities.

4.188 In addition, specific sites are listed in the policy as suitable for specialist care accommodation. These sites have been identified based on their proximity to local services, accessibility, and potential for integration into the community. Further details of the capacity and specific accommodation mix for these sites are set out in the relevant allocation policies.

4.189 It is evident from the HEDNA 2023 that there is a need for affordable specialist accommodation, therefore affordable units should be provided in the same proportion as the requirements for general housing (see Policy SDH5). The Whole Plan Viability Assessment– South Downs National Park Authority acknowledges the additional costs and challenges in providing C2 use class accommodation, the Authority will therefore take account of the nature of the scheme and the practicalities of providing and managing affordable units in determining the appropriate proportion of affordable accommodation.

EVIDENCE

- Housing and Economic Development Needs Assessment 2023.
- Whole Plan Viability Assessment 2026

SEE OTHER RELEVANT POLICIES INCLUDING

SDL2 Design, SDH2 Housing Mix, SDH3 Accessible and Adaptable Homes, SDH5 Affordable Homes

Strategic Policy SDH5: Affordable Homes

Purpose of Policy

The purpose of this policy is to maximise the delivery of affordable homes across the National Park as part of market-led housing schemes.

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.

Policy SDH5: Affordable Homes

- 1** Development proposals for new self-contained residential development (Use Class C2 and C3, including retirement and other specialist care housing) will be permitted that maximise the delivery of affordable housing to meet local need, and provided that, as a minimum, the following are met:
 - a) On sites with gross capacity to provide 10 or more homes, the following will be required:
 - i. a minimum of 40% of new homes created will be provided as affordable homes on-site on greenfield sites and a minimum of 30% as affordable homes on-site on previously developed land;
 - ii. a minimum of 75% of these affordable homes will be provided as Social Rent or Affordable Rent, with no less than 25% Social Rent, unless robust justification is agreed with the Authority that demonstrate local needs require otherwise;
 - iii. the remaining percentage will be provided as low-cost home ownership in perpetuity which may include shared ownership, other tenures (e.g. Discounted Market Sales or Shared Equity) will be considered on a case-by case basis, with robust evidence to justify these and where this does not prejudice the ability to meet the priority need for additional rented affordable homes. For discounted market products, a discount of a minimum of 30% below local market value will be required.

- b) On sites with gross capacity to provide between 3 and 9 homes, a proportion of affordable homes will be provided in accordance with the following sliding scale, applied to new homes created:
- 3 homes: a meaningful financial contribution towards off-site provision of affordable homes;
 - 4 – 5 homes: 1 affordable home;
 - 6 – 7 homes: 2 affordable homes;
 - 8 homes: 3 affordable homes;
 - 9 homes: 3 affordable homes;
- Development proposals of 4 to 9 gross dwellings will provide affordable housing on-site. The Authority's preference is for rented affordable homes (social rent or affordable rent). Alternative affordable tenures will be accepted where the homes will remain affordable in perpetuity, and a Registered Provider or alternative reputable provider of affordable housing (such as a Community Land Trust or Rural Estate) cannot be identified to manage any rented affordable homes. Exceptionally, at the discretion of the Authority, financial contributions in lieu will be accepted;
- c) The above requirements do not override place-specific affordable housing requirements set out in made Neighbourhood Development Plans, for example Lewes Low-Cost Housing, or affordable housing requirements set out in specific allocation policies;
- 2** Insufficient affordable housing provision which does not meet the requirements of Part 1 will be a significant factor weighing against approval, irrespective of any viability barriers. Robust independent financial appraisal will be required alongside any application not complying with Part 1. Where, exceptionally a reduction in the level of affordable housing provision is agreed, the Authority will use review mechanisms to ensure that any future improvement in viability, helps to deliver additional affordable homes. Priority will also be given to achieving the target number of on-site affordable homes over other requirements set out in this policy;
- 3.** Development proposals will be permitted provided that affordable housing units are integrated within the development, are indistinguishable in design and materials from the market housing on the site;
- 4.** Affordable homes for rent will be managed by a Registered Provider or alternative reputable provider (e.g. Community Land Trust or Rural Estate).

Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable;

- 5.** Developers may not circumvent this policy by artificially subdividing sites;
- 6** The redevelopment of existing affordable housing areas for higher density homes will be supported subject to the following:
- a) Evidence of comprehensive and robust early engagement with existing tenants in formulating redevelopment proposals;
 - b) The new homes are all affordable with at least as many social rent and affordable rent as the existing development;
 - c) The embodied carbon implications are fully considered and demolition materials reused on site wherever possible; and
 - d) The new homes demonstrate significant improvements in climate change adaptation and energy and water consumption compared to the existing ones.

SUPPORTING TEXT

4.190 All development falling within Use Classes C2 or C3 is subject to Policy SDH5, including and retirement or extra-care accommodation. The policy applies to all developments of 3 or more new homes and applies to all residential units on the site that have been created by building new structures or converting existing structures.

Amount of Affordable Housing

4.191 Policy SDH5 sets out a sliding scale of requirement for developments to provide affordable housing. This recognises the greater challenges that exist for both small site developers and the development of previously developed land, in making such provision. These requirements have been tested for viability, taking account of the different market circumstances across the National Park. Where a site comprises both greenfield and previously developed land, the affordable housing requirement shall be calculated pro-rata based on the proportion of each land type. Where the calculation of the on-site affordable housing requirement results in a fraction of a unit, the requirement will be rounded up to the nearest whole number.

4.192 Gross capacity shall mean the maximum number of dwellings that could reasonably be accommodated on the site, having regard to site size, layout, and local character, irrespective of the applicant’s proposed scheme.

Mix of Affordable Housing Tenures

4.193 The Housing and Economic Development Needs Assessment (HEDNA 2023 and 2025 update) demonstrate strong evidence of need for affordable rented homes, and in particular social rented housing. Since the first South Downs Local Plan, house values and market rents have continued to rise whilst household incomes remain modest. The National Park Authority considers that social rent is the most affordable tenure to those in greatest need and should be prioritised over other forms of rented tenure. The *NPPF 2024* also places greater emphasis on social rented housing and states planning policies are to specify the minimum proportion of social rent homes required. Whilst the *HEDNA* points to evidence that around 60% of new affordable homes should be social rent, consideration has been given to the findings of the *Whole Plan Viability Assessment* in setting a minimum requirement of 25% social rent in Policy SDH5. The Authority will negotiate the greatest viable level of social rent over and above this minimum on a case-by-case basis.

4.194 Whilst the priority is for affordable rented homes, there can be a role for low-cost home ownership which may assist in the overall viability of a development and allow more units overall to be delivered. Given the high cost of housing locally however, low-cost home ownership will only be accessible to a very limited proportion of those in housing need. The Authority requires a discount of a minimum of 30% below local market value to reflect the high cost of buying a home in the National Park and local income levels.

4.195 Policy SDH5 reflects the *HEDNA* strategic tenure mix as a requirement for new housing development, whilst allowing flexibility to reflect local need. Evidence of local need can include but is not limited to: local (parish) housing needs assessment or housing registers (waiting lists). If a tenure mix is proposed which departs from the strategic tenure mix set out in Policy SDH5, robust evidence must be provided, which is supported by the relevant housing enabler.

Viability

4.196 The *Whole Plan Viability Assessment 2026* highlights that development viability within the National Park has become increasingly challenging since the adoption of the first Local Plan. In response, affordable housing requirements have been reduced,

particularly on previously developed land (PDL). As PDL is typically located within towns and villages, it offers well-situated opportunities for affordable homes. A careful balance must therefore be maintained: ensuring the delivery of affordable housing while avoiding delays to development. The *Vision and Circular on English National Parks and the Broads* emphasizes that new housing in National Parks should prioritize affordability, while also supporting local employment opportunities and essential services.

4.197 In exceptional cases where viability is a genuine barrier to delivery, and the requirements of Policy SDH5 cannot be met, the Authority will require the applicant to demonstrate this by submitting a robust viability appraisal. This should show that the cost of land reflects the existing value of land in its current use, plus a reasonable, but not excessive, uplift which provides an incentive for the land to be sold. The Authority will not accept a land cost assumption that factors in ‘hope’ value. It will expect also that land purchase/sale negotiations have ensured due diligence, and have fully taken into account the whole cost of development, including all adopted and emerging development plan policies, CIL, and any abnormal costs reasonably identifiable ahead of development, as a prerequisite for development potential. Affordable housing provision and other planning obligations should therefore result in reduced residential land values which reflect these factors.

4.198 In cases where viability is still an issue, having had regard to the above, developers will be expected to contribute as fully as possible to mixed and balanced communities, by assessing development options in accordance with the following cascade:

- i) Firstly, reduce the proportion of rented affordable tenure homes in favour of intermediate housing that best reflect local need;
- ii) Secondly, reduce the overall percentage of housing provided as affordable units; and
- iii) Thirdly, provide a financial contribution for affordable housing to be delivered off-site.

4.199 The viability appraisal must be done on an independent and open-book basis and must be undertaken by a professionally qualified member of the Royal Institution of Chartered Surveyors (RICS) to establish the appropriate form and level of contribution. Where the Authority does not agree that the appraisal has been undertaken robustly and fairly, it must be independently audited at the cost of the developer and subsequently reviewed if necessary.

4.200 Where an in lieu financial contribution is agreed, this will be based on £111,558 to offset one affordable dwelling. This figure will be updated each year index linked. Where a meaningful financial contribution is required for sites of 3 homes, a financial contribution equivalent to half of an affordable homes will be required.

Affordable Housing Review Mechanisms

4.201 Where a lower proportion of affordable housing is accepted by the Authority, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions, up to the requirement in Policy SDH5, if market conditions improve before the completion of development. This is known as a review mechanism and is designed to ensure that, where a development is permitted with reduced affordable housing due to viability constraints, its viability is reassessed so that any improvement in market conditions can translate into additional affordable housing. Developments of 10 dwellings or more will be subject to an early review which is triggered if sufficient progress on construction of the approved development has not been achieved after 2 years from the date of the permission being granted (or at an alternative time as agreed with the Authority). In addition to any early stage review, a late stage review on sites of 25 or more homes will be required where a policy-compliant level of affordable housing required was not achieved at planning permission stage as a result of viability evidence. The late stage review will generally take place at the point when 75% of the permitted dwellings have been sold (or if not being sold, when 75% are occupied), but before the completion and sale of the whole development to ensure that any additional requirements are enforceable.

4.202 Further guidance on viability matters is set out in the *Affordable Housing Supplementary Planning Document*.

GUIDANCE

- Affordable Housing SPD

EVIDENCE

- HEDNA 2023 and Addendum 2025
- Whole Plan Viability Assessment 2026

SEE OTHER RELEVANT POLICIES INCLUDING

SDH2 Mix of homes, SDH6 Rural Exception Sites.

Strategic Policy SDH6: Rural Exception Sites and Rural Estates Housing

Purpose of the Policy

The purpose of this policy is to maximise affordable housing provision and to meet local needs, by considering affordable housing development on land where planning permission would not normally be granted, on what is referred to as 'exception sites' or as part of small-scale Rural Estate development.

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.

SDH6: Rural Exception Sites and Rural Estates Housing

- 1** Proposals for rural exception sites will be permitted where:
 - a) 100% Affordable housing is provided in perpetuity; or
 - b) at least 70% of housing provided meets priority local affordable housing needs in perpetuity, and where it is demonstrated to the Authority's satisfaction that a mixed tenure scheme including alternative forms of housing (e.g. self-build or market housing), is essential to make the scheme viable and it is the minimum number of market dwellings needed to make a scheme financially viable; or
 - c) Provision of a serviced plot or dwelling for the landowner is demonstrated to be essential to make land available.
- 2** All proposals for rural exception sites will be subject to the following criteria:
 - a) The scale and location relate well to the existing settlement and landscape character;
 - b) Community engagement feeds into the design, layout and types of dwellings proposed;
 - c) The size (number of bedrooms), type and tenure, (for example, social and affordable rented, intermediate, shared ownership or older people's housing) of affordable homes is based on robust evidence of local community need

in the form of either a local housing needs survey or appropriate secondary data; and

- d) Affordable homes for rent will be managed by a Registered Provider or alternative reputable provider (e.g. Community Land Trust or Rural Estate). Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met and that the dwellings are retained as affordable rent in perpetuity. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or Community Land Trusts where applicable.
- 3** Community-led Development proposals will be given positive weight in the planning balance.
- 4** Small-scale development proposals (9 or fewer dwellings) on rural estates will be permitted for 100% affordable housing for rent in perpetuity. On these sites, the Estate shall set out how the proposed homes will be developed and managed to meet the housing needs of rural or essential local workers, and such details will need to be agreed with the Authority. The following criteria must be demonstrated and will be secured through any relevant planning permission:
- a) The Estate sets out the access and eligibility criteria for the affordable homes together with the rent policy and rent levels. Such details are to be approved by the Authority, with an appropriate review mechanism in place; and
- b) 100% of the housing will be occupied by either essential local workers who meet the requirements of the agreed access and eligibility criteria, or people with a local connection and housing need which is not met by the open market.

SUPPORTING TEXT

4.203 Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connections to the locality.

Mix of tenures

4.204 Since the adoption of the first Local Plan in 2019, only a very limited number of affordable homes have been delivered on exception sites within the National Park. The Authority recognises that improving delivery may require cross-subsidy from market housing or alternative incentives for landowners. However, this must

be carefully managed to avoid inflating the 'hope value' of potential sites and undermining affordable housing provision.

4.205 Any proposal for a rural exception site that relies on cross-subsidy from market or self-build housing must be supported by a robust viability appraisal. In certain cases, where a landowner does not seek a capital receipt and wishes to retain part of the site or a dwelling for personal use, this may be acceptable provided that at least 70% of the homes meet priority local affordable housing needs. Any plot or dwelling retained by the landowner should be modest in scale and comply with the wider requirements of the Local Plan, including Policy SDH2.

Evidence of local housing need

4.206 It is important that the need for affordable housing in the existing settlement (or group of settlements) is well evidenced. This may be through an up-to date local housing needs survey or can include alternative data sources including reference to the Housing Authority's Register. Consideration should also be given to community priorities expressed in Neighbourhood Development Plans or Parish Priority Statements, provided these are supported by robust and current evidence.

Management of affordable homes

4.207 Affordable homes delivered through Rural Exception Sites are typically managed by a Registered Provider. However, alternative arrangements may be supported where a reputable organisation– such as a local authority, rural estate, or legally constituted Community Led Housing Group– can demonstrate transparency and fairness in property allocation, alongside high-quality ongoing management and maintenance.

Delivery of Rural Exception Sites

4.208 The Authority is committed to proactively supporting the delivery of Rural Exception Sites. Applicants and local communities are encouraged to engage with the Authority at the earliest stage of proposal development. Early advice will be provided on site suitability, and applicants for sites of 9 or fewer may seek an initial 'Permission in Principle' to confirm this. In addition, the Authority offers an Affordable Housing Grant, funded through developer contributions (Section 106), to support non-profit groups such as Community Land Trusts (CLTs) in creating permanently affordable homes.

Rural Estate Affordable Housing

4.209 Rural estates have a long tradition of providing homes for estate workers. More recently, some estates within the National Park have expressed interest in delivering affordable housing for local residents. Policy SDH6 sets out criteria to enable small-scale affordable housing development on rural estates, ensuring homes are secured as affordable rent tenure in perpetuity. These homes are intended for essential local workers, including frontline public sector employees such as NHS staff, teachers, police officers, firefighters, military personnel, and those working in social care and childcare.

GUIDANCE

- Affordable Housing SPD

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDT1 Vision-led Transport

Strategic Policies SDH7 and SDH8: Replacement and Subdivision of Dwellings and Householder Development

Purpose of the Policies

The purposes of these policies are to facilitate replacement and sub-division of homes and householder development whilst:

- Avoiding potential adverse impacts on the character and appearance of the landscape and on the amenities of occupants and neighbouring properties; and
- Protecting the supply of small and medium dwellings in the National Park.

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.

Policy SDH7: Replacement and Subdivision of Dwellings

- 1** Proposals for the replacement and/or subdivision of dwellings will be permitted where they are not overbearing or of a form which would be detrimental to the amenity of occupants and/or neighbouring properties by virtue of loss of outlook, privacy, and/or light.
- 2** Proposals for the replacement of one dwellings with one new dwelling will be permitted where the replacement dwelling– considering all new and existing development– does not result in a net floorspace increase of more than approximately 30% compared with the gross internal area (GIA) of the “existing dwelling” (as it was originally built or existed on 18 December 2002, whichever is the later) unless the existing dwelling has a GIA of more than 120 square metres.
- 3** Proposals for the replacement or subdivision of one dwelling with two or more new dwellings will be permitted where:
 - a) The new dwellings each have a gross internal area of approximately 120 square metres or less and are designed with appropriate layouts and internal arrangements; and

- b) There is sufficient scope within the curtilage of the existing dwelling to provide satisfactory outdoor private amenity space, landscaping, boundary treatments, external storage and vehicular parking for each new dwelling.
- 4 Where permission is granted, future development may be managed by the removal of permitted development rights.

Policy SDH8: Householder Development

- 1 Proposals for householder development will be permitted where:
- a) They respect the established character of the local area, are visually subservient and in keeping with the appearance, character, and scale of the host dwelling, and retain adequate outdoor private amenity space and parking; and
- b) They are not overbearing or of a form which would be detrimental to the amenity of occupants and/or neighbouring properties by virtue of loss of outlook, light and/or privacy.
- 2 Proposals for alterations and/or extensions to dwellings will be permitted where they satisfy Criteria 1 and – in considering all new and existing development– do not result in a net floorspace increase of more than approximately 30% compared with the gross internal area (GIA) of the “existing dwelling” (as it was originally built or existed on 18 December 2002, whichever is later) unless the existing dwelling has a GIA of more than 120 square metres or there are exceptional circumstances.
- 3 Proposals for new and/or extended annexes should satisfy Criteria 1 and demonstrate that they are ancillary and have a functional and physical dependency on the host dwelling.
- 4 Proposals for new and/or extended outbuildings should satisfy Criteria 1 and demonstrate that they are required for purposes incidental to the use of the host dwelling.
- 5 Where permission is granted, future development may be managed by the removal of permitted development rights.

SUPPORTING TEXT:

4.210 The policies apply to proposals for the replacement, subdivision, alteration (including loft conversions) and/or extension (including conservatories, dormers and porches) of C3 residential dwellings and other development within their curtilages. It

is recognised that the way in which we use our homes is changing. The Authority will generally support home-working and home-based businesses where this does not involve a change of use of the host dwelling.

4.211 The adherence to – and applicability of – floorspace limits does not mean that permission will automatically be granted. The policies will be considered alongside other relevant policies in the Development Plan.

SDH7 and SDH8– Existing Dwelling

4.212 The “existing dwelling” is either the residential unit(s) that existed on 18 December 2002 (when the National Park was first designated) or the original dwelling(s) first built or legally established after this date. If the residential unit(s) existed on 18 December 2002, then the existing dwelling includes all alterations, conversions, demolitions, extensions, and replacements completed on this date, including those carried out under permitted development rights. Development that is not part of the existing dwelling – including development carried out under permitted development rights– will be considered as part of the 30% floorspace limit.

SDH7 and SDH8– Floorspace Calculations

4.213 Floorspace is measured as gross internal area (GIA) and denoted in square metres (sqm) as per Nationally Described Space Standards and the RICS 6th Edition Code of Measuring Practice. The onus is on the applicant to provide evidence to determine floorspace and headroom. This may include building control records, lawful development certificates, photographs and/or other appropriate evidence as requested. Where there is any doubt, it will be presumed that any visible or known changes are not part of the existing dwelling and, instead, form part of the 30% floorspace limit. Any reference to permitted development rights or previous planning permissions to justify going beyond the 30% floorspace limit will need to be demonstrated as implementable and not theoretical.

4.214 There will be a degree of judgement in considering whether annexes, attics, basements, car ports, lofts, garages and outbuildings should be included in floorspace calculations. The above should be included if capable of being used as habitable floorspace and/or they are of substantial construction. In coming to a determination, access, exposed elevations, light (both artificial and natural), headroom (at least 1.5m), and rationalisation should be considered. In terms of rationalisation, this will be considered on a case-by-case basis and only applied where a clear improvement is demonstrated.

SDH7 and SDH8– Floorspace Limits

4.215 The word “approximately” allows a degree of flexibility to ensure a proposal is landscape-led and sensitively designed, while still delivering on the purpose to protect the supply of small and medium dwellings. In terms of subdivisions only, it is recognised that it will not always be possible to deliver new dwellings with a GIA of 120sqm or less given limitations in re-configuring existing spaces.

4.216 A “large dwelling” in the South Downs National Park is defined as a dwelling with a GIA of 120sqm or more. Replacement of, and alterations and extensions to, an existing dwelling that is a large dwelling will not reduce the supply of small and medium dwellings, and so the 30% floorspace limit is not applicable in these instances. However, like small and medium dwellings, proposals to large dwellings will still be considered in relation to the amenities of occupants and neighbouring properties, and potential impacts on the character and appearance of the immediate and wider landscape amongst other material considerations.

SDH8– Exceptional Circumstances

4.217 There is no prescribed definition of “exceptional circumstances” so proposals will be considered on a case-by-case basis. As an example, the Authority believes that the daily care, health and wellbeing needs of an older or disabled person (as defined by the *Equality Act 2010*) – including their ability to carry out day-to-day activities and any needs to accommodate living carers (not an au pair or “nanny”) – could be an exceptional circumstance. It will need to be demonstrated how a proposal would appropriately and genuinely support such needs and activities. It is recognised that the above will be personal and specific to each individual and will need to be considered respectfully and sensitively. Evidence from applicants, medical and/or clinical practitioners, and others may be required and will be kept confidential and not published.

SDH8– Annexes and Outbuildings

4.218 Additional accommodation can include extensions to, and outbuildings within the curtilage of, a host dwelling. Accommodation is either “ancillary” or “incidental” depending on primary living accommodation (i.e., bathroom, bedroom, kitchen, and/or living room). Incidental uses can contain an element of primary-living accommodation but remain subordinate to the host dwelling (i.e., a garage, office or shower room), while ancillary uses contain primary-living accommodation that allow a degree of independence (i.e., an annex).

4.219 If development contains primary living accommodation which would allow it to be self-contained, then this would not be ancillary and would create a new planning unit. A physical dependency and functional link between the accommodation and host dwelling must be demonstrated to be considered ancillary. An occupant’s relationship to those living in the host dwelling, and reliance on the host dwelling for their day-to-day needs, will be considered. In all instances, the ancillary accommodation and host dwelling must fall under the definition of a Class C3(a) dwellinghouse as outlined in the *Use Class Order*.

4.220 Annexes and outbuildings should be sensitively sited to the side or rear of – and must share the same access, parking, private amenity space, and utilities as – the host dwelling. In general, existing buildings should be reused before considering new buildings and structures.

SDH7 and SDH8– Planning Conditions

4.221 Planning permission may be subject to planning conditions including, but not limited to, the removal of permitted development rights, specification of certain land use classes, and/or measures to avoid annexes becoming separate planning units. This does not necessarily prevent future development but instead enables the Authority to manage future changes through the planning system to ensure that the appearance, character, design, relationship, and use of a development endures in perpetuity.

GUIDANCE

- Nationally Described Space Standards Technical Housing Standards – nationally described space standards (MHCLG 2015)
- Extensions and Replacement Dwellings Technical Advice Note

EVIDENCE

- Housing and Economic Development Needs Assessment
- Needs and aspirations for small dwellings in Neighbourhood Development Plans and Parish Priorities Statements

SEE OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDL1 Landscape Character, SDL2 Design, SDH3 Accessible and Adaptable Homes, SDH5 Affordable Homes

Strategic Policy SDH9: New Rural Workers' Dwellings

Purpose of Policy

The purpose of this policy is to support rural workers that have a genuine need to live on or near their place of work.

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.

Policy SDH9: New Rural Workers' Dwellings

1 Development proposals for rural workers' dwellings will be permitted where it has been demonstrated that the nature and demand of the work concerned make it essential for one or more people engaged in rural land-based enterprises to live at, or very close to, the site of their work.

2 Applications for new permanent rural workers' dwellings will need to demonstrate that:

- a) The rural land-based enterprise is established, extensive, viable and contributes to the special qualities of the National Park;
- b) There is an essential functional need for the rural workers' dwelling that could not be fulfilled either by another residential dwelling on the enterprise or existing residential accommodation in the local area which is suitable and available for occupation by the workers concerned;
- c) No other residential dwellings either on or closely connected to the enterprise have been sold off separately or alienated from it in the past five years unless the reason for separation is justified through robust evidence;
- d) Full consideration has first been given to the conversion of an existing building within the enterprise; and
- e) The proposed rural workers' dwelling should be well-related in terms of siting to existing buildings or dwellings within the enterprise, have a total habitable floor space not exceeding 120m² (gross internal area excluding rural working related rooms such as office space and boot rooms) and be designed appropriately for its function.

3 Applications for the removal of occupancy conditions will not be permitted unless it can be demonstrated through robust evidence that there is no longer a current or possible renewed need for the dwelling for the authorised use for the foreseeable future, and will only be made available on the open market when it has been robustly demonstrated that its use as an affordable dwelling would be unviable or unsuitable or unnecessary.

4 Temporary dwellings for rural workers will be permitted for a temporary period where they are essential to support the rural land-based enterprise, whether new or established, provided that it is demonstrated that:

- a) There is a firm intention and ability to develop the enterprise;
- b) There is a clear functional need to support the enterprise;
- c) The enterprise has been planned on a sound financial basis;
- d) The location would be suitable for a permanent rural workers' dwelling; and
- e) It is easily dismantled and/or taken away.

5 Where permission is granted for new dwellings under this policy, future extensions may be controlled by the removal of permitted development rights.

SUPPORTING TEXT

4.222 Previously this policy was restricted to agricultural and forestry workers, but the extension to all rural workers reflects national policy and the reality that the diversification of agriculture and other land-based industries, as well as the growing nature sector, means that work that is necessary to the positive management of land is no longer restricted to traditional agricultural and forestry sectors. Robust evidence will be required to support the essential need for a rural worker to live at, or very close to, the site of their work, including for instance safe response times to address medical issues with livestock.

4.223 A 'rural worker' is defined as someone who is engaged on a full-time basis in a land-based industry – such as farming, forestry, horticulture, nature conservation or equestrian businesses– which rely on open land and associated buildings.

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDW5 Pollution and Air Quality.

Strategic Policy SDH10: Gypsies, Travellers and Travelling Showpeople

Purpose of the Policy

The purpose of this policy is to set out how the Authority will seek to meet the needs of the gypsy, traveller and travelling showpeople communities.

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.

Policy SDH10: Gypsies, Travellers and Travelling Showpeople

1 Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need;

2 The National Park Authority will seek to meet the local needs of Gypsies, Travellers and Travelling Showpeople, as demonstrated in the most up to date Gypsy and Traveller Accommodation Assessment, by the allocation of permanent pitches on the following sites as identified on the Policies Map:

- Land west of Liphook – 14 pitches (SDA31);
- New Barn Stables, Binsted – 1 pitch (SDA37);
- Land north of Kings Lane, Coldwaltham – 2 pitches (SDA43); and
- Offham Barns, Offham – 4 pitches (SD83).

3 Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in Planning Policy for Traveller Sites 2024 or any subsequent policy) on unidentified sites will be permitted where they:

- a) Meet gypsy, traveller or travelling showpeople needs as demonstrated in the most up to date Gypsy and Traveller Accommodation Assessment or other robust evidence;

- b) Are in locations in reasonable proximity to settlements from which residents can access education, health, welfare and employment infrastructure, reflecting the extent to which opportunities for mixed residential and business uses can contribute to sustainability;
 - c) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;
 - d) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park;
 - e) Provide sufficient amenity space for residents;
 - f) Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers;
 - g) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
 - h) Restrict any permanent built structures in rural locations to essential facilities;
- 4** Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.

SUPPORTING TEXT

4.224 The evidence base for the needs of these communities is set out in the South Downs, Brighton & Hove and Adur and Worthing Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) published in December 2024. This report established the following needs for gypsy and traveller accommodation (PPTS definition).

Area of the SDNP	2024-29	2029-34	2034-39	2039-42	Total Need
Adur	0	0	0	0	0
Arun	10	2	2	1	15
Brighton & Hove	7	1	2	1	11
Chichester	11	1	1	1	14
Worthing	2	0	0	1	3
East Hampshire	5	2	4	1	12
East Sussex (Lewes)	1	1	1	1	4
Horsham	0	0	0	0	0
Mid Sussex	0	1	1	1	3
Winchester	0	0	0	0	0
Total Need	36	8	11	7	62

4.225 Four allocated pitches at Fern Farm, Greatham have been implemented since the GTAA was prepared, reducing the overall need during the plan period to 58 pitches. Assuming an adoption date of 2027 for this Local Plan, a five year land supply of gypsy and traveller sites (i.e to 2032/33) would be approximately 42 pitches (taking a mid-point for the 2029-34 figure). In terms of needs for travelling showpeople, the GTAA establishes a need for 11 plots over the plan period, approximately 7 of which would be needed before 2032/33. Unfortunately, despite three separate calls for sites and joint working with neighbouring local planning authorities, the Authority can only identify sites for 21 gypsy and traveller pitches and no travelling showpeople plots.

4.226 In the light of this shortfall, unidentified sites will be considered positively against the criteria in 3 and 4 in order to boost the supply.

GUIDANCE

- Planning Policy for Traveller Sites, updated 12 December 2024
- Gypsy and Traveller Topic Paper (including site assessments)

EVIDENCE

- **Gypsy and Traveller Accommodation Assessment– South Downs National Park Authority** and letter from RRR Consultants confirming this takes into account the changes to the definition in the December 2024 PPTS.

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDW5 Water and Pollution.

ECONOMY



Strategic Policy SDE1: Economic Development

Purpose of Policy

The purpose of this policy is to support the provision and enhancement of employment floorspace and to safeguard existing employment space from alternative uses. This is to support sustainable communities where working age people are able to be economically active and can work close to where they live. A prosperous local economy contributes to improving mental health and wellbeing and reducing health inequalities for the population.

Local Plan Objectives

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.

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.

Policy SDE1: Economic Development

1 Development proposals that foster the economic and social well-being of local communities within the National Park will be permitted provided that they meet one or more of the following:

- a) Promote and protect businesses linked to the National Park's key sectors including professional services, manufacturing, the green economy, tourism and land-based sectors;
- b) Support supply chains across the National Park and its environs and encourage closer ties between businesses;
- c) Provide for and support small and micro businesses through the provision of small, flexible, start-up and move-on business units including incubator uses;
- d) Provide flexibility for established businesses to secure future resilience and protect local jobs;

e) Intensify the use of an employment (Classes B2, B8 and/or E(g)) site and make a more efficient use of brownfield land; and

f) Promote smart economic growth and advances in information and communications technologies, particularly superfast broadband.

2 Development proposals for the change of use of B2 and B8 premises to new E(g) offices will be permitted.

3 The Authority will safeguard all existing employment (Classes B2, B8 and/or E(g)) sites and allocations that are fit for purpose from development proposals for other uses. Applications that would result in a loss of such employment land will only be permitted provided that evidence of a robust marketing campaign clearly demonstrates that there is no market demand for the business premises. The marketing campaign will be at least 12 months and details of marketing requirements are set out in Appendix A1.

SUPPORTING TEXT

4.227 The 'green economy' is sometimes referred to as the net zero economy. It includes low-carbon infrastructure, facilities to support the circular economy or reduced use of resources, renewable energy, local food systems, eco-tourism and environmental consultancy.

4.228 The Housing and Economic Development Needs Assessment identifies a need for 5.9 hectares of office space and 13.2 hectares of industrial/warehousing space between 2022 and 2042. The Employment Land Review demonstrates that the overall need can be met through existing commitments (extant planning permissions). However, there is an imbalance between the provision for offices and industrial/warehousing due to a very large development for warehousing at Longmoor Camp near Liphook, and the loss of significant office space at Syngenta near Fernhurst. Criterion 2 of the policy seeks to address this imbalance by facilitating the change of use of existing industrial/warehousing space to office space. Additional employment land is also proposed at Shoreham Cement Works to provide flexibility of supply and an appropriate mix of uses on the site.

4.229 Criterion 3 seeks to safeguard all existing and allocated employment sites in Use Classes B2, B8 or E(g), previously B1. The introduction of Class E to the Use Classes Order, which includes offices with a range of other uses including retail, may make the safeguarding of offices difficult if there are no planning conditions or

Article 4 Directions which limit the use of a unit to Class E(g). In these circumstances the Authority will take a pragmatic approach to proposed changes of use or redevelopment, having regard to any realistic fallback position.

GUIDANCE

- Marketing Appendix A1

EVIDENCE

- HEDNA, Employment Land Review and the Economic Profile 2025.

SEE OTHER RELEVANT POLICIES INCLUDING

SDE2 Agricultural Development, Diversification and Conversion of Rural Buildings, SDE5 Development in Town and Village Centres.

Strategic Policy SDE2: Agricultural Development, Diversification and Conversion of Rural buildings

Purpose of the Policy

The purpose of this policy is to support the regenerative management of the National Park's farmland and forests by facilitating agricultural and forestry development, diversification projects and conversion of rural buildings which support viability whilst also delivering multiple benefits for the National Park purposes and duty.

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.

Policy SDE2: Agricultural Development, Diversification and Conversion of Rural buildings

Development which supports the regenerative land management of the National Park's farmland and forests, enables the long-term viability of the agricultural or forestry unit and supports the green rural economy whilst furthering the purposes of the National Park will be permitted as set out below. This should be demonstrated through the submission of a proportionate holistic long-term strategy for the holding, such as a Whole Estate Plan, showing how the proposed development, in combination with other proposals on the holding, achieves these multiple benefits.

- 1** Development proposals for new buildings or structures for the purposes of agriculture or forestry will be permitted where:
 - a) There is an agricultural or forestry need for the development within the National Park and its scale is commensurate with that need;
 - b) The development occupies the site best suited to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park. Wherever possible, development should re-use or be on the footprint of an existing agricultural building, otherwise it should be related physically and

functionally to existing buildings associated with the enterprise, unless there is an exceptional agricultural or forestry need for a more isolated location;

- c) The buildings are in keeping with local character and of a design that reflects the proposed agricultural or forestry use;
 - d) The proposals include planting to integrate the development into the existing local landscape framework;
 - e) A building has not been disposed of or converted to an alternative use at the holding in the past three years, which could have met the need of the development proposed; and
 - f) Existing redundant buildings or structures within the holding which have a negative impact on landscape or historic character are removed where appropriate.
- 2.** Development proposals for new or improved access tracks for forestry or agriculture will be permitted where:
- a) The proposal is essential for the management of the land;
 - b) It has been demonstrated that it is not feasible to accommodate the proposed traffic using existing accesses; and
 - c) The layout and design conserves and enhances local landscape character and the special qualities.
- 3.** Development proposals relating to farm and forestry diversification will be permitted where:
- a) They support the viable retention of agricultural or forestry uses on the site and do not cause severance or disruption to the holding;
 - b) The development re-uses or replaces existing buildings where feasible. Where this is not feasible, the development should be related physically and functionally to existing buildings, be of an appropriate scale, and retain agricultural character; and
 - c) Any outdoor storage is provided as a minor ancillary element of other uses.
- 4.** The conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries to an alternative use will be permitted where:
- a) The location is sufficiently well related to existing infrastructure, amenities and services;

- b) The existing vehicular access is suitable in landscape terms for the use proposed;
- c) The original building is capable of conversion without the need for substantial reconstruction, significant extensions or ancillary buildings;
- d) The design of the building(s), their curtilages and ancillary structures respects their agricultural/forestry character as informed by a Historic Farmstead Assessment; and
- e) In respect of heritage assets, existing historic fabric and features of architectural or historic significance are retained and respected.

SUPPORTING TEXT

4.230 The preamble of this policy refers to supporting regenerative land management. The five core principles of regenerative land management are:

- minimising soil disturbance
- maximising crop diversity
- keeping living roots in the soil
- maintaining soil cover, and
- integrating livestock.

These principles aim to improve soil health, enhance biodiversity, and promote a more sustainable food system.

4.231 Development which enables the long-term viability of the agricultural or forestry unit could include associated businesses such as saw mills, timber processing, or machinery maintenance where these are demonstrated to be necessary to the efficient functioning of the agricultural or forestry holding.

4.232 Applications should be accompanied by a holistic plan demonstrating how the development proposals, in combination with any other existing or future projects on the holding, will meet the requirements of this policy. This can take the form of a Whole Estate Plan, a diversification plan or similar strategy for the whole holding and should be proportionate to the scale of the proposals. Benefits to the National Park and restrictions on occupation will be secured via conditions and/or legal agreements.

4.233 Viticulture development related to the growing of vines is agriculture and will be considered under this policy. However, development required for winemaking and wine tourism also needs to accord with SDE3.

4.234 Redundant farm buildings are often favoured habitats for bats and barn owls, so the requirements of the biodiversity policies and protected species legislation will be key to the acceptability of their re-use. Appropriate species surveys will be expected to accompany any application.

GUIDANCE

- A Farmers Guide (to be updated)

EVIDENCE

- Historic England South East Farmsteads Character Statement (October 2014)
- Historic England Farmstead and Landscape Statement South Downs National Character Area 125 (February 2020)

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL6 Historic Environment and Cultural Heritage, SDN1 Nature Recovery, SDE3 Economic Development, SDE7 Regenerative Tourism, SDE8 Equestrian Development.

Strategic Policy SDE3: Winemaking and Wine Tourism

Purpose of the Policy

The purpose of this policy is to guide the careful design, planning, and management of land on which grapes are grown (viticulture), wine is made (wineries), and associated activities take place (wine tourism and other activities).

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.

Policy SDE3: Winemaking and Wine Tourism

- 1 Development proposals which support regenerative land management, enable the long-term viability of the enterprise, and support the green rural economy, whilst furthering the purposes of the National Park, will be permitted. This should be demonstrated through the submission of a proportionate and holistic management plan and long-term strategy for the enterprise showing how development (in combination with other proposals on the enterprise) achieves these multiple benefits.
- 2 Development proposals for new, extended and/or improved winemaking activities (or wineries) and associated infrastructure will be permitted where it satisfies Criteria 1 and:
 - a) It is informed by a contextual analysis and landscape appraisal to ensure it occupies the most suitable area of the enterprise in terms of conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park;
 - b) It is of a density, intensity, and scale that is appropriate, compatible, and proportionate to local landscape character and the special qualities of the National Park;
 - c) It makes best use – or is within the footprint– of existing farmsteads, buildings, and structures. If not available, feasible or viable – or if there would be a benefit from removing existing buildings or structures which have a negative

impact on amenities and landscape character– then new buildings and structures must:

- i) Be demonstrated to be necessary;
 - ii) Be related physically and functionally to existing buildings and structures associated with the enterprise as appropriate;
 - iii) Not adversely impact on the amenities of neighbouring properties, uses, and surrounding communities; and
 - iv) Include structural planting to integrate into the existing local landscape framework.
- d) It is well located to existing utilities and transport infrastructure, and utilises existing access tracks which are appropriate and capable of accommodating associated machinery and vehicles. New or improved access tracks will only be permitted where it is demonstrated that:
- i) They are essential for the regenerative management of land and necessary to accommodate associated machinery and vehicles which cannot feasibly or safely be accommodated on existing tracks; and
 - ii) They are understated, and designed and laid out in a way which conserves and enhances local landscape character and the special qualities of the National Park.
- e) It demonstrates a site-wide approach to energy and water efficiencies, including the incorporation and appropriate siting of renewable energy and water conservation measures (including reuse and onsite collection) using best practice industry standards and third-party accreditation as appropriate; and
- f) It demonstrates a site-wide approach to regenerative land management showing how sustainable, regenerative and organic land practices have been incorporated to contribute to nature recovery, and avoid, reduce or fully mitigate any potential environmental impacts.
- 3** The expansion of viticulture and winemaking activities, as part of an agricultural diversification scheme, must be linked to the core business of growing grapes and making wine. In addition to the above and Criteria 1 and 2, development proposals for new, extended and/or improved wine tourism facilities and other associated activities will be permitted where:

- a) It does not adversely impact on the amenities of neighbouring properties, uses and surrounding local communities;
- b) Any visitor accommodation, attractions and/or facilities also satisfy Policy SDE7 (Regenerative Tourism); and
- c) Any retail elements complement and support, and do not detract from, the vitality and viability of town or village centres, and community facilities. If satisfied, retail elements should aim to offer and sell the following proportion of sales goods:
 - i) At least 40% produced from, or within 30 miles of, the enterprise; and
 - ii) 40% produced from Hampshire, Sussex or Surrey.

SUPPORTING TEXT

When Viticulture is Development

4.235 Viticulture is a form of agriculture. Planning permission is not generally required to cultivate the land, plant vines, grow grapes or install trellising if it is already in agricultural use, although an Environmental Impact Assessment (EIA) may be required if the land has been left uncultivated for 15 years. In terms of the making and selling of wine, grapes grown on the same premises (or associated vineyard) can be considered as ancillary agricultural activities. Where sites process grapes on behalf of other growers and/or include additional or more intense activities, these will be considered under this policy and other relevant policies.

Buildings, Structures and Infrastructure

4.236 Wineries need to accommodate the equipment and infrastructure for all winemaking stages, but these need to be designed sensitively. Many English wineries have grown out of historic farmsteads which have a distinct landscape and historic character. Local characteristics– such as building heights, materials, openness, tranquillity, and views – will all need to be considered, along with operational and vehicular movements to, from and across a site. If a wine cellar is proposed, then careful consideration must be given to groundwater sensitivities and to extracted spoil and resulting levels.

Energy and Water

4.237 The viticulture industry uses a lot of energy and water in its machinery, operations and processes. Measures to address criterion 2(e) can include: rainwater harvesting, energy efficiency improvements, mechanical ventilation,

heat recovery systems, solar panels, and air and ground source heat pumps. Third party accreditation, such as the Sustainable Wines of Great Britain Certification, is encouraged.

Regenerative Land Management

4.238 To demonstrate compliance with criterion 2(f), regenerative land management practices can include: the re-naturing of non-vine areas, including native species rich grass swards and wildflower planting; the retention and restoration of historic field boundaries with native trees, hedgerows and planting to provide food, shelter, natural habitat and wildlife corridors; and the avoidance or minimising of use of artificial fertilisers, herbicides, pesticides and soil disturbance.

Wine Tourism and Other Activities

4.239 The *2025 South Downs Visitor Accommodation Review* identifies the symbiotic relationship between the viticulture industry and visitor accommodation, attractions and facilities, and such joint uses may mean that proposals also need to be considered under SDE7 Regenerative Tourism. The Authority will consider the use of planning conditions to restrict sale goods, operational hours, and event and occupancy numbers, as appropriate and relevant.

GUIDANCE:

- 2021 South Downs Viticulture Technical Advice Note.

EVIDENCE:

- 2021 South Downs Viticulture Growth Impact Assessment.
- 2023 Sussex Wine Tourism Growth Plan.
- 2023 South Downs & Rural West Sussex Partnership Viticulture Economic Profile, and Visitor Sector Business Insight Report.
- 2025 South Downs Visitor Accommodation Review
- 2025 South Downs Visitor Accommodation Audit and Market Review.

OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDL1 Landscape Character, SDL2 Design, SDL3 Safeguarding Views, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDN1 Nature Recovery, SDN8 Trees, Woodland, hedgerows and Scrub, SDE2 Agricultural Development, Diversification and Conversion of Rural Buildings, SDE7 Regenerative Tourism.

Strategic Policies SDE4, SDE5 and SDE6: Town and Village Centres and Shops in the Countryside

Purpose of these Policies

The purpose of these policies is to identify the hierarchy of town and village centres and support all town and village centres by encouraging new retail and other uses appropriate to those locations and safeguarding those that already exist. It also allows for some retail development in the countryside where this is justified by being closely related to the local agricultural and horticultural economy.

Local Plan Objectives

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.

Policy SDE4: Hierarchy of Town and Village Centres

1 Development proposals for town centre development will be permitted where they promote or protect the following hierarchy of identified centres as defined on the Policies Map:

- a) Town Centres: Lewes, Petersfield, Midhurst, and Petworth
- b) Larger Village Centre: Liss
- c) Smaller Village Centres: Alfriston, Ditchling, Fernhurst and Findon

Policy SDE5: Development in Town and Village Centres

1 Within the town and larger village centres as shown on the Policies Map, development proposals for main town centre uses, in particular those that promote or protect local markets and retailers linked to local supply chains across the National Park, will be permitted providing they do not harm the retail function of the centre, and are compatible with its scale and historic nature. Community-led developments and enhancements to the public realm and greater use of these areas for community activities and seating will be supported in principle.

2 Proposals that result in the loss of floorspace in ground floor units in Use Class E will not be permitted unless:

- a) Within the defined primary shopping frontages as shown on the Policies Map, it is for a main town centre use and for a temporary period not exceeding two years; or
- b) Within the secondary shopping frontage as shown on the Policies Map, it is for a main town centre use, and the design of the street elevation maintains an active frontage to the street to reflect its commercial character.

3 Development that supports the evening economy within the defined town and larger village centres, particularly for visitors/tourists, will be permitted provided the use would not result in significant adverse impacts on the amenity of residents and businesses. Where the operation of an existing business or community facility could have a significant adverse effect on proposed new development (including changes of use) in its vicinity, the 'agent of change' principle will apply, and the new development must include suitable mitigation to address these effects.

4 Within the smaller village centres, development proposals for Class E purposes will be permitted where they are compatible with its historic nature and of a scale appropriate to the community they sit within. Such development should be well related to any existing shops and services within the village unless it can be demonstrated that this is not feasible or practicable.

5 The loss of ground floor units in Use Class E that are fit for purpose will not be permitted within smaller village centres unless evidence of a marketing campaign of at least 12 months demonstrates that there is no market demand for the premises, and that its continued use for Class E purposes is not viable. Details of marketing requirements are set out in Appendix A1.

Policy SDE6: Shops Outside Centres

1 Development proposals for small convenience stores will be permitted where they:

- a) Have a net sales area less than 150m²; and
- b) Are to meet the everyday shopping needs of the local community.

2 The loss of ground floor units in Use Class E or F2(a) that are fit for purpose will not be permitted outside the centres identified in SDE4 unless evidence of a marketing campaign of at least 12 months demonstrates that there is no market demand for the premises, and that its continued use for Class E purposes is not viable. Details of marketing requirements are set out in Appendix A1.

3 Development proposals for new farm or nursery shops or extensions to existing farm or nursery shops will be permitted provided that:

- a) The scale and scope would not harm the retail offer in the immediate area. Such shops should aim to sell:
 - i. At least 40 per cent of goods that are produced on or within 30 miles of the holding;
 - ii. 40 per cent of goods that are from Hampshire, Sussex or Surrey;
- b) The proposal has re-used or replaced existing buildings, unless it is demonstrated that this is not feasible and
- c) The use of new farm or nursery shops will normally be restricted to Class E(a) or F2(a) retail with ancillary E(b) food and drink, with no other uses under Class E permitted.

4 An impact assessment will be required for Class E development outside of the defined Town and Larger Village Centre boundaries as follows:

- a) within the settlement policy boundaries, where the proposal exceeds the following thresholds for floorspace:
 - i. Town: 750 m²
 - ii. Larger Village: 500 m²
- b) outside of the settlement policy boundaries where the proposal exceeds 150m².

SUPPORTING TEXT

4.240 The four towns and Liss referenced in SDE4(1a) all have identified town or village centres which are reflected in the Policies Map. The four towns all have identified primary shopping frontages and Lewes, Petersfield and Midhurst also have secondary shopping frontages.

4.241 'Main town centre uses' referred to in SDE5(1) and (2) are defined in the National Planning Policy Framework as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

4.242 Appropriate enhancements to the public realm and greater use of these areas for community activities and seating can be assessed through a Healthy Streets Assessment or similar and can include good quality green infrastructure.

4.243 The 'agent of change' principle referred to in SDE5(3) is that a person or business (the agent) who is responsible for introducing a new land use is responsible for managing the impact of that change. An example is where a residential use is proposed in an area where there is an existing music venue, any potential conflict from noise should be addressed by the design of the residential scheme, not by imposing restrictions on the music venue.

4.244 The criteria in SDE6(3) reflect that farms and horticultural nurseries often seek to sell produce directly to their customers, and this can be an important form of diversification for the holding and provide a useful service to the community. However, it is important that these farm or nursery shops remain primarily an outlet for local produce and do not become general retail stores that should be located in town or village centres. Garden Centres that are not related to a horticultural holding will be treated as general retail stores.

4.245 Chapter 7 of the National Planning Policy Framework sets out the sequential test that local planning authorities should apply, directing town centre uses to centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When assessing applications for such development outside centres, local planning authorities should require an impact assessment if the development is

over a proportionate, locally set floorspace threshold. These thresholds are set out in SDE6 (4) and apply to all Class E uses because they can be used for retail purposes without express planning permission.

GUIDANCE

- Healthy Streets Guidance [healthystreets.com/](https://www.healthystreets.com/)

EVIDENCE

- Economic Profile 2025 [southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/south-downs-economic-profile/](https://www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/south-downs-economic-profile/)

SEE OTHER RELEVANT POLICIES INCLUDING

SDE1 Economic Development, SDE7 Regenerative Tourism, SDE9 Shop Fronts and Advertisements.

Strategic Policy SDE7: Regenerative Tourism

Purpose of the Policy

The purpose of this policy is to support regenerative tourism to address the potential conflict between the visitor economy and associated development with the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park which visitors come here to experience and enjoy.

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.

Policy SDE7: Regenerative Tourism

1 Development proposals for visitor accommodation, attractions and/or facilities shall enhance and regenerate the places and communities in which they operate, while also demonstrating how they positively contribute to – and provide opportunities to increase the awareness, understanding and enjoyment of – the natural beauty, wildlife, cultural heritage and special qualities of the National Park.

2 Development proposals for alterations or extensions to existing visitor accommodation, attractions and/or facilities will be supported where they enhance accessibility, amenity, biodiversity, design, landscape and movement, and mitigate existing identified issues wherever possible.

3 Development proposals for new visitor accommodation, attractions and/or facilities must be informed by a contextual analysis to demonstrate their design, layout and location are proportionate and sensitive to – and do not detract from – the appearance, character, heritage, tranquillity, and setting of the landscape. If successfully demonstrated, then development will be permitted where it is also demonstrated that:

- a) It does not result in the loss of a C3 dwellinghouse;
- b) It includes accessibility features to cater for older and disabled visitors;

- c) It is accessible via active travel routes or public transport to encourage sustainable travel in, out and across the National Park;
 - d) It does not detract from the visitor experience nor adversely impact on the amenities of neighbouring properties and uses;
 - e) It makes best use of existing buildings or, if demonstrated to be necessary, new buildings are physically and functionally related to existing development associated with the enterprise;
 - f) Ancillary facilities, if demonstrated to be necessary, are proportionate in terms of their design, scale and use;
 - g) It complements and supports, and does not detract from, the vitality and viability of town or village centres, and community facilities; and
 - h) It is located within the defined settlement boundary unless it meets an exception criterion of the development strategy or:
 - i. It is part of an agricultural diversification scheme;
 - ii. It is part of an endorsed Whole Estate Plan; or
 - iii. It is closely associated with an existing visitor attraction or facility.
- 4** Development proposals that result in the whole or partial loss of existing visitor accommodation, attractions and/or facilities will not be permitted unless evidence is provided which demonstrates that:
- a) The existing use harms the special qualities of the National Park and there is no demand for a more suitable community or tourism use; or
 - b) The existing use is financially unviable and a robust marketing campaign of at least 12 months has been carried out that clearly demonstrates there is no market demand for the existing use, an equivalent tourism use, or an alternative community use. Details of marketing requirements are in Appendix A1.
- 5** Development proposals – either alone or in combination with other development – must not detract, disadvantage, or prejudice the enjoyment of existing visitor activities, nor contribute to existing negative impacts associated with high visitor numbers, especially in identified hotspots or honeypots.

SUPPORTING TEXT

4.246 National Park and surrounding areas are major resources for tourism, recreation and learning. The visitor economy provides opportunities to promote the understanding and enjoyment of the special qualities of the National Park, as per the statutory purpose 2 of National Parks. However, such development has the potential to impact on the natural beauty, wildlife and cultural heritage of the area and conflict with statutory purpose 1.

4.247 The *2024 Regenerative Tourism in UK National Parks* explains that regenerative tourism is about making a net positive contribution to National Parks. In line with the above, the purpose of this policy is to:

- Champion and support tourism development that contributes to the enhancement and regeneration of the places and communities in which it operates; and
- Support tourism activity that helps reduce carbon emissions and increases nature recovery, whilst ensuring National Parks are relevant to everyone's needs.

4.248 This policy applies to development proposals for visitor accommodation, attractions, and facilities within the National Park. However, the Authority will also support proposals that help to better connect the National Park with visitor attractions and facilities in surrounding areas, and vice versa.

4.249 In terms of "facilities", this policy does not apply to uses which primarily meet local (rather than visitor) needs as these are more appropriately considered under Policies SDG1 Community Facilities and SDG3 Public Open Space, Sports and Recreational Facilities.

4.250 The *2025 South Downs Visitor Accommodation Review* found that the number of visitor bedspaces has more than doubled since 2014, and that immediate visitor needs can be met by existing accommodation across the National Park. The Authority will continue to consider applications for new and expanded visitor accommodation, attractions, and facilities, especially where these support a year round visitor economy and longer visitor stays. However, the expectation will be for development to deliver on the vision for regenerative tourism in National Parks and make net positive contributions.

Cumulative Impacts

4.251 There are popular attractions and areas across the National Park which are subject to pressure from high visitor numbers. This can lead to negative impacts on local and wider areas in relation to access, amenity, ecology, environmental degradation, erosion, highways, local resources and/or public safety amongst other considerations. These attractions and areas are known as "honeypots" and "hotspots", respectively, and are found across the National Park, especially around the Sussex Heritage Coast which hosts the Birling Gap and Seven Sisters.

4.252 The *2025 South Downs Visitor Accommodation Review* maps known areas that experience high visitor numbers. These may change over the plan period and so the most recent evidence of visitor numbers and pressures should be considered when determining a planning application. Any development should improve the accessibility, management, and movement of visitors – while contributing to nature recovery and reductions in carbon and environmental degradation – to enhance and regenerate the local communities, places and surrounding areas that domestic and international tourists are visiting.

GUIDANCE

- The Camping and Glamping Technical Advice Note

EVIDENCE

- 2021 South Downs Visitor Survey
- 2023 South Downs Business Survey
- 2024 Regenerative Tourism in UK National Parks
- 2025 South Downs Visitor Accommodation Review
- 2025 South Downs Economic Profile

SEE OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDL1 Landscape Character, SDL2 Design, SDL3 Safeguarding Views, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDN1 Nature Recovery, SDT1 Vision-led Transport, SDT2 Active Travel.

Strategic Policy SDE8: Equestrian Development

Purpose of the Policy

The purpose of this policy is to ensure the careful design, planning, and management of equine activities, development and uses.

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.

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.

SDE8: Equestrian Development

1 Development proposals for equestrian development which support regenerative land management, enable the long-term viability of an enterprise or holding, and support the green rural economy will be permitted. This should be demonstrated through the submission of a proportionate and holistic management plan and long-term strategy for the enterprise or holding showing how development (in combination with other proposals) achieves these multiple benefits.

2 Development proposals for equestrian development – including changes of land use – will be permitted where they:

- a) Satisfy Criteria 1;
- b) Are of a location, scale, siting, and intensity of equestrian use which is compatible with, and responds to, local landscape character and the special qualities of the National Park;
- c) Avoid removing or eroding historic field boundaries and, wherever possible, minimise field subdivisions and fencing;

- d) Avoid pollution of aquifers, watercourses and other controlled water through appropriate manure storage and run-off treatments;
 - e) Provide sensitively located ancillary storage and equipment;
 - f) Are well located to existing utilities and transport infrastructure, including vehicle and field accesses, as well as bridleways, restricted byways, byways open to all traffic, and other tracks open to equestrian use; and
 - g) Provide new or supplementary hard and soft landscape features and treatments informed by local landscape character and green infrastructure principles.
- 3** Development proposals for equestrian buildings, structures, yard areas, and associated infrastructure – for personal, recreational and/or commercial use – will be permitted where they:
- a) Satisfy Criteria 1 and 2;
 - b) Re-use or replace existing development unless it is demonstrated to be unfeasible, unviable, or removal of existing development would have a positive amenity, landscape or heritage impact; and
 - c) Are physically and functionally related to existing development associated with the enterprise or holding and they respect the amenities and activities of surrounding properties and uses.

SUPPORTING TEXT

Regenerative Land Management

4.253 Land management can impact the landscape, horse and soil health, and wider environmental and wildlife benefits. The Authority encourages owners to adopt best practice in land management, and this should be set out in a holistic plan or strategy which is proportionate to the impact, scale and use (i.e., personal, recreational or commercial use) of development. The management approach should be influenced by soil type and natural drainage patterns and processes which – through management of ditches and water courses – can contribute to soil resilience, biodiversity, and habitat improvements. Further advice is set out in the South Downs Equine Land Management Guidance and Equestrian TAN.

Subdivision and Fencing

4.254 The subdivision of fields into small turnout paddocks can affect landscape character and views. Where subdivision and fencing are demonstrated to be necessary, they should be sensitive, simple, understated, designed to be unobtrusive and reflect historic field boundaries where possible.

Waste

4.255 Horse manure can leach harmful nitrates into watercourses, soils and groundwater. As such, it should not be stored where there is a risk of run-off to field drains, watercourses, springs, wells or boreholes. The run-off from hay soaking, muck heaps and washing down of horses, stables and yards should also be managed to prevent pollution. Neighbouring amenities and uses – and environmental protection requirements – should be taken into account when considering appropriate waste management.

Buildings and Infrastructure

4.256 Criterion 3 is applicable to a wide range of built development, including access roads, gallops and canter tracks, horse walkers, indoor and outdoor riding arenas, shelters, stables, storage, and other associated facilities. The layout of buildings and structures should seek to contain and enclose yard areas for storage, parking and other activities, and avoid the adverse visual impacts of car parking, trailer storage and manure arrangements.

GUIDANCE

- South Downs Equine Land Management Guidance.
- South Downs Equestrian Development Technical Advice Note (2023).

SEE OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDL1 Landscape Character, SDL2 Design, SDL5 Dark Night Skies, SDN1 Nature Recovery, SDE7 Regenerative Tourism, SDT1 Vision-led Transport.

Strategic Policy SDE9: Shop Fronts & Advertisements

Purpose of Policy

The purpose of this policy is to support sympathetic changes to shop fronts and advertisements that enhance the local economy whilst respecting the landscape and cultural heritage of our special places.

Local Plan Objectives

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'.

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.

Policy SDE9: Shop Fronts & Advertisements Shop Fronts

- 1** Development proposals for new, or changes to existing shop fronts will be permitted where they:
 - a) Relate well to the building in which they are situated, giving regard to upper floors, in terms of scale, proportion, vertical alignment, architectural style, any illumination and materials;
 - b) Retain and restore where possible significant historic features of any original shop front;
 - c) Are based upon a traditional approach to shop front design;
 - d) Take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a listed building; and
 - e) Use materials which respect the street scene.
- 2** If a single shop front is to be created by joining two or more units, it should reflect and show the original divisions that existed, particularly in the case of historic properties.

- 3 There will be a presumption against solid shutters or any other feature which obscures window displays, unless this is a traditional feature of a historic premises.

Advertisements

- 4 Advertisement consent will be granted where:

- a) The location, size, scale, proportions, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and/or area;
- b) The number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and
- c) There is no harmful impact to public safety.

- 5 There will be a presumption against internally illuminated and/or flashing or moving image signage/logos or advertisements. Externally lit advertisements are normally only appropriate for businesses operating in the evening. If it cannot be avoided, they should be kept to a minimum, be discreetly positioned and incorporated into the design of a building.

SEE OTHER RELEVANT POLICIES INCLUDING

SDL5 Dark Night Skies, SDL6 Historic Environment and Cultural Heritage, SDL7 Listed Buildings, SDL8 Conservation Areas.

SUPPORTING TEXT

4.257 Many shops are within historic town and village centres where policies SDL6-9 will be relevant. A key policy for illuminated shopfronts and advertisements is SDL5 on Dark Night Skies.

4.258 Criteria 4 and 5 apply to all advertisements whether they are part of shop fronts, attached to other buildings or free standing. Advertisement Consent is a different regime to planning permission and governed by The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

GUIDANCE

- Relevant Conservation Area Management Plan
- Dark Skies TAN
- Circular 03/07: Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

EVIDENCE

- GIS maps for dark skies southdowns-sdnpa.hub.arcgis.com/search?q=dark%20skies

GREEN, BLUE AND COMMUNITY SPACES



Strategic Policy SDG 1: Community Facilities

Purpose of the Policy

The purpose of this policy is to support new, and protect existing, community facilities that serve local communities in and around the National Park.

Local Plan Objectives

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

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.

Policy SDG 1: Community Facilities

1 Development proposals for enhancements to existing community facilities will be supported subject to all other material considerations.

2 Development proposals for new, and expansion of existing, community facilities will be permitted where:

- a) It is demonstrated that there is a local need;
- b) The scale is proportionate to the local area;
- c) They have been informed by prior local community engagement;
- d) They are accessible, inclusive and well located to the communities that they are intended to serve; and
- e) It is demonstrated that shared use, re-use and/or redevelopment of existing buildings is not feasible.

3 Development proposals that would result in the loss of, or have an unacceptable adverse impact on, existing community facilities will not be permitted unless:

- a) For a facility that is commercially run, it is robustly demonstrated through a 12 month marketing campaign that there is no market demand for the existing use, and there are no opportunities for an equivalent or alternative

community use to move into the premises. Details of the marketing requirements are in Appendix A1;

- b) For a facility that is community or publicly owned or managed, it is robustly demonstrated through a Local Needs Assessment that there is a lack of need for the existing use, and there are no opportunities for an equivalent or alternative community use to move into the premises;
- c) An alternative community facility is provided that is accessible, available, inclusive, and well located to the communities served by– and of an equivalent or better quality to– the facility being lost without causing an unreasonable shortfall in local service provision; or
- d) It is for a partial loss which is robustly demonstrated to be necessary to support the viability of the existing facility.

SUPPORTING TEXT

4.259 Community facilities are at the heart of local communities and a facility in one community may also serve surrounding communities (inside and/or outside the National Park) in rural areas. The loss of a community facility is very difficult to replace. There is a presumption that community facilities should be retained or replaced with proposals of at least an equivalent quality which are accessible, available, inclusive and well located to the local communities that they are intended to serve. This is so that all individuals within the intended communities can utilise community facilities via active travel and other sustainable transport measures. As part of the above, the Authority will support proposals with shared spaces, Changing Places, and gender-neutral facilities in accessible locations subject to other material considerations.

4.260 For the purpose of this policy community facilities include:

- Community and youth centres
- Cultural facilities (for example arts centres, theatres, and music venues)
- Early years and education
- Event spaces and halls (for example scout huts and bingo, community, concert, dance, exhibition, meeting, public, town and/or village halls)
- Galleries
- Health and medical uses
- Libraries

- Museums
- Places of worship
- Public houses

4.261 It should be noted that some of these uses fall within Use Classes (such as Classes E and F) where planning permission may not be required to change to other uses within that class.

4.262 In terms of Criterion 2, brand new community facilities should be located in a defined settlement boundary unless an exception criterion of the development strategy is met. The Authority encourages applicants to support their planning application with a robust, but proportionate, business plan and governance arrangement to ensure that the new facility will be sustainable in the longer term.

4.263 Criterion 3 is applicable to existing community facilities regardless of whether they are in a defined settlement boundary. A proposal for the loss of a community facility must not be based solely on the needs of the current owner or tenant or their chosen business model, with the exception of the National Health Service (NHS). The supporting evidence – either in the form of a marketing campaign or Local Needs Assessment as required – must robustly demonstrate that there is no longer a need for the premises and there are no opportunities for an equivalent or alternative community use to move into the premises. In instances where an alternative community facility is provided, this will need to be delivered and operational before the closure of the facility being lost. Proposals for the partial loss of a community facility will be assessed to ensure that it does not contribute to a whole loss in the future. This may include a request for a robust business plan and governance arrangement to ensure that the remaining facility will be sustainable in the longer term.

4.264 There is a balance in guarding against the loss of community facilities, while taking into account and supporting the delivery of strategies to improve health – for example, the NHS Long Term Plan. The decision about whether an NHS facility is surplus to operational requirements is made by local health commissioners and NHS England. In instances where Criterion 3b is applicable, a published NHS Estates Strategy or NHS Service Transformation Plan can be submitted in lieu of a Local Needs Assessment. Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use.

4.265 The borough, district and unitary authorities maintain registers of Assets of Community Value (ACV). If registered, a community has an opportunity, under the Community Right to Bid, to make a bid to purchase the asset if it is put on the open market. All ACV landowners and freeholders must comply with ACV regulatory requirements and must engage with the community group who originally made the ACV nomination when preparing evidence to meet Criterion 3.

GUIDANCE

- 2024 NPPF Paragraphs 88d and 98.

EVIDENCE

- Authority Monitoring Report
- Infrastructure Business Plan
- Infrastructure needs set out in Neighbourhood Development Plans and Parish Priorities Statements

OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDC3 Regenerative Development and Ecosystems Services, SDL1 Landscape Character, SDL2 Design, SDN9 Sustainable Construction, SDT5 Infrastructure.

Strategic Policy SDG2: Green and Blue Infrastructure

Purpose of the Policy

The purpose of this policy is to promote the provision of new – and protect and enhance existing – green and blue infrastructure assets, corridors, and links, while protecting the integrity of the wider, functioning and living network which extends across and beyond the boundaries of the National Park.

Local Plan Objectives

- 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.
- 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.
- 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.

Policy SDG2: Green and Blue Infrastructure

- 1** Development proposals will be permitted where it is demonstrated that they:
 - a) Conserve, connect, create, enhance, and/or restore green and blue infrastructure assets, corridors, links and the overall network; and
 - b) Provide new, and/or improve existing, green and blue infrastructure assets, corridors and links which are integrated into a landscape-led design that supports and meets the needs of communities, wildlife and habitats within and, wherever possible, beyond the boundaries of the National Park.
- 2** Green and blue infrastructure proposals must be high quality and contribute to the accessibility, character, connection, multifunctionality, and variety of the landscape by:

- a) Contributing to nature recovery through the connectivity, diversity, enhancement, and resilience of ecological networks;
 - b) Incorporating measures as part of an overall regenerative and landscape-led design that are appropriate to the character, context, and sense of place of an area and the type of development proposed;
 - c) Maximising opportunities to mitigate, adapt and improve resilience to flood risk and climate change for both people and nature;
 - d) Maximising opportunities for connections to new and existing active travel routes, including circular routes wherever possible;
 - e) Improving health and wellbeing through the provision and offer of accessible, inclusive and safe green and blue spaces; and
 - f) Improving opportunities for the understanding and enjoyment of the National Park and its special qualities.
- 3** Development proposals that will harm the green and blue infrastructure network will not be permitted unless, where it is demonstrated that harm cannot be avoided, satisfactory measures are incorporated that sufficiently mitigate or offset any negative effects.
 - 4** The Authority will seek to secure – via planning condition or legal agreement – provision for the future management and/or maintenance of green and blue infrastructure as appropriate.

SUPPORTING TEXT:

4.266 The provision and enhancement of green and blue infrastructure can contribute to national, regional, and local targets to improve air quality, biodiversity, climate and nature amongst other aspirations.

4.267 Green and blue infrastructure are defined in Annex 2 of the 2024 National Planning Policy Framework. As set out in the 2023 Natural England's Green Infrastructure Principles they provide places which are nature rich and beautiful, active and healthy, thriving and prosperous, resilient and adaptive to climate change, and have improved water management. It is important to remember that green and blue infrastructure can take a variety of forms, ranging from natural and semi-natural features (i.e., woodland and hedgerows etc.) to site specific features (i.e., green roofs and SuDS etc.).

4.268 Green and blue infrastructure is multifunctional and integral to the landscaped approach to development as set out in SDC3, SDL1 and SDL2. It is important that it is considered and integrated at the earliest stage of concept and design to realise maximum benefits for communities, wildlife and habitats. This will help to reduce habitat fragmentation and pollution, improve recreational opportunities and water quality, support nature recovery and human health and wellbeing, and strengthen climate resilience through sustainable drainage and carbon and flood storage provisions. As part of the above, consideration should be given to geodiversity, native and pollinator species planting and movement, and the safety and security of human users, especially more vulnerable groups.

GUIDANCE

- Building with Nature Framework and Standards, and Natural England Green Infrastructure Principles and Standards.
- South Downs Design Guide SPD
- Hampshire LNRS hants.gov.uk/landplanningandenvironment/nature-recovery-hampshire/hampshire-strategy
- Sussex LNRS sussexnaturerecovery.org.uk/

EVIDENCE

- 2016 South Downs Green Infrastructure Framework.
- 2018 25-Year Environment Plan.
- 2020 South Downs People and Nature Network.
- 2023 Natural England Green Infrastructure Principles.

OTHER RELEVANT POLICIES INCLUDING

SDC3 Regenerative Development and Ecosystems Services, SDL1 Landscape Character, SDL2 Design, SDN1 Nature Recovery, SDN8 Trees, Woodlands, hedgerows and Scrub, SDW1 Protection of the Water Environment, SDW2 Flood Risk management, SDW3 Sustainable Drainage, SDG3 Public Open Space, Sports and Recreational facilities, SDG4 Local Green Space, SDT2 Active Travel.

Strategic Policy SDG3: Public Open Space, Sports and Recreational Facilities

Purpose of the Policy

The purpose of the policy is to protect existing, and provide new and extended, public open space, sports and recreational facilities to meet local needs.

Local Plan Objectives

- 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.
- 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.

SDG3: Public Open Space, Sports and Recreational Facilities

- 1** Residential development of 10 dwellings or more will be required to provide accessible, inclusive and safe public open space on site, or within proximity to the site, in line with the standards set out in the tables below unless justified by any alternative updated and robust evidence;

TABLE 1: GUIDELINES FOR MINIMUM QUANTITIES AND MAXIMUM WALKING DISTANCES OF OPEN SPACE, OUTDOOR SPORTS, AND PLAY SPACE.

Open Space Typology	Minimum Quantity Guideline (per 1000 population)	Maximum Walking Guideline (from dwellings)
A minimum of 3.2ha of Open Space per 1000 population comprising:		
Amenity Greenspace	0.6ha	All dwellings should be within 200-300m walking distance of an open space, and within 1000m of the full range of open space types.
Parks & Gardens	0.8ha	
Natural and Semi Natural Greenspace	1.8ha	
A minimum of 1.6ha of Outdoor Sports per 1000 population comprising:		
Sports Pitches	1.2ha	
1200m		
Courts, Greens, Tracks, Trails or Sports Equipment	0.4ha	
A minimum of 0.55ha of Play Space per 1000 population comprising:		
Equipped Designated Play Areas	0.25ha	100m for LAPs, 400m for LEAPs and 1000m for NEAPs.
Informal Play Provision	0.3ha	700m

TABLE 2: GUIDELINES FOR MINIMUM SIZES OF PLAY SPACE.

Play Space	Minimum Size
Equipped Designated Play Areas	
Local Area for Play (LAP)	100sqm distributed within a development as part of playable routes.
Locally Equipped Areas for Play (LEAP)	400sqm.
Neighbourhood Equipped Areas for Play (NEAP)	1000sqm
Informal Play Provision	
Informal Play can include bouldering walls, pump tracks, multi-use games areas (MUGA), skate parks, and social areas amongst others.	1000sqm (A typical MUGA is 40x20m).

2 Development proposals for new, extended or improved public open space, and/or sports and recreational facilities, should demonstrate how they:

- Are of a scale, type, and offer which addresses the needs of the area as set out in the South Downs Open Space Study, a Local Authority Built Facilities or Playing Pitch Strategy, or other robust evidence;
- Are of a high-quality design which reflects landscape character;
- Are accessible, inclusive and safe for all of the community;
- Have been informed by prior community engagement; and
- Include provision for their long-term management and maintenance.

3 Development proposals for new buildings or playing surfaces that provide sports and recreational facilities should be located within or close to settlement boundaries as defined on the Policies Map. Outside of defined settlement boundaries, new buildings or playing surfaces for sports and recreational facilities will be limited to:

- Those ancillary to and essential for the existing lawful use of the land for outdoor sports and recreation; or

b) Those supported by robust evidence of a sequential search for sites demonstrating that the most suitable and available location has been selected in terms of landscape, ecosystem services and overall sustainability.

4 Development proposals will be refused where they would result in the whole or partial loss of public open space, and/or a sports and recreational facility, unless provision of equal or better quantity, quality and accessibility is made in close proximity to the existing public open space and/or sports and recreational facility. Robust evidence must be provided to demonstrate the following:

- a) Alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need;
- b) The land cannot reasonably be converted to another form of public open space, and/or other sports and recreational facility, for which there is an identified deficit; and
- c) The development will provide alternative public open space, and/or a sports and recreational facility, the need for which clearly outweighs the loss of the existing public open space and/or sports and recreational facility.

5 Development proposals for new or extended allotments, community gardens / orchards, burial grounds and/or cemeteries will be permitted where they:

- a) Are appropriately sited, designed and laid out with regard to accessibility, amenity, security, parking and landscape character;
- b) Are designed to make the most of opportunities to improve and/or create new active travel routes, biodiversity, habitats, and green and blue infrastructure; and
- c) Will have no adverse impacts on water quality or quantity, including groundwater and surface water.

SUPPORTING TEXT

4.269 The provision of public open space, sports and recreational facilities can support physical and mental health and wellbeing, and provide opportunities for community cohesion and the delivery of green and blue infrastructure, nature recovery, and climate change adaptation and mitigation measures.

4.270 Applicants must demonstrate how new, extended or improved public open spaces, and/or sports and recreational facilities, will be delivered, maintained and

managed in the long term. The Authority will seek to secure such provision through planning obligations and will not accept private open space or financial contributions in lieu of policy requirements. The only exception for a financial contribution may be where there is a direct need related to a specific site and location in close proximity to a development proposal.

Public Open Spaces

4.271 2026 South Downs Open Space Study is currently under preparation and will provide an update of existing provisions, and identified needs, for different types of public open spaces in settlements across the National Park. In the meantime, Tables 1 and 2 set out 2024 Fields in Trust guidance and standards for different types of public open spaces (including open spaces, outdoor sports and play spaces), and there is a range of historic local authority evidence in relation to the provisions and needs for different types of public open spaces in different areas of the National Park. There are many different types of public open spaces that sit within a wider network of green and blue infrastructure and which offer a range of benefits. For example, allotments and community orchards can be used for healthy food growing, burial grounds and cemeteries can be used for contemplation and reflection, and amenity greenspaces, parks and children's play equipment can be used for informal and formal play and sports. The quantity and types of public open spaces should meet identified needs and be located, designed and laid out in response to local landscape character and opportunities for active travel connections and nature recovery. Although not included in emerging and existing open space evidence, the Authority will support opportunities for community farms in principle, subject to the requirements of relevant policies in the Development Plan.

Sports and Recreational Facilities

4.272 The local authorities have prepared built facilities and playing pitch strategies that set out existing provisions of, and requirements for new and expanded, sports and recreational facilities. This policy applies to both publicly and privately owned sports and recreational facilities, including school playing fields and sports clubs, as these are equally important to National Park purposes and duties. It is recognised that Paragraph 100 of the 2024 National Planning Policy Framework gives great weight to creating, expanding or altering early years, schools and post-16 facilities to meet educational needs of communities. The Authority will consider proposals involving school playing fields on a case-by-case basis, taking account of educational needs, playing fields policy and guidance, and whether sports and recreational facilities

could be newly provided, re-configured, and/or protected from unnecessary loss. The Authority will encourage the preparation of Community Use Agreements (CUAs) at schools whose facilities are used by communities to meet local sports and recreational needs. As for pavilions and clubhouses (and similar buildings and structures), any proposed loss may also need to satisfy SDG3.4 if they are used to host other community activities and events.

GUIDANCE

- 2021 Sports England Playing Fields Policy and Guidance
- 2023 Natural England Green Infrastructure Principles
- 2024 Fields in Trust Standards
- 2024 NPPF Paragraphs 100, 103 and 104.

EVIDENCE

- 2026 South Downs Open Space Study (currently under preparation)
- local authority open space assessments, studies, and strategies
- local authority built facilities and playing pitch strategies.

OTHER RELEVANT POLICIES INCLUDING

SDC2 Development Strategy, SDC3 Regenerative Development and Ecosystems Services, SDL1 Landscape Character, SDL2 Design, SDL4 Relative Tranquillity, SDL5 Dark Night Skies, SDG1 Community Facilities, SDG2 Green and Blue Infrastructure, SDG4 Local Green Space, SDT2 Active Travel Routes, and SDT4 Parking Provision.

Strategic Policy SDG4: Local Green Spaces

Purpose of the Policy

The purpose of this policy is to designate and protect local green spaces which have been nominated by local communities as being demonstrably special and of particular importance to them.

Local Plan Objectives

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.

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’.

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.

Policy SDG4: Local Green Spaces

1 The green areas listed below, as defined on the Policies Map, are designated and protected as Local Green Spaces, in line with the *National Planning Policy Framework*. Development proposals within these green areas will only be permitted in very special circumstances.

Alfriston

- Alfriston Allotments
- Alfriston Recreation Ground
- The Tye

Binsted

- Binsted Recreation Ground

Brighton & Hove

- Green Ridge

Buriton

- Buriton Recreation Ground
- Sheep Dip and Pond Green
- Sumner Road Green Spaces
- The Links
- Village Pond / War Memorial

Cheriton

- Open Space at Top of Freemands Yard Lane

Cocking

- Cherry Close Community Amenity Garden

Corhampton and Meonstoke

- Church Green

Droxford

- Droxford Parish Green

East Chiltington

- Hollycroft Field

East Dean (East Sussex)

- The Horsefield
- Went Way Allotments

East Worldham

- East Worldham Playground

Fulking

- North Town Field

Hambledon

- Speltham Down (1) and (2)
- The Glebe Land

Heyshott

- Heyshott Playground

High Cross, Froxfield

- King George V Memorial Ground

Kingston-near-Lewes

- Kingston Community Wildlife Garden

Langrish

- Reeds Meadow

Lewes

- Church Lane Allotments
- Land adjacent to Stanley Turner Recreation Ground
- Priory Park
- Queens Road Allotments

Liss

- Land west of Rotherbank

Midhurst

- Carron Lane Recreation Area
- Half Moon Covert
- Holmbush Recreation Area
- Jubilee Path and Green Space Corridor
- St Margaret's Development Community Garden
- South Pond and Green Space Corridor

Poynings

- Poynings Allotments
- Poynings Playing Field

Selborne

- Church Meadow
- Culvercroft (Burlands Field)
- Dowlings Little Mead

- Goslings Croft Allotments
- Selborne Recreation Ground

Slindon

- Jubilee Orchard
- Meadway
- Slindon Common Recreation Ground
- The Allotments
- The Copse
- The Forge Field
- The Village Pond
- Top Playing Field

Steep

- Steep Common
- Steep War Memorial

Wannock, Polegate

- Wannock Coppice

West Ashling

- The School Dell

alternatively suitable, available, or feasible sites. As required, satisfactory mitigation will need to be considered to ensure the integrity of a local green space is conserved.

GUIDANCE

- Planning Practice Guidance (PPG, 2014) on open space, sports, recreational facilities, public rights of way, and local green space.

EVIDENCE

- South Downs Local Green Space Assessment (January 2026).

SEE OTHER RELEVANT POLICIES INCLUDING

SDG2 Green and Blue Infrastructure, SDG3 Public Open Space, Sports and Recreational Facilities.

SUPPORTING TEXT

4.273 The green areas listed in this policy are in addition to those local green spaces designated in made Neighbourhood Development Plans.

4.274 The National Planning Policy Framework and Planning Practice Guidance set out how local green spaces are protected. If planning permission is required, the very special circumstances in which development may be permitted will be considered on a case-by-case basis and where any potential harm is clearly outweighed by other considerations. Fundamentally, development within a local green space should not conflict with the reasons for its designation, or prejudice its role and function, as a local green space. Examples of very special circumstances may include, but are not limited to, enhancements to existing features (for example, ancillary buildings and play equipment) or provision of essential utilities infrastructure where there are not any

Image: Buriton road calming © SDNPA/Mischa Haller



TRANSPORT AND INFRASTRUCTURE

Strategic Policy SDT1: Vision-led Transport Approach

Purpose of the Policy

The purpose of this policy is to set out the vision-led transport approach, which seeks to locate and design development that minimises the need and distance to travel, for instance by locating people close to amenities, services and sources of employment and education; maximises the potential for active travel by providing safe routes for walkers, wheelers, cyclists and equestrians; and facilitates access to public transport through the provision and safeguarding of infrastructure.

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.

Policy SDT1: Vision-led Transport Approach

1 Development proposals should take a ‘vision led’ approach to transport, based on setting outcomes for achieving well-designed, sustainable and popular places, and providing the transport solutions to deliver those outcomes.

2 Development proposals will be permitted provided that they are located and designed to minimise the need and/or distance to travel and facilitate the use of sustainable modes of transport, including active travel. Existing sustainable transport infrastructure will be safeguarded unless it can be robustly demonstrated that it is no longer needed or is to be replaced by alternative infrastructure of an equivalent or better quality.

3 Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres, public transport routes, main roads and, where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.

4 Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks including Public Rights of Way.

5 The following improvements to transport infrastructure will be supported:

- a) Public transport undercover and comfortable waiting facilities, particularly those with reliable and accessible information;
 - b) Infrastructure supporting the transfer of freight from road to cycle, rail and water;
 - c) Improvements to walking/wheeling, cycling and bus connectivity at all transport interchanges including the provision of Mobility Hubs;
 - d) Improvements to the quality and provision of cycle parking (including electric bicycle charging facilities) at railway stations and key bus interchanges;
 - e) Improvements to accessibility and step free access at railway stations; and
 - f) New transport infrastructure will maximise opportunities to enhance green and blue infrastructure, and opportunities to create and connect habitats.
- 6** In town and village centres, development will be permitted which appropriately provides for improved bus interchanges, improved and accessible active travel routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic on historic streets.

SUPPORTING TEXT

4.275 The vision-led transport approach decides what the desired transport outcome will be and then designs the development to achieve that outcome (sometimes known as ‘decide and provide’). This contrasts with the previous ‘predict and provide’ transport approach where likely traffic impacts were predicted or modelled, and then infrastructure provided to mitigate those impacts. The National Highways guidance for Local Plans describes vision-led transport as involving three core features:

- “Transport vision statements are the foundation, capturing the ambition and desired outcomes for a Local Plan or new development.
- A vision-led approach incorporates the vision as the central guiding principle of all planning, assessment, and decision-making processes.
- Transport monitoring should accompany the transport vision statement and vision-led approaches to ensure the real-world impacts of a local plan or development are understood and realised”.

4.276 Proposals should connect and contribute to the active travel network where appropriate and feasible to do so– this may require a section 106 obligation if the connection is off-site. Active travel links should be accessible, attractive, direct, legible, and safe, providing connection to the existing network at a safe and

convenient point of access. Active Travel Assessments are required for proposals that meet thresholds for Active Travel England as a statutory consultee.

4.277 Mitigation measures to support modal shift should also include measures to make vehicular routes safer for active travel users, including designing new streets to encourage low traffic speeds and potentially imposing speed limits such as 20mph in urban areas. Such proposals will need to be developed in consultation with the Highway Authority as their implementation would be through the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (as amended) rather than through the planning system, see [gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits#framework](https://www.gov.uk/government/publications/setting-local-speed-limits/setting-local-speed-limits#framework)

4.278 The reference to a 'significant' number of journeys in criterion 3 relates to the thresholds for transport statements and assessments as set by the Highways Authorities. For up-to-date information on this please seek advice as appropriate from:

- **Pre-application advice for roads and transport– West Sussex County Council**
- **Planning applications and transport | East Sussex County Council**
- **Information for highways developers | Transport and roads | Hampshire County Council**

4.279 Road safety provisions under criterion 4 can include measures to improve road safety and reduce traffic flow especially within the urban areas and close to areas like schools, hospitals and care homes. They may also include measures to improve resilience in extreme weather conditions.

4.280 The list of transport infrastructure improvements in criterion 5 is an open rather than a closed list – other improvements will also be supported where appropriate. Where relevant proposed development should support transport infrastructure proposals in Local Transport Plans and by Mayors and Combined County Authorities.

4.281 Mobility hubs are defined as locations where people can access multiple types of transportation modes in a central location such as bike hire, park and ride, car club vehicles and micro mobility devices such as electric scooters.

4.282 The Authority encourages community-led initiatives to improve road safety and reduce traffic speeds and has published guidance on the 'Community-led Approach

to Traffic Solutions'. A good example of such an approach is the 'Safer C7 Project Plan' thec7road.co.uk/safer-c7-project.

GUIDANCE

- Roads in the South Downs
- Community-led Approach to Traffic Solutions
- Working with National Highways to deliver a vision-led approach for Local Plans December 2025
- RTP1: Cracking the Code: How design codes can contribute to net-zero and nature's recovery, 24 Mar 2022.
- Department for Transport (DfT) Circular 01/2022: Strategic road network and the delivery of sustainable development (December 2022)
- Healthy Streets Approach, DfT Local Transport Note 1/20, and DfT Manual for Streets
- Local Transport Plans.

EVIDENCE

- Transport Study southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/transport/

SEE OTHER RELEVANT POLICIES INCLUDING

SDT2 Active Travel Routes, SDT3 Highway and Public Realm Design, SDT4 Parking Provision, SDL1 Landscape Character, SDL2 Design, SDL5 Dark Night Skies.

Strategic Policy SDT2: Active Travel Routes

Purpose of the Policy

The purpose of the policy is to safeguard, conserve, enhance, and expand the extensive network of active travel routes which run across and beyond the National Park.

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.

Policy SDT2: Active Travel Routes

1 Development proposals will be permitted provided they conserve and enhance the active travel network, including its amenity, accessibility, attractiveness, character, connectivity, legibility, safety, tranquillity, wayfinding and views, as well as its function as part of the wider green and blue infrastructure network.

2 Development of new and enhanced active travel routes and wayfinding will be permitted. For all other types of development, proposals will be permitted where they:

- a) Positively contribute to – and mitigate any significant additional pressures on– the active travel network;
- b) Incorporate accessible, attractive, direct, legible and safe active travel links that prioritise active travel users and connect to a convenient and safe point on the active travel network;
- c) Provide sensitively designed and safe, or protect and enhance the design and safety of existing, active travel crossings over roads, railways and/or watercourses;
- d) Provide appropriate wayfinding; and
- e) Take opportunities to explore links to the wider green and blue infrastructure network.

3 The following disused railway lines within the National Park, as shown on the Policies Map, are safeguarded for existing and future use as active travel routes. Development proposals that facilitate such use (either through whole or part delivery) and connect to them will be permitted, while development proposals that adversely affect their future potential as active travel routes will not be permitted:

- a) Boran to Bentley.
- b) Petersfield to Pulborough (via Midhurst).
- c) Chichester to Midhurst (Centurion Way).
- d) Wickham to Alton (Meon Valley Trail).
- e) Guildford to Shoreham-by-Sea (Downs Link).
- f) Liss to Longmoor.
- g) Devil’s Dyke Route.
- h) New Alresford to Kingsworthy (Watercress Way).

4 The following corridors within the National Park, as shown on the Policies Map, are safeguarded for future restoration to their historic uses. Development proposals for their restoration will be permitted, while development proposals that adversely affect their future potential for restoration will not be permitted. Opportunities for active travel routes as part of their restoration will be supported:

- a) The original course of the former Lewes to Uckfield railway line.
- b) The Wey and Arun Canal.

SUPPORTING TEXT

4.283 The active travel network is used for commuting, leisure and recreational purposes. In doing so, it facilitates access and movement across and to the National Park (contributing to Purpose 2), encourages physical activity (improving health and wellbeing), and reduces vehicular traffic (reducing associated emissions).

4.284 For the purpose of SDT2:

- Active Travel Users are those who make journeys by physically active means such as walking/wheeling (including mobility scooters, electric wheelchairs, self or assistant propelled wheelchairs, and pushchairs), cycling (including electrically assisted pedal cycles) and horse-riding (including carriage drivers).

- Active Travel Routes are highly valued public routes used by active travel users. They include, but are not necessarily limited to, designated cycle routes, licenced routes, low traffic routes, quiet lanes, permissive paths, and public rights of way (PRoW). The latter comprises footpaths, bridleways, restricted byways, and byways open to all traffic (BOAT) which have been designated for intended users – i.e., pedestrians/wheelers, cyclists and/or equestrians.

Conserving and enhancing the active travel network

4.285 The existing active travel network is extensive and generally well-used. But it can be adversely impacted by new development or the intensification of existing uses which affect the amenity, accessibility, attractiveness and safety of users of these routes. This will be a key consideration for such development. Where harm is unavoidable suitable mitigation or compensation will be sought to achieve an overall positive impact on active travel.

Local Strategies

4.286 It is not practical to list all existing – and all aspired, planned, and/or new – active travel routes across and close to the National Park. Instead, this strategic policy supports the conservation, enhancement and delivery of new, reinstated, restored, and improved active travel routes across and beyond the National Park which are evidenced in local strategies. This may include – but is not limited to – active travel networks plans, cycling and walking strategies (sometimes known as Local Cycling and Walking Infrastructure Plans), infrastructure delivery plans, neighbourhood development plans, rights of way improvement plans, transport plans and travel plans. In particular, the Authority will support proposals which improve accessibility to key destinations, public transport hubs (bus and railway stations), safe routes to schools, and major settlements.

Crossings, Materials, Wayfinding and Widths

4.287 The crossings, materials and widths of new or improved active travel routes will need to consider potential conflicts, needs, passing space, and safety requirements of intended users, and be informed by local landscape character and site constraints (for example, drainage and topography). Similarly, the location, design, and adoption of wayfinding infrastructure (for example signage, street furniture, and landmarks) should be informed by local landscape character, ensure improved navigation, and avoid clutter and proliferation along active travel routes. Applicants must refer to Active Travel England Rural Design Guidelines, Local Transport Note 1/20,

and Highway Authority guidance and standards when considering all the above. Moreover, proposals that improve active travel users' accessibility and safety, reduce severance effects, and introduce lower vehicular speeds will be supported. Proposal for wayfinding should also be considered under Policy SDT3.

Disused Railway Line and Identified Corridors

4.288 The disused railway lines and identified corridors present opportunities for active travel. In terms of the former railway lines, some are already partly converted for active travel, while restoration of the identified corridors could provide active travel links and routes where feasible. Existing structures and features connected to former uses and related heritage should be retained wherever possible. In some instances, the exact routes are not yet established and diversions from original lines may be necessary. Please note, 3c and 3f do not include parts of the original lines in international designated sites.

GUIDANCE

- NPPF Paragraph 105
- Active Travel England Standing Advice Note
- Healthy Streets Approach
- DfT Local Transport Note 1/20
- DfT Manual for Streets.

EVIDENCE:

- SDNPA Active Travel Network Plan (under preparation)

OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDN1 Nature Recovery, SDT1 Vision-led Transport, SDG2 Green and Blue Infrastructure.

Strategic Policy SDT3: Highway and Public Realm Design

Purpose of the Policy

The purpose of this policy is to set out the design principles for new and altered highways and the public realm around them.

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.

Policy SDT3: Highway and Public Realm Design

- 1** Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, *Roads in the South Downs*, or any future replacement.
- 2** Development will not be permitted where it would reduce the biodiversity, landscape, amenity value, character and alignment of rural roads and routes within settlements. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.
- 3** Development proposals should support and enable healthy and active environments which increase mobility, are inclusive and create places for people to rest, meet and interact.
- 4** Site layout must be designed to protect the safety and amenity of all road users. The design and layout of new development must give priority to active travel, to the needs of walkers and wheelers, cyclists and equestrians. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it. The development should also facilitate access to public transport, including through the provision of bus stops with inclusive, undercover and comfortable waiting facilities.
- 5** Street design and management proposals must be context-sensitive, responding to the specific character, activities, heritage, built form and layout,

materials and street furniture of the location. It should take opportunities to enhance green and blue infrastructure, including through street trees and swales where appropriate. Highway design must pay particular attention to the role and location of buildings, doors and entry points.

- 6** Appropriately designed and located new public art will be supported, in particular within settlements. New public art should be site specific, reflecting and respecting the site and its context and contributing to the identity of the community and sense of place.

SUPPORTING TEXT

4.289 The design of roads and pathways through a development is critical to how a place functions, and occupants' travel choices. The public realm around these routeways, and the green and blue infrastructure along them is crucial to the success of creating a place that feels safe and welcoming to all, promotes active travel and supports peoples' health and wellbeing. Provision of bus stops that are safe and welcoming, including being accessible for people with disabilities, is key to encouraging the use of public transport. Public art can make a significant contribution to this sense of place, connecting occupants with the cultural heritage of the location.

4.290 The policy also covers the impact of development on surrounding roads and routes. Rural roads and routes through settlements are often used by pedestrians, cyclists and equestrians for active travel and recreation and retain historic characteristics that are distinctive to the National Park and positively contribute to its landscape character. These benefits and characteristics can be adversely impacted by increases in traffic and will be an important consideration even where a proposal meets technical highway capacity requirements.

GUIDANCE

- Roads in the South Downs southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/
- Road User Utility Framework, healthystreets.com/resources
- RTPi Dementia and Town Planning rtpi.org.uk/new-from-the-rtpi/dementia-and-town-planning/

EVIDENCE

- Transport Study southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/transport/

SEE OTHER RELEVANT POLICIES INCLUDING

SDL2 Design, SDT1 Vision-led Transport, SDT2 Active Travel Routes.

Strategic Policy SDT4: Parking Provision

Purpose of the Policy

The purpose of this policy is to set out the approach to the provision of parking spaces, cycle parking and associated EV charging infrastructure.

Local Plan Objectives

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.

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.

Policy SDT4: Parking Provision

1 All new private and public parking provision will be designed using the vision-led transport approach and will:

- Be of a location, scale and design that reflects its context; and
- Incorporate appropriate sustainable drainage systems.

2 Development proposals for new, extended, improved or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SDC2: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:

- There is evidence that overriding traffic management or recreation management benefits can be achieved;
- It is a component of a strategic traffic management scheme which gives precedence to sustainable transport;
- The site is close to and easily accessible from main roads by appropriate routes, and well connected to active travel routes;

- d) Within settlements, the car park is linked to other parts of the settlement by attractive walking/wheeling routes, to allow easy onward journeys; and
 - e) Opportunities are explored to deliver multiple benefits such as combining with a mobility hub and/or including solar panels over parking spaces.
- 3** Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking, including secure cycle storage, to serve the needs of that development in accordance with the adopted parking standards in the Parking Supplementary Planning Document or subsequent updated versions unless lower provision is justified by the vision-led approach, access to other means of transport or measures such as car clubs. Wherever feasible, electric vehicle charging facilities must also be provided.
- 4** All new public parking provision will comply with the following:
- a) Wherever feasible, electric vehicle and electric bicycle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters; and
 - b) Where located with good accessibility to the bridleway network, and other routes and land available for horse riding / carriage driving, include provision for horse box parking.

SUPPORTING TEXT

4.291 The vision-led approach to transport set out in SDT1 may result in different parking provision than required by the Parking Supplementary Planning Document (SPD) because the desired modal shift away from travel by private car requires the provision of parking spaces to be restricted. In urban locations with good access to services and public transport, parking provision may not be necessary at all, and removal of this requirement may result in a more efficient use of land and better design solutions. In all other circumstances the calculator in the SPD should be used to ensure that new development does not result in pressure for additional parking in the surrounding area.

4.292 More detail is provided in the Parking Supplementary Planning Document and calculator at southdowns.gov.uk/planning-policy/supplementary-planning-documents/supplementary-planning-documents/parking-spd/ with provisions for EV charging in the Sustainable Construction Supplementary Planning Document at southdowns.gov.uk/planning-policy/

[supplementary-planning-documents/supplementary-planning-documents/sustainable-construction-supplementary-planning-document/](#)

GUIDANCE

- Parking SPD
- Sustainable Construction SPD
- Part S of the Building Regulations

EVIDENCE

- Parking standards in the SPD are informed by Census data on car ownership.

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL2 Design, SDL5 Dark Night Skies, SDT1 Vision-led Transport, SDT2 Active Travel Routes, SDT3 Highway Design and Public Realm.

Strategic Policy SDT5: Infrastructure

Purpose of the Policy

The purpose of this policy is to set out how we will determine applications for new infrastructure and how we will require infrastructure provision to accompany new development.

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.

Policy SDT5: Infrastructure

1 Development proposals will only be permitted where it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all necessary infrastructure requirements arising from the proposed development. In addition:

- a) The timing of infrastructure provision will need to be considered and agreed with the Authority and relevant infrastructure providers to ensure that infrastructure is delivered and operational prior to, or alongside, the proposed development it is required to serve. In some cases, the phasing of development may be appropriate. Where this is the case, the Authority will use conditions or planning obligations to secure the phasing arrangement to ensure that infrastructure is delivered at the appropriate time; and
- b) The delivery of the relevant infrastructure will be secured either through direct provision by the developer in the form of suitable on-site or off-site works or through financial contributions (such as obligations secured in a Section 106 Legal Agreement or the Community Infrastructure Levy). Financial contributions towards future infrastructure maintenance, where necessary, will also be secured by means of a legal agreement.

2 Development proposals for new, improved or supporting infrastructure will only be permitted where:

- a) It represents the least environmentally harmful option reasonably available, also having regard to the operational requirements and technical limitations of the proposed infrastructure; and
 - b) Opportunities have been taken to design infrastructure with a holistic approach, having regard to the mitigation hierarchy, by:
 - i. Avoiding impacts on the natural, historic or built environment, on landscapes and on people; or
 - ii. Where adverse impacts are unavoidable, effectively mitigating or
 - iii. As a last resort compensating for those impacts by using nature-based solutions appropriate to the landscape and ecology of the locality.
- 3** The development or expansion of water supply or wastewater facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply, quality and wastewater management, subject to 2 above.

SUPPORTING TEXT

4.293 Infrastructure for the purposes of this policy comprises public and private physical structures such as roads, railways, bridges, public transit systems, water supply, sewers, electrical power equipment, renewable energy, gas network as well as health, education and other community facilities and blue and green infrastructure.

4.294 Some types of infrastructure are also covered by other policies as follows:

- SDG1 Community Facilities (including health)
- SDG2 Green and Blue Infrastructure
- SDG3 Open Space, Recreation and Sport
- SDN10 Renewable Energy
- SDT1 Vision-led Transport Approach
- SDT2 Active Travel Routes
- SDT6 Telecommunications

4.295 Necessary infrastructure will be secured through a combination of planning obligations (such as Section 106 agreements) and Community Infrastructure Levy (CIL). The Authority adopted its CIL Charging Schedule in 2017 which includes standard tariffs for residential development and large format retail. As a general

rule, infrastructure that is directly related to a development will be secured through a planning obligation whereas more general community infrastructure requirements will be met through CIL.

EVIDENCE

- Infrastructure Business Plan
- Community Infrastructure Levy Charging Schedule

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDG1 Community Facilities, SDG2 Green and Blue Infrastructure, SDG3 Open Space, Recreation and Sport, SDN10 Renewable Energy, SDT1 Vision-led Transport Approach, SDT2 Active Travel Routes, SDT6 Telecommunications.

Strategic Policy SDT6: Telecommunications Infrastructure

Purpose of the Policy

The purpose of this policy is to support the provision of telecommunications infrastructure whilst also minimising its environmental impact.

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.

Policy SDT6: Telecommunications Infrastructure

1 Development proposals for new telecommunications infrastructure will be permitted where:

- a) It is demonstrated that the identified need cannot be met using existing infrastructure or other appropriate structures;
- b) The site selected for the development is the least harmful of the realistic alternative options in terms of its impact on the landscape, cultural heritage and wildlife of the National Park; and
- c) The development shall have regard to the mitigation hierarchy, by:
 - i. Avoiding impacts on the natural, historic or built environment, on landscapes and on people; or
 - ii. Where adverse impacts are unavoidable, effectively mitigating or
 - iii. As a last resort compensating for those impacts by using nature-based solutions appropriate to the landscape and ecology of the site and its immediate surroundings.

2 All new residential dwellings should be served by a superfast broadband connection, or an equivalent alternative technology, installed on an open access basis. All other non-residential buildings must also be provided with this standard of connection when available, unless it can be demonstrated through consultation with relevant service providers that this would not be deliverable.

SUPPORTING TEXT

4.296 High quality digital connections are key to the economic prosperity of the National Park, reduce the need for people to travel to work and to access other necessities, and support the efficient provision of health, education and other key services. However, the physical infrastructure can be challenging to locate in a sensitive landscape, especially open downland, and these impacts need to be carefully balanced against the benefits.

4.297 Telecommunications operators should submit robust evidence with their applications to demonstrate how they have thoroughly explored opportunities to use existing infrastructure or other appropriate structures, selected the least harmful location and design for the equipment and how they have followed the mitigation hierarchy.

4.298 The NPPF makes clear that local planning authorities should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure. The last aspect is generally covered by the submission of a certificate with a planning application confirming that the operator has complied with the guidelines.

SEE OTHER RELEVANT POLICIES INCLUDING

SDL1 Landscape Character, SDL3 Safeguarding Views, SDE1 Economic Development.

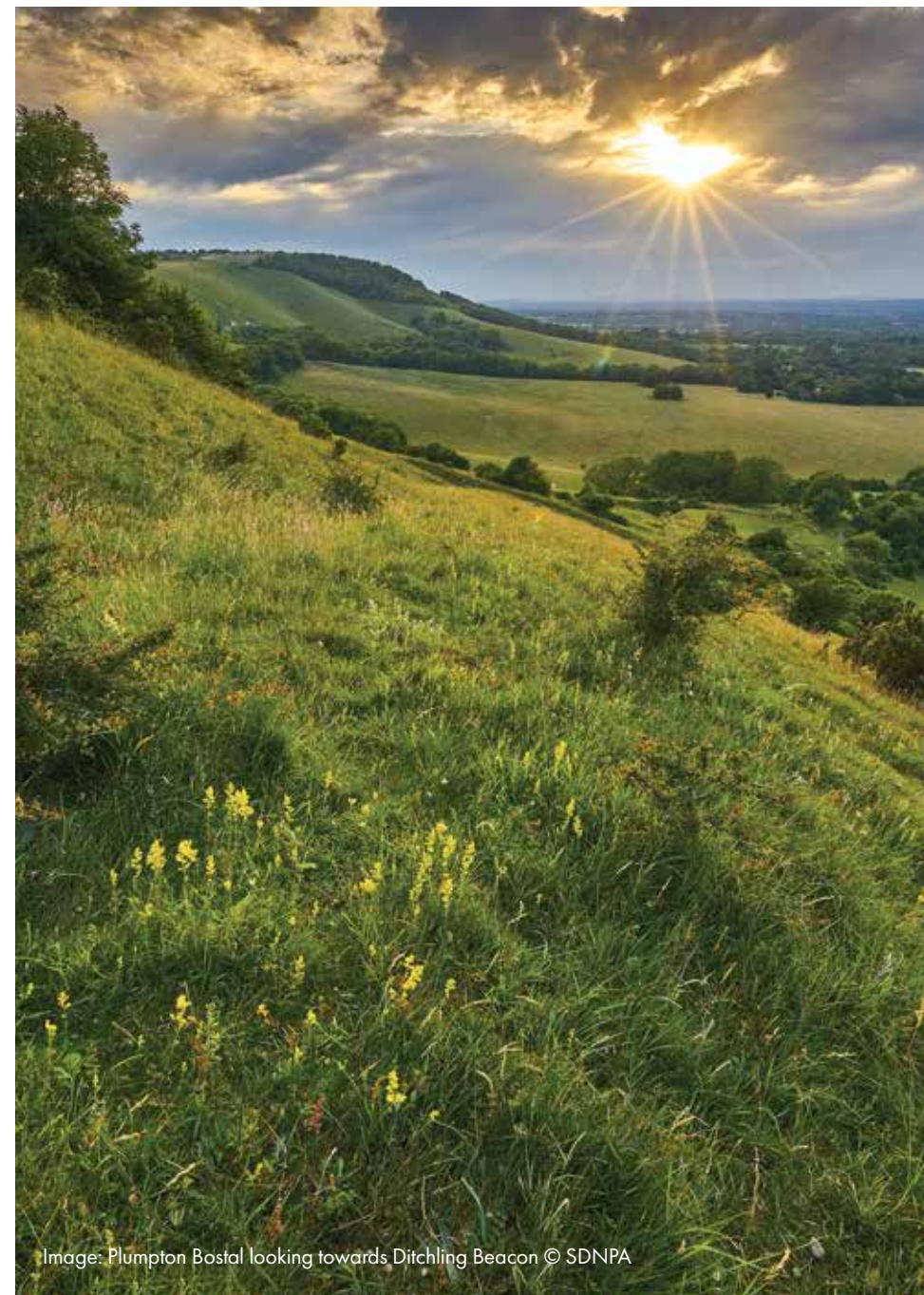


Image: Plumpton Bostal looking towards Ditchling Beacon © SDNPA