South Downs National Park
Local Plan

Draft Options Consultation Document

Version for SDNPA Planning Committee
23 January 2014

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South Downs National Park Local Plan
Options Consultation
Chapter 1 - Introduction

What is the Local Plan?

1.1 When adopted the Local Plan will set out the planning policies for the South Downs National Park. This will be the first time that the South Downs National Park will be planned for as a single entity. The Local Plan policies will cover a wide range of topics setting out the approach to different types of development from the very detailed issues, such as the size of extensions to houses, to National Park-wide issues, such as levels of affordable housing over a 15 year period from adoption. It will also include site allocations (for example, identifying a site for housing, or a site for employment use). Once the Local Plan has been adopted, all planning applications for development within the National Park will be judged against these adopted policies.

1.2 The Local Plan is being developed in the context of the South Downs Partnership Management Plan (PMP) which sets out the long-term Vision for the National Park. The policies in the Local Plan will contribute to the achievement of the Vision and help deliver many of the objectives of the PMP. Once adopted, the Local Plan policies will replace all the ‘saved’ Local Plan and Core Strategy policies inherited by the South Downs National Park Authority (SDNPA) when it became local planning authority for the National Park in April 2011, and also Joint Core Strategies adopted since April 2011 (see para.1.15).

1.3 Minerals and waste policies are being developed through Joint Minerals and Waste Plans, working with the adjoining Minerals and Waste Authorities across the three counties covering the National Park. Consequently minerals and waste will not be part of the Local Plan and are, therefore, not discussed in this Options Consultation Document. The relevant Minerals and Waste Plans are:

- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)
- West Sussex Waste Local Plan (submitted to Secretary of State for Examination, 2013)
- Draft West Sussex Minerals Local Plan.

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1 On 1st April 2011 the South Downs National Park Authority inherited all the existing policies from the 15 previous planning authorities (Adur District, Arun District, Brighton and Hove City, Chichester District, Eastbourne Borough, East Hampshire District, East Sussex County, Hampshire County, Horsham District, Lewes District, Mid Sussex District, Wealden District, West Sussex County, Winchester City and Worthing Borough Councils).
What is this Options Consultation about?

1.4 This Options Consultation Document represents the first stage in developing the Local Plan. It will represent the formal Regulation 18 stage (of the Town and Country Planning (England) Regulations 2012), whereby the local planning authority notifies stakeholders of its intention to produce a local plan. The aim of the Options Consultation is to ask for your views on what approach the Local Plan policies should take on various key planning issues. At this early stage in the development of the Local Plan the discussions will be broad and at a high level.

1.5 This Options Consultation Document consists of 10 chapters:
1. Introduction
2. A Portrait of the South Downs National Park
3. Landscape and Natural Resources
4. Historic Environment
5. Design
6. Settlement Strategy
7. Housing
8. Economy and Tourism
9. Community Facilities and Infrastructure
10. Transport and Accessibility.

1.6 The development of the Local Plan and the choice of issues that this consultation focuses on builds on the conversations and engagement which have been on-going through the development of the South Downs National Park Vision, the Special Qualities, the State of the National Park Report and, most recently for the development of the PMP. Each chapter covers a different topic, but there is considerable cross-over and important links between the chapters and issues. Links between chapters and also to other reference material are highlighted in the side bars throughout the document.

1.7 For each of the issues realistic, broad approaches have been given for consideration and discussion. For most of the issues the document sets out 'what we propose to do' statements, which set out the suggested approach for Local Plan to take on the individual issue taking into account the National Park’s Purposes and Duty, the requirements of national planning policy and guidance from documents such as the English National
1.8 At the same time as the Options Consultation Document is being consulted upon the SDNPA is also consulting on a Preliminary Draft Community Infrastructure Levy (CIL) Charging Schedule. This represents the first formal consultations stage in implementing a CIL for the National Park and comments are sought on the document.

**What are the next stages?**

1.9 Following the Options Consultation all of the responses received during this consultation will be collated and analysed against the options outlined. The responses will be taken into account alongside the evidence base and other considerations, such as national policy and guidance, to produce the Preferred Options Document. This will be the first draft of the Local Plan, including draft policies and proposed site allocations.

**Key dates for the development of the Local Plan**

<table>
<thead>
<tr>
<th>Local Plan Stage</th>
<th>Date</th>
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<tr>
<td>Options Consultation</td>
<td>February 2014</td>
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<tr>
<td>Preferred Options Consultation</td>
<td>January 2015</td>
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<tr>
<td>Publication and Pre-Submission</td>
<td>November 2015</td>
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<td>Submission to Secretary of State</td>
<td>June 2016</td>
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<td>Examination</td>
<td>To be confirmed</td>
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<td>Adoption</td>
<td>Spring 2017</td>
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1.10 Once the SDNPA has considered the comments received on the Preferred Options outlined with the first draft of the Local Plan, a final draft Local Plan will be prepared. This will be published as a ‘Pre-Submission’ version, where representations can be made on the soundness and legal compliance of the plan. All representations made at this stage, along with the Pre-Submission version of the plan, will then be submitted to the Planning Inspectorate (on behalf of the Secretary of State), which will appoint an Inspector to carry out an examination of the plan.

**How to respond to this consultation**

1.11 The Local Plan Options Consultation will run from **xx February 2013** to **11.59 hours xx April 2013**. There are three different ways to respond to the Options Consultation:
• the preferred consultation response is online via the consultation website: www.southdowns.gov.uk@xxxxxxxxxxx
• by filling in an electronic comment form and emailing to planningpolicy@southdowns.gov.uk, or
• by either filling out a paper copy comment form or writing to:
  Options Consultation
  SDNPA Local Plan Team
  Hatton House, Bepton Road
  Midhurst, West Sussex
  GU29 9LU.

So that the SDNPA Local Plan team can accurately record your comments, please ensure that for each comment that you outline the part the topic, issue and option you are commenting on. Further information on how to respond can be found at: http://www.southdowns.gov.uk/localplan.

National Context

National Park Purposes and Duty and Section 62

1.12 National Park status recognises, and gives great weight to, its high quality landscape, natural beauty, wildlife and cultural heritage.

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<th>The SDNPA has statutory purposes and socio-economic responsibilities as specified in the Environment Act 1995:</th>
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<td>1) of conserving and enhance the natural beauty, wildlife and cultural heritage of the area; and</td>
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<td>2) of promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.</td>
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<td>Shall seek to foster the economic and social well-being of the local communities within the National Park, without incurring significant expenditure in doing so and shall co-operate with local authorities and public bodies.</td>
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1.13 In addition Section 62 of the 1995 Environment Act requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these Purposes. Where there is an irreconcilable conflict between the statutory purposes, the Sandford Principle is statutorily required to be applied and the first Purpose of the National Park will be given priority.

**English National Parks and the Broads UK Government Vision and Circular 2010**

1.14 In 2010 the Government published the Circular as guidance for National Park Authorities as to how to achieve the Purposes and Duty. The Circular refocuses attention on achieving National Parks’ Purposes of conserving and enhancing the natural and cultural environments and ensuring the widest range of people are able to access and enjoy National Parks responsibly.

1.15 The Circular makes clear the responsibility of National Park Authorities to be: ‘exemplars in achieving sustainable development’. The Circular builds on this by adding the National Parks have a key role as exemplars of how to adapt to and mitigate the impacts of climate change, and to lead the way as exemplars of how to live within environmental limits.

1.16 The Circular also provides further guidance on delivery of the second Purpose. It focuses on the opportunities for people from within and visitors to National Parks to learn about these areas and what makes them special. It stresses the need for people to enjoy those special qualities responsibly, so as to enable future generations to enjoy them too, with an emphasis on new educational tools to engage a variety of users, as well as sustainable tourism.

1.17 The Circular recognises the key role that people have had in shaping the landscapes of National Parks. People have lived, worked, farmed and enjoyed these areas for centuries and their activities have shaped how our National Parks appear today. The importance of sustaining the communities who live and work within the National Park is recognised and supported through the Duty placed on National Park Authorities. The Circular describes the different elements which can contribute to sustainable local communities, including supporting the rural economy, the importance of truly affordable housing to sustain the long term needs of local communities and the infrastructure which underpins these rural, and often remote, communities with a particular emphasis on electronic communication networks.

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3 The Sandford Principle – a statement first made by Lord Sandford in his committees report on possible changes to the management and legislation governing National Parks and now in the 1995 Environment Act which states that: ‘if it appears that there is a conflict between those two Purposes, any relevant Authority shall attach greater weight to the first [Purpose]’.


National Planning Policy Framework

1.18 The National Planning Policy Framework (NPPF) was published in March 2012. It sets out the Government’s priorities and principles for development across the country and replaces the previous Planning Policy Statements. Its core principles reflect the need to identify and plan for the housing and employment needs of the area, with specific mention of supporting thriving rural communities. It makes clear the preference for efficient use of resources by identifying the re-use of previously-developed land and existing buildings, including the re-use or conversion of cultural and historical assets. It recognises the wider contribution of open land and the varied functions that it performs, such as for recreation, carbon storage and food production, recognising the wider benefits of ecosystem services and that development should be directed to land of lesser environmental value. Climate change, carbon reduction and energy from renewable resources are embedded principles within the NPPF.

1.19 The NPPF is based on the principle of ‘sustainable development’, which combines environmental sustainability, social sustainability and economic sustainability. These three elements underpin the policies and aims of the NPPF – the delivery of sustainable development. The NPPF promotes a ‘presumption in favour of sustainable development’, emphasising the need for positive plan-making and that local planning authorities must objectively assess the need for future housing and then meet that need unless specific policies in the NPPF indicate development should be restricted (para. 14), such as those for land within National Parks.

1.20 The NPPF makes several references to the importance of National Parks and states that: ‘great weight should be given to conserving landscape and scenic beauty in National Parks’, areas which have the highest status of protection. National Parks are highlighted as one of the important instances where specific policies in the NPPF indicate development should be restricted. It also states that the conservation of wildlife and cultural heritage are important considerations and should also be given ‘great weight’ and refers to the English National Parks and the Broads UK Government Vision and Circular 2010 for further guidance.

1.21 The NPPF goes on to say that:
‘planning permission should be refused for major developments in these designated areas 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:
• 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;
• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.’
(para.116, emphasis added)

It is, therefore, important to be clear what is considered to be ‘major development’ in the National Park.
1.22 The interpretation of major development taken by England’s National Parks and Areas of Outstanding Natural Beauty varies. NPAs in England and Wales have used the definition of major development set out in the Town and Country Planning Development Management Procedure Order 2010, that:

‘development involving any one or more of the following –

- the winning and working of minerals or the use of land for mineral-working deposits
- waste development
- the provision of dwellinghouses where –
  (i) the number of dwellinghouses to be provided is 10 or more or
  (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i)
- the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more or
- development carried out on a site having an area of one hectare or more’

1.23 The Order applies only within the limits of the order and is not a general definition. However, this approach has been adopted by the Peak District National Park Authority and the Broads Authority. The Brecon Beacons NPA also include in its major development definition development that triggers the requirement for an Environmental Impact Assessment (EIA), or screening opinion, using this assessment method to signal potential adverse impact on the natural environment. Another approach, adopted by the Lake District and Yorkshire Dales NPAs, is to look at what development would have a significant impact on the National Park and on its special qualities. In contrast other National Parks do not provide a definition of major development, choosing to assess applications and their significance on a case by case basis, with some providing examples of the types of development which may be considered major.

1.24 The definition that the SDNPA has takes with regard to major development is development that by, reason of its scale, character or nature, has the potential to have a serious adverse impact on either the natural beauty of, or recreational opportunities provided by, the National Park. Generally the SDNPA expects that, in recognition of their unique size and scale in a National Park context, within the urban forms of Petersfield and Lewes the tests on scale of major development which has an impact on the natural beauty of the National Park will be different from other parts of the National Park.

South Downs National Park Context
Current Planning Policy Context for the South Downs National Park

1.25 The current set of planning policies for the National Park is made up of the districts’ planning policies (inherited by the SDNPA on 1st April 2011), as well as adopted and emerging joint planning policies that the SDNPA has worked on with neighbouring local authorities, including:

- **Worthing Borough Core Strategy** – adopted August 2011
- **Winchester Joint Core Strategy** – Local Plan Part I – Adopted March 2013
- **Wealden Core Strategy (Incorporating Part of the South Downs National Park)** – adopted February 2013
- **East Hampshire District Local Plan: Joint Core Strategy** – submitted May 2012, and
- **Lewes District Local Plan Part 1 – Joint Core Strategy** – due for submission May 2014.

1.26 While much of the development of the joint plans was carried out prior to the National Park coming into being they do (or will) provide an up-to-date policy framework for much of the National Park. The Local Plan will take into account the recently developed policies in these joint plans.

1.27 Neighbourhood planning provides the opportunity for local people to influence the types and location of development for their community. The ambition of the community should be aligned with the strategic needs and priorities of the wider area and neighbourhood plans must be in general conformity with the policies of the local plan. Once adopted neighbourhood plans will form part of the ‘development plan’.

1.28 Neighbourhood Plans are one form of community-led planning. Others include Village Design Statements and Parish Plans. These can provide valuable local insight to issues in a specific town, village or parish. The SDNPA encourages all communities in be actively involved in shaping the planning process be that through direct input into the Local Plan, or more focussed community level plans. These other community-led plans, where it is considered that they provide guidance to the planning process, will be formally adopted by the SDNPA as Supplementary Planning Documents which gives them ‘material weight’ in determining of planning applications.

Delivering the Partnership Management Plan and National Park Vision

1.29 The Local Plan will represent the last in the suite of documents produced by the SDNPA since its inception in April 2011:

- **South Downs National Park Special Qualities** (2011)
- **State of the South Downs National Park Report** (2012)
Figure 1: Policies and Plans
The South Downs National Park Special Qualities

1.30 During 2011 the SDNPA and partners, established what it is about the National Park that makes it such a very special place – the ‘Special Qualities’, and also agreed the Vision for the South Downs to 2050 which sets out how we would like the National Park to look and feel in the long term. The seven Special Qualities of the National Park are:

- Distinctive towns and villages, and communities with real pride in their area
- Tranquil and unspoilt places
- Well-conserved historical features and a rich cultural heritage
- A rich variety of wildlife and habitats including rare and internationally important species
- Diverse, inspirational landscapes and breathtaking views
- Great opportunities for recreational activities and learning experiences
- An environment shaped by centuries of farming and embracing new enterprise

Figure 2: The Seven Special Qualities

6 http://www.southdowns.gov.uk/about-us/vision
1. Diverse, inspirational landscapes and breath-taking views

The geology of the South Downs underpins so much of what makes up the special qualities of the area: its diverse landscapes, land use, buildings and culture. The rock types of the National Park are predominately chalk and the alternating series of greensands and clays that form the Western Weald. Over time a diversity of landscapes has been created in a relatively small area which is a key feature of the National Park. These vary from the wooded and heathland ridges on the greensand in the Western Weald to wide open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these diverse landscapes are hidden villages, thriving market towns, farms both large and small and historic estates, connected by a network of paths and lanes, many of which are ancient.

There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul.

2. A rich variety of wildlife and habitats including rare and internationally important species

The unique combination of geology and microclimates of the South Downs has created a rich mosaic of habitats that supports any rare and internationally important wildlife species. Sheep-grazed downland is the iconic habitat of the chalk landscape. Here you can find rare plants such as the round-headed rampion, orchids ranging from the burnt orchid and early spider orchid to autumn lady’s tresses, and butterflies including the Adonis blue and chalkhill blue.

The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all our native reptile and amphibian species are found. There are large areas of ancient woodland, for example the yew woodlands of Kingley Vale and the magnificent ‘hanging’ woodlands of the Hampshire Hangers.

The extensive farmland habitats of the South Downs are important for many species of wildlife, including rare arable wildflowers and nationally declining farmland birds. Corn bunting, skylark, lapwing, yellowhammer and grey partridge are notable examples.

The river valleys intersecting the South Downs support wetland habitats and a wealth of birdlife, notably at Pulborough Brooks. Many fish, amphibians and invertebrates thrive in the clear chalk streams of the Meon and Itchen in Hampshire where elusive wild mammals such as otter and water vole may also be spotted. The extensive chalk sea cliffs and shoreline in the East host a wide range of coastal wildlife including breeding colonies of seabirds such as kittiwakes and fulmars.
3. Tranquil and Unspoilt Places
The South Downs National Park is in South East England, one of the most crowded parts of the United Kingdom. Although its most popular locations are heavily visited, many people greatly value the sense of tranquillity and unspoilt places which give them a feeling of peace and space. In some areas the landscape seems to possess a timeless quality, largely lacking intrusive development and retaining areas of dark night skies. This is a place where people seek to escape from the hustle and bustle in this busy part of England, to relax, unwind and re-charge their batteries.

4. An Environment Shaped by Centuries of Farming and Embracing New Enterprise
The rural economy has strongly influenced the landscape and over 80 per cent of the South Downs is farmed. Past agricultural practices have produced some nationally valuable habitats including chalk downland and lowland heath, with traditional breeds specific to the area such as Southdown and Hampshire Down sheep significant in the past and still bred today. Many farmers and landowners are helping to conserve and enhance important habitats through environmental stewardship schemes. Large estates such as Goodwood, Cowdray, Petworth and Firle, with their designed parklands, have a significant effect on the landscape and the rural economy. The ownership of large areas of the eastern Downs by local authorities or the National Trust is a legacy of the early 20th century conservation movements to protect the iconic cliffs and Downs and the water supply to coastal towns.

Farming has always responded to the economy of the day and continues to do so. Some farmers are diversifying their businesses, for example by providing tourist accommodation and meeting the growing market for locally produced food and drink. Climate change and market forces continue to influence the landscape leading to new enterprises such as vineyards, and increasing opportunities for producing alternative energy, for example wood fuel. However, the economy of the National Park is by no means restricted to farming. There are many popular tourist attractions and well-loved local pubs which give character to our towns and villages. The National Park is also home to a wide range of other businesses, for example new technology and science, which supports local employment.

5. Great opportunities for recreational Activities and learning experiences
The South Downs offers a wide range of recreational and learning opportunities to the large and diverse populations living both within and on the doorstep of the National Park, and to visitors from further afield.

With 3,200 kilometres (2,000 miles) of public rights of way and the entire South Downs Way National Trail within the National Park there is exceptional scope for walking, cycling and horse riding. Many other outdoor activities take place such as paragliding, orienteering and canoeing. There is a chance for everyone to walk, play, picnic and enjoy the countryside, including at Queen Elizabeth Country Park in Hampshire and Seven Sisters Country Park in East Sussex.
The variety of landscapes, wildlife and culture provides rich opportunities for learning about the South Downs as a special place, for the many school and college students and lifelong learners. Museums, churches, historic houses, outdoor education centres and wildlife reserves are places that provide both enjoyment and learning. There is a strong volunteering tradition providing chances for outdoor conservation work, acquiring rural skills, leading guided walks and carrying out survey work relating to wildlife species and rights of way.

6. Well-conserved historical features and a rich cultural heritage

The distinct character of many areas of the South Downs has been created by well conserved historical features, some of which are rare and of national importance. Bronze Age barrows, Iron Age hill forts, Saxon and Norman churches, dew ponds, historic houses and landmarks of the two World Wars help to give the National Park strong links to its past human settlement. These links are reinforced by the variety of architectural building styles spanning the ages. Evidence of earlier farming traditions can still be seen today in the pattern of field boundaries, and relics of the industrial past remain in the form of old iron workings, brickworks, quarries and ancient coppiced woodlands.

The South Downs has a rich cultural heritage of art, music and rural traditions. There is a strong association with well-known writers, poets, musicians and artists who have captured the essence of this most English of landscapes and drawn inspiration from the sense of place: Virginia Woolf, Jane Austen, Hilaire Belloc, Edward Thomas, Gilbert White, Edward Elgar, Joseph Turner, Eric Gill and Eric Ravilious, among many others. Today traditions continue through activities such as folk singing and events like Findon sheep fair. Culture lives on with new art and expression, celebrating the strong traditions of the past.

7. Distinctive towns and villages and communities with real pride in their area

The South Downs National Park is the most populated National Park in the United Kingdom, with around 110,000 people living within the boundary. Significantly more people live in the major urban areas and villages that surround the National Park including communities that are actively involved in the South Downs such as Brighton and Hove, and Eastbourne.

The South Downs is unique in having the largest market towns of any UK National Park - Lewes, Petersfield and Midhurst. The character and appearance of these and many other settlements throughout the National Park derives in large part from the distinctive local building materials. Picturesque villages like Selborne, Charlton and Alfriston blend into their landscapes.

Many of these settlements contain strong and vibrant communities with much invested in the future of where they live, and a sense of identity with their local area, its culture and history. Across the South Downs there are also communities of people who come together through common interests, for example, farming, conservation and recreation. These communities dedicate time and resources to enhancing community life, conserving what is important to them and planning for future generations.
The State of the National Park Report

1.31 These special qualities were used as the basis for the State of the Park Report8, published in Autumn 2011, which paints a picture of the National Park. This document provides a baseline of information and data on a wide range of aspects of the National Park. For example, the current condition of protected sites, the number of historic buildings and assets considered to be ‘at risk’, and key data on levels and types of employment.

South Downs National Park Partnership Management Plan

1.32 Throughout 2012 and 2013 the SDNPA, together with partners and stakeholders, developed a series of outcomes, or long-term goals, for the National Park that would help to achieve the Vision, and defined a set of shorter-term policies, which will guide work over the next five years towards achieving the outcomes and the Vision.

1.33 Together these formed the Partnership Management Plan (PMP), which was formally adopted by the SDNPA in December 2013. The PMP9 is a five-year plan for the National Park. While it is not part of the formal ‘development plan’10 it can be a material consideration11 in determining planning applications. The Local Plan and subsequent development management decisions are key ways that the SDNPA will help deliver the PMP’s policies and work towards delivering the 2050 Vision (see overleaf).

1.34 The PMP has had a comprehensive engagement programme with key stakeholders, residents and recreational users of the National Park and the results of this engagement have helped inform this Options Consultation Document. The PMP consultation identified policy areas where there was agreement on the priorities for the National Park, such as the importance of encouraging sustainable modes of transport, support for facilities in rural communities and provision of enhanced communication technology, including high-speed broadband and mobile-phone coverage. There were also several areas of disagreement and differing views, such as balancing the needs of different users of the National Park, for example the needs of residents, business, recreational users and visitors. The planning-related issues are explored in this Options Consultation Document. By looking in more detail at these issues and listening to the responses of stakeholders, SDNP A will begin to identify the right approaches for the National Park.

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9 http://www.southdowns.gov.uk/about-us/management-plan
10 The South Downs National Park Development Plan includes adopted Local Plans including the Joint Minerals and Waste Plans for Hampshire, West Sussex and East Sussex and Neighbourhood Plans.
11 A material consideration is a factor or issue that should be taken into account when determining a planning application, these can include previous planning decisions, nature conservation, government policy or noise.
## South Downs National Park Vision

By 2050 in the South Downs National Park:

The iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures.

People will understand, value, and look after the vital natural services that the National Park provides. Large areas of high-quality and well-managed habitat will form a network supporting wildlife throughout the landscape.

Opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities. The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly.

Its special qualities will underpin the economic and social well-being of the communities in and around it, which will be more self-sustaining and empowered to shape their own future. Its villages and market towns will be thriving centres for residents, visitors and businesses and supporting the wider rural community.

Successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.
Landscape and Natural Beauty: the Local Plan’s Golden Thread

1.35 In planning for the future of the National Park it is essential to understand the value of this unique environment. The landscape that we know today has been shaped by centuries of interaction between human activity and natural processes and it is this interaction (see Figure 3 below) which has created the places, vistas and townscapes we value so greatly. The places we live and work in, visit and enjoy are part of and embedded in the natural environment. This can be seen in the way settlements sit in their surrounding landscape, the building materials sourced locally or the way settlement patterns can follow the contours or other physical features of the land.

Figure 3: How Landscape is Formed
**The importance of well connected green infrastructure (GI)**

1.36 The natural environment underpins the National Park’s economy, providing an enormous range of products and services with a considerable worth to local, regional and national economies. In addition, a well-planned and managed natural environment is fundamental to shaping the character and quality of places in which people live and work. Contact with nature contributes to people's physical and mental well-being. Nature is also a valuable resource for the whole community, providing opportunities for learning, artistic expression, spiritual refreshment, research, outdoor education, exploration, recreation, exercise, and play.

1.37 To maximise all the environmental, economic and social benefits that development can facilitate biodiversity and recreational improvements should be carried out within a green infrastructure (GI) strategy. GI is a network of high quality green spaces, rivers and streams and other environmental features. It should be planned and delivered at all scales from the national level to individual local neighbourhoods.

1.38 GI makes use of natural assets and systems to create places that: are more resilient to climate change, have distinct local character, offer increased recreational opportunities, that promote well-being, productivity, educational benefits and crime reduction, and where communities can actively engage with their local environment. In order to conserve and enhance the natural environment within the National Park it is important to look at the overall existing location, type and condition of the green and blue ecological networks and environmental features, and assess what needs to be done to support and improve the size, quality and condition of these.

**Responding to climate change**

1.39 The Local Plan provides the opportunity to put in place planning policies that take into account the changes that are, and will be, occurring during the plan period due to climate change. Issues such as rising sea levels, changes in weather patterns and increases in severe weather events need to be factored into the Local Plan. Our ability to adapt to climate change is greatly dependent on a well-functioning natural environment with connected and robust ecological networks. GI also helps to mitigate the impacts of climate change by reducing greenhouse gas emissions, for example, through carbon storage and sequestration and by reducing car use through facilitating walking and cycling. The Local Plan will provide strategic guidance as to how the National Park will contribute towards national objectives to reduce carbon emissions.

1.40 The impacts of climate change can be dealt with in two ways: firstly through ‘mitigation’ measures, and secondly through ‘adaptation’. Mitigation measures focus on:

- reducing emissions of CO$_2$ and other greenhouse gas and
- carbon sequestration, that is, the planting of woodland and other vegetation to absorb and store CO$_2$, and the management of soils.
1.41 Adaptation measures are those that help communities and businesses prepare for the consequences of climate change, in order to safeguard what we value in our historic and natural environment for future generations.

1.42 The response to climate change is a cross-cutting issue that is discussed in several chapters and will require policies in different contexts of the Local Plan. As an example, reducing carbon emissions to mitigate climate change is a priority within both transport and the built environment; the former is addressed in Transport and Accessibility - Chapter 10, while the latter is dealt with in Design – Chapter 5.
Introduction

2.1 The South Downs National Park contains over 1,600 square kms of some of the most varied and beautiful landscapes in the country. The quintessentially English scenery - the iconic chalk cliffs of Beachy Head, sheep-grazed open chalk grassland, gently rolling hills, ancient woodlands and wide views south to the sea – is dotted with peaceful, picture-perfect hamlets, flint-knapped farmsteads, imposing castles and grand country estates. Signs of the past are everywhere, from Neolithic earthworks and Bronze Age barrows to Roman villas, Iron Age hillforts and medieval drove ways. Located in the most populated region in the country, and with cities like Brighton and Winchester on its doorstep, the South Downs National Park provides an escape from the stress and clamor of city living with its calm and tranquil space, offering a welcome breath of fresh air.

2.2 Modern life goes on here too, in lively towns like Lewes, Petersfield and Midhurst, and over 300 other villages and hamlets. About 112,000 people live in the National Park, and millions of visits are made every year, drawn as they have been for generations by the peaceful hills and stunning views. Many families have a long connection with the area, having lived and worked here for generations. The landscape we see today has been shaped by those who live and work on the land and maintain the forests and woodlands. The Park is also home to an incredible variety of flora and fauna, some rare and endangered: wild orchids, Adonis Blue butterflies, nightjars, larks, natterjack toads, dragonflies, water voles, field crickets and cheese snails, to name just a few.

2.3 The South Downs Way, a 162.5km (101-mile) long National Trail bridleway, stretches across the Downs from Winchester to Eastbourne, following the ridgeline for most of the way. Amongst the many other routes are the Hangers Way from Alton to the Queen Elizabeth Country Park and the Centurion Way in West Sussex.
Figure 4: The South Downs National Park
Figure 5: A Snapshot of the South Downs National Park
Hampshire Downs and Chalk Valleys

2.4 This is an area of wide open spaces, with large scale rolling farmland punctuated by dense blocks of woodland. The South Downs Way follows the old drove ways and ridges from the historic city of Winchester, passing Bronze Age tumuli and Iron Age hillforts on the way, and has some of the best viewpoints in the south of England, many of them nature reserves and all worth the climb. On the western edge of the Park is St Catherine’s Hill, with views along the Itchen valley, it is the site of an Iron Age hillfort and distinctive turf maze (mizmaze). Heading east the South Downs Way crosses Beacon Hill and Old Winchester Hill. With little light pollution, Beacon Hill is a magnet for orchid spotters with 13 rare species found here, and Old Winchester Hill attracts clouds of butterflies in the summer. Butser Hill, the highest point on the South Downs ridge, is perfect for star gazing – on a clear night the spectacular Milky Way, rarely visible in towns, can be seen with the naked eye. In the south of the Park, the landscape changes. The ancient royal Forest of Bere is a mix of woodland, open spaces and heathland, containing ponds and streams, as well as farmland and downland. A network of walking and cycling trails lead you through coppice and woods, ablaze with bluebells in the spring.

2.5 The clear chalk rivers of the Itchen and Meon are among the best fly-fishing spots in the world, with abundant wild trout in beautiful, peaceful settings. The Itchen flows through the Winnall Moors nature reserve where many protected species are found, including otters and water voles. The Meon flows through lush wet woodlands and water meadows, past the picturesque and quintessentially old English villages of East Meon, Exton and Droxford. At Warnford, the famous watercress beds grow along the river banks in the pure spring water.

2.6 The city of Winchester lies on the edge of the South Downs National Park, as do the attractive and historic market towns of Bishops Waltham, Wickham, Alton and New Alresford. In this area the National Park is sparsely populated with small villages nestled in the landscape.

Hampshire Hangers and Western Weald

2.7 The eastern edge of the Hampshire Downs is marked by steep chalk and greensand escarpments. This area of dramatic landscape is dominated by ancient woodland, known as ‘The Hangers’, houses habitats and wildlife of international importance (designated a Special Area of Conservation). Sunken lanes lead through the dark, enclosed hangers, climbing the steep scarp to emerge on open commons such as Noar Hill, known for its wild flowers and rare butterflies, like the Brown Hairstreak. High on Selborne Common you can see for miles to the east and beyond. The open grassland bristles with gorse and bracken, and in the spring and summer is dotted with wood anemone and yellow archangel. Selborne is an attractive village in a beautiful setting at the foot of Selborne Hanger, surrounded by beech woodlands and farmland, and made famous by Gilbert White. The village has a Norman church, known locally for the remains of its huge yew tree – said to have been 1400 years old when it was blown down by a storm in 1990.

2.8 There are many nature reserves and woods, which are linked by old trails and tracks. The 21-mile Hangers Way runs the length of this landscape, starting in Alton and going south through the hanger woods and finishing at Queen Elizabeth Country Park, Hampshire’s largest...
country park, with 2000 acres of woodland and downland, and 20 miles of trails for walking, cycling and horse riding. The new 60-mile Shipwright’s Way starts in Alice Holt Forest, the most northerly part of the National Park, and runs south following the route travelled by medieval shipbuilders transporting oak trees to Portsmouth dockyards.

2.9 The River Rother rises here, at Noar Hill, and then runs south through Liss and down to Petersfield, the second largest town in the National Park, and an historic market town built around two squares, The Spain and The Square, the latter the venue for the town’s twice weekly market. The river then meanders eastwards across the valley, through pasture, wet woodland, marsh and wet meadow, which contain breeding and feeding grounds for birds including snipe and Bewick swan. The River loops to the north of the town of Midhurst, running between the eastern edge of Midhurst and the neighbouring village of Easebourne. Midhurst is a busy market town with a historic centre containing buildings dating back to the 16th and 17th century, like the Spread Eagle Hotel. Many buildings in the village of Easebourne sport the bright yellow painted window frames of the Cowdray Estate. The river continues east until it meets the river Arun in the Village of Stopham just outside Pulborough. Tranquil Pulborough Brooks RSPB reserve includes extensive wetlands as well as woodlands and heathland, havens for a wide range of wildlife. Hedge-lined paths lead to viewing areas and hides where birds can be watched feeding and wading. In the summer butterflies and dragonflies flutter and swoop around the trails and ponds.

2.10 To the east and north of the Rother steep greensand hills are shrouded in beech, oak and coppiced sweet chestnut. Sunken lanes, worn down by centuries of human activity, criss-cross the countryside, secluded and quiet beneath tunnels formed by arching trees. A scattering of medieval villages and timber framed houses survive, along with other signs of the past including low, round Bronze Age barrows and the hammerponds used in the Middle Ages by the Wealden iron industry. Ebernoe Common National Nature Reserve near Petworth is a classic Low Weald woodland, containing grassy meadows in the clearings.

2.11 The historic and picturesque market town of Petworth was mentioned (as Pettorde) in the Domesday Book. Backed by the high wall of Petworth House, a late 17th century mansion set in a deer park and pleasure grounds landscaped by ‘Capability’ Brown, the quaint cobbled streets of the old centre remain unspoilt, with fine merchants’ and landowners’ houses and tiny cottages, many quite ancient. The town is a renowned antiques centre, with over 30 dealers located there.

2.12 Scattered through the Western Weald are a series of heathlands, large and small. Woolmer Forest, a remnant of the former medieval royal hunting forest, is the largest and most diverse area of lowland heath in the National Park and in Hampshire outside the New Forest. Its value is recognised and designated a Special Area of Conservation. The heather, mosses, lichens and ponds are teeming with wildlife. This area is the only site in Britain that supports all six native reptiles including the sand lizard, and all six native amphibians including the great crested newt.

12 The Royal Society for the Protection of Birds
Together with the adjacent Longmoor, it is internationally designated as a Special Protection Area for its ground nesting birds. On Black Down in West Sussex, the highest point in the National Park, the heathland is wild and beautiful – hazy purple heather and vibrant golden patches of sweet-smelling gorse stretch out to the horizon and there are sweeping views to the English Channel and the Weald. The heathland flowers teem with butterflies and insects and attract rare birds like nightjars and woodlarks. Other notable areas of lowland heath include Woolbeding, Iping and Trotton, Steadham, Ambersham and Dincton.

**Central Wooded Downs**

2.13 The northern edge of this area is marked by the dramatic steep north escarpment of the chalk ridge. From the ridge there are impressive views out across the Western Weald to the north. Distinctive hangers of beech and yew trees cling to the steepest hillsides. The ridge is home to many important and protected habitats including the Duncton to Bignor Escarpment Special Area of Conservation, Harting Down SSSI, a large area of ancient chalk downland with an area of rare juniper scrub and Heyshott Down, shrouded with ancient beech and yew woodland with a small chalkland nature reserve on the site of old chalk pits.

2.14 From Rowlands Castle to Arundel the rolling chalk slopes gently southwards with views out to the English Channel. Large areas are covered with mainly oak, birch and holly woodlands. On open summits like The Trundle, an Iron Age hill fort, you feel on top of the world, looking down over ancient woods and fields across the coastal plain to as far as the Isle of Wight. This area is dominated by large fields, with areas of ancient woodlands, such as the Charlton Forest near Cocking, one of the largest beech plantations in Europe, Earham Wood near Chichester and Houghton Forest near Arundel. From the fresh air and open skies of the hill tops, one can drop into the sheltering, enclosed woods and dry valley coombes furrowing the slopes. The intermittent Lavant and Ems rivers flow through floodplains of wet woodland, water meadows and open water, home to many species of wild birds. Kingley Vale National Nature Reserve is famous for its grove of ancient yew trees, among the oldest living things in Britain.

2.15 Away from the roads it is peaceful and quiet. Medieval villages scatter the slopes, many relatively untouched by modern development. This rich legacy includes the great landed estates with their grand houses and 18th century landscaped parks, adding to the picturesque appearance of this part of the National Park. Once a medieval hunting lodge, Stansted House evokes the atmosphere of Edwardian life in a great house, both upstairs and down. In a tranquil downland setting, Uppark is an elegant 18th century house with Georgian interiors, though entirely rebuilt after a fire in 1989. Goodwood House sits in beech forest which surrounds the estate. Some of the oldest trees at Goodwood are the Cedars of Lebanon, planted in 1761, by the third Duke of Richmond, who introduced species from many parts of the world. There are many attractive villages, such as unspoilt Slindon, set on a slope of the downs and the estate village for Slindon House (now a school). Singleton is a pretty village in the Lavant valley near Goodwood racecourse. South Harting has a beautiful setting below Harting Down, and its copper green church spire is a local landmark.
The East – Open Downland and Heritage Coast

2.16 Stretching from the River Arun to Beachy Head, this is an iconic South Downs landscape carved through by the Arun, Adur, Ouse and Cuckmere rivers that, curve across the landscape under big skies and provide sweeping views stretching out to the sea. These chalk grasslands provide habitats for a range of flora and fauna. In the spring and early summer the rare chalk heath and the sheep-nibbled downland turf is scattered with harebells, orchids and sweet-smelling herbs, and butterflies like the Adonis Blue and Grizzled Skipper can be seen. The ponds, lakes and reedbeds at Arundel Wildfowl and Wetlands Centre are home to over a thousand exotic ducks, geese and swans. On Castle Hill NNR and SSSI near Woodingdean the chalk grassland is scattered with rare wild flowers such as the Early Spider Orchid and blue gentian, and the Chalkhill Blue butterfly and the rare Longwinded Cone head cricket are often seen here. Mill Hill nature reserve near Shoreham-by-sea has over 160 species of flowering plants, attracting butterflies including the vibrant Adonis Blue.

2.17 This is perfect walking country, and the South Downs Way National Trail, runs along the northern edge of the South Downs. On the skyline the outlines of Arundel Castle and Lancing College shimmer in the distance, bringing history right to the present. The north facing slopes form a distinctive escarpment and a dramatic undulating ridgeline. Steep, rounded coombes and deep dry valleys are covered by chalk grassland. From both Chanctonbury Ring, with its distinctive ring of trees and the Devil’s Dyke, the longest, deepest and widest dry valley in the UK, there are magnificent views northwards across the Weald. There are 360° views from the highest point in East Sussex, Ditchling Beacon, an Iron Age hillfort and nature reserve of chalk grassland and scrub. The village of Ditchling lies below Ditchling Beacon. Dating back to Saxon times, Ditchling has a picturesque village green with a willow-framed pond, and a mix of architecture, from the 12th century St Margaret’s Church to timber framed Tudor houses, Georgian villas and Victorian cottages.

2.18 Lewes, the largest settlement in any national park in the UK, is considered to be one of the best preserved market towns in England. It has many historic buildings, including a Norman castle keep which dominates the townscape, the 16th century Anne of Cleves’ House and the ruins of Lewes Priory. The town, which sits astride the River Ouse, is the County town of East Sussex and an important administrative centre for the wider area.

2.19 To the east of Lewes is Malling Hill, and nearby is Mount Caburn, the latter an Iron Age hillfort. Both areas are rich in wildlife. The upper slopes are mainly chalk grassland, as at Willingdon Down and the Firle Escarpment, with some shrouded in dense woodland hangers. From the ridge and hill tops such as Edburton Hill the views stretch for miles across the lowlands of the Weald, and paragliders can be seen drifting into the blue overhead. Below the steep north facing ridge streams bubble up from chalk springs and flow north, through narrow, hidden valleys. Peaceful, sheltered underhill lanes, that often follow old coaching tracks, feel remote and timeless and lead to pretty flint and brick villages, and historic parklands such as Firle and Glyndebourne.
2.20 The Long Man of Wilmington, a mysterious cut out chalk figure, lies on the side of Windover Hill. There are numerous bostals, the deeply sunken lanes that zigzag across the hills and were once used by farmers to move their herds from the Weald to the chalk downland for summer grazing. On the floodplains of Cuckmere Haven are distinctive ox bow lakes and saltmarsh meadows. The peaceful and quiet Friston Forest is popular with walkers, horse riders and mountain bikers, and contains waymarked bridleways and trails. The chalk grassland on Willingdon Down SSSI near Eastbourne is rich in rare varieties of orchid.

2.21 Here, at the farthermost Eastern part of the National Park the South Downs dramatically meet the sea, revealing their chalk layers in the famous white cliffs of the Seven Sisters, and Beachy Head.

<<INSERT Figure 6: Distinctive Areas of the South Downs National Park>>
Introduction

3.1 The rich and diverse landscape – that is, its natural beauty, wildlife and cultural heritage - of the South Downs, described in Chapter 2 A Portrait of the South Downs National Park, is the reason for its National Park designation. This landscape is the result of a wide variety of natural and man-made interactions that have been experienced across the National Park over the centuries. Its valued natural beauty, wildlife and cultural heritage contribute to the overall quality of life of everyone living, working, or visiting the National Park. Ensuring that these are conserved and enhanced in the future, whilst also supporting our local communities and businesses, is one of the key challenges for the Local Plan.

3.2 National Parks, alongside Areas of Outstanding Natural Beauty, receive the highest protection in the UK in relation to conserving and enhancing its landscape. It follows that the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.

3.3 This chapter considers in more detail what approaches the Local Plan might adopt in relation to landscape and natural resources. The issues that are considered in this chapter are:

Issue 1 – How can the Local Plan best help conserve and enhance landscape character?

Issue 2 – How can the Local Plan provide resilience for people, businesses and their environment?

Issue 3 – How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?

Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?

Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

South Downs National Park Context

3.4 The key outcomes in relation to landscape and natural resources within the Partnership Management Plan (PMP) are:
Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Outcome 2: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

Outcome 3: A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park.

Outcome 4: Well planned and managed landscapes contribute to the social, environmental and economic interests of communities, stakeholders and visitors.

3.5 The State of the National Park Report highlights key aspects of the landscape, including highlighting how the various layers blend to produce unique landscape characters.

Background

3.6 The National Park designation provides the highest status of protection relating to conserving landscape and scenic beauty. The National Planning Policy Framework (NPPF) draws upon the requirements of legislation and other government policy that underpins this conservation and enhancement of the environment. Paragraph 115 of the NPPF sets out that:

- great weight be given to conserving landscape and scenic beauty in National Parks, and
- the conservation of wildlife and cultural heritage are important considerations in these areas.

3.7 In addition, the NPPF makes it clear that the planning system should contribute to and enhance the natural environment through the protection and enhancement of valued landscapes, geological conservation interests and soils, minimising the impacts on biodiversity and, where possible, providing net gains in biodiversity. It also recognises the wider benefits of ‘ecosystem services’\(^\text{13}\) (para.109).

3.8 As described in the Introduction (Chapter 1), the English National Parks and the Broads: UK Government Vision and Circular, DEFRA (2010), provides more detailed guidance on implementing, through policy, the Purposes and the Duty on the National Park Authorities. It recognises

\(^{13}\) Ecosystem services: economic and social benefits that society gets from the natural environment.
the major impact that the planning system and planning decisions have on the landscape, biodiversity, cultural heritage and access to the National Parks and the role of planning in balancing the differing demands of the statutory Purposes and Duty placed on the NPAs.

3.9 The European Landscape Convention, 2007 (ELC) came into force in the UK in 2007. It is a key policy document in relation to landscape which aims to promote landscape planning, management and protection across Europe. This applies to all landscapes in the UK and aims to ensure that all landscapes are properly valued and looked after. Specific measures promoted by the ELC that are relevant to the Local Plan include:

- recognition of the importance of landscape in law
- proper assessment and planning for landscape change with the active involvement of local communities
- the implementation of landscape policies through the establishment of plans and programmes that deliver effective protection, management and planning of landscape
- improved consideration and integration of landscape within both spatial and sectoral planning
- monitoring what is happening in terms of landscape
- raising awareness of the value of landscape with the public, and society’s role in shaping it.


3.11 The Directives advise that any plan should only be adopted if it is shown that it will not adversely affect Natura 2000 sites. However, the Directives further state that if an assessment indicates that there will be a negative impact on Natura 2000 sites that the plan may be adopted if there are imperative reasons of overriding public interest and all compensatory measures to ensure the Natura 2000 sites are protected. In the UK, the Habitats Directive is implemented by the Conservation of Habitats and Species Regulations 2010, and the Environmental Assessment of Plans and Programmes Regulations 2004.

**Evidence Base Studies**

**Integrated Landscape Character Assessment**
3.12 Landscape Character Assessments (LCAs) establish the unique characteristics of an area that gives it a distinctive identity. They identify the features that give localities a ‘sense of place’ and pinpoint what makes them different from neighbouring areas. LCAs can make an important contribution to identifying solutions that enable development to take place while helping to maintain and enhance the diverse character and essential qualities of the countryside.

3.13 The key piece of landscape evidence for the National Park is the **South Downs Integrated Landscape Character Assessment (Updated 2011)**. The Assessment (ICLA) was first completed in 2005 and was updated in 2013. It is designed to produce a comprehensive, fully integrated assessment of all aspects of the landscape character of the South Downs, so that greater understanding of this nationally important landscape and its needs and opportunities can lead to improved management and enjoyment. The study follows the accepted method for landscape character assessment as set out in ‘Landscape Character Assessment: Guidance for England and Scotland’, published by the Countryside Agency and Scottish Natural Heritage in 2002, and subsequent topic papers.

3.14 The main part of the ILCA comprises a detailed LCA. The landscape classification defines 18 generic landscape types (see Figure 7), which are sub-divided into 51 individual geographic character areas. A detailed description and evaluation is presented for each of the landscape types and further specific information is provided for each of the character areas. Landscape and Visual Impact Assessments (LVIA) are also used in assessing overall landscape quality or condition, value, susceptibility to change, tranquillity and visual amenity. Landscape susceptibility to a particular type of change can be assessed in more detail. For example, landscape sensitivity to wind farm development. This is where the specific details of the development type can be considered in relation to the landscape, the way it is perceived and the particular nature of the likely impacts of the development type in question.

3.15 The collection of further landscape evidence is an on-going task for the authority and its partners to help inform the development of the relevant Local Plan policies. Further information on tranquillity and landscape sensitivity is being sought to help inform both Local Plan policies and relevant strategies.
Figure 7: Landscape Character Types
Figure 8: National Landscape Character Areas
3.16 **Green Infrastructure Study**

Phase One of the **Green Infrastructure Study** for the National Park was completed in 2013. The study covers 27 local planning authority areas, to take into account wider connections. The study identifies:

- deficits in access to greenspace and vulnerabilities of habitats and species to the effects of development and climate change
- opportunities for strategic GI initiatives in GI ‘Investment Areas’ including: newly created accessible greenspace connected by green and blue corridors and access routes, considerations for incorporating water sensitive urban design, such as sustainable urban drainage schemes (SUDS) and, initiatives to help cool urban environments and schemes for improving river environments and
- further analysis relating to Accessible Natural Greenspace Standard (ANGSt).\(^\text{14}\)

3.17 It also considers how development will influence access to existing GI, where access can be improved and the role of GI in creating and improving wildlife corridors between habitats, including international, national and locally designated sites.

3.18 The National Park Authority is commissioning a **Water Cycle Study** with the following objectives:

(i) assess capacity of current water infrastructure to accommodate growth without adversely affecting the environment by considering:

- availability of water resources and the supply network
- capacity of existing wastewater infrastructure and the drainage network
- environmental capacity of receiving watercourses to receive wastewater and
- potential of development to increase flood risk.

(ii) determine the potential impact of proposed development in the context of requirements of environmental legislation including the Water Framework Directive (Directive 2000/60/EC), Habitats Directive and any other relevant water policy

(iii) identify the infrastructure necessary to achieve proposed growth within the constraints of the environment and legislation and

(iv) develop a strategy for a phased approach to development that allows key growth targets to be met whilst providing sufficient time for the identified infrastructure to be adopted.

\(^\text{14}\) ANGSt is based on the Natural England standard which recommends that everyone, wherever they live, should have accessible natural greenspace of at least two hectares in size, no more than 300 metres (five minute walk) from their home.
Strategic Flood Risk Assessment

3.19 The Strategic Flood Risk Assessment (SFRA) is required to demonstrate the essential information on flood risk, taking climate change into account, that allows a local plan to understand the risk across its area so that the flood risk sequential test can be properly applied. SFRAs should be a key part of the evidence base to help inform the allocation of development in a local plan area through the preparation of local plans. A local plan not supported by an adequate evidence base on flood risk is unlikely to be found to be ‘sound’. For the National Park the intention is that the SFRA will be carried out through the Water Cycle Study.

Issues and Potential Options

Landscape

3.20 The SNPDA has responsibility for conserving and enhancing the National Park’s natural beauty, wildlife and cultural heritage (first Purpose). As mentioned in para.3.2 in meeting this responsibility the Local Plan will, as a principle, use landscape:

- as an integrating concept – encompassing natural beauty, wildlife and biodiversity, and cultural heritage, and
- for providing a framework for managing change within the National Park.

3.21 What approach the Local Plan adopts will set out the general principles, strategies and guidelines aimed at protecting, managing and planning for landscapes. The use of criteria-based policies, by which proposals for development will be judged, will help achieve this objective.

Issue 1 – How can the Local Plan best help conserve and enhance landscape character?

3.22 The Local Plan will need robust policies that will encourage development that inspires and respects its landscape setting. Most successful development is rooted in the landscape: in the setting and shape of the land, its character, its appearance and its ecologies – all of which are the result of natural and cultural processes. Traditionally the landscape, and the materials that can be won from it, have shaped the patterns of building, helping to make places locally or regionally distinctive. High-quality, well-designed sustainable development is that which respects its context and is shaped by the built and natural landscape and local distinctiveness.

3.23 In sharp contrast, development is the wrong location can have a negative impact on the landscape and can result in the loss or reduction of landscape character or local distinctiveness. The scale and location of some developments can also affect important views or landmarks and detract from the visual integrity, identity and scenic quality that are characteristic of the National Park. These impacts can also extend to developments beyond the boundary of the National Park that can affect its setting. The use of standard design solutions erodes local distinctiveness in urban and rural areas. Poor or inappropriate design can increase the sense of urbanisation in the countryside. Ineffectual
landscape enhancement, or mitigation of certain developments, can also impact on the special qualities of the landscape, such as the erosion of tranquillity or the impact on dark night skies by increased light pollution.

3.24 The cumulative impact of development or land-use change, including some changes in agricultural practices, can influence changes to landscape character. The importance of the historic character of landscape patterns is often undervalued in terms of historic field patterns and boundaries. These are important landscape features and need to be protected in the context of the Local Plan.

**Issue 1 – How can the Local Plan best help conserve and enhance landscape character?**

**What we propose to do**
The Local Plan to include a criteria-based policy which ensures the conservation, management and enhancement of the National Park’s landscape, supported by sector, issue and/or area specific policies.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 1a** - In addition to adopting the criteria-based policy above which seeks the conservation, management and enhancement of the landscape, the Local Plan could adopt a policy to restrict development in areas which are considered - through an objective assessment of landscape sensitivity - to be especially sensitive to change.

**Are there any other options you think need to be considered?**

**Issue 2 - How can the Local Plan provide resilience for people, businesses and their environment?**

3.25 Green infrastructure (GI) is defined in Government policy as: ‘a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.’ In particular, elements of GI planning such as the emphasis on linking ecological networks and ecosystem services make it a valuable tool to enable people and wildlife to adapt to rising temperatures and extreme weather events associated with climate change. GI initiatives are undertaken in the context of resilience for climate change.

**Issue 2 – How can the Local Plan provide resilience for people, business and their environment?**

**What we propose to do**
The Local Plan to include a green infrastructure policy that encourages green infrastructure initiatives and will help underpin the commitment to conserving and enhancing the natural environment, cultural heritage and landscape character of the National Park in the face of both development pressure and climate change. Such a policy will be supported and informed by a GI Strategy setting out the approach to the provision of GI in and around the National Park.

Do you agree with this approach?

Do you agree with the following option?

Option 2a – The Local Plan could take the approach of not pursuing an all embracing GI strategy but individual opportunities for GI are taken as they arise through development proposals.

Are there any other options you think need to be considered?

Biodiversity

Issue 3 - How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?

3.26 The National Park contains valuable and diverse wildlife habitats, including including farmland habitats, chalk grassland, lowland heath, woodland (including ancient woodland), floodplain grazing marsh, rivers and streams, coastal and marine habitats and urban habitats. There are many sites with national or international designations for the quality of their wildlife value. Whilst activity to conserve and manage these habitats has been effective and created new habitats, many species and habitats have continued to decline.

<<INSERT Figure 9: Map of international, national and local designated wildlife and biodiversity sites>>

3.27 The Local Plan needs to minimise and mitigate the potential direct and indirect impacts from new development on designated habitats and protected species, in addition to maximising the opportunities for enhancement and management. It also needs to prevent the detrimental impact of development on the wider network of habitats and valuable species beyond the designated sites. This also includes the potential impact of development on areas on or near designated sites and consideration of the overall network of sites of biodiversity importance.
3.28 While national policy encourages re-use of previously developed land where not of high environmental value, many of ‘brownfield’ sites do enjoy biodiversity value and the valuable features should be retained and enhanced. Opportunities to incorporate biodiversity in and around developments on brownfield sites should also be encouraged.

3.29 Rivers provide an example of a valuable habitat which acts a corridor or connection across a network of habitats. The Local Plan will need to consider how best planning policy can prevent loss or deterioration of such valuable assets. In accordance with the Water Framework Directive, development should not have a detrimental impact on visual quality, water quality or ecological value of existing river corridors.

**Issue 3 – How can the Local Plan best ensure designated habitats and protected species are conserved and enhanced?**

**What we propose to do**

The Local Plan to incorporate a criteria-based policy ensuring the conservation and enhancement of protected habitats and species, with the level of protection being commensurate with their status, and is pro-active in seeking to significantly enhance biodiversity, for example through the expansion of the local ecological network and re-establishment of species. Encourage new development to contribute to the local ecological network by incorporating features to promote biodiversity and contribute to green infrastructure, supported by a Green Infrastructure Strategy, which informs development proposals, other spatial policies within the Local Plan and the identification and management of designated sites.

**The following designated site hierarchy will be applied:**

(i) **International Sites** - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar Sites

(ii) **National Sites** - Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs)

(iii) **Local Sites** - Sites of Interest for Nature Conservation (SINC), Local Nature Reserves (LNR), Local Geological Sites and other Ancient Woodland not identified within (ii) above.

Outside of these areas, new development, where appropriate, will be required to contribute to the protection, management and enhancement of biodiversity.

**In line with National Policy, a sequential approach to the impact of development on biodiversity should be applied as follows:**

1.1 harm resulting will be avoided

2.1 if (i) cannot be avoided (that is, through locating development on an alternative site with less harmful impacts) then the impact of development should be adequately mitigated

3.1 if both (i) and (ii) are demonstrated as being unachievable, then the impact should be compensated for.
Do you agree with this approach?

Do you agree with either of the following options?

**Option 3a** – The Local Plan could develop specific policies to deal with potential impact of development on particular habitats, such as river corridors.

**Option 3b** – The Local Plan could specify the types of development appropriate within Nature Improvement Areas.

Are there any other options you think need to be considered?

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**Geodiversity**

**Issue 4 - How can the Local Plan best ensure that geodiversity is conserved?**

3.30 Geological processes have played a major role in shaping and defining the landscapes of the National Park. Through the existence of visible exposures on cliffs, foreshore, quarries and cuttings it is possible to see and study the geological record and impact of environmental change over millennia. The combinations of underlying geology, and natural processes, have produced the wide range of landforms and soil types that are present in the National Park (see Figure 10). In turn these have influenced the historic land-use patterns, habitats, landscape character and settlement patterns. It also exerts a strong influence on the built vernacular through the use of local stone and building materials that occur within the National Park.

3.31 The underlying geology also provides many of the essential natural resources that society depends upon. These include:

- soils in which we grow our food, timber and other produce
- aggregates for building and other material uses
- natural resources that help maintain economic growth
- the filtering and storage of our water supplies.

3.32 Nationally important geological sites are protected through designations as Sites of Special Scientific Interest (SSSIs). In the National Park there are 10 geological SSSIs (see Figure 11: Designated Geological Features of the South Downs National Park). There is also a secondary tier of non-statutory or local geological sites that are known as Regionally Important Geological/Geomorphological sites (RIGS). There are 50 RIGS/local sites that have been notified within the National Park (see Figure 11: Designated Geological Features of the South Downs National Park).
3.33 There are number of potential threats to geological sites. Important geological features can be lost through burial or damage by coastal defence schemes, landfill and other development. Important geological features can also be lost through overgrowing vegetation and scrub encroachments. The conservation of geological features and landforms is a crucial consideration for mineral extraction and quarrying. The impact on geomorphological features or processes needs to be considered when planning for coastal defences and re-engineering of river catchments. Removal of fossil or mineral specimens through irresponsible or unregulated collecting is also an issue for some designated sites.

**Issue 4 – How can the Local Plan best ensure that geodiversity is conserved?**

**What we propose to do**
The Local Plan to include a policy that seeks to conserve geological conservation interests and geodiversity.

**Do you agree with this approach?**

**Are there any other options you think need to be considered?**
Figure 10: Geology of the South Downs National Park
Figure 11: Designated Geological Features of the South Downs National Park
Protection of Natural Resources

**Issue 5 - How can the Local Plan best address issues of water resources, water quality and flooding?**

3.34 Within the National Park 41% of the rivers and streams and 90% of the groundwater bodies are defined as having a ‘poor’ status, under the European Water Framework Directive. Therefore, it is crucial that the Local Plan considers the importance of water at a catchment scale to reverse further deterioration of the water environment. The emerging Water Cycle Study will address these, and other, crucial water-related issues.

3.35 There is a limit to the increase in the amount of water the environment can provide to consumers. Equally, there is a limit to the amount of, and rate, waste water can be returned safely to the rivers and sea without having a detrimental impact on the environment. In addition, extreme rainfall can overwhelm drains and flood defences and climate change may make more intense rainfall events more common. Planning for water has to take into account these natural constraints, and the impact of development.

**Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?**

**What we propose to do**

The Local Plan to consider the potential impact on the water environment of proposals for development on a case-by-case basis, in line with national policy and legislation and using other policies in the Local Plan and Neighbourhood Plans.

**Do you agree with this approach?**

**Do you agree with the following options?**

**Option 5a** – The Local Plan could include a policy focusing on demand management/water efficiency.

**Option 5b** – The Local Plan could include polices that address a ‘twin-track approach’ to water management, that is:

(a) a policy on demand management/water efficiency and

(b) a policy not permitting development proposals that would adversely affect the water environment in terms of the quality and yield of water bodies, and their location in the floodplain.

**Option 5c** - The Local Plan could include a policy of ‘water neutrality’, whereby there would be no net additional water resource required over the course of the plan to meet the needs of new development.

**Are there any other options you think need to be considered?**
Trees and Woodland

Issue 6: How can the Local Plan adequately protect, manage and enhance trees and woodland?

3.36 Trees, hedgerows and woodlands provide valuable habitats, connections for wildlife between sites of biodiversity important and play an important role in the mitigation and adaptation to climate change. The importance of ancient woodland and hedgerows in the function of priority and protected species and habitats is also recognised. It is also important to consider the value of all trees, woodland and hedgerows beyond those in designated habitats or sites and/or protected.

3.37 In addition to environmental value of woodland, it is important to recognise the recreational value and the economic benefits it can provide. The Local Plan will need to take into account the need for sustainable management of woodland on a commercial and non-commercial basis and the value of forestry within the National Park, including for the construction industry and wood fuel.

3.38 Ancient and veteran trees are a valuable resource for biodiversity, as cultural connections to the past and as significant markers of our landscape heritage. Ancient and veteran trees outside areas of ancient woodland, wood pasture and parkland require special protection and management. The replacement and relocation of ancient and veteran trees is usually not possible, given their age and value within the landscape, and therefore protection and buffering within developments is essential.

3.39 Ancient woodland covers 10.5% of the National Park. It includes areas of ancient semi-natural woodland, which retains a native tree and shrub cover that has not been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally, or plantation on ancient woodland sites – where the original tree cover has been felled and replaced by planting, often with conifers, and usually over the last century. Some areas of ancient woodland, particularly those under two hectares, are not afforded statutory protection by designations, despite being of prime ecological importance and of unique character. It is important that sufficient protection is provided around ancient woodland to prevent detrimental impact and allow expansion and long-term management.

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

What we propose to do
The Local Plan to specify clear criteria to ensure the protection and protective buffering of trees and woodland subject to Tree Preservation Orders and trees within Conservation Areas.

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Ancient woodland is defined as an area continuously wooded since before 1600 AD.
Do you agree with this approach?

Do you agree with either of the following options?

**Option 6a** – The Local Plan could, where appropriate, seek to retain existing trees, woodland and hedgerows, require adequate protection between existing trees and woodland and proposed development and, where appropriate, require the planting of new trees and other vegetation (with appropriate local native species).

**Options 6b** – The Local Plan could specify clear criteria to ensure the adequate protection and protective buffering of ancient and veteran trees and ancient woodland, particularly referencing ancient woodland outside SSSIs.

Are there any other options you think should be considered?
Introduction

4.1 The South Downs National Park has a rich and varied historic environment. It ranges from archaeological sites of all periods through to historic buildings and settlements and other less tangible expressions of local cultural distinctiveness, as well as extensive literary and artistic connections of national importance. This rich resource was one of the reasons that the South Downs designation as a National Park, and the conservation and enhancement of this cultural heritage is required by the first Purpose.

4.2 The planning system is an important mechanism for underpinning the protection of the historic environment, particularly the historic buildings, archaeological sites and other surviving physical features. The planning system refers to physical remains (listed buildings, conservation areas, historic parks and gardens, historic battlefields, and archaeological sites) collectively as ‘heritage assets’ and distinguishes recognises the distinction between ‘designated’ and ‘undesignated’ assets whilst protecting both types of heritage assets.

4.3 This chapter focuses on the issues associated with cultural heritage that we believe need a planning response and specific policies in the Local Plan. These issues are:

Issue 7 – What approach should the Local Plan adopt to heritage at risk?
Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?
Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?
Issue 10 - How might climate change impact upon the historic environment? To what extent should individual heritage assets be expected to contribute to climate change solutions?
Issue 11 - How might best the Local Plan best protect non-designated heritage assets from total loss or incremental change?
Issue 12 - Should the Local Plan include a policy on enabling development to address heritage at risk issues?
Issue 13 - How might new infrastructure projects affect the cultural heritage?
South Downs National Park Context

4.4 The National Park’s first Purpose requires the conservation and enhancement of the cultural heritage. The key outcomes for cultural heritage within the Partnership Management Plan are:

| Outcome 4 | The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place. |
| Outcome 7 | The range and diversity of traditional culture and skills has been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park. |

Background

4.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 provides the legal framework, including the requirement to secure Listed Building Consent for works to listed building. The National Planning Policy Framework supports that 1990 Act with national planning policy.

Evidence Base Studies

4.6 In 2013 SDNPA commissioned a survey of historic buildings and structures at risk. Of the 5861 historic buildings surveyed the study found that the vast majority are in good order, with only 1.5% of buildings at risk and another 4.5% vulnerable. In many cases, the buildings at risk are structures where there is difficulty in finding a use for, which makes securing their repair particularly difficult.

Issues and Potential Options

Issue 7 – What approach should the Local Plan adopt with regard to heritage at risk?

4.7 In the case of buildings at risk arise largely from neglect of buildings and structures by their owners, whilst the main threat to ancient monuments stem from farming practices, burrowing animals and plant roots. There is not an explicit duty on the owners of heritage assets to maintain them.

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16 Buildings at Risk in the South Downs National Park, Handley Associates 2013
4.8 As the local planning authority, the SDNPA has responsibility for monitoring the condition of designated heritage assets and is empowered to step in when they are being allowed to fall into an unacceptably poor condition. However, the SDNPA has to help and encourage owners to keep their assets in good order. There are some coercive powers available but these are weak and difficult to apply, particularly in a time of financial restraint.

**Issue 7 – What approach should the Local Plan adopt with regard to heritage at risk?**

**What we propose to do**

The Local Plan to outline the approach of the National Park Authority and its partners in relation to heritage at risk, that is monitor the condition of designated heritage assets, identify those already at risk or vulnerable, exploit opportunities to secure their repair and enhancement, including the use of the community infrastructure levy and take a proactive role in addressing heritage at risk, working with partners and communities and seeking external funding as necessary.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 7a:** The Local Plan could include a policy which encourages the re-use of buildings at risk with a more flexible approach to new uses.

**Are there any other options you think need to be considered?**

**Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?**

4.9 The uses to which buildings are put can change and evolve over time, sometimes dramatically. For example, churches and chapels, have seen changes in patterns of worship over recent years. Some faith institutions have worked hard to develop more secular uses within their buildings, to re-position themselves and the services they offer within the communities they serve. This has led to escalating demand for adaptations and extensions to church buildings, as kitchens and toilets, meeting rooms and halls are added to traditional structures. This can be a delicate process, as these buildings are often the finest heritage structures in any settlement, but it is often necessary if the core use is to be maintained for the long term.

4.10 The global economic recession and the expansion of retailing on the internet has had an impact in traditional town centres, with ‘bricks and mortar’ retailers closing. In the towns of Petersfield, Midhurst and Lewes there has always been some ‘ebb and flow’ of retail activity along
central streets – buildings which started life as houses have often been converted into shops – and now the process may reverse again. This can present problems where a historic shopfront survives, of interest and value in its own right. It also has an implication on the vitality of the street scene, as shops will always present a more lively frontage to the pavement than houses would.

4.11 Left entirely to market forces, there is a perennial danger that uses will gravitate to those of the highest value. This could ultimately lead to serious imbalances of use, with lower value but still essential uses ‘frozen out’ of certain locations. There is a risk that this, unchallenged, could diminish the vitality of town centres over time.

**Issue 8 – What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?**

**What we propose to do**
The Local Plan to seek to secure the optimum viable use for heritage assets, that is consistent with, or least harmful to, the character and appearance of the heritage assets affected and their wider setting.

**Do you agree with this approach?**

**Do you agree with either of the following options?**

- **Option 8a** - The Local Plan could adopt a generally restrictive policy approach to conversion of historic assets to new uses. In conservation terms, the original use is usually the best one for the preservation of any particular historic asset. Alternatives should only be entertained if the original use is wholly and demonstrably defunct.

- **Option 8b** - The Local Plan could adopt a pragmatic policy approach to conversion of historic buildings to other uses, on a case-by-case basis. Policy guidance may still be required regarding the neighbourliness of certain uses, the balance of uses in town centre locations, or the long-term preservation of certain architectural features, such as historic shopfronts.

**Are there any other options you think need to be considered?**

**Issue 9 - What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?**
4.12 This issue is related Issue 8 but is treated separately in reflection of the importance of farm buildings to the National Park. It is also subject to any possible changes in the General Permitted Development Order that were part of a recent consultation by Central Government.

4.13 There is evidence that this category of heritage assets is subject to rapid change, whether designated or non-designated. 35% of the listed stock remains in agricultural use and these listed farm buildings are an important part of the landscape, including by offering habitats for species such as owls, swallows and bats. The groupings of these buildings into farmyards can have an important and beneficial impact on the landscape and heritage of an area.

4.14 The issue is that with changing agricultural practices, the growth of mechanisation and the ever-increasing size of farm machinery, many traditional farm buildings are now an obsolescent or wholly redundant part of farming operations. Also, in the current economic climate, farmers are looking for opportunities to diversify, so there is demand to use such barns for more intensive economic uses, business units or holiday lets or dwellings – all of which produce an income or capital receipt to maintain the buildings in the future as well as subsidise the farm as a business and employer – but which carry the potential to profoundly alter the character of the buildings and their farmyards.

4.15 Some of the inherited Local Plans within the National Park have policies preferring business use to residential conversion for redundant farm buildings. This can cause delay in the development process whilst the owner seeks a business use that is viable, but for which there may be limited demand. This contributes to continuing decay in the building stock. Business use in itself is not a panacea, for while conversion to office or light industrial use will often preserve spacious open volumes within buildings, intensive parking, external lighting and signage can compromise their setting, although planning conditions can be enforced to ensure an acceptable development.

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**Issue 9 – What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?**

**What we propose to do**

The Local Plan to set out a policy seeking to secure the optimum viable use for historic/traditional farm buildings that is consistent with, or least harmful to, the character and appearance of the buildings affected and their wider setting.

**Do you agree with this approach?**

**Do you agree with either the following options?**

**Option 9a** - The Local Plan could adopt a policy approach to conversions which continues to favour business and community uses over residential and only allows the latter where all other uses have been demonstrated to be unviable.
Option 9b - The Local Plan could adopt a more permissive policy approach to new uses, which allows for greater variety of proposed uses.

Are there any other options you think need to be considered?

**Issue 10 - How best should the Local Plan ensure the appropriate management of the climate change impact upon the historic environment?**

4.16 Climate change is a challenge that will have a range of impacts on the historic environment, including archaeological sites. However, the main interface with the historic environment and the planning system will arise from the impact of retrofitting technology (including insulation) to traditional buildings, both as a potential challenge to their intrinsic character and the way in which they perform as buildings.

4.17 There is mounting evidence that current methods of modelling a building’s energy performance significantly underestimate the actual performance of buildings of traditional construction. It is also the case that the re-use of old buildings, which constitute a store of embodied energy and carbon, should be an inherently sustainable activity.

4.18 There are many low-impact, relatively low-cost ways of improving the performance of a building. It is widely accepted that the second most cost-effective energy saving measure, after loft insulation, for most traditional buildings is the provision of a modern condensing boiler, along with an adequate suite of controls to monitor the temperature of different parts of the building. In considering the retrofitting of some insulation techniques and other energy saving technology to a building of traditional construction, the SDNPA needs to be alert to the possibility that works may harm the character of the building. ‘Character’ is a rather more subtle concept than ‘appearance’.

4.19 Ill-considered insulation can also have an adverse impact on the performance of a building of traditional construction, with potential to promote dampness within the wall fabric, thereby accelerating decay. The challenge for the SDNPA, therefore, is to balance the desire of making the area’s stock of traditional buildings as energy efficient as possible whilst protecting their character and fabric.

**Issue 10 – How best should the Local Plan ensure the appropriate management of the climate change impact upon the historic environment?**

**What we propose to do**

The Local Plan to include a policy to permit and encourage work to improve the energy performance of heritage assets consistent with their character and appearance and that of their wider setting.
Do you agree with this approach?

Do you agree with the following option?

**Option 10a** – Guidance could be developed, underpinned by a policy in the Local Plan, which attempts to provide clarity about the potential impacts of various forms of retrofitting and detailed guidance over which options are most suitable in different contexts.

Are there any other options you think need to be considered?

**Issue 11 - How best can the Local Plan protect non-designated heritage assets from loss or incremental change?**

4.20 The National Park Authority bears the major responsibility of managing change in the historic environment within its boundary, largely through the operation of the planning system. The Planning Act 2008 and the Planning (Listed Buildings and Conservation Areas Act) 2008, provides the statutory framework for this duty and it is also supported by the National Park’s first Purpose to: ‘conserve and enhance … the cultural heritage of the area’ (emphasis added).

4.21 The NPPF establishes a fundamental division between those heritage assets which are protected to varying degrees by established heritage designations (such as listed buildings, buildings within conservation areas, scheduled monuments, registered parks and gardens or battlefields) and undesignated assets which do not enjoy statutory or local protection. It is only necessary to recognise and assess the significance of these undesignated assets as a material consideration in the wider planning process.

4.22 The challenges in dealing with non-designated heritage assets fall into two broad categories: (i) the protection of heritage assets that are currently unknown, and (ii) those whose interest might reasonably be predicted, but do not meet the strict criteria for statutory listing or scheduling. Unknown assets will usually comprise archaeological features, but might also include heavily eroded landscape features such as former deer parks, or individual buildings containing an ancient core, wholly unseen from the exterior. As sites are gradually analysed and recorded on Historic Environment Records, it might be expected that such ‘surprises’ diminish in frequency over time. However, the interpretation and accessibility of information kept on Historic Environment Records may present an issue in this regard. There is guidance available from the Institute for Archaeology on undertaking assessments for archaeology on development sites and archaeological officers in local authorities are also the first place to seek advice as part of the pre-application process.

4.23 In terms of the second category, the National Park contains a large number of unlisted buildings which, nevertheless, possess some architectural or historic merit. Many stand beyond the boundaries of conservation areas. Some local planning authorities have attempted to survey and list
such buildings, selecting them against published criteria to screen them in terms of quality and significance. Many stakeholders and some developers welcome the greater degree of certainty that these ‘local lists’ offer. On assuming its duties as Local Planning Authority the SDNPA inherited local lists in Arun District and Eastbourne Borough.

**Issue 11 – How might best the Local Plan protect non-designated heritage from total loss or incremental change?**

**What we propose to do**

The Local Plan to encourage the consolidation of the existing local lists and add new entries within conservation areas identified according to established criteria as part of the Conservation Area Appraisal process. Heritage assets of strong merit will be afforded consideration under the determination process.

**Do you agree with this approach?**

**Do you agree with either of the following options?**

**Option 11a -** The Local Plan could highlight that no further co-ordinated attempt to identify non-designated heritage assets and provide no special policy for their preservation.

**Option 11b -** As resources permit, survey probable non-designated heritage assets for the creation of a National Park-wide local list, selected against carefully considered, pre-established criteria. The Local Plan could provide a policy safeguard to ensure that their special interest is considered and given appropriate weight in the planning decision-making process.

**Are there any other options you think need to be considered?**

**Issue 12 - Should the Local Plan allow for enabling development to be used to address heritage at risk?**

4.24 Enabling development is a well established term to describe development that would normally be contrary to planning policy, but which, in certain exceptional circumstances, is justified because of the benefits it will bring to heritage assets. The majority of heritage assets at risk across the National Park are either archaeological features or small structures of limited or no economic use. It is anticipated that this level of heritage at risk can be addressed by conventional means, co-operation with owners, fund-raising packages and in difficult cases, the use of statutory provisions and partnerships with Building Preservation Trusts active in the area.

4.25 It is, therefore, not considered that enabling development should be considered as a usual means of addressing heritage at risk problems. Given the prosperity of the South-East England region, the close proximity to London, and the resultant high property prices, the use of enabling
development should be exceptional in the National Park. The best tool to assess any proposal for enabling development remains an English Heritage published guidance document, Enabling Development and the Conservation of Significant Places.

**Issue 12 – Should the Local Plan allow for enabling development to be used to address heritage at risk?**

*What we propose to do*

The Local Plan to use the guidance set out by English Heritage when assessing any proposals for enabling development. The use of enabling development should be exceptional in the National Park.

*Do you agree with this approach?*

*Do you agree with the following option?*

**Option 12a** - The Local Plan could adopt a restrictive policy approach whereby enabling development will not be permitted.

*Are there any other options you think need to be considered?*

**Issue 13 – How might new infrastructure projects affect the historic environment?**

4.26 New infrastructure projects can have a major direct impact on heritage assets, for instance, the archaeological sites discovered, excavated but destroyed by the M3 Twyford Down cutting and the A27 Brighton by-pass. Such infrastructure projects can also have a significant impact on the visual setting of the National Park’s landscape and seascape, or on the setting of designated heritage assets such as archaeological sites, listed buildings, or battlefields. This can include projects which are outside the boundaries of the National Park.

4.27 The planning system is well placed to consider the impact of infrastructure proposals on known heritage assets. It is the discovery of previously unknown heritage assets, (which will be for the most part archaeological sites) that is more problematic. Where new heritage assets are affected, the first option is to establish whether there is a viable alternative that would not damage archaeological remains – ‘mitigation by design’. For some projects ‘mitigation by design’ may not be feasible and then the impact on the cultural heritage assets should be carefully considered and a proposal for recording the assets should be prepared as part of any planning application or application to the Secretary of State. This is called ‘mitigation by record’.
4.28 The investigation works associated with infrastructure projects often represent a good opportunity for community engagement and learning during project work on site and the information from the investigations can feed into a wider understanding and appreciation of the National Park’s cultural heritage.

**Issue 13 – What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?**

**What we propose to do**
The Local Plan to adopt an approach that ensure that the impact of new infrastructure proposals on known heritage assets is fully considered in dealing with planning applications and that proper provision is made for dealing with the discovery of previously unknown heritage assets in the course of construction.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 13a** - The Local Plan could include planning policy guidance that ensures that infrastructure schemes deliver opportunities for community engagement and learning during the period of project work on site and that the information from the investigations of the cultural heritage is widely disseminated.

**Are there any other options you think need to be considered?**
Introduction

‘The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’ (NPPF para.56)

5.1 Design is the process of transforming ideas into material representation. The design process in relation to development should address economic, social and environmental aspects of sustainable development and it will be important that the key aspects to this are integrated within and represented through design proposals.

5.2 The role of design in delivering sustainable development is a cross-cutting issue that relates to other issues throughout this Options Consultation Document and will be an important policy driver in the development of policies in the Local Plan. This chapter considers how the various aspects of sustainable development may be brought together in a strategic approach that is tailored to the specific context of the National Park. Conserving and enhancing sustainable places within the National Park depends on a shift in mindsets, expectations and practices about the design of new development in towns, villages and the countryside.

5.3 National Parks, alongside Areas of Outstanding Natural Beauty, receive the highest protection in the UK in relation to conserving and enhancing its landscape. It follows that the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the National Park, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.

5.4 The issues discussed in this chapter are:

Issue 14 - How should the Local Plan ensure the design of new development supports built environment character and conserves and enhances the National Park’s natural beauty, wildlife and cultural heritage?

Issue 15 - How should the Local Plan best ensure the use of appropriate local materials?

Issue 16 - How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible to different uses over time?

Issue 17 - Should the local plan include minimum space standards for new residential development?
Issue 18 - How can the Local Plan best ensure that the design of streets and roads within new development reduces vehicle dominance and speeds, enhance local distinctiveness and minimise signage clutter and light pollution?

Issue 19 - How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?

Issue 20 - How can the Local Plan address carbon reduction targets through energy efficiency schemes?

South Downs National Park Context

5.5 The design approach set out in the policies of the Local Plan will reflect the principles and objectives set out in the Partnership Management Plan (PMP). The fundamental principle guiding the PMP is of a landscape supporting the communities within it, and the communities supporting the landscape through balanced, sustainable and mutually-beneficial processes, (see Figure 10). This relationship between people and the landscape has shaped the land, the location and layouts of settlements and the look and types of building, open spaces and streets that we see today.
5.6 From land use practices to settlement patterns and building designs, there are relationships between people and place. These patterns and relationships need to be fully understood and reflected in both new development and the adaptation of existing buildings to accommodate new uses, for the National Park first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage to be met. The definition of sustainable development within the National Park’s context must take account of the complex relationship between the landscape and people that have developed over centuries.

5.7 The Local Plan will consider design in the following ways:
• The need for new buildings and infrastructure to support the sustainable management of the landscape – ‘sustainable landscapes’
• The need for buildings and infrastructure to support the conservation and enhancement of landscape and built environment character; the wildlife, natural beauty and cultural heritage – ‘sustainable character’
• The need for buildings and infrastructure to support the needs of the people living and working within the National Park and for these needs to be most closely aligned with sustainable landscape management, the conservation and enhancement of the wildlife, natural beauty and cultural heritage – ‘sustainable communities’.

5.8 As a cross-cutting theme design relates to many of the outcomes of the PMP. The outcomes which are most pertinent to design are:

| Outcome 1: | The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change. |
| Outcome 4: | The condition and status of cultural heritage assets and their settings is significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place. |

**Background**

5.9 The *English National Parks and the Broads UK Government Vision and Circular 2010* sets out a clear objective for National Parks to be exemplars of sustainable development. If this is to be achieved there needs to be a major shift in attitudes, awareness and actions in terms of resource management and energy efficiency. The *Environment Act 1995* emphasises the importance of the economic and social well-being of communities to the long-term sustainability of the National Park and its special qualities.

5.10 It is the intention that the Local Plan policies will encourage communities to become more sustainable, where residents have better access to the housing, jobs, facilities and services they need locally, and to make them less reliant on private transport or lengthy journeys on public transport. The Local Plan will also seek the creation of more balanced communities (communities with a diverse range of age, socio economic and social groups).

**Issues and Potential Options**
Issue 14: How should the Local Plan best ensure the design of new development is of a high quality that supports the built environment character and conserves and enhances the National Park’s natural beauty, wildlife and cultural heritage?

5.11 From a design perspective, landscape and built environment character is affected by the use, location, form and materials of a new development including the infrastructure associated with the provision of energy, communications, lighting, industry, agriculture and transport.

5.12 The built environment is one of the key defining characteristics of the South Downs National Park. It is important in:

- underpinning the quality of life
- attracting economic activity
- defining the cultural identity
- indicating adaptable, sustainable modes of living and
- for the evidence it gives us of past human activity.

Therefore, a key consideration of the Local Plan is how this can be conserved and enhanced.

5.13 From large country estates and market towns to churches, farm buildings and industrial works, the buildings of the National Park are a reflection of the historic, social, political and cultural development of the landscape over time. The extent of their survival is testament to their value to owners, residents and visitors, as well as the strength of the planning system. However, although the level of protection offered to the built historic environment is high, the extent of our understanding of characteristic vernacular building traditions, materials, form, layout and relationship with the wider landscape is relatively undeveloped and more work is needed to understand it better.

5.14 Whilst good design can greatly reduce the impact of new development on its surroundings, ensuring the right building is located in the right place is also crucially important. A well designed building, be it housing, retail, for agriculture or industry, must take account of its setting. This involves understanding and responding to both the built and natural environments. The same is also true when conversions or alterations are made to existing buildings where an understanding of the existing structure and its relationship to surrounding buildings and the wider landscape is vital. Two important ways to address this is through the production of Design Guidance. This can inform and be informed by working with local communities in the development of Village Design Statements which will help define local built environment characteristics and how they may be conserved and enhanced.
Issue 14 – How should the Local Plan ensure the design of new development supports the built environment character and conserves and enhances the National Park’s natural beauty, wildlife and cultural heritage?

What we propose to do
- Develop and publish Design Guidance
- The Local Plan to require development to be of a high design quality and demonstrates how it responds to the local landscape and built environment character.

Do you support this approach?

Do you agree with the following option?

Option 14a - The Local Plan could set out that development applications are supported by robust built environment characterisation studies and that designers integrate defining characteristics into development proposals.

Are there any other options that need to be considered?

Issue 15: How should the Local Plan best ensure the use of appropriate materials?

5.15 The choice of type and source of construction materials have a substantial bearing on sustainability and local distinctiveness. Locally sourced materials can support sustainable land management (for example, coppiced sweet chestnut cladding and sheep's wool insulation) and sustainable communities, and reduce the carbon emissions of transportation. The use of local materials also expresses the relationship between the built and natural landscape, adding to local distinctiveness. There are also a growing number of building materials that are certified as ‘responsibly sourced’, indicating that they have been sustainably mined or harvested, manufactured and processed. Use of these materials can reduce the overall environmental impact of development.

Issue 15 – How should the Local Plan best ensure the use of appropriate materials?

What we propose to do
The Local Plan to encourage the use of local building materials, particularly where their use will contribute to sustainable landscape management and local employment.

Do you support this approach?
Do you agree with either of the options below?

**Option 15a** – The Local Plan could encourage the use of the most sustainable, energy efficient materials regardless of source.

**Option 15b** – The Local Plan could encourage the use of materials which match locally distinctive appearances, regardless of source or energy performance.

Are there any other options you think need to be considered?

**Issue 16: How can we create buildings and developments that are adaptable and flexible to different uses over time?**

5.16 Buildings and places which can be adapted to many different uses over time do not become obsolete when circumstances change and so are more sustainable. Designing for adaptability has a bearing on building design and the design of public spaces. New buildings can be designed from the outset to enable accessibility to the widest range of people (including level floorings between spaces and wide doorways allowing wheelchair access) or ensuring the construction of the building could accommodate the extra weight and have space for hoists or stair lifts. This can allow the building to be adapted as occupants/residents circumstances change (for example, through changes in mobility). Buildings can also be designed in such a way that they can accommodate different uses, for example a building that can be open plan and used as one large space, or that could be subdivided to create many smaller units. This can allow buildings to adapt to different users and uses over time.

**Issue 16 – How can we create buildings and developments that are adaptable and flexible to different uses over time?**

**What we propose to do**

- The Local Plan to require development to demonstrate robustness to changing social, economic and environmental circumstances
- The Local Plan to require public spaces to be able to demonstrate viability for multiple uses, rather than specific or inflexible uses
- The Local Plan to require buildings to be designed so that they can be adapted.

**Do you agree with this approach?**

**Do you agree with the following option?**

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17 Further information on adaptable and inclusive design refer to Lifetime Homes - [http://www.lifetimehomes.org.uk/pages/welcome.html](http://www.lifetimehomes.org.uk/pages/welcome.html)
Option 16a – The Local Plan could include a policy whereby buildings within major developments incorporating mixed-use and commercial activities will be required to demonstrate a higher level of adaptability and robustness to change than those which are predominantly housing-led. This recognises that commercial and mixed-use environments are subjected to higher pressure to change than residential environments.

Are there any other options you think need to be considered?

Issue 17 – Should the Local Plan include minimum space standards for new residential development?

5.17 Research has found that the size of housing can have an impact on the flexibility of housing to people’s changing lifestyles and physical requirements, rates of antisocial behaviour, educational attainment and productivity (due to the opportunity to work and study at home), a stable family life and general health and wellbeing.18

5.18 Some local planning authorities have identified the small size of dwellings in their area as a problem and introduced minimum internal space standards for new development, on the basis of research into local needs. The NPPF allows for the principle of local planning authorities identifying the size of dwellings that is required in particular locations.19

5.19 In August 2013, the Government published a paper on housing standards for consultation.20 This included a possible national approach to the issue of space standards for new dwellings. Whilst Government prefer either an ‘industry-led voluntary space labelling’ system, or a national space standard, the consultation paper recognised the potential for local planning authorities to produce robust evidence justifying the need for such standards. Therefore the option of local planning authorities producing local space standards was included in the consultation. The consultation is now closed and responses are being considered by Government.

5.20 Recent housing evidence21 has identified that the National Park has a higher representation of larger dwelling types (detached and semi-detached) and under-representation of smaller dwelling types. This is a factor in the high average house prices that characterise the area, and the difficulty of those on average or lower quartile earnings being able to access home ownership, but does not directly assess minimum or average local space standards. Therefore, further studies would be needed to establish local minimum space standards in the National Park.

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19 NPPF paragraph 50
Issue 17 – Should the Local Plan include minimum space standards for new residential development?

Do you agree with any of the following options?

Option 17a – The Local Plan could set local minimum space standards for new residential development.

Option 17b – The Local Plan could follow the Government’s approach, adopting nationally set space standards, if introduced.

Option 17c – The Local Plan could avoid setting minimum space standards.

Are there any other options you think need to be considered?

Issue 18 – How can the Local Plan best ensure the design of streets and roads within new development reduces vehicle dominance and speeds, enhance local distinctiveness and minimise signage clutter and light pollution?

5.21 Signage, street furniture and highways infrastructure are put in place to guide or inform people, for their convenience (for example, seating) and to manage traffic movements but is often applied without direct reference to the social and economic context of local communities. This can impact on local character and the pedestrian accessibility and quality of towns and villages. Inappropriately designed or located signage or street furniture can detract from a place’s overall setting and character as well as blocking pedestrian movements. This includes a wide range of ‘street furniture’, including bollards, seating, signposts, bus shelters and lighting columns.

5.22 Inappropriately designed lighting schemes can also have a wider impact on the environment, adding to light pollution and to the ‘sky glow’ from built up areas. This can have local impacts caused by glare from for example inappropriately positioned security lighting as well as wider impacts, for example on wildlife, when a lot of artificial light can be seen in one area (often seen as an orange glow around built-up areas at night).

What we propose to do

- Develop Design Guidance and a Design Protocol for highways.
• The Local Plan to ensure that development is designed in accordance with guidance/protocol to raise the quality of the public realm and, where appropriate, to engage with the quality of the characteristic built and natural environment of the area, rather than using standardised highway measures which can erode the distinctiveness and quality of places.

• The Local Plan to ensure that signs, road markings, barriers, street lighting and traffic signals will be kept to a minimum to reduce clutter and keep to a minimum the impact on dark-night skies from light pollution.

• The Local Plan to ensure that the shared function of roads, streets and spaces within settlements is recognised and priority given to non-motorised movement

• The Local Plan to ensure that through the provision of street lighting that additional light spill kept to the absolute minimum.

Do you agree with this approach?

Do you agree with the following option?

Option 18a – The Local Plan could set out that street lighting is desirable in certain circumstances, such as within village and town centres. Rather than limiting lighting in all circumstances a more graded approach will help limit lighting to where it is really necessary.

Are there any other options you think need to be considered?

Issue 19 - How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?

5.23 Sustainable development requires consideration of location, design and construction, along with improving the resilience to the effects of climate change as part of the development proposals. In guiding new sustainable development, the Local Plan will need to take account of the increased vulnerability to climate change affecting flood risk, coastal change, water supply, biodiversity and landscape. The Local Plan will also need to ensure that development is sustainable by ensuring that it does not add to the vulnerability of the natural beauty, wildlife, and cultural heritage of the National Park but conserves and enhances the features at risk.

5.24 The creation of sustainable communities, characterised by a balance between the amount and types of housing and jobs, can help reducing distances travelled and therefore levels of carbon dioxide produced. However, given the rural nature of most of the National Park, dependency on the car is likely to remain high. There is also a recognised trade-off between achieving residential developments that meet the highest standards of sustainability in terms of design and the affordability of the properties.
Issue 19 – How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?

What we propose to do
The Local Plan to ensure that the National Park’s landscape and natural beauty are given greatest weight in determining the location and design of new development and that levels of carbon emissions and sustainable design standards follow national targets and building regulations.

Do you agree with this approach?

Do you agree with one of the following options?

Option 19a - The Local Plan could require developers to undertake and submit a sustainability assessment for proposed development that considers the broadest criteria for environmental performance and adopting an established sustainability assessment model, such as Bioregional’s ‘One-Planet Living’.

Option 19b - The Local Plan could include a variation on Option 19a with levels of assessment based upon local specific criteria.

Are there any other options you think need to be considered?

Issue 20 - How might the Local Plan best address carbon reduction targets through energy efficiency schemes?

5.25 As part of the national response to climate change, there needs to be a prioritisation of where energy savings and carbon emission reductions can be targeted through planning. Government policy in relation to the introduction of zero-carbon new build homes from 2016 is in a significant state of flux and is now likely to be linked with other low carbon measures via a related policy of ‘allowable solutions’. The 2013 Building Regulations require a 29.5% improvement on the energy performance requirements for the 2006 Building Regulations, which roughly in the middle of Code for Sustainable Homes Levels 3 and 4 for Energy.

5.26 The call for NPAs to be exemplars of sustainable development, ‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs’ suggests that the SDNPA should take every opportunity to avoid adding to the problems caused by climate change and minimise the impact of new development.


Allowable Solutions offers the mechanism for achieving zero carbon for the residual emissions associated with new development that cannot be achieved by developers – principally encompassing the household consumed energy demands over and above heating and lighting.

5.27 A significant issue is that approximately one third of homes are not connected to the national gas grid. Many of these properties incur higher than average carbon emissions and heating bills that can trigger fuel poverty. Thus, measures improving energy efficiency of such properties will also help to achieve economic and health benefits.

5.28 The SDNPA recognises that standard assessment procedures to evaluate the thermal efficiency of buildings can underestimate performance in older traditional properties (particularly pre-World War 1 construction). As a consequence, the significance and integrity of important historic assets can be threatened by poorly designed adaptation and mitigation responses. Energy efficiency and renewable energy in historic buildings are discussed further in the Historic Environment chapter.

**Issue 20 – How can the Local Plan address carbon reduction targets through energy efficiency schemes?**

**What we propose to do**
The Local Plan to support energy efficiency schemes on existing buildings where they do not impinge on the National Park’s Purposes. For new build, exploit the Government’s emerging zero-carbon policy to secure high standards of energy efficiency in new build and, where appropriate, target opportunities for ‘allowable solutions’ into local low carbon schemes including energy-efficiency schemes.

**Do you agree with this approach?**

**Do you agree with any of the following options?**

**Option 20a** – The Local Plan could include ‘consequential improvements’ policy requiring property owners seeking planning permission to extend their property, to make energy efficiency improvements to the whole of their property.

**Option 20b** - For new buildings, the Local Plan could require a greater level of energy reduction than currently required by National Building Regulations, that is, a policy of Code for Sustainable Homes Level 4, or 44% reduction on 2006 emission rates.

**Option 20c** – The Local Plan could restrict new development if it cannot be connected to mains gas unless higher levels of sustainability are proposed (for example, low carbon schemes or energy efficiency schemes)

**Are there any other options you think need to be considered?**
Introduction

6.1 This Settlement Strategy chapter addresses the strategy for development in these settlements. Based on conserving and enhancing the natural beauty, wildlife and cultural heritage and the landscape golden thread described in the Introduction, this chapter sets out potential options for the appropriate amount and type of development for different parts of the National Park. This variation may reflect landscape characteristics, the hierarchy of settlements, accessibility by public transport, tourism routes and attractions, and the mitigation of climate change through an efficient pattern of development and protection of the open countryside from sporadic building.

6.2 Options are explored for delivering a sustainable pattern of development that also conserves and enhances its landscape and natural beauty, its special qualities and its local distinctiveness. This pattern should reflect, as well as influence, the infrastructure that connects settlements, both transport routes (‘grey’ infrastructure) and ‘green’ infrastructure, which may include wildlife corridors, pedestrian routes and cycling links.

6.3 This chapter focuses on the following issues that it is considered need a planning response and possibly specific policies in the Local Plan:

Issue 21 – What development should the Local Plan permit outside settlements?
Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?
Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?
Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?
Issue 25 – What approach should the Local Plan adopt to development in Tier 1 & 2 settlements?
Issue 26 – How should the Local Plan best take account the adjoining settlements outside the National Park?
Issue 27 – What approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?
Issue 28 - What approach should the Local Plan adopt to the redevelopment of major brownfield sites?

South Downs National Park Context
6.4 The key outcomes from the National Park’s Partnership Management Plan (PMP) that relate to the settlement strategy are:

| Outcome 1: | The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change. |
| Outcome 9: | Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities. |

Other Outcomes will be influenced by the settlement strategy but those above are critical to determining what the settlement strategy for the National Park should be. The Local Plan is one mechanism for delivering most of the positive, long term outcomes in the PMP.

**National Policy and Guidance**

**National Planning Policy Framework**

6.5 The National Planning Policy Framework (NPPF) states that local plans should follow the presumption in favour of sustainable development, with: ‘clear policies that will guide how the presumption should be applied locally’ (paragraph 15). The presumption means that the Local Plan should meet objectively-assessed needs for development unless specific policies in the NPPF indicate development should be restricted. Such policies include those for protected habitats and species, local green space, heritage assets, flood risk areas and nationally designated landscapes, including National Parks. Paragraph 115 of the NPPF, states that:

‘great weight should be given to’ conserving landscape, scenic beauty, wildlife and cultural heritage within a National Park’, while paragraph 116 states that:

‘major development will be refused except in exceptional circumstances and where it can be demonstrated that it would be in the public interest.’

6.6 When developing ‘clear policies that will guide how the presumption should be applied locally’, one of the key considerations is which are the most appropriate and sustainable locations for development.

**English National Parks and the Broads: UK Government Vision and Circular 2010**

6.7 The English National Parks and Broads Vision and Circular states that National Parks have an important role to play in the delivery of affordable housing and Local Plans should proactively respond to local housing needs. However, it recognises that the National Parks are not suitable locations for unrestricted housing. ‘The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.’ (para. 78). It also suggests that, in order to sustain their communities, authorities should, through
their role as planning authorities, be instrumental in encouraging developments that are appropriate to their setting and maximise the benefits of a high quality environment, in order to provide a broader economic base and foster more diverse and higher value local employment opportunities and provide the critical mass needed to drive provision of modern communications infrastructure.

Other National Policy and Reports

6.8 The National Park’s socio-economic duty was given added weight by the Taylor Report\(^{25}\) and the Rural Advocacy Reports, which both pointed to the need to accommodate growth, development and investment in all rural areas at an appropriate scale and form.

Evidence Base Studies

Settlement Hierarchy Study

6.9 The aim of the National Park’s Settlement Hierarchy Study is to establish the level of services and facilities available to communities throughout the area. The score of each settlement within the Settlement Hierarchy Study is determined by the number and type of services and facilities present. These were surveyed in 2011. Following consultation with Parish Councils, further desktop analysis was undertaken in 2012. The number and type of services have been quantified using a scoring system. The scores for each settlement provide an indication of the relative access to services and facilities in each of the settlements and its position within the National Park’s settlement hierarchy. Final scores were then separated into ‘tiers’ to identify groups of settlements with broadly similar characteristics. The study will be updated during 2014 to feed into the ‘Preferred Options’ version of the Local Plan.

Landscape Character Assessment

6.10 Landscape Character Assessment (LCA) is an important tool in helping us plan for the National Park, given that landscape protection and enhancement has great weight in planning decisions. LCA is a way of classifying, mapping and describing the distinct and recognisable elements that make up a landscape. It provides a framework within which elements that are important to the quality and distinctiveness of the landscape can be maintained, change can be managed and positive environmental benefits secured. In order to analyse the National Park in greater detail, the South Downs Integrated Landscape Character Assessment\(^{26}\) (2011) was carried out. This defined 18 landscape types (see Figure 7 in Landscape and Natural Resources chapter), with several sub-categories of landscape areas within each.

Employment Land Review


6.11 The Employment Land Review assesses the need for, and supply of, employment land. It recommends that the Local Plan includes criteria-based policies to deal with applications for new employment uses and to guide diversification. It recommends that a tiered-policy approach is used, for example:

- large towns – a more proactive policy could be adopted to ensure that sustainable economic growth is facilitated in these areas. This could encourage new business development and growth which is not directly connected to the land economy and include the provision of new land to meet future demand.
- market towns/larger villages – use criteria based policies to control the loss of employment land and floorspace, which could require minimum marketing periods and/or viability assessments to justify a change of use.
- rural sites (including existing isolated estates) – allow replacement floorspace only and/or encourage smaller units, offices and light industrial to meet local demand. Consider how to encourage the redevelopment of less desirable sites.

Issues and Potential Options

Issue 21 – What development should the Local Plan permit outside settlements?

6.12 As described in the Portrait (Chapter 2), the National Park has a diversity of landscapes, varying from the wooded and heathland ridges on the greensand in the Western Weald to wide open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these distinctive landscapes are villages and market towns, farms and historic estates, connected by a network of paths, historic lanes and main roads.

6.13 Paragraphs 115 and 116 of the NPPF and the 2010 Circular lead to a generally restrictive approach to development outside existing settlements in the National Park. How a range of development pressures such as:

- residential extensions and replacements (link to Housing Chapter)
- conversion of farm buildings to residential, tourism or employment use, where not allowed as permitted development (links to Housing, Historic Environment and Economy and Tourism Chapters)
- other farm diversification (link to Economy and Tourism Chapter)
- renewable energy schemes (link to Design and Infrastructure Chapters)
- large buildings in the countryside
- equestrian and polo-related developments (link to Economy and Tourism Chapter)
- other development associated with recreational activities (link to Economy and Tourism Chapter)
could be accommodated within the National Park is dealt with in the other chapters of this Options Consultation Document and different considerations will apply to each of these uses. The NPPF (as well as Government changes to permitted development rights) generally encourages much of this development but within National Parks paragraphs 115 and 116 consideration of wider landscape, natural beauty, wildlife and cultural heritage issues is given great weight. However, isolated new homes in the countryside should be avoided unless there are special circumstances (as set out in paragraph 55 of the NPPF).

6.14 The SDNPA seeks to balance the demands for development such as that listed above, much of which would support growth in the economy as well as the duty to seek to foster social and economic well-being of local communities, against the great weight to be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area (first Purpose). The NPA’s role is also to promote opportunities for the understanding and enjoyment of the special qualities of the National Park (second Purpose) which could be covered by some of the above developments. Because of the primacy of the first purpose, the options for how to respond, in general terms, to development in the open countryside in the National Park are relatively limited.

**Issue 21 – What development should the Local Plan permit outside settlements?**

**What we propose to do**
Within the countryside outside settlements, and where consistent with the National Park first Purpose, the Local Plan to:

- Normally allow development on previously developed land (brownfield sites) in relation to agriculture and forestry (including related infrastructure), farm diversification, tourism, recreation and the promotion of the understanding and enjoyment of the countryside in the countryside but put in place strict controls on greenfield land
- not permit new residential development, except in special circumstances, for example where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset or on a rural exception site (these are discussed in the Housing and Historic Environment chapters).

**Do you agree with this approach?**

**Please choose one of the following options to deliver the proposal outlined above:**

**Option 21a** - The Local Plan could apply the same policy across the whole National Park.

**Option 21b** - The Local Plan could identify specific locations that are of high landscape sensitivity in which an especially restrictive approach should apply.

**Option 21c** - The Local Plan could apply different policies for development in the countryside in each of the four main National Landscape Character Areas.
Are there any other options you think need to be considered?

**Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?**

6.15 The Settlement Hierarchy Study shows that there are about 250 small settlements in the National Park with very few facilities (Tier 5). A few, whilst maintaining their individual character and identity, are close to services in larger settlements and can be treated functionally as parts of them. Nearly 70% of Tier 5 settlements have no facilities at all. With very few exceptions these settlements have no public transport, medical facilities or schools.

6.16 The absence of a primary school can have a significant adverse impact on the sustainability of a settlement and would be a concern if new houses were to be developed in a village. Reliance on a private car for all journeys also makes a settlement less sustainable, although there is no guarantee that even the currently poor rural bus services will be maintained, given pressures on local authority budgets. With the possible exception of those with a railway station, these settlements are not considered sustainable and are not locations in which development should be encouraged.

**Issue 22 – What should be the approach to development in Tier 5 settlements?**

**What we propose to do**

- The Local Plan to include a policy whereby permission will only be granted for housing development in Tier 5 settlements in special circumstances, such as where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset or; on a rural housing exception site, in accordance with the NPPF.
- The Local Plan to include a policy whereby development in Tier 5 settlements will be considered on the same basis as other development in the countryside.
- The Local Plan will not define settlement policy boundaries for any Tier 5 settlements and existing settlement boundaries would not be carried forward into the Local Plan.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 22a** – The Local Plan could allow small-scale development (such as rural exception sites for affordable housing) which do not significantly extend the built form of settlements and where the landscape will be conserved and enhanced.
Are there any other options you think need to be considered?

**Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?**

6.17 The Settlement Hierarchy Study indicates that there are about 50 Tier 4 settlements, although a few are close to services in larger settlements and can be treated functionally as parts of them, while maintaining their individual character and identity. Most of these villages have a school and about half have a shop. Whilst many of these settlements do have a bus service, almost half only operate on weekday at present. Very few have medical facilities.

6.18 The limited extent of services in Tier 4 villages casts doubt on whether expansion should be encouraged if the overall aim is to achieve a sustainable pattern of development. On the other hand, it might be argued that some development would assist in the retention of the limited services and facilities that exist, although experience elsewhere suggests that the amount of development required to achieve this is likely to be out of proportion with the character of the villages and potentially harmful to the landscape of the area.

6.19 One solution might be to explore if groups of neighbouring villages (preferably within walking distance of each other) making use of each others services and facilities, would enable the retention of services. This approach is supported by paragraph 55 of the NPPF: ‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.’

**Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?**

**What we propose to do**

The Local Plan to:

- include a policy whereby development on brownfield land and other sites within the existing built-up area/settlement boundary of Tier 4 settlements will normally be allowed.
- ensure housing development will be for affordable and local housing needs only.
- ensure there would be a presumption in favour of community facilities, small-scale retail development and business units, including live-work housing, and against the loss of such facilities.
- Ensure that, unless reviewed through Neighbourhood Plans, current settlement boundaries in Tier 4 villages will be incorporated into the Local Plan unchanged.
• Ensure that where there is no existing settlement boundary, and a Neighbourhood Plan is not proposed, the Local Plan will propose a settlement boundary, in close consultation with the community.

Do you agree with this approach?

In addition to the above approach we could also consider the following options:

Option 23a – The Local Plan could allow a limited extension of the settlement to meet local needs for affordable housing, employment and community facilities, providing it conserves and enhances the landscape.

Option 23b – The Local Plan could allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other development (for example, market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process.

Option 23c – The Local Plan could ensure collaboration between communities will be encouraged to allow economies of scale to support rural services. With community agreement, settlement would be grouped in clusters and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision).

Are there any other options you think need to be considered?

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

The Settlement Hierarchy Study identifies 12 Tier 3 settlements, although some are close to services in larger settlements and can be treated as functional parts of them, while maintaining their individual character and identity (for example, Easebourne and West Liss). Most of these villages have a school, convenience store, doctors’ surgery and evening or weekend bus service. These villages are relatively sustainable and, subject to landscape and other constraints, could contribute towards meeting objectively assessed housing needs for the National Park. Indeed such a contribution is desirable if these villages are to continue to be able to provide the current level of services and facilities for their communities and those nearby, in furtherance of the National Park’s Duty.

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

What we propose to do
• Within Tier 3 villages, development on brownfield land and other sites within the built-up area/ settlement boundary will normally be allowed
There would be a presumption in favour of community facilities, small-scale retail development and business units (including live-work housing) and against the loss of such facilities, to meet local needs.

A limited allocation / settlement extension may be made to meet local development needs, including for affordable and local housing.

Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale in keeping with the existing settlement, and do not have a potentially adverse landscape impact.

Where Neighbourhood Plans are not proposed, site allocations required for housing, the review of existing settlement boundaries and the creation of new settlement policy boundaries will be proposed by the Local Plan, in close consultation with the community.

Do you agree with this approach?

Do you agree with any of the following options?

Option 24a - Allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other development (such as market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process.

Option 24b - Allow some land to be allocated to meet objectively assessed needs for the wider housing market area, as determined through the Strategic Housing Market Assessment.

Option 24c - Collaboration between communities would be encouraged to allow economies of scale to support rural services. With community agreement, Tier 3 villages would be grouped in clusters with other nearby settlements, and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision). Collaboration between communities would be encouraged to allow economies of scale to support rural services.

Are there any other options you think need to be considered?

Issue 25 – What approach should the Local Plan adopt to development in Tier 1 & 2 settlements?

Lewes and Petersfield (Tier 1 towns) are the largest settlements within the National Park. They provide a good range of services and facilities, including hospitals, health centres, secondary schools, railway stations, supermarkets, employment sites and a good bus network. Midhurst (Tier 2) has most of the same facilities, although on a smaller scale and there is no hospital or railway connection. Liss (Tier 2) has fewer facilities than Midhurst but it does, however, have a main-line railway station with direct services to London Waterloo and Portsmouth Harbour.
6.22 These Tier 1 and 2 settlements are best placed to make a significant contribution towards meeting objectively assessed housing needs in the National Park, subject to environmental constraints. A key consideration will be the landscape impact on the National Park. This will include a consideration of the impacts of development when viewed from outside the settlements as well as of views from within the settlements outwards. It must also include impact within the settlement, since the urban landscape is as much part of the designated area as the rural landscape. Further key constraints are flood risk in Lewes and the Special Areas of Conservation/ Special Protection Areas near Liss.

6.23 Given these constraints, the objectively assessed need for housing is likely to exceed the capacity of the National Park to accommodate it.

**Issue 25 – What approach should the Local Plan adopt to development in Tier 1 and 2 settlements?**

**What we propose to do**
- Within Tier 1 and 2 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.
- Subject to landscape and other constraints, land will also be allocated to meet the settlement’s objectively assessed local development needs, including for affordable and local housing. The location and quantity of development proposed will be determined primarily by a landscape assessment of each settlement to determine the direction of growth (if any).
- A presumption in favour of retail development within existing shopping centres and, if no suitable sites are available there, then on sites immediately adjoining centres.
- A presumption in favour of community, tourism, cultural and leisure facilities and other town centre uses (of an appropriate scale and type) within centres and, if no suitable sites are available there, on sites immediately adjoining centres. Loss of community facilities will be resisted.
- Provision for an appropriate amount of employment uses (B1, B2 and B8 use classes) within, on the edge of and outside centres in accordance with the sequential approach which seeks to allocate the most central and sustainable site first before considering one further out from the centre. Support will be for the retention of existing employment where there is reasonable prospect of the site being used for this purpose.
- Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale and in keeping with the existing settlement, and do not have an adverse impact on the landscape. Where Neighbourhood Plans are not proposed, the Local Plan will review Tier 1 & 2 settlement boundaries and allocate required sites for housing, business and other uses, in close consultation with the community.

**Do you agree with this approach?**

**In addition, to the above approach do you agree with either of the following options?**
Option 25a - To allocate sufficient sites in the Tier 1 settlements to make a contribution towards development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints, these would be in excess of the town’s local development needs, in recognition of the additional services and facilities available in those towns.

Option 25b - To allocate sufficient sites in Tier 1 and 2 settlements to make a contribution towards development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints, these would be in excess of the settlement’s local development needs, in recognition of the additional services and facilities available in those settlements.

Are there any other options you think need to be considered?

Issue 26 – How should the Local Plan best take account the adjoining settlements outside the National Park?

6.24 In developing a settlement strategy for the National Park it is important not to treat it as an island. Just outside the designated area are a large number of towns which provide services, facilities and jobs for the National Park residents and whose residents represent important ‘consumers’ of the National Park’s special qualities. Some of these places can also perform important gateway functions for those arriving to enjoy the National Park, particularly by train.

6.25 There are options, however, around how the Local Plan could take account of these adjoining centres and settlements in meeting the needs of the National Park. These needs will include:

- retail (other than convenience)
- secondary and further education
- health centres and hospitals
- leisure and cultural
- employment
- transport facilities (including park and ride)
- housing
- green infrastructure.

6.26 If the National Park is unable to meet its objectively assessed needs for housing, there will need to be detailed discussion and agreement with adjoining authorities as to how much, if any, of the National Park’s housing requirements could be met in settlements outside its boundaries,
which would be in addition to meeting their own needs. Unless all the housing need of the National Park can be met within its boundaries the SDNPA will be required to demonstrate how the Authorities have met this obligation.

6.27 With regard to retail, leisure and employment uses, the Local Plan will only have a limited influence on what are commercial decisions. However, levels of provision in settlements within the National Park will be influenced by the extent to which such development can be accommodated in towns outside the National Park to serve the National Park’s residents in a sustainable way. The Local Plan may choose to be more restrictive about such development if provision is being made just outside but, on the other hand, it may wish to encourage such development for the benefit of local communities and accessibility within the National Park. Similar considerations will apply to education and health facilities, with many of the decisions as to how to serve the National Park’s population being made by organisations and businesses (County Councils, academies, clinical commissioning groups and hospital trusts) based outside its boundaries.

6.28 There may be a difference between how these matters are dealt with in different parts of the National Park, with central parts of the west being more self-contained (especially around Petersfield and Midhurst), while to the east and areas on the boundary more dependent on adjoining large towns beyond the boundary, for example, Eastbourne, Brighton, Worthing, Chichester, Havant and Winchester) as well as on smaller towns along the boundary, for example Bishops Waltham, Alresford, Alton, Liphook, Haslemere, Pulborough, Storrington, Steyning and Hassocks.

6.29 While the Local Plan cannot set policies for sites outside the National Park, its settlement strategy should recognise these destinations and gateways. We need to consider what options are realistically available to make provision for links to and from them, especially by bus, cycle or on foot. These options will also include park and ride, recognising that many will wish to access the National Park by car, but that we wish to minimise the impact of this on the environment and climate change.

**Issue 26 – How should the Local Plan best take account of the adjoining settlements outside the National Park?**

**What we propose to do**
Through seeking to comply with the Duty to Co-operate, the SDNPA will meet with neighbouring authorities and other relevant public bodies to discuss cross boundary strategic planning issues on an on-going basis.

**Do you agree with this approach?**

**In addition to the above approach do you agree with either of the following options?**
Option 26a - To develop a strategy for development which assumes that many of the facilities to serve the National Park’s population are provided in adjoining settlements outside its boundaries and to focus on developing sustainable transport links between the National Park and these neighbouring settlements and working with partners to enable this.

Option 26b – To develop a strategy that seeks to encourage as many facilities as possible to be provided within the settlements within the National Park, especially Tiers 1, 2 and 3.

Are there any other options you think need to be considered?

Issue 27 – What approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?

6.30 A particular issue relates to development proposals on sites adjoining settlements outside the National Park which are either on land within the National Park and/or are very visible from key view points within it. This Local Plan cannot set out policies for land outside the National Park or set out criteria for assessing proposals which affect its setting. However there are options as to how to deal with sites within the Park but on the edge of settlements outside it. Examples of such settlements are Liphook, Horndean, and Swanmore.

Issue 27 – How approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?

What we propose to do
- The Local Plan to include a policy that will only permit development on land within the National Park, on sites adjoining settlements situated just outside the boundary, following a comprehensive landscape assessment of the whole settlement.
- The Local Plan to include a policy that will only permit development on such sites will only be allowed where it can be demonstrated that it will not have an adverse landscape impact and conserves and enhances the natural beauty, wildlife and cultural heritage.

Do you agree with this approach?

In addition to the above approach do you agree with either of the following options?

Option 27a – The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that there is no other suitable, developable and deliverable sites outside or within the National Park to meet the objectively assessed need for development in that settlement and that it does not have a detrimental impact on the landscape.
Option 27b – The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that other suitable, developable and deliverable sites around the settlement have a greater impact on the National Park’s landscape than the proposed site within the National Park.

Are there any other options you think need to be considered?

Issue 28 – What should be the approaches to the redevelopment of major brownfield sites?

6.31 There are currently three important strategic brownfield sites in key locations within the National Park:

- **Syngenta, Fernhurst** – A former research establishment in the ownership of a house-builder in a relatively isolated but well-screened location just of the A286 south of Haslemere. It comprises a former office block (Highfields), a former conference centre (the Pagoda), car-parking and various temporary buildings. It is allocated in the existing Local Plan for employment uses. Previous proposals for housing development were withdrawn. Current proposals in the draft Fernhurst Neighbourhood Plan are for 150 dwellings and 2000sqm employment uses, but the developer is seeking about 250 dwellings.

- **Shoreham Cement Works, Upper Beeding** – A large former chalk quarry and semi-derelict works in the ownership of a developer but leased to a waste operator and to various temporary users (west of the A283). This is one of the most prominent sites in the National Park, in a key location where the Park is at its narrowest. It is allocated in the existing Local Plans for employment use. A previous proposal for mixed use development was rejected on appeal mainly because of the proposed housing content on the western part of the site.

- **North Street, Lewes** – A site of approximately nine hectares at North Street and the neighbouring part of Eastgate is a proposed allocation within the Lewes District Joint Core Strategy (Pre-Submission) for a mixed-use development creating a new neighbourhood in Lewes. A detailed masterplan is being prepared in advance of a planning application based on the broad quantum set out in the pre-submission Lewes Joint Core Strategy of: 350 homes, between 4000 and 5000 square metres of B1a office floorspace, retail floorspace, a hotel, the redevelopment of the existing food superstore and other uses.

Issue 29 – What should be the approaches to the redevelopment of major brownfield sites?

Do you have any views on how these sites should be developed?
Introduction

7.1 The provision of new housing is a major issue for the National Park which will need to be addressed through the Local Plan. The Local Plan will need to determine the extent to which ‘objectively assessed housing needs’ of the area’s local communities can be met for the plan period while ensuring that the first Purpose, to conserve and enhance the natural beauty, wildlife and cultural heritage is met. It will also need to ensure that paragraphs 115 and 116 of the NPPF are met, that is: National Parks have the highest level of landscape protection and only in exceptional circumstances should major development in National Parks be permitted.

7.2 The ‘objectively assessed housing need’ will be assessed through a National Park wide Strategic Housing Market Assessment (SHMA), which builds on the existing joint SHMAs carried out for parts of the National Park and surrounding areas. If the National Park is unable to meet its objectively assessed housing need then the NPA will need to discuss how the shortfall will be met with its neighbouring local authorities through the duty to co-operate.

7.3 Having determined the extent to which the objectively assessed housing need can be met within the National Park, and the way that it is to be achieved, the Local Plan will need to set out housing allocations. The distribution of new housing will need to follow the settlement strategy. The housing policies of the Local Plan will also need to set out the types of housing that will be encouraged and general criteria setting out where housing development may be permitted.

7.4 The Local Plan will also address the need for different types of accommodation to meet the specific needs of different sections of the community. This includes provision of: low cost/affordable housing, housing to meet the needs of the elderly, and accommodation for gypsies, travellers and travelling showpeople.

7.5 This chapter focuses on issues that we consider need a planning response and possibly specific policies in the Local Plan. These are:

**Issue 29** – How best should the Local Plan ensure a ‘sufficient’ supply of housing?

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27 Objectively assessed need is explicitly referred to in the NPPF (para.14). Within the context of the reference to objectively assessed need in NPPF it also identifies that in the case of the national landscape designations that other factors will play an important determining role in what is the appropriate level of housing.
South Downs National Park Local Plan Options Consultation
7 - Housing

**Issue 30** – How best should the Local Plan address housing mix in the National Park?

**Issue 31** – What approach should the Local Plan adopt to best meet local need?

**Issue 32** - What approach should the Local Plan adopt for rural exception sites?

**Issue 33** – How best should the Local Plan meet the housing needs of agricultural and forestry workers?

**Issue 34** – How best can the Local Plan ensure the housing needs of older people are met?

**Issue 35** – How best should the Local Plan ensure that the housing needs of Gypsies, Travellers and Travelling Showpeople are met?

**Issue 36** – How best should the Local Plan encourage Community Land Trusts?

**South Downs National Park Context**

7.6 The key outcome related to housing within the Partnership Management Plan is:

| **Outcome 9:** Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities. |

**Background**

7.7 There were 112,343 National Park residents in 2011 (2011 Census) and about 50,100 homes. Of these homes about 2800 are second or holiday homes, or vacant. Thus, the average household size is approximately 2.37 people per household. An estimated 2500 new homes have been built in the National Park area since 2001 to 2011, based on wards predominantly in the National Park, an average of approximately 250 per year.

7.8 House prices across the National Park are well above the national and regional averages, and there are significant differences in price between the towns and the surrounding rural areas. The average rural house price is approximately £400,000, while in the towns it is significantly less at £265,000, although this may partly be a reflection of the different types of properties that are found in the rural areas compared to the towns. In general, housing is more affordable outside the National Park to the south, whereas to the north of the National Park house prices are higher, reflecting proximity to London and the M25 corridor.

7.9 With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of 'affordable' homes (both market, intermediate and social rented), it can be difficult for people working in the National Park to be able to afford to live within it. This impacts on
the availability of people resident in the National Park to fill lower paid jobs and consequently adds to the high level of traffic movements. Given the high proportion of larger houses and the associated high prices of housing, access to affordable housing is a key issue facing many local communities. Young people and young families, in particular, find it difficult to be able to find low-cost housing and, therefore, to be able to continue living in the area.

7.10 There were 3780 households on housing waiting lists in 2010, about seven per cent of all households in the National Park. However, it is important to note that the housing needs waiting list is not always a good indicator of urgent housing need, and that numbers on waiting lists in individual areas can fluctuate significantly over time.

7.11 The National Park’s resident population is ageing at an increasing rate, with a median age of residents being 46.6 years in 2010. This overall ageing mirrors the wider national trend. However, the number of people in the National Park aged over 65 is significantly higher in percentage terms than in the South East England region, though this characteristic is common in many of the more rural areas.

7.12 There are currently 75 gypsy, traveller and travelling showpeople’s pitches within the National Park. These are shown in the table below, grouped according to which County or Unitary Authority area they are in.

<table>
<thead>
<tr>
<th>Area of the National Park within each County/Unitary Authority</th>
<th>Total</th>
<th>Permanent</th>
<th>Transit</th>
<th>Temporary</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Sussex and Brighton &amp; Hove</td>
<td>36</td>
<td>4</td>
<td>32</td>
<td>0</td>
</tr>
<tr>
<td>Hampshire</td>
<td>18</td>
<td>9</td>
<td>0</td>
<td>9</td>
</tr>
<tr>
<td>West Sussex</td>
<td>21</td>
<td>19</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>75</strong></td>
<td><strong>32</strong></td>
<td><strong>32</strong></td>
<td><strong>11</strong></td>
</tr>
</tbody>
</table>

7.13 In Hampshire, the three largest communities of gypsies are English gypsies (Romany), Irish travellers and travelling showpeople. In West Sussex in the south of the county the largest population is English gypsies and a small population of new travellers and travelling showpeople. The largest gypsy population in the county is in Chichester district. Within the north of the county there are English, Irish, and a small population of ‘new travellers’. Over the last few years the number of travellers passing through and staying for short periods has increased, although there does not appear to be any known reason for this.
7.14 Within East Sussex and Brighton and Hove there is a small but significant population of English gypsies, most of who are settled in the area. Brighton and Hove is predominantly visited by Irish travellers and a smaller number of Romany gypsies and new travellers. Brighton & Hove also has a comparatively high number of people locally known as ‘van dwellers’, predominantly outside the National Park. Van dwellers usually live in their vehicles on the roadside or on unauthorised encampments and are generally not nomadic. Van dwellers are not dealt with further in the Options Consultation Document as they do not meet the definition of a ‘traveller’ as collectively they are not a recognised ethnic group nor are they considered ‘new travellers’ as they are effectively permanently resident.

**National Policy and Guidance**

7.15 The policies of the Local Plan will need to accord with national planning policy, the authority’s evidence studies, which are currently underway, and evidence jointly commissioned with other authorities. As referred to in para.7.2 of this chapter Local Plans should meet:

‘**objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:**

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole, or
- specific policies in the NPPF indicate development should be restricted (including National Parks)” (para.14, emphasis added).

7.16 Paragraphs 115 and 116 of the NPPF say that National Parks have the highest level of landscape protection and only in exceptional circumstances should major development in National Parks be permitted.

7.17 To achieve the delivery of a wide choice of high quality homes, widening opportunities for home ownership and the creation of sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and needs of different groups
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand
- policies for meeting affordable housing need on site, unless off-site provision or a financial contribution can be robustly justified.

7.18 The *English National Parks and Broads UK Government Vision and Circular* (2010) highlights that NPAs have important roles to play as planning authorities in the delivery of affordable housing and that the expectation is that new housing will be focused on meeting affordable housing requirements and that authorities will maintain a focus on affordable housing, working with local authorities and others to ensure that the needs of local communities are met and affordable housing remains so in the longer term (paras 78 & 79). The reference to not providing
general housing targets is dated as following publication of the NPPF the Government does not provide any general housing targets. It is now for local authorities to identify the extent of local housing need and then to make provision in their Local Plans to meet that need.

7.19 National planning policy, ‘Planning Policy for Traveller Sites’ (PPTS), requires all local planning authorities to assess the need for sites for gypsies, travellers and travelling showpeople within their area for both permanent and temporary accommodation; to identify suitable land for sites and include fair, realistic and inclusive policies\(^{28}\) within their Local Plans. The document states that local planning authorities should, in producing their Local Plan:

- identify and update annually, a supply of specific deliverable sites sufficient to provide five years’ worth of sites against their locally set targets
- identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density
- protect local amenity and environment.

**Evidence Base Studies**

**Strategic Housing Market Assessments**

7.20 Strategic Housing Market Assessments are intended to provide an assessment of the needs for all types of housing taking into account demographic projects, economic projections and the needs of different groups in the community, as well as housing demand and the level of housing supply necessary to meet this demand.

7.21 To arrive at an ‘objectively assessed need’ figures or ranges for the National Park, the SDNPA is commissioning an update of the Strategic Housing Market Assessments (SHMAs) and related work that have already been carried out for different parts of the National Park, that is:

- Coastal West Sussex Strategic Housing Market Assessment (GL Hearn, 2012)
- Coastal West Sussex Duty to Co-Operate Housing Report (GL Hearn, 2013)

\(^{28}\) Paragraph four of Planning policy for traveller sites, CLG, 2012.
- *East Hampshire Strategic Housing Market Assessment (NLP, 2013)*
- *Winchester Housing Market and Housing Need Assessment Update (DTZ 2012).*

**Strategic Housing Land Availability Assessment**

7.22 As part of the evidence regarding potential housing sites the authority is required to carry out a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA will consider all sites that the Authority has been made aware of that have potential for housing development under the three assessment criteria set out in the Government’s SHLAA practice guidance of: suitable, available and achievable. Work on the SHLAA is being carried out by officers of the SDNPA and a draft report will be available in spring 2014. This SHLAA will be central in determining which potential housing sites are proposed in the preferred options draft Local Plan as housing allocations.

**Gypsy and Traveller Accommodation Assessments**

7.23 In order to meet the requirements of the Planning Policy for Travellers Sites the SDNPA, in partnership with adjoining local planning authorities, is undertaking several accommodation assessments. These evidence base studies provide an assessment of the current needs for traveller sites as well as the need for sites in the future. At the time of publication studies in Hampshire and West Sussex have been completed and the East Sussex and Brighton and Hove study has commenced but is not completed. Until updated studies have been completed, the existing data for Brighton and Hove, Lewes, Wealden, Eastbourne and Horsham is based on the studies completed prior to the SDNPA being established. Therefore, the data for need for pitches is based on the district-wide need.

- Brighton and Hove – *Brighton and Hove City Plan Part 1* identifies a five year need of 18 pitches from 2014-2019
- Lewes District – *Lewes Joint Core Strategy* states a need for 9 pitches until 2018
- Wealden District – The *Wealden District (Incorporating the South Downs National Park) Core Strategy Local Plan* identifies a need for 23 additional pitches within the district by 2016
- Eastbourne Borough – The *South East Plan* identified a need of 3 permanent pitches and 1 for travelling showpeople by 2016
- Horsham District – there is an identified need for 10 pitches (2012-2017).


30 West Sussex Gypsy and traveller Accommodation Needs Assessment (2007); East Sussex and Brighton & Hove Gypsy & Traveller Study (2005)
7.24 The newly completed studies (since the establishment of the SDNPA) show the following need for new pitches within the National Park:

<table>
<thead>
<tr>
<th>Area of the National Park within each district</th>
<th>Identified need (Permanent pitches)</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Hampshire and Winchester</td>
<td>7 (2012-27)</td>
</tr>
<tr>
<td>Adur, Arun, Chichester, Worthing (Coastal West Sussex)</td>
<td>4 (2012-27)</td>
</tr>
<tr>
<td>Mid Sussex</td>
<td>1 (2013-31)</td>
</tr>
</tbody>
</table>

7.25 Many travelling showpeople across the National Park actively travel across the country to funfairs and shows, which serves as regular employment. Many own and transport large rides and attractions to these shows. These require safe areas for storage when not in use. Therefore, the space requirements for accommodation for travelling showpeople is different to that considered appropriate for those of the gypsy or traveller communities. The studies that have been undertaken have considered these specific needs of travelling showpeople and established that there is the need for at least one additional travelling showpeople’s plot in the Hampshire area of the National Park. Once completed, the East Sussex and Brighton and Hove study will provide up to date data on the need for additional plots within the eastern area of the National Park.

7.26 Working with neighbouring authorities, the SDNPA has assessed the need for transit pitches across the sub-region. The joint study with Adur, Arun, Chichester and Worthing Councils identified a need for 10 transit pitches across the Coastal West Sussex area and a site has been identified within the area which would provide nine new transit pitches.

7.27 The Hampshire study differentiated the identified need between the western and the eastern part of Hampshire. The eastern area covers Fareham/ Winchester/ Gosport/ Havant/ East Hampshire Districts (including Hampshire part of the National Park) and has a notional target of 29 transit pitches.

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31 Since December 2012 nine new pitches have been granted permanent planning permission in the Coastal West Sussex area within the South Downs National Park. One additional pitch has been granted permanent personal permission within the Coastal West Sussex area of the SDNP.
**Issues and Potential Options**

**Issue 29 - How best should the Local Plan ensure a ‘sufficient’ supply of housing?**

7.28 The NPPF requires Local Plans to meet the full objectively assessed needs for market and affordable housing in the housing market area, where consistent with the rest of the NPPF. This policy reflects that set out in NPPF paragraph 14 – need should be met in full only so far as is consistent with the rest of the policies in the NPPF. In other words, if restrictive policies within paragraphs 115 and 116 of the NPPF mean that the full objectively assessed need cannot be met, the approach is that those needs do not have to be met in full.

**Issue 29 – How best should the Local Plan ensure a ‘sufficient’ supply of housing?**

**What we propose to do**
The Local Plan will set out a level of new housing (combined affordable and market) provision for the National Park. The level of the new housing provision set out in the Local Plan will be determined from:

- the ‘objectively assessed need’ of the National Park as determined through the SHMA and
- the constraints identified from the evidence base, particularly the landscape character assessments of the major settlements and how paragraphs 115 and 116 of the NPPF are met.

**Do you agree with this approach?**

**Do you agree with any of the alternative approaches set out below?**

**Option 29a** - The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set them for areas of the National Park, which could be based on local authority boundaries.

**Option 29b** - The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set individual levels of new housing provision for the different housing market areas that overlay the National Park.

**Option 29c** - The Local Plan will not set a specific level of new housing provision for the whole of the National Park but will set individual housing targets for major settlements (that is, those in settlement tiers 1, 2 and 3).

**Are there any other options you think need to be considered?**
**Issue 30 – How best should the Local Plan address housing mix?**

7.29 In helping to achieve sustainable communities it is important for the South Downs National Park to have a well balanced mix of tenures and dwelling types within its housing stock. Due to its attractive environment and location the housing stock of the National Park is skewed towards large, owner occupied, detached properties, with a relatively small proportion of smaller homes and affordable tenures. Consequently it is important that, through new development over time, a better balance of tenures, sizes and types is achieved. This approach is consistent with para.50 of the NPPF.

**Issue 30 – How best should the Local Plan address Housing Mix?**

**What we propose to do**

For the Local Plan to set out how, through meeting housing requirements and building sustainable communities, residential development will be required to provide:

- a range of dwelling tenures, types and sizes based on identified local needs to meet a range of housing requirements of the local community, including the elderly and those with special or supported needs, and
- a range of affordable housing types and sizes, based on the local need.

New housing development will be required to ensure that it contributes to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

**Do you agree with this approach?**

**To deliver the above approach, do you agree with one or more of the following options?**

**Option 30a** - Put an emphasis on the delivery of smaller properties for market tenures, and a mix of sizes for affordable tenures, unless indicated otherwise by local housing need information and whilst respecting the setting of the development site.

**Option 30b** - Existing properties should not be extended excessively\(^\text{32}\), further diminishing the existing property stock of small and medium sized dwellings.

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\(^{32}\) Definition of excessive in this context would be developed for the preferred options draft local plan stage should this option be selected.
Option 30c - On larger sites the different types and tenures will be required to be spread across development sites, whilst recognising the management requirements of registered providers of affordable housing. Also, there should be no distinguishing in terms of design between market and affordable homes.

Option 30d - Existing properties should not be replaced (one for one) by significantly larger\textsuperscript{33} properties.

Option 30e - Any proposed size restrictions to extensions and replacement dwellings should only apply to dwellings outside settlement policy boundaries.

Are there any other options you think need to be considered?

**Issue 31 – What approach should the Local Plan adopt to best meet local need?**

7.30 The high cost of housing in the National Park raises issues over accessibility to both affordable market and social housing for those households with strong local connections to the area but without significant equity or above average incomes. The provision of affordable housing is one of the National Park Authority’s priorities, working in partnership with the housing authorities.

7.31 The provision of new housing within the National Park will be focused on meeting affordable housing need, while recognising that economic viability of development schemes needs to be achieved and that there are other aspirations that will limit the level of affordable housing that can be achieved, such as high-quality design, sustainable construction and energy efficient buildings, and the collection of developer contributions. The SDNPA will need to work closely with local authorities, parish councils and other partners to ensure the needs of local communities are met, where they can be within the constraints of the National Park designation, and affordable housing remains so in the longer term.

7.32 The level of local affordable housing need within most of the communities of the National Park is such that it can rarely be fully met through the building of new market homes to subsidise the affordable housing element.

**Issue 31 – What approach should the Local Plan adopt to best meet local need?**

**What we propose to do**

The Local Plan to set out a proportion for affordable housing provision of all residential development proposals, subject to confirmation that this level is achievable from the Viability Assessment\textsuperscript{34}. Affordable homes will normally be required to be built on-site, unless it can be demonstrated to be unsuitable, where a financial contribution would be required. Affordable housing will need to remain available as affordable housing for local people in perpetuity.

\textsuperscript{33} Definition of significantly larger properties would be developed for the preferred options draft local plan stage should this option be selected.
Do you agree with this approach?

Do you agree with any of the following options?

**Option 31a** - The Local Plan could include a ‘local connections’ policy for the provision of affordable housing within parishes and towns in the National Park, with local connection being defined as those households unable to access the open housing market and having a residential, employment, family or primary carer connection within first the local parish (whether wholly or only partly within the National Park) and second neighbouring parishes.

**Option 31b** - The Local Plan could include a policy that all residential development, that is, one net additional dwelling, should contribute towards the provision of affordable housing.

**Option 31c** - The Local Plan could include a policy that there is a dwelling threshold, either by site area or number of dwellings, for the provision of affordable housing on a market housing sites.

**Option 31d** - The Local Plan could set an affordable housing proportion of at least 40%, subject to confirmation that this level is achievable from the updated Viability Assessment. This provision will normally be on-site, unless it can be demonstrated to be unsuitable where a financial contribution would be required.

Are there any other options you think need to be considered?

**Issue 32 - Rural Exception Sites**

7.33 Rural exception sites provide a significantly higher proportion of affordable housing than on non-exception sites (the NPPF encourages some element of market housing on exception sites to encourage them to come forward more readily). For a rural exception scheme to assist in meeting local housing need it is important for the local community’s need for the additional affordable housing being proposed to be proven by an up-to-date local housing need survey.

**Issue 32 – What approach should the Local Plan adopt for rural exception sites?**

**What we propose to do**

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The Local Plan to support and encourage rural exception schemes, provided they are led and supported by local communities, on sites either within the settlements or immediately adjacent to either:
- settlement policy boundaries or
- where there is no settlement policy boundary defined the built form, and

where the National Park’s first Purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage is supported.

The scale of the development proposal will need to be modest in size and relate well, in terms of location and size, to the existing settlement. The focus of new housing on rural exception sites will need to be on affordable housing and the need for a small proportion of market housing will need to be demonstrated through a viability assessment.

Do you agree with this approach?

Do you agree with either of the following options?

Option 32a – The Local Plan could set a site threshold for rural exception sites.

Option 32b - The Local Plan could extend the definition of housing permitted on rural exceptions sites to allow individual ‘self-build’ schemes to come forward where supported locally.

Are there any other options you think need to be considered?

Issue 33 – How best should the Local Plan meet the housing needs of agricultural and forestry workers?

The agricultural and forestry industries are an essential part of the South Downs. Whilst the numbers of workers required in these operations has declined significantly over recent decades there is still a need for a local workforce to work on the land, generally on modest salaries, that mean they are unable to afford the high values of market housing.

What we propose to do

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35 If the option of setting a site threshold for rural exception sites was taken forward that threshold would be defined at the preferred option stage.
The Local Plan to set a policy whereby tied affordable residential accommodation for local workers within close proximity\(^{36}\) to agricultural or forestry enterprises, including temporary workers, will be permitted in the countryside as an exception provided:

- it is essential for the workers to live permanently at or near their place of work in the countryside
- it is in keeping with the local context, and does not adversely affect National Park Purposes
- is retained in perpetuity as accommodation for local agricultural and forestry workers and
- other residential properties on the farm or economic unit have not been sold or redeveloped for other uses within the recent past\(^ {37}\).

Do you agree with this approach?

Do you agree with either of the following options?

**Option 33a** - In addition to the approach described above, the Local Plan could limit the size of such agriculture or forestry workers accommodation\(^ {38}\).

**Option 33b** - The allowance of additional affordable residential accommodation for local workers could be restricted by the Local Plan to instances where there has been no sale of another residential property on the estate.

Are there any other options you think need to be considered?

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**Issue 34 – How best can the Local Plan ensure the housing needs of older people are met?**

As the proportion of the resident population that is older increases there is a need to ensure that their housing requirements, where they do change, are addressed.

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**What we propose to do**

The Local Plan to include a policy to encourage new residential development which aims at providing accommodation for the older people, both those in early retirement and those needing some form of care.

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\(^{36}\) The definition as to what close proximity is in this context will be provided through the Preferred Options draft Local Plan.

\(^{37}\) The definition of what the recent past is in this context will be developed through the Preferred Options draft Local Plan should this option be taken forward.

\(^{38}\) The definition of the threshold on property sizes permitted should this option be taken forward will be defined in the Preferred Options Local Plan.
Do you agree with this approach?

Do you agree with any of the alternative options set out below?

Option 34a - The Local Plan could set out that residential development for older people be provided through smaller properties and opportunities for flats and bungalows exclusively for those 55 / 60 years and over, and retirement accommodation and care homes in the more sustainable settlements (tiers 1, 2 and in some cases 3), both with access to a good range of services and facilities, including public transport.

Option 34b – The Local Plan could identify specific appropriate sites in the larger and more sustainable settlements (tiers 1 and 2) for special needs housing, including the elderly.

Option 34c - The Local Plan could make no specific provision for elderly persons housing but assumes that this will be delivered by the market as part of the overall housing provision within the National Park.

Option 34d - The Local Plan could allow for appropriately sized annexes and free-standing accommodation to be built within the curtilage of existing properties where they do not detract from the existing built form.

Are there any other options you think need to be considered?

Issue 35 – Identifying Accommodation to meet the Needs of Gypsies, Travellers and Travelling Showpeople

7.36 ‘Planning Policy for Traveller Sites’ states that local planning authorities should, when producing their Local Plan, identify and maintain a five year supply of specific, deliverable sites. Local planning authorities should also identify a supply of developable sites or broad locations for growth for future growth (up to 15 years). This is for permanent and transit sites in either public or private ownership.

Issue 35 – How best should the Local Plan ensure that the housing needs of gypsy, travellers and travelling showpeople are met?

What we propose to do: The evidence supporting the Local Plan to assess the accommodation needs of gypsies, travellers and travelling showpeople, and the Local Plan will identify sites to provide a 15 year supply to meet identified accommodation needs, working with our partners/adjoining authorities. A policy will be included within the Local Plan setting out the criteria for assessing sites and applications. This will follow the principles set out in Government policy.

Do you agree with any of the following options?
Option 35a – The Local Plan could identify specific locations for temporary stopping places\(^{39}\), to provide alternatives to illegal encampment for those gypsies and travellers passing through.

Option 35b – The Local Plan could protect existing sites with permanent planning permission for gypsy and traveller accommodation from other uses. As there are existing sites with permanent permission one option is for the Local Plan to safeguard these existing sites against loss through the granting of subsequent planning permissions.

Option 35c – The Local Plan could protect any future site granted planning permission for gypsy and traveller accommodation and which has been implemented. These sites could be safeguarded as long as there is an identified need.

Are there any other options you think need to be considered?

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Issue 36 – How best should the Local Plan encourage Community Land Trusts?

7.37 Community Land Trusts (CLTs) are defined in Statute as a corporate body satisfying the conditions laid out in Section 79 of the Housing and Regeneration Act 2008. The Localism Act 2011 introduced new opportunities for communities to shape their local area by developing a vision through a neighbourhood plan. This provides an opportunity for CLTs to be identified as part of the solution to locally identified needs. CLTs can range in size and provide a variety of housing tenures as well as other community facilities. Despite the diversity in the sector, there are five key features of a CLT:

- Community-controlled and community-owned - assets can only be sold or developed in a manner that benefits the local community
- Open democratic structure - people living and working in the defined local community must have the opportunity to become members of the CLT
- Permanently affordable housing or other assets - they will endeavour to keep the homes or assets permanently affordable
- Not for profit - CLTs are not for profit and any must be used to further the community’s interests
- Long-term stewardship - a CLT has a long-term stewarding role, including when the homes are sold or re-let.

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39 Temporary stopping places are areas where gypsies or travellers can stop for up to 28 days.
The Local Plan to encourage the establishment of Community Land Trusts as a way of encouraging affordable housing for local people where the CLT proposals are consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage.

Do you agree with this approach?

Are there any other options you think need to be considered?
Introduction

8.1 The National Park is a diverse area, containing inspirational and internationally important landscapes, wildlife and historic environments, with lively market towns and villages. In delivering the National Park’s statutory Purposes of: ‘conserving and enhancing the natural beauty, wildlife and cultural heritage’, and ‘promoting opportunities for the understanding and enjoyment of the special qualities by the public’, the National Park Authority (NPA) has also a Duty to: ‘seek to foster the economic and social well-being of the communities within the National Park’. The challenge is to encourage sustainable development within the limits of the environment and ensuring the National Park’s Purposes are not compromised in meeting the Duty.

8.2 The National Park’s socio-economic Duty was given added weight by the Taylor and Rural Advocacy Reports40, which both pointed to the need to accommodate growth, development and investment in rural areas at an appropriate scale and form. The report ‘Valuing England’s National Park’41 recognises the valuable contribution National Park economies make at a local, regional and national level. Estimated turnover of businesses within the National Park was £3.6 billion in 2012.

8.3 The Vision for English National Parks to 2030 set out in the DEFRA Circular states that that National Parks will be: ‘recognised as fundamental to our prosperity and well-being’ (English National Parks and the Broads UK Government Vision and Circular 2010, p.5). It goes on to suggest, that in order to sustain their communities, NPAs should:
- encourage developments appropriate to their setting and
- maximise the benefits of a high-quality environment, to provide a broader economic base and foster more diverse and higher-value employment opportunities.

8.4 The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. The latest estimate is that the National Park has about 46 million visitor days per year, generating an income of £464.3m and supporting around 11,700 jobs. By

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41 Valuing England’s National Parks; Cumulus Consultants and ICF & GHK for National Parks England (May 2013)
supporting and promoting sustainable tourism and recreation across the National Park, there is an opportunity to contribute to economic growth within the area. This contributes to meeting the National Park’s second Purpose: to promote opportunities for the understanding and enjoyment of the National Park’s special qualities by the public, whilst also meeting the National Park Authority’s Duty.

8.5 This chapter focuses on economic and tourism issues that the Local Plan may need to address with specific policies. These are:

**Issue 37** - Identifying strategic goals for the economy

**Issue 38** - Should we safeguard existing employment sites?

**Issue 39** - What approach should we take to the allocation of additional employment land?

**Issue 40** - How can we support new businesses, small local enterprises and the rural economy?

**Issue 41** - What approach should the Local Plan take to the diversification of agricultural land and buildings?

**Issue 42** - What approach should the Local Plan take to equine development?

**Issue 43** - How should the Local Plan consider visitor accommodation, types of tourism developments and recreational activities?

**Issue 44** - What approach should the Local Plan take to static holiday caravan sites?

**South Downs National Park Context**

8.6 The key outcomes related to the local economy and tourism within the *Partnership Management Plan*:

| Outcome 5: | Outstanding visitor experiences are underpinned by a high quality access and sustainable transport network providing benefits such as improved health and wellbeing. |
| Outcome 6: | There is widespread understanding of the special qualities of the National Park and the benefits it provides. |
| Outcome 7: | The range and diversity of traditional culture and skills has been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park. |
| Outcome 8: | More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely. |
| Outcome 9: | Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities. |
Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities many of which are positively linked with the special qualities of the National Park.

Outcome 11: Local people have access to skilled employment and training opportunities.

National Policy and Guidance

8.7 In pursuing the National Park Purposes the SDNPA will support and promote a diverse and sustainable economy, by promoting thriving villages and market towns and supporting the wider rural community. This will underpin the economic and social well-being of communities and is in line with the Government’s commitment to economic growth and the importance placed on ensuring that the planning system supports sustainable growth. The Local Plan should plan proactively to support the needs of businesses and support the local economy. This includes the need to recognise and seek to address potential barriers to investment in the area. There are three Local Enterprise Partnerships (LEPs) which cover the National Park, Coast to Capital LEP, Enterprise M3 LEP and South East LEP. The strategies they develop will determine the investment priorities that will support and sustain economic growth in the area.

8.8 Local Plans should support a strong rural economy and support economic growth in rural areas (NPPF para.28). This includes promoting the development and diversification of agricultural and other land-based rural businesses and supporting sustainable rural tourism and leisure facilities that benefit business in rural areas, communities and visitors, which respect the character of the countryside.

8.9 There are an estimated 7,000 businesses within the National Park, providing employment for more than 58,000 people. This is within a range of employment sectors and a variety of types and sizes of businesses, which operate within both rural areas and the main employment centres of Lewes and Petersfield.

8.10 The Local Plan should seek to encourage economic development that supports National Park Purposes, and economically prosperous and thriving town centres. The NPPF also highlights that local plans need to recognise the value of town centres to local communities and the local economy, and the challenges that high streets and town centres currently face. Growth should be focused in existing centres, and planning policy should support town centres, providing choice and a diverse retail offer (NPPF para.23).

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42 Local Enterprise Partnerships have been designated by the Secretary of State for Communities and Local Government and established for the purpose of creating or improving the conditions for economic growth for their local area.
8.11 The *South Downs National Park Employment Land Review* (ELR)\(^{43}\) draws on existing evidence on employment land from across the National Park and provides information on the employment land currently available and the potential future need for employment land by area and sector. This will support decisions on the allocation, protection or release of employment sites which will be considered in the Local Plan. The *ELR* identifies some of the characteristics of the National Park economy:

- tourism accounts for 15% of all employment and it is expected that this sector will grow
- a lower proportion of jobs in sectors which would normally occupy B-class\(^{44}\) employment space
- there is a higher proportion of residents employed in agriculture, forestry and fishing, compared to those living in the surrounding area
- there are higher percentages of managers and senior officials, professional occupations and skilled trades living within the National Park, than in surrounding areas. Given the employment structure of the area, this suggests out-commuting by higher paid and higher skilled workers
- the profile of business is skewed towards smaller business, with over three quarters of businesses employing fewer than five people.

8.12 The ELR makes the following policy recommendations:

- need to recognise that within the National Park there are some relatively large settlements and in order to sustain economic prosperity and growth there is a need to continuously refresh the stock of commercial and industrial buildings. Policy should therefore facilitate appropriate changes and/or expansion
- need to adopt development management policies for small sites and to guide new farm diversification
- consider a tiered policy approach to employment policy, for example, market towns, villages and rural sites.

**South Downs National Park Visitor Survey 2013**

8.13 Currently, only 36% of employment in the National Park is in sectors normally occupying B-class employment space (that is, business, general industrial or storage and distribution). Therefore, it is important to recognise other sectors and principal among these is the tourism sector. The *South Downs National Park Visitor Survey 2013*\(^{45}\) provides the findings of research including two key components:

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\(^{43}\) *South Downs National Park Employment Land Review (May 2012)*

\(^{44}\) B1 business - offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area, B2 general industrial - use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste), and B8 storage or distribution - includes open air storage.

\(^{45}\) *South Downs National Park Visitor and Tourism Impact Study (January 2013)*
(i) an audit of visitor-related businesses, including surveys on business performance and future plans, and
(ii) visitor and resident surveys, including a profile of who uses the area, how they use it and their experience of visiting. The environmental survey identified and quantified the impacts visitors have on the landscape, biodiversity and cultural heritage they come to enjoy, so that appropriate visitor management, conservation and enhancement programmes can be developed and implemented.

8.14 The Visitor Survey provides some important findings to consider for the emerging Local Plan including:
• existing tourism and recreation related businesses have aspirations to expand
• need to promote sustainable tourism
• dominance of day visitors - day visitors from homes within the National Park represent 6% of all visits, and those resident nearby, 72% of all visits. Only four per cent of visits are from people from further afield who stay within the National Park
• visitors staying within the National Park are likely to spend six times more than day visitors travelling from home.

8.15 Studies into the future opportunities for visitor accommodation have been carried out in East Hampshire, Lewes, Chichester and Wealden. The most recent is for East Hampshire District46.

**Issues and Potential Options**

**Issue 37 – Strategic goals for the local economy**

8.16 Local Plans are required to set out clear strategic goals for the economy in their area which encourage sustainable economic growth (NPPF para.21). In setting out these goals the authority will take into account the National Park’s Purposes and the NPA’s Duty of seeking to foster the economic and social well-being of the communities within the National Park.

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**Issue 37 – Strategic goals for the local economy**

**What we propose to do**
The Local Plan will set clear strategic goals for the local economy, which will support the Partnership Management Plan.

**Do you agree with this approach?**

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46 East Hampshire Hotel and Pub Accommodation Futures Study 2013
**What strategic goals for the local economy should we consider in the Local Plan?**

**Issue 38 - Should the Local Plan safeguard existing employment sites?**

8.17 Partly due to the disparity between housing and employment land values, there can be pressure to release employment land for residential development. Whilst this could contribute to helping meet housing need, it is important that the Local Plan considers both the short and long-term needs of the local economy. However, national policy recognises that in some cases employment sites are no longer required and could have an alternative use. It is therefore important that we have a clear understanding of the need for employment land and/or commercial floorspace, in addition to an assessment of the existing and future supply of land available and its sufficiency and suitability to meet this need.

8.18 The Local Plan may want to consider identifying the criteria by which it will be considered acceptable to allow the change of use of employment land to other uses. This could include a demonstrated lack of developer interest, persistently high vacancy rates, serious adverse impacts from existing operations, or loss of some space could facilitate further or improved provision of floorspace. Other factors which we may want to consider are the redevelopment potential of the site for other employment uses or a mix of uses, including the scope for intensifying use or improving existing buildings to meet the requirements for modern employment floorspace.

**What we propose to do**

- The Local Plan will consider up-to-date evidence on the need for employment land and/or commercial floorspace and consider the suitability of existing land to meet the identified business needs. Where appropriate, the Local Plan will aim to safeguard employment land to ensure sites are available to meet the short and long term needs, and will have a presumption against the loss of employment land and set criteria within policy against which the loss of employment land/floorspace will be judged.

- Local Plan policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. However, where appropriate, the Local Plan will encourage the redevelopment of such sites, retaining the employment use but providing improved facilities or making better use of the site.

**Do you agree with this approach?**

**What criteria do you think are important in determining if an employment site is retained?**

**Do you agree with one the following options to help deliver the approach outlined above?**
Option 38a – The Local Plan could adopt a sequential approach to the loss of employment land/floorspace as follows:

(i) preference given to the redevelopment of the site whilst retaining the employment use on the whole site.

(ii) if (i) is demonstrated as being unachievable, we will consider a mixed use development on the site, which includes some employment land/floorspace.

(iii) if both (i) and (ii) are demonstrated as being unachievable, we will then consider the loss of the employment land/floorspace

Option 38b – Where development is proposed which would result in a loss of an existing active industrial or business use, the Local Plan could require a planning obligation to offset the loss of employment and mitigate. For example, this could contribute to the provision of a local enterprise centre or start-up units.

Are there any other options that need to be considered?

Issue 39 - What approach should the Local Plan take to the allocation of additional employment land?

8.19 There is a broad range of employment sectors and a variety of types and sizes of businesses operating within the National Park. In order to sustain economic prosperity and growth there is a need to ensure the supply of suitable and sufficient land and property for commercial enterprise built to a high-quality design and construction standard and contributes to conserving and enhancing the natural beauty and landscape of the National Park.

8.20 Policies will need to be sufficiently flexible to accommodate changing business needs and economic circumstances. Whilst there is evidence of existing need in some parts of the National Park, the Employment Land Review recommended that no National Park-wide qualitative target needs to be set for additional employment land. It does recommend that existing employment allocations are retained and acknowledges that a balance is required between allocation and achieving flexibility and responsiveness to meeting emerging needs as they arise.

8.21 National policy states that local planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. The Local Plan will need to consider this when reviewing any existing allocations and needs to be mindful that any new allocations would need to be regularly reviewed in line with the NPPF.

Issue 39 - What approach should the Local Plan take to the allocation of additional employment land?

What we propose to do

- The Local Plan will identify if there is need for new employment sites within the National Park through regular assessments and monitoring of take-up of different employment floorspace. Part of this consideration will include a review of existing employment sites.
As discussed above under Issue 37 the Local Plan to encourage the redevelopment of existing sites, whilst retaining the employment use, to accommodate the needs for new or expanding businesses.

**Do you agree with this approach?**

**In addition to the above approach do you agree with any of the following options?**

**Option 39a** – Set criteria for the provision of new employment land/floorspace

**Option 39b** – Allocate new strategic employment sites to accommodate the need for new or expanding businesses in appropriate locations

**Option 39c** – Allocate strategic mixed-use sites to accommodate the need for new or expanding businesses

**Are there any other options that need to be considered?**

**What criteria do you think is important in determining the location of new employment sites?**

### Issue 40 - How can the Local Plan support new businesses, small local enterprises and the rural economy?

8.22 The Employment Land Review identifies the National Park has:

- a high proportion of smaller business, with over three quarters of businesses employing fewer than five people and
- evidence of a need for small units and start up enterprise centres.

Enterprise centres provides flexible space and facilities to encourage, support and nurture businesses during start up and during the early stages of their development. With a large proportion of small rural business, the National Park’s economy is especially vulnerable in the current economic climate and it is important to provide support. Rural-based businesses show a potential for growth, but remain smaller overall and survival rates are mixed. This may be a result of lack of premises for expansion, access to skills and infrastructure issues, such as poor broadband and transport.

### Issue 40 – How can the Local Plan support new businesses, small local enterprises and the rural economy?

**What we propose to do**

- The Local Plan to support the sustainable growth and expansion of a range of businesses and enterprise in rural areas, both through appropriate conversion of existing buildings and well designed new buildings, where consistent with National Park Purposes.
The Planning policies will support the delivery of small and flexible start-up business units, by encouraging the provision of small units as part of larger developments and/or encouraging the appropriate conversion or sub-division of industrial units into small units. Such units must be well designed and sustainable construction and ensure that they meet with National Park Purposes.

Do you agree with this approach?

Do you agree with the following option?

Option 40a – Allocate land for start-up enterprise centres located where there is demonstrated to be a strong market demand.

Are there any other options that need to be considered?

Issue 41 - What approach should the Local Plan take to the diversification of agricultural land and buildings?

Farm diversification can provide additional income to support agricultural businesses and potentially create more employment opportunities. It is estimated that around half of farms within the National Park have diversified into a wide range of other activities including storage, farm shops, business and light industrial premises, horse liverys and tourism-related activities, including visitor accommodation and educational facilities. This can provide investment into the rural economy and provide wider conservation and community benefits.

The NPPF identifies that local plans should promote the diversification of agricultural and other land-based rural businesses. However, it is crucial to ensure that diversification does not have a detrimental impact on the special qualities of the National Park and is consistent with the National Park’s Purposes.

What we propose to do

- The Local Plan to support the appropriate development associated with the expansion of businesses and enterprise in rural areas, subject to the development being of a high quality, both through the well designed conversion of existing buildings and high quality new buildings, which reflects its landscape setting

Do you agree with this approach?

An enterprise centre provides flexible space and facilities to encourage, support and nurture businesses during start up and during the early stages of their development.
Do you agree with either of the following options to deliver the approach outlined above?

Option 41a – The Local Plan could support a limited scale of farm diversification on the premise that the diversification supports the core agricultural use and development in accordance with the National Park’s Purposes. This may also include the development of buildings to enable on-site processing and sale of products grown on site.

Option 41b – The Local Plan could allow for more diverse economic use of agricultural buildings where they are considered to promote the understanding and enjoyment of the National Park, subject to delivering conservation and enhancement of the National Park.

Do you think there any other options that need to be considered?

Equine-Related Development

Issue 42 - What approach should the Local Plan take to equine-related development?

8.25 Equestrian activities can range from those of a commercial nature such as livery stables, polo-related activities and riding schools to small domestic stables and field shelters. The ‘keeping’ of horses has the potential to make a positive contribution to the management of the local landscape and can offer an opportunity for diversification. There are potential individual and cumulative impacts associated with an increase in areas of the National Park being used for equine-related development. Therefore, whilst the National Park Authority will support the appropriate use of land for equine development, it is important that support and guidance is included in the Local Plan to ensure that a balance is struck between protecting the landscape and maintaining and living and working environment.

8.26 Whilst the ‘grazing’ of horses on land is a form of agriculture that does not require planning permission, the ‘keeping’ of horses and related development does require planning permission. The distinction between ‘grazing’ and ‘keeping’ is not always clear, although a judgement can normally be made on the basis of the area of grazing land available per animal, the existence of stables and other facilities, and the condition of the land. The sub-division of agricultural land into paddocks with shelters provided for horses is likely to consist keeping and, therefore, will require permission. More information and guidance on the keeping of horses is available from DEFRA at https://www.gov.uk/keeping-horses-on-farms.

8.27 There are a number of factors which need to be taken into account when considering equine development. This includes the impacts of development on the landscape which can be both individual and cumulative, for example: fencing, lighting, new buildings, ménages, polo

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48 Equine includes domestic horses and ponies (including feral and semi feral ponies), donkeys and hybrids (including mules).
grounds, horse walkers, parking areas for horse boxes, intensification of human activity associated with livery yards, new access provisions and the appropriate re-use of traditional agricultural buildings. There are also associated land management issues such as the impact on pasture of stock density, manure and waste management and associated infrastructure and access to the site, including the potential impact of horse related development on rights of way.

### Issue 42 – What approach should the Local Plan take to equine-related development?

**What we propose to do**

The Local Plan to:

- support appropriate development and diversification of agricultural and other land-based rural businesses where such development conserves and enhances the natural beauty, wildlife and cultural heritage (Purpose One) and the landscape character of the National Park
- require planning applications for development associated with the keeping of equine will need to be accompanied by sufficient information to demonstrate that the associated impacts conserve and enhance the natural beauty and wildlife, for example by including details of fencing and landscaping.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 42a** – The National Park Authority could develop guidance on the keeping of horses which may deal with some of the following:

- stables and other buildings fencing, landscaping, sub-division of land and other associated changes
- manure and waste management.
- stock density
- impact of riding activity on Public Rights of Way
- access
- associated infrastructure
- outdoor and indoor manages.

Any policy and or guidance will acknowledge the different impacts associated with commercial and domestic equine related development.
Are there any other options that need to be considered?

Tourism and Recreation, Environmental Education and Interpretation

Issue 43 - How should the Local Plan consider visitor accommodation, types of tourism developments and recreational activities?

8.28 The National Park is a popular visitor destination with a number of visitor attractions (see Figure 13 overleaf), with a significant proportion of visits being day trips from those living in and around the area. The tourism and visitor economy makes a positive contribution to the overall local economy and provides job opportunities. Currently, due to the dominance of day visits, there are low levels of average visitor expenditure because the majority of those visiting are travelling from home or staying in accommodation outside the National Park.

8.29 Due to the large numbers of visitors to certain parts of the National Park, there are concerns regarding the pressure and potential impact of tourism and recreational activities. It is important that whilst recreational activity is encouraged, it does not damage the special qualities or other people’s enjoyment of the area. This will include the tranquillity and therefore some activities may not be appropriate. The Local Plan will need to consider how we may manage certain activities in more sensitive areas where disturbance or damage could occur. In addition, there are currently issues related to the fragmentation of the tourism sector and limited options to enable visitors to use more sustainable modes of transport.

8.30 Visitor accommodation includes serviced accommodation such as bed and breakfast, guest houses, camping and touring caravans, hotel accommodation and youth hostels and non-serviced accommodation including self-catering accommodation and other holiday lets (for example, ecopods, lodges and cabins). The visitor survey identified the range of current accommodation available, with the most popular accommodation being the homes of friends or relatives in and around the National Park. There are camping and caravanning sites available within the National Park, however 55% of the capacity of these is located in three large sites.
Figure 13: Visitor Attractions and Key Transport Routes and Nodes
8.31 In order to cater for all preferences and incomes there needs to be a greater variety of accommodation types provided throughout the National Park. Gaps in accommodation provision have been identified, such as for lower-cost accommodation and for accommodation along the South Downs Way.

8.32 Evidence from the various Hotel Futures Studies indicates that occupancy levels are relatively high. This indicates the need to safeguard existing accommodation to prevent further loss. However, further evidence on the occupancy levels and provision of visitor accommodation across the National Park is required to cover those areas that have not been previously covered and to update those that were done more than five years ago.

8.33 The Local Plan may want to consider identifying the criteria by which it will be considered acceptable to allow the loss of visitor accommodation. This could include a demonstrated lack of developer interest, persistently high vacancy rates, considerable adverse impacts from existing operations, or loss of accommodation could facilitate further or improved provision of visitor accommodation on the site or at a more appropriate location.

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**Issue 43 – How should the Local Plan consider visitor accommodation, types of tourism developments and recreational activities?**

**What we propose to do**
- To meet the second Purpose to promote opportunities for the understanding and enjoyment of the special qualities by the public, the Local Plan to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the National Park’s first Purpose.
- The Local Plan to support the development and maintenance of appropriate recreation and tourism facilities and visitor hubs including a mix of quality accommodation, which responds to market demands and supports a sustainable visitor economy.
- The Local Plan to have a presumption against the loss of visitor accommodation and set criteria within policy, against which the loss of accommodation will be judged.

**What criteria do you think are important in determining if visitor accommodation should be retained?**

**Visitor Accommodation**

Do you agree with any of the following options to deliver the proposal outlined above (relating to visitor accommodation)?
Option 43a – The Local Plan could encourage development visitor accommodation to certain parts or areas, such as the larger settlements and/or areas within close proximity to visitor attractions.

Option 43b – The Local Plan could encourage development associated with visitor accommodation away from certain parts or areas, such as the less accessible areas.

Option 43c – The Local Plan could take a more flexible approach to visitor accommodation, informed by Landscape Character Assessments.

Are there any other options that need to be considered?

Recreational Activity
Do you agree with any of the following options to deliver the proposal outlined above (relating to recreational activity):

Option 43d – The Local Plan could encourage recreational activity to certain parts or areas of the National Park, such as the larger settlements and/or areas within close proximity of existing visitor attractions.

Option 43e – The Local Plan could encourage recreational activity away from certain parts or areas of the National Park, such as less accessible areas.

Option 43f – The Local Plan could take a more flexible approach to recreational development, which is informed by Landscape Character Assessments.

Are there any other options that need to be considered?

Issue 44 - What approach should the Local Plan take to static holiday caravan sites?

8.34 Static holiday caravan sites contribute to the range of visitor accommodation currently available across the National Park. However, the location and scale of new sites or extensions to existing sites needs to be considered due to the potential impact on the landscape. It may be that smaller sites could be acceptable, in an appropriate location. We will not define small as a set number of pitches or size of site, as what is appropriate in terms of size will vary depending on location.

8.35 Due to the potential impact on the landscape, we may want to be more restrictive on the provision of static holiday caravan sites. It could be that the Local Plan applies a more restrictive policy, which will only allow the relocation of existing sites or provision of alternative camping and caravan provision, where this would conserve and enhance the landscape.
Issue 44 – What approach should the Local Plan take to static holiday caravan sites?

Do you agree with any of the following options?

**Option 44a** – The Local Plan could have a presumption against the development of new static caravan parks across the National Park.

**Option 44b** – The Local Plan could restrict the development of new static caravan sites and support the appropriate redevelopment or relocation of existing sites only.

**Option 44c** – The Local Plan could allow the development of new static caravan parks that are appropriate in size and can be accommodated where they meet with the National Park Purposes, subject to the approach taken under Issue 42.

Are there any other options that need to be considered?
Introduction

9.1 Providing housing and employment opportunities alone will not be sufficient to create sustainable communities. A range of services and facilities are necessary to ensure the local economy can function effectively and address social needs such as schools, medical facilities, sporting and recreational facilities and open spaces. Development can create a wide-range of infrastructure needs from large-scale strategic assets serving an entire settlement through to small-scale works provided for just a single development.

9.2 Services and facilities across the South Downs National Park are a source of local pride and greatly contribute to the quality of life and wellbeing of communities. They have generally been in decline over many years, particularly in smaller villages, causing increased dependency on the larger settlements, and eroding the autonomy, vitality and vibrancy of communities.

9.3 The planning system has an important role in helping protect existing community services and facilities and providing a positive framework for proposed new provision and service innovation. The Community Infrastructure Levy (CIL) is a new form of funding for infrastructure which largely replaces the existing system of negotiated financial contributions from developers. The CIL will provide an opportunity to fund local priorities and support new development. A proportion of CIL funds will be passed to Parish Councils to spend on projects of their choosing.

9.4 This chapter focuses on issues that we consider need a planning response and possibly specific policies in the Local Plan. These are:

- Issue 44 - How best can the Local Plan ensure communities have access to local services?
- Issue 45 - How best can the Local Plan resist the loss of community infrastructure?
- Issue 46 - How best can the Local Plan ensure adequate infrastructure provision for new development?
- Issue 47 - How best might the Local Plan address statutory requirements to support carbon reduction targets through low carbon / renewable energy schemes?
- Issue 48 - Expenditure of Community Infrastructure Levy

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49 Section 216 of the Planning Act 2008.
**Issue 49** - How best should the Local Plan deal with proposals for strategic infrastructure?

**South Downs National Park Context**

9.5 The key outcomes related to community facilities and infrastructure in the *Partnership Management Plan* are:

<table>
<thead>
<tr>
<th>Outcome 8</th>
<th>More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outcome 9</td>
<td>Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities</td>
</tr>
</tbody>
</table>

9.6 In the past development has been directed towards larger villages and towns through the designation of settlement boundaries or policy areas. The *Settlement Hierarchy Study* identifies the relative accessibility of settlements to key services and facilities. There are many smaller, isolated communities where accessing essential services can be challenging. Over 250 settlements were identified as having minimal or no provision across seven categories of socio-economic infrastructure.

9.7 The on-going shift in the population of the National Park over time towards older, retired age groups will change the nature of facilities and services required. The majority of the National Park is in the 20% most deprived areas in the country for access to services and housing, according to the *Indices of Multiple Deprivation 2010*, indicating a need for better accessibility to community infrastructure.

**Background**

9.8 The availability of local services such as a post office, sports field or pub is often a good indicator of the sustainability of a community and the quality of life for residents. Reasons for the loss of facilities include the reorganisation of the post office service, the consolidation of health and education facilities, and cuts in public budgets. There has also been a general decline in the number of pubs, although many of the remaining rural pubs continue to be highly valued and play an important part in village life. The most active communities have responded to this challenging backdrop by taking on the running of services themselves. Innovative forms of service delivery have sprung up from community-run buses to community-energy schemes providing low-cost electricity.

9.9 In the market towns new development has outpaced infrastructure provision. There is a need to increase and upgrade provision in certain areas as new development takes place.
9.10 Public transport in many areas is limited or unavailable, increasing dependency on travel by car to the larger towns and villages and main settlements outside of the National Park. For the most vulnerable in society and those without access to a car, this can result in isolation. Parish and neighbourhood plans provide further evidence of infrastructure needs including a lack of necessary local services, community transport, banking, schools, village shops and village hall provision.

9.11 A core planning principle in the National Planning Policy Framework (NPPF) states there is a need to take account of and support: ‘local strategies to improve health, social and cultural wellbeing for all’, and deliver: ‘sufficient community and cultural facilities and services to meet local needs’. Local strategies in this context could include parish plans and neighbourhood plans.

9.12 The NPPF identifies the importance of community facilities in underpinning the sustainability of communities, guarding against their loss and ensuring they are able to develop and modernise in a sustainable way. Particular mention is made of public open spaces/green spaces, recreational buildings and land and public rights of way. There is strong support for the provision of new schools, including ‘free’ schools.

**Evidence Base Studies**

**Settlement Hierarchy Study**

9.13 The aim of the National Park’s Settlement Hierarchy Study is to establish the level of services and facilities available to communities throughout the area. The score of each settlement within the Settlement Hierarchy Study is determined by the number and type of services and facilities present. These were surveyed in 2011. Following consultation with Parish Councils, further desktop analysis was undertaken in 2012. The number and type of services have been quantified using a scoring system. The scores for each settlement provide an indication of the relative access to services and facilities in each of the settlements and its position within the settlement hierarchy. Final scores were then separated into ‘ tiers’ to identify groups of settlements with broadly similar characteristics. The study will be updated during 2014 to feed into the ‘Preferred Options’ version of the Local Plan.

**Energy Study**

9.14 The Energy Study highlights:

- the predicted potential carbon savings for the National Park of several energy efficiency measures against a 2034 target (based upon 80% reduction by 2050), indicates that despite significant potential carbon reduction associated with energy efficiency measures for existing buildings, the saving falls well short of the 2034 target

- once opportunities for reducing energy demand have been exhausted, further carbon reduction can only be achieved through lowering the carbon content within the energy supply and
• full take-up of micro-generation opportunities along with full take up of the energy-efficiency measures is unlikely to achieve the targeted emissions savings.

**Issues and Potential Options**

**Issue 45 – How best can the Local Plan ensure communities have access to local services?**

9.15 Easily accessible facilities and services sustain the vitality and vibrancy of local communities. The range of facilities and services should be sustained or enhanced where there is a need and suitable land or premises are available. The smallest communities have little or no access to public transport and so it is important to locate services and facilities as close as possible to these users. However, the Local Plan is relatively limited in the influence that it has in influencing and facilitating the provision of new services and facilities, particularly in small rural settlements. The CIL may be able to assist in funding some community-based projects.

9.16 Increased land and property prices, a challenging economic environment, technological and cultural change has led to the loss of certain key village facilities and services. An increasingly ageing population will mean the needs for facilities and services which can cater for older age groups is likely to increase over the period of the Local Plan. At the same time, it is important that a broad mix of facilities is retained which meet the needs of all age groups. High speed broadband will improve the capability of residents to work at home and reduce travel but this is still unavailable across many rural locations.

**Issue 45 – How best can the Local Plan ensure communities have access to local services?**

**What we propose to do**
The Local Plan will take a flexible and positive approach to the delivery of new and expanded community facilities to address identified needs. It will provide certainty of where the SDNPA wishes to encourage new facilities and the circumstances in which such development will be supported.

In each of the following options, the acceptability of proposals will be tested against their ability to meet National Park Purposes. The National Park Authority would require evidence of a site-selection process to ensure new and expanded facilities take account of the special qualities of the National Park and other Local Plan policies.

**Do you agree with this approach?**

**Do you agree with any of the following options?**
Option 45a – The Local Plan could support new and expanded facilities and services, primarily in settlement tiers 1, 2 and 3 where suitable sites can be found. The need for new facilities should be demonstrated through parish plans and neighbourhood plans or other forms of evidence agreed by the National Park Authority.

Option 45b - In addition to Option 44a, the enhancement and expansion of essential facilities and services could be supported by the Local Plan, as identified by the local community, in any settlement. Particular support will be given for facilities and services which can demonstrate a benefit to a cluster of settlements.

Option 45c - Where necessary, to enable the delivery of Option 44a or 44b, small-scale mixed-use developments could be supported by the Local Plan, including through the use of Community Right to Build Orders. The quantum of enabling development should be limited to that which allows the community facility to be provided.

Option 45d - The shared and flexible use of new and existing buildings to allow a range of community facilities and services could be supported by the Local Plan. Where this applies to an existing service the sharing of facilities should support the retention of the primary use.

Are there any other options that need to be considered?

Issue 46 – How best can the Local Plan resist the loss of community infrastructure?

Some communities have lost essential services increasing the need for journeys to other settlements, particularly the larger settlements in the National Park and adjacent to its boundary. Over time, this trend can progressively weaken a community’s identity and increase its dependence on services and facilities elsewhere to address day-to-day needs and reduces the opportunities for the community to meet and participate in local life, adversely affecting social cohesion.

Issue 46 – How best can the Local Plan resist the loss of community infrastructure?

What we propose to do
The Local Plan will support the protection of existing local facilities and services in the areas where they are needed. Communities themselves can use Community Right to Bid powers, providing an opportunity to bid to take over a community asset for sale.

Do you agree with this approach?

Do you agree with either of the following options?
Option 46a - The Local Plan could include a policy resisting the loss of any community infrastructure except where there is no longer a demonstrable need, it is no longer viable or where a suitable alternative is provided. Where these tests are met, the preference for future use of the site will be an alternative community use.

Option 46b – The Local Plan could include a policy supporting communities designating Local Green Spaces. These will be mostly undesignated land which is in close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.

Are there any other options that need to be considered?

Issue 47 – How best can the Local Plan ensure adequate infrastructure provision for new development?

9.18 New development places a burden on the existing infrastructure provision of settlements, particularly on school places as well as many other social and physical infrastructure impacts. There are also minimum requirements for associated infrastructure to support new development. This can include highways and access, broadband (a particular deficit in rural areas at present) and utilities provision. Development sites will be expected to be ‘self supporting’ with this associated infrastructure delivered through a combination of on-site provision and developer contributions.

Issue 47 - How best can the Local Plan ensure adequate infrastructure provision for new development?

What we propose to do
New development in the National Park will be required by the Local Plan to provide new or improve existing infrastructure to mitigate its impact and support future residents or businesses. This infrastructure can be delivered on- or off-site and be secured through S106 legal obligations, CIL charges, other financial contributions or direct provision. Connectivity to broadband facilities, particularly in rural areas, will be a key requirement of the infrastructure package. The economic viability of development proposals will be considered when determining infrastructure contributions.

Do you agree with this approach?

Are there any other options that need to be considered?
9.19 All planning decisions on renewable energy development proposals will have to be made in the context of the nationally important landscape character of the National Park. Wind turbines, photo-voltaics and solar thermal schemes could affect the expansive views experienced from the chalk scarp, and from the Weald. The cumulative impact of these schemes and associated infrastructure could harm the essentially undeveloped character of the South Downs.

9.20 It is perhaps helpful to distinguish between different scales of renewable development that may comprise:

- strategic renewables and commercially financed industrial-scale community renewable projects: these could either be community-initiated schemes that are primarily aimed at providing renewable energy to a settlement or group of settlements or a community share within a larger strategic renewables scheme. Developments of such scale would need to be considered under the major development test discussed in the Introduction chapter (para.1.21-1.24)
- domestic micro-renewable serving the needs of an individual property or business.

9.21 The above categorisation differentiates between the objective of the scheme rather than the scale of the development; depending upon the size / nature of the installation, a scheme in any of the categories may constitute major development. Some other NPAs have adopted policy to indicate that strategic renewables are schemes that constitute major development not consistent with National Park Purposes and Duty while supporting appropriate micro-renewables, particularly those that are community-initiated projects that support the Purposes and Duty.

**Issue 48 - How best might the Local Plan address statutory requirements to support carbon reduction targets through low carbon / domestic-scale renewable energy schemes?**

**What we propose to do (Renewable Energy Development Proposals)**

In line with Government guidance, and with the aim of meeting Government climate change targets, the Local Plan will give positive consideration to renewable energy schemes of a size, scale and design that is appropriate in the National Park, that is, where consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

**Do you agree with this approach?**

Do you agree with any of the following options?
**Option 48a** – The Local Plan could include a policy relating to generating energy from renewable sources where these are of a location, scale and design appropriate to the locality and which contribute towards meeting domestic, community or business energy needs within the National Park.

**Option 48b** – The Local Plan could include a variation on Option 47a that gives overriding preference to community energy schemes.

**Option 48c** - The Local Plan could include the development of a sensitivity analysis of the National Park’s landscape to identify areas most appropriate for renewable energy schemes of a size, scale and design that is appropriate to a National Park.

*Are there any other options you think need to be considered?*

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**Issue 49 – Expenditure of Community Infrastructure Levy**

9.22 Insufficient infrastructure provision in the past has increased the resistance of communities to new development and the Community Infrastructure Levy (CIL) is intended to reverse this trend by directly funding infrastructure to support and incentivise that development. CIL funds are designed to deliver infrastructure to support new development alongside negotiated section 106 agreements to secure affordable housing and certain on-site infrastructure and section 278 agreements for highways works. However, whilst a proportion of the CIL funding will go directly to the Parish Council in which development occurs, the remaining CIL funds will be able to be spent anywhere in and around the National Park, irrespective of the location of the development.

**Issue 49 – Expenditure of Community Infrastructure Levy**

**What we propose to do**

As the CIL Charging Authority, the SDNPA to allocate and spend future Community Infrastructure Levy (CIL) funding in partnership with stakeholders on infrastructure projects to support the growth of communities and to deliver the National Park’s statutory Purposes and Duty.

**Do you agree with this approach?**

**Do you agree with any of the following options?**

**Option 49a** – The investment of CIL funds could be prioritised in areas within close proximity to the new development which generated the CIL. This would provide a significant source of additional funding which can then be directed to support community facilities and services in the immediate area.
Option 49b – The investment of CIL funds could be prioritised on National Park-wide strategic projects, such as improvements to the South Downs Way. This could ensure the benefits of CIL are felt over a wide area and enhance the ability of the National Park Authority and its partners to deliver large-scale projects supporting National Park Purposes. This funding could also be used to lever in investment from other parties.

Are there any other options you think need to be considered?

Issue 50 – How best should the Local Plan deal with proposals for strategic infrastructure?

What we propose to do
The Local Plan will assign great weight to conserving and enhancing the landscape, biodiversity or cultural heritage (first Purpose), and that strategic infrastructure development proposals will need to meet the tests for major developments set out in paragraph 116 of the NPPF, including demonstrating that it is in the public interest.

Do you agree with this approach?

Do you agree with either of the following options?

Option 50a – In exceptional circumstances, and where the tests of NPPF paragraph 116 are met, the Local Plan could seek to enhance the landscape, biodiversity and cultural heritage by securing maximum benefits from any strategic infrastructure delivery. This could include supporting a limited number
of strategic infrastructure proposals to facilitate maximum landscape and community gain in the immediate area or improvements elsewhere in pursuit of the National Park’s Purposes and Duty.

Are there any other options you think need to be considered?
South Downs National Park Local Plan Options Consultation
10 - Transport and Accessibility

Introduction

10.1 In planning for the National Park, the Local Plan needs to consider how accessible places are and how well they are served by public transport – both in terms of social accessibility and carbon reduction. While the Local Plan can dictate where development should be focused, it is the County Councils for Hampshire and East and West Sussex, together with Brighton and Hove City Council – the Local Transport Authorities (LTAs) - that are responsible for local transport and highways matters. Network Rail, as the national rail operator, and the train and bus operators are important key transport partners.

10.2 The SDNPA can influence decisions on sustainable transport through working with these partners on actions and projects as part of delivering the Partnership Management Plan objectives. These are primarily operational matters rather than planning matters and are not dealt with further in the Options Consultation Document.

10.3 The content of this chapter is focused on planning-related transport and accessibility issues that could have specific policies in the Local Plan. Considerable work has already been done by the constituent local authorities of the National Park and other bodies to identify transport issues and devise policy responses. There is a degree of commonality between the issues highlighted by the constituent LTAs, including:

**Issue 51** – How best should the Local Plan protect existing routes for use as sustainable transport routes?

**Issue 52** - What should the Local Plan’s approach be to car parking?

**Issue 53** - How best can the Local Plan ensure new developments are accessible?

South Downs National Park Context

10.4 There are key outcomes relating to sustainable transport within the Partnership Management Plan. These outcomes state what we aim to have achieved by 2050:
Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Outcome 5: Outstanding visitor experiences are underpinned by a high quality access and sustainable transport network providing benefits such as improved health and wellbeing.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

10.5 The policies which guide the achievement of the outcomes for the National Park are wide ranging and will need to be supported by a broad spectrum of communities, groups and activities. The Local Plan is one mechanism for delivering these positive, long term outcomes.

10.6 The Local Sustainable Transport Fund (LSTF) bid in 2011 (jointly submitted for the New Forest and South Downs National Parks by Hampshire County Council) is also an important foundation for identifying sustainable transport policies. The bid included four key objectives, within which a series of actions were identified for potential implementation using LSTF and other funding. The four objectives are:

- improve key public transport gateways
- make it easy to reach key attractions
- promote sustainable travel packages to visitors before they arrive and while they are in the National Parks and
- manage all traffic effectively so that it does not detract from visitors’ experience.

Background

10.7 There is also significant traffic generated by commuting, business and visitor related traffic. The increasing use of vehicular transport can threaten the very qualities of tranquillity and other environmental qualities that attract visitors, as well as causing congestion at popular visitor sites. The Government’s travel hierarchy needs to be the starting point for the National Park’s transport policies:

- reduce the need to travel
- switch to sustainable modes
- manage existing networks more effectively and
10.8 Transport accounts for around one third of carbon emissions, so reducing the need for travel and the carbon emissions associated with travel are important objectives for sustainable development. This theme is discussed in the Settlement Strategy chapter, which explores options for locating new development at sites that have good access to service centres and therefore minimise the need for travel, and the Economy and Tourism chapter, in relation to the need for sustainable and flexible working practices, including home working, and improvement to broadband that supports these.

10.9 Walking, cycling or taking the bus are the most eco-friendly ways for visitors to enjoy the National Park and the National Park Authority and partners have set up a number of transport projects. Transport is also vital for local residents, businesses and visitors so that they can get to employment, schools and other educational institutions, services and facilities, markets, and visitor attractions. With the quality of public transport provision in the National Park being relatively poor, accessibility for those without regular access to their own private vehicle is a significant issue.

10.10 The English National Parks and the Broads: UK Government Vision and Circular (2010) highlights that there needs to be close liaison between the NPAs and the transport authorities in order to help promote sustainable travel choices. Where there is additional demand for travel in National Parks transport authorities are expected to have firstly considered demand management measures before new infrastructure. Where new transport capacity is considered necessary within the National Park’s low-carbon initiatives, such as enhancements to public transport, car club and sharing schemes, improved cycling and walking connections – particularly between train stations and other nodes need to be given consideration.

10.11 National policy on car parking (Issue 52) is restricted to considerations of how to determine parking provision for new development and for town centres. Sustainable transport options should guide such decisions in addition to other factors such as the accessibility, type of development and general levels of car ownership. Parking in town centres should be convenient, safe and secure and accommodate motorcycles and bicycles, as well as cars and other vehicles.

10.12 Local Planning Authorities should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice. This policy links directly to Issue 51. New development should be accessible by sustainable transport, although government policy acknowledges that the extent to which this can be achieved varies from urban to rural areas. In this respect, the predominantly rural nature of the National Park, which includes 179 communities with little or no access to public transport, is a key consideration in considering where new development could be sustainably located.
South Downs National Park Local Plan Options Consultation

10 – Transport and Accessibility

Evidence Base Studies

South Downs Transport Study

10.13 The South Downs Transport Study Phase One includes a review of the existing polices for the LTAs together with some high-level analysis of transport movements, trends and characterisation of key issues. Key policy implications arising from the study are:

a) public transport accessibility as a spatial planning criterion
b) growth in visitor access and activity as a means of achieving a more sustainable local economy
c) managing access points to reduce negative impacts at hotspots
d) planning access points and interchanges to boost visits by sustainable means and
e) planning rights of way improvements in relation to access by sustainable means of travel.

All of the above are of importance, either in contributing to the objective of sustainable transport or in view of their susceptibility to influence through the Local Plan. Each issue is dealt with in the following issues and options.

Issues and Potential Options

Issue 50 – How best should the Local Plan protect existing routes for use as sustainable transport routes?

10.14 Some 4,500 miles of abandoned railway lines now form a stunning network of green cycling routes and footpaths across the UK. A number of these abandoned railway lines exist within the National Park, including:

- part of the Meon Valley line connecting Wickham and Alton
- the north section of Centurion Way connecting Lavant with Chichester and
- the Downs Link route connecting Guilford with Shoreham-by-Sea.

10.15 Following a successful grant application to government, the SDNPA has been awarded a further £3.81M to extend the network of cycle routes (see Figure 14: Existing and planned cycle routes within the South Downs National Park). In the longer term, existing disused rail routes could be used to connect:

- Petersfield with Pulborough, via Midhurst
- Chichester with Midhurst and
- Wickham with Alton, all via non motorised user routes.
Figure 14: Existing and planned cycle routes within the South Downs National Park
10.16 To offer additional options for public transport in the future and/or cycle/footpath routes there may be a case for safeguarding former rail routes for reinstatement of railways, either to connect to the existing rail network, as light rail options or for cycleways, footpaths and bridleways. For example, there is the opportunity of reinstating the link between Uckfield and Lewes to offer an alternative rail route between London and Brighton (BML2). Decisions to re-instate rail routes will not be a decision for the SDNPA but it will be important for the Local Plan to safeguard such opportunities. If a route is safeguarded as a non motorised user route, this would not prevent its later consideration for a potential light rail connection, providing that an alternative replacement non motorised user route forms part of the scheme.

**Issue 50 – How best should the Local Plan protect existing routes for use as sustainable transport routes?**

**What we propose to do**
The Local Plan to identify and protect disused railway line routes which could be critical in efforts to widen sustainable transport choice.

**Do you agree with this approach?**

**Do you agree with the following option?**

**Option 50a** – Safeguard the following routes:
- Lewes – Uckfield disused railway line route that lies within the National Park
- Disused Bordon – Bentley light railway line route that lies within the National Park
- Petersfield – Petworth disused railway line route
- Chichester – Midhurst (Centurion Way) disused railway line route
- Wickham – Alton (Meon Valley Line) disused railway line route and
- Guildford – Shoreham-by-Sea (Downs Link) disused railway line route.

**Are there any other options you think need to be considered?**

**Issue 51 – What should be the Local Plan’s approach to car parking?**

10.17 Determining an appropriate approach toward future car parking is challenging, particularly with public transport services limited in all but a few locations in the National Park. Residents, businesses, and visitors use vehicles for different reasons and have different needs in terms of parking.
The approach to car parking in the Local Plan needs to respond to these different requirements whilst respecting the Purposes and Duty of the National Park.

10.18 Car parking provision cannot be tackled with a one size fits all approach. There are several important car parking categories applicable in the National Park, including:

- public on-street and off-street parking in larger villages and towns
- parking at railway stations
- parking at ‘honeypots’ and other visitor attractions
- residential car parking and
- parking for special events.

These uses can conflict with one another, a point which reinforces the importance of integrating planning for visitors into the Local Plan. Imaginative solutions can also be explored such as the use of business or school car park facilities by visitors at weekends.

**Issue 51 – What should be the Local Plan’s approach to car parking?**

**What we propose to do**

The Local Plan to set out a policy identifying what is required for new parking facilities for cars, motorcycles and bicycles in town and village centres and visitor attractions and for new development. New parking provision needs to be convenient, safe and secure. Sufficient provision will need to be made for the amount of parking that is likely to be needed by residents of new residential developments and for commercial developments, with the emphasis on promoting good design. In line with the NPPF local parking standards for residential and non-residential development will take into account:

- the accessibility of the development
- the type, mix and use of development
- the availability of and opportunities for public transport
- local car ownership levels and
- an overall need to reduce the use of high-emission vehicles.

**Do you agree with this approach?**

**Do you agree with one, or more, of the following options?**
Issue 52 - How best can the Local Plan ensure new developments are accessible?

10.19 There is a clear case for new developments being focussed in places that have good public transport services providing easy access to key facilities like surgeries, hospitals, supermarkets and schools. In the National Park, there are only a limited number of locations that have good accessibility to services and facilities by non-car modes.

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10.20 Accessibility maps provide a starting point in the search for possible locations for housing and other development. Many rural locations, such as Meonstoke, are very poorly served by public transport compared to larger settlements, Petersfield, for example. However, accessibility by public transport is but one factor amongst many that should guide planning decisions. Other factors include making best use of brownfield sites and maintenance of landscape character. The Settlement Hierarchy Study [http://www.southdowns.gov.uk/planning/planning-policy/local-plan/settlement-hierarchy-study] is another key piece of evidence that we will use to investigate how well villages and towns are served by key facilities including employment. Scoring for the Settlement Hierarchy Study is partly based upon access to hourly bus services or rail travel.

10.21 Linking suitable sites for development to a strategy on tourism that considers hubs and gateways largely based upon accessibility criteria offers multiple benefits in providing focal points of economic activity and employment that have the critical mass to support services that can serve both visitors and residents.

Issue 52 – How best can the Local Plan ensure new developments are accessible?

What we propose to do
The Local Plan to assess the suitability of sites for housing and businesses (including tourist facilities) using the Settlement Hierarchy Study and accessibility mapping for the National Park to ensure that, wherever feasible, new housing or businesses are located at sites with good public transport services and require a travel plan for all major development.

Do you agree with this approach?

Do you agree with any of the following options?
Option 52a – The Local Plan could define maximum travel times via public transport to/from service centres and use them to guide decisions on whether or not new development should be permitted.

Option 52b – The Local Plan could require all major development proposals to ensure that sustainable transport and accessibility are key components of sustainability assessments.

Option 52c – The Local Plan could encourage consideration of locally funded community transport provision via the Neighbourhood Planning process.

Are there any other options you think need to be considered?