



South Downs National Park Duty to Cooperate Interim Statement

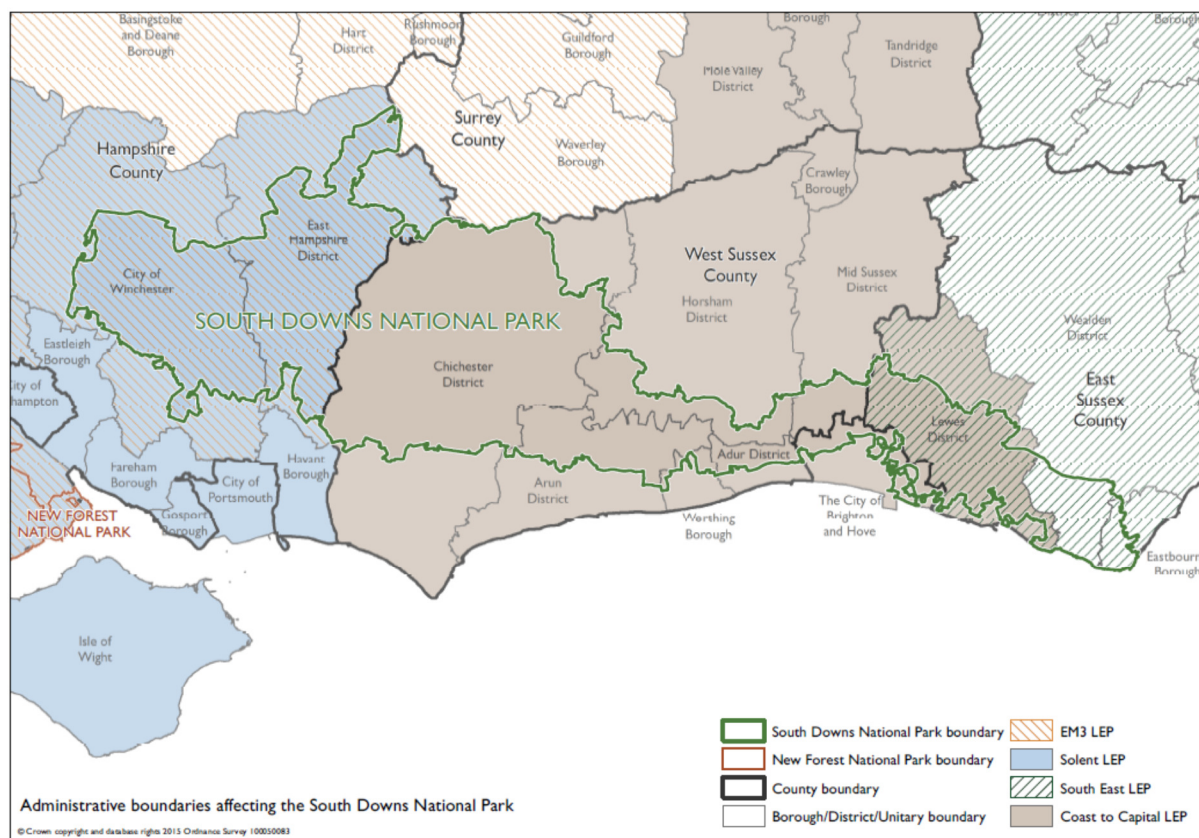
Autumn 2015

1. Introduction to the Duty to Cooperate

- 1.1 The Duty to Cooperate was introduced by the Localism Act 2011 and the National Planning Policy Framework (NPPF) (2012) in light of the abolition of the Regional Spatial Strategies, and prior to that, the abolition of County Structure Plans. As a consequence it has become increasingly important for the local planning authorities to work together to provide this strategic tier of planning and determine the appropriate strategy for their area. This is known as the 'Duty to Cooperate' (from here on to be known as 'the duty')
- 1.2 The duty applies to all Local Planning Authorities, National Park Authorities and County Councils in England as well as a number of other public bodies including the Environment Agency, Highways England and Natural England. It places a legal duty on all such public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation where it relates to strategic cross boundary matters.
- 1.3 The NPPF sets out the strategic issues where cooperation might be appropriate. This could include where strategic policies are required in order to deliver the homes and jobs needed in the area; climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.4 The priority given to these issues will depend on local circumstances. The Sustainability Appraisal work which underpins the preparation of the South Downs Local Plan (and was itself informed by the preparation of National Park Vision, State of the National Park Report and the Partnership Management Plan) forms the basis on which strategic matters which raise possible cross boundary issues have been identified. This is supplemented by an understanding of the ecosystem services approach to the preparation of the Local Plan and the purposes and duty of a National Park.
- 1.5 This interim statement has been prepared in order to set out the work done to date in order to respond to the requirements of the duty. Responses to the South Downs Local Plan: Preferred Options consultation in September / October 2015 by bodies that fall under the duty will be fundamental in updating this statement. These responses will form the basis by which gaps in the knowledge and potential further joint working can be identified.
- 1.6 This interim statement sets out:
 - Context
 - National Park Governance and working arrangements
 - Strategic context
 - Strategic planning priorities
 - Key relationships
 - Monitoring

2. Context

- 2.1 The South Downs National Park covers over 1600 square kilometres of England's most valued lowland landscapes. It has been shaped by the activities of its farmers and foresters, its large estates and communities, its charities and local businesses.
- 2.2 Stretching from Winchester in the west to Eastbourne in the east, it is situated in the most crowded part of Britain, and is under intense pressure. Impacts of development, people, water extraction and many other factors can be significant and need to be addressed.
- 2.3 The South Downs is heavily populated compared to other National Parks with a population of around 112,000 residents. Its future is very interdependent with the areas and communities that surround it. Many settlements, including Chichester, Winchester, Brighton & Hove, Eastbourne and Alton, lie on its doorstep. Nearly 2 million people live within 5 kilometres of its boundary.
- 2.4 The National Park covers parts of Hampshire, West and East Sussex and stretches over parts of 12 Districts and Boroughs.



3. National Park Governance and working arrangements

- 3.1 Planning within National Parks differs from other local planning authorities in that the National Park Authorities are responsible for planning policy and development management but other functions are carried out by the Districts, Boroughs and County Councils such as housing, transport and education. Partnership working and cooperation is therefore fundamental given the responsibilities of these different organisations, the size of the National Park and the number of Districts and Boroughs it covers.

- 3.2 The Authority is a public body, funded by government, and run by a Board of 27 Members. The Environment Act 1995 makes it a duty for all relevant authorities to have regard to National Park purposes when coming to decisions of carrying out their duties.

i) The South Downs National Park Authority

- 3.3 The South Downs National Park Authority (SDNPA) is governed by a board of 27 Members:

- 14 Councillors from Local Authorities within the South Downs National Park¹. Their joint role enables there to be a strong connection with the authorities at a member / councillor level.
- 6 Councillors from Town and Parish Councils within the South Downs National Park. 2 councillors each are appointed from East Sussex, West Sussex and Hampshire.
- 7 Members appointed by the Secretary of State following a national, open competition. They are appointed to represent national interests.

- 3.4 SDNPA Members are appointed to represent the SDNPA as a whole and not their appointing body.

- 3.5 A selection of Members of the Authority sit on the Planning Committee which scrutinises the preparation of the Local Plan.

ii) South Downs Partnership

- 3.6 Whilst the National Park Authority itself is responsible for the delivery of the Purposes and Duty of a National Park it is committed to working in partnership with stakeholders to achieve this.

- 3.7 The South Downs Partnership is the key mechanism through which this occurs and is made up of representatives from different sectors, all with an important stake in the future of the South Downs National Park. This includes Natural England, the Environment Agency, The National Trust, Land owners association, farmers representative, heritage groups representative, Association of Parish Council representative, water Authority representative etc.

- 3.8 The Partnership members work closely with each other, and with the South Downs National Park Authority itself, in order to:

1. Use the specialist background of individual members to provide strategic advice to the SDNPA, forge new high-level collaborations and play an active role in reconciling conflicting perspectives amongst wider stakeholders;
2. Help shape the development and implementation of the Partnership Management Plan which guides the work of the National Park Authority and establishes the vision for the National Park;
3. Help shape the development and implementation of the South Downs Local Plan;
4. Monitor both the Partnership Managements Plan and the Local Plan; and,
5. Act as ambassadors for the National Park, working for its success.

¹ There are 15 local authorities within the Park, and each is entitled to a seat on the Park Authority but two councils have decided to share a seat.

- 3.9 The Partnership meets three times a year, and in addition has two joint workshops per year with SDNPA Members. It has been involved at key stages in the preparation of the Local Plan including 2 sessions to date specifically dedicated to the Local Plan. Many members of the Partnership, such as the Environment Agency have interests outside of the National Park boundaries and are able to identify and input into cross boundary strategic issues as part of the day to day formulation of the Local Plan.

iii) Partnerships with Local Authorities

- 3.10 The SDNPA is responsible for planning across the entire National Park but have agreed partnerships with the local authorities operating within the National Park boundaries. For five of these Authorities the National Park deals directly with all planning questions, advice and applications. The other nine authorities deal with these on behalf of the National Park. This way of working requires considerable cross Authority understanding of the issues and coordination is managed through meetings (known as Planning Working Group) between all the Heads of Service across the National Park.

iv) Joint Core Strategies

- 3.11 A key part of the work of the SDNPA in the earliest years of its existence was the preparation of a number of Joint Core Strategies. To date these adopted are:
- East Hampshire District Local Plan: Joint Core Strategy (2014)
 - Wealden District Core Strategy Local Plan (2013)
 - Winchester District Local Plan Part I – Joint Core Strategy (2013)
- 3.12 Worthing Core Strategy was prepared before the South Downs National Park had full planning powers but was subsequently adopted by the Authority in May 2011.
- 3.13 Lewes District Joint Core Strategy is currently the subject of an Examination and modifications to the plan are being consulted on. Further detail is set out in Section 5 of this Statement.
- 3.14 The South Downs Local Plan has incorporated as far as possible the policies within the adopted and emerging Joint Core Strategies where the evidence base is up to date and the principles of a landscape led Local Plan are indoctrinated into the relevant policies. This includes the levels of employment, retail and housing agreed.
- 3.15 The existence of the these Joint Core Strategies fulfils many of the requirements of the Duty and demonstrates the level of joint working and a shared understanding of the issues facing the National Park across much of its area.
- 3.16 The National Park also responds as a statutory consultee to all consultations on relevant Local Plans as they are being prepared across the region, most recently this has included the East Hampshire Housing & Employment Allocations Plan, the Brighton & Hove City Plan and the Mid Sussex District Plan.

v) Planning Committee and Local Plan Members Working Group

- 3.17 Planning Committee is comprised of Members elected or appointed by the relevant local authorities and the Secretary of State. In support of the work on the Local Plan a Working

Group of Members was also established and regularly reports back to Planning Committee. This Working Group (called Local Plan Members Working Group) is open to all Members of the Authority. This is a further key mechanism through which the plan making work of the National Park Authority can be fed back to the 12 Districts and Boroughs it covers.

4. Strategic planning priorities

- 4.1 The purposes and duty of the National Park along with the sustainability appraisal and the emerging Core and Strategic policies of the South Downs Local Plan has helped to establish the key strategic issues that need to be considered through the work on the duty. These are in turn also influenced by the ecosystem services approach to the preparation of the plan.
- 4.2 The key strategic issues for the purpose of fulfilling the Duty are therefore identified as:
- Conserving and enhancing the **natural beauty** of the area
 - Conserving and enhancing the region's **biodiversity** (including green infrastructure issues)
 - The delivery of new **homes**, including affordable homes and pitches for **Travellers**.
 - The promotion of sustainable **tourism**.
 - Development of the **rural economy**
 - Improving the efficiency of **transport** networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.
- 4.3 These key issues were shared with representatives of many Local Authorities within and adjoining the National Park at an event in July 2015. No new issues were identified at that point.
- 4.4 There are of course a range of other issues that may or may not have cross boundary implications an assessment of which is contained in Appendix I. This list will be kept under review. However, the purpose of this statement is to consider those that have strategic / larger than local cross boundary implications.
- 4.5 Matters relating to Minerals and Waste are outside of the scope of this statement. These matters are addressed in separate mineral and waste plans currently being prepared jointly with other authorities.
- 4.5 The following section of this report takes each key strategic issue in turn, provides a brief background; summarises to date what actions have been undertaken to manage the issue; sets out the joint evidence prepared where this has taken place and the outcomes to date.

Conserving and enhancing the natural beauty of the area

- 4.6 The landscape of the South Downs through its designation is recognised as being of national importance. Any development in or near to the National Park has the potential to cause harm to the landscape both individually and cumulatively. The policies in the Local Plan therefore seek to ensure that development does not have a detrimental impact on the landscape and its Special Qualities, that it accords with National Park purposes and furthers the policies and vision in the Partnership Management Plan (PMP). Conserving and enhancing the natural beauty of the area forms part of the first purpose of the National Park and is therefore the key strategic planning issue that guides all the work of the Authority.

- 4.7 The National Park includes a number of market towns and borders a number of large urban areas, including Winchester, and the Worthing, Brighton conurbation along the coastal plain. Development both within and outside the National Park has the potential to create further cumulative impact on the landscape and amenity of the National Park and is a key cross boundary strategic issue. The impacts of such developments must be carefully managed and mitigated. Indeed Section 62 of the Environment Act 1995 requires that authorities outside of the National Park have due regard to the purposes of the National Park when carrying out their activities.
- 4.8 Under the theme ‘A Thriving Living Landscape’, the South Downs Local Plan goes beyond a traditional consideration of landscape character and also includes policies on:
- Safeguarding views
 - Relative Tranquillity
 - Dark Night Skies
 - Open Coast

Evidence of co-operation

Joint Evidence	
Landscape Character	South Downs Integrated Landscape Character Assessment 2005 (updated 2011) is a tool to help understand what the landscape is like today, and how it may change in the future. It was prepared jointly with Countryside Agency, English Heritage, Hampshire County Council, West Sussex County Council and East Hampshire District Council.
Open Coast	South Coast Seascape Analysis – The South Coast Seascape Assessment that was commissioned by the Marine Management Organisation and undertaken as part of the South Marine Plan preparation. Its preparation included consultation with Natural England and Local Planning Authorities. The SDNPA has provided input to both the methodology and the final report.

Other	
International Dark Skies reserve status	The NPA has been measuring and mapping the quality of the sky to provide evidence for why the South Downs has the potential to become a Dark Sky Reserve. A key element of the application to become a Dark Sky Reserve is to demonstrate the support of not only the NPA but also Authorities surrounding or near to the park where proposals might impact on the level of light. In order to demonstrate this support, all relevant Authorities have been written to and asked to provide information on their policies and proposals. This is being collated as part of the reserve application. In addition to this all adjoining Parish Councils as well as all within the National Park have also been contacted and their support gained.

- 4.9 In addition to the above the South Downs Viewshed Characterisation Study (2015) provides information about, and mapping of, the major views and visibility within, to and from the National Park. It is based on existing evidence such as the South Downs Integrated Landscape Character Assessment which was prepared jointly.
- 4.10 The South Downs National Park Tranquillity Study (2015) provides evidence on the relative tranquillity of the National Park. It identifies where the most (and least) tranquil areas are, and where areas might be vulnerable to change. To date draft maps based upon a national dataset developed by Natural England and the CPRE have been prepared and they are now being assessed for accuracy by members of the Volunteer Ranger Service (VRS).
- 4.11 The SDNPA inputs into landscape studies of neighbouring LPA's and provides responses to Neighbourhood Development Plan groups preparing plans that cross or are in close proximity to the boundary of the National Park including most recently West Chiltington, Pulborough, Steyning Cluster and Alton to ensure that conserving and enhancing the natural beauty of the area is at the forefront of the groups minds when preparing plans.

Outcomes from strategic working and how they have influenced the Local Plan to date.

- 4.11 The SDNPA has sought to ensure that the importance of conserving and enhancing the natural beauty of the National Park is not only intrinsic to the preparation of its own Local Plan but is also recognised and reflected in the Local Plans being prepared by neighbouring LPA's. The SDNPA has provided responses to various LPAs preparing Local Plans including most recently the East Hampshire District Local Plan Housing and Employment Allocations and the Mid Sussex District Plan. It has sought to ensure that the National Park and its setting is recognised within these documents. In responding to consultations on neighbouring Local Plans the SDNPA has also sought to try to widen out the consideration of landscape character by these Authorities to include issues such as dark night skies and tranquillity
- 4.12 The policies within the emerging Local Plan have been based upon the need to deliver the purposes and duty of a National Park, the evidence base prepared and best practice. In the main these pieces of evidence have been prepared in partnership with other Authorities, Statutory Bodies and other organisations and have influenced plan making processes not only within the National Park but outside of it ensuring a shared understanding of this key strategic issue. The NPA will use the responses to the Local Plan: Preferred Options to identify whether any issues exist between the relevant Authorities and if there is a need for further work.

Conserving and enhancing the region's biodiversity (including green infrastructure issues)

- 4.13 The South Downs National Park contains a wealth of wildlife and habitats which contribute to the rich biodiversity of the Park. Many sites are recognised as national or European priorities for wildlife and a newly created Marine Conservation Zone also falls partially within the National Park boundary.
- 4.14 Evidence has been collated on particular pressures affecting biodiversity within the SDNP. Wildlife habitats are often degraded and fragmented, so a landscape-scale approach is

needed to conserve, restore and reconnect habitats across the National Park. By restoring an interconnected network of wildlife sites species can be helped to adapt to pressures such as climate change, and vital ecosystem services such as food and water provision can continue to be provided by the natural environment.

- 4.15 As the most highly populated National Park in the UK, the South Downs National Park is under significant pressures. Green infrastructure is the network of natural and semi natural features and green spaces, rivers and lakes that intersperse and connect villages, towns and cities. Green infrastructure can occur at a range of scales from park-wide landscape networks such as lowland heath to site-specific assets such as local allotments. They cross the National Park boundaries and extend into many adjoining communities.
- 4.16 Under the theme 'A Thriving Living Landscape' the SDNP Local Plan includes policies on:
- Biodiversity and Geodiversity
 - International Sites
 - Green Infrastructure
- 4.17 The SDNPA works in partnership with various organisations such as Natural England, the Environment Agency, local authorities and Local Nature Partnerships in order to deliver biodiversity-led landscape initiatives. Many involve organisations and land outside of the National Park boundaries, including:
- The South Downs Way Ahead Nature Improvement Area (NIA) (chalk grassland)
 - The Brighton and Lewes Biosphere Reserve Partnership (chalk downland and water)
 - Water Framework Directive projects (such as the rivers Adur and Ouse).

Evidence of Cooperation

Joint Evidence	
Biodiversity	Biodiversity Opportunity Areas - In 2008 a wide consultation was held in South East England to develop a landscape-scale approach to conservation by identifying 'Biodiversity Opportunity Areas' (BOAs). Nearly half (46%) of the National Park is covered by BOAs. Sussex and Hampshire Wildlife Trust led on the identification and mapping of BOAs which was done in partnership with other conservation organisations.
International Sites	Interim Solent Recreation Mitigation Strategy (2014) - A very small area of the National Park is located within the zone of influence of the Solent Special Protection Areas (SPAs) as identified in the Solent Recreation Mitigation Strategy (SRMS). The SRMS was prepared by the Solent Recreation Mitigation Partnership which includes Chichester District Council, East Hampshire District Council, Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Hampshire County Council, Havant Borough Council, Isle of Wight Council, New Forest District Council, New Forest National Park Authority, Portsmouth City Council, Southampton City Council, Test Valley Borough Council,

	<p>Winchester City Council, Natural England, the Royal Society for the Protection of Birds, Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy..</p> <p>Through work on the SRMS, it has been concluded that any net increase in residential development will give rise to likely significant effects on the Solent SPAs (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA), either 'alone' or 'in combination' with other development proposals. All new residential development within this zone of influence will be required to mitigate the negative impact. Work is being undertaken to investigate the option of providing this mitigation through financial contribution to the strategic measures set out in the emerging SRMS (or as subsequently adopted).</p>
Green infrastructure	<p>South Downs National Park access network and Accessible Natural Greenspace Study (2014) identifies where particular pressures exist on the green infrastructure both within the National Park and beyond its boundaries. The aim is to prepare a Green Infrastructure Framework which provides an agreed and co-ordinated position on the strategic principles and priorities for planning, investment and delivery of green infrastructure, in order to protect, enhance and create a connected network of multifunctional assets, which sustainably meet the needs of local communities in the South Downs National Park and surrounding areas and support the special qualities of the South Downs.</p>

Other	
Habitats Regulation Assessment (HRA)	<p>A HRA of the Preferred Options version of the Local Plan has been prepared. The recommendations of this report will be taken into account in the Publication version of the Local Plan. It has been reviewed by Natural England.</p> <p>The SDNPA has provided input into the preparation of a number of other HRAs being prepared in Authorities adjacent to the National Park.</p>

- 4.18 In addition to the above work, Habitat Connectivity and Habitat Opportunity Mapping for the SDNPA identifies priority habitats, habitat connectivity, and local ecological networks in and beyond the National Parks boundaries. The study uses a range of evidence prepared by other bodies and organisation as part of the assessment.

Outcomes from strategic working and how they have influences the Local Plan to date.

- 4.19 The policies within the emerging Local Plan have been based upon the need to deliver the purposes and duty of a National Park, the evidence base prepared and best practice. In the main these pieces of evidence have been prepared in partnership with other Authorities, Statutory Bodies and other organisations and have influenced plan making processes not only within the National Park but outside of it ensuring a shared understanding of this key strategic issue. The NPA will use the responses to the Preferred Options plan to identify whether any issues exist between the relevant Authorities and if there is a need for further work.

The delivery of new homes (including affordable housing and pitches for Travellers)

- 4.20 The provision of new housing is a major issue across the country, but in National Parks the focus is on the provision of affordable housing as stated in the *National Parks Vision and Circular* (2010). House prices across the National Park are above the national and regional averages, and there are significant differences in prices between the towns and surrounding rural areas. The appropriate provision of housing to meet local needs is crucial to ensuring the sustainability and vitality of communities within the National Park.
- 4.21 The Local Plan must determine the level of housing provision and types of homes to be delivered. For a local plan to be considered 'sound' at examination, the plan should be positively prepared and based on a strategy which seeks to meet objectively assessed needs in the housing market areas, including unmet needs from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development which, in the case of the South Downs, includes meeting the purposes and duties of a National Park.
- 4.22 In preparing the Local Plan, the SDNPA must identify the extent to which 'objectively assessed need' can reasonably be met without compromising the purpose and special qualities of the National Park. Where it is demonstrated that it cannot be sustainably accommodated, the SDNPA will need to work with adjoining authorities to consider whether any unmet need can be met elsewhere within each housing market area. The National Park lies within 4 Housing Market Areas.



- 4.23 Housing numbers and distribution are already addressed to varying degrees in parts of the National Park through the preparation of Joint Core Strategies in East Hampshire, Winchester, Lewes, Wealden and Worthing. Insofar as is possible these are incorporated

into the Local Plan where the evidence base is up to date and the principles of a landscape led Local Plan are already indoctrinated into the relevant policies.

- 4.24 To achieve inclusive and sustainable communities it is also important to address the needs and aspirations of all people through an appropriate mix, type and amount of accommodation. This includes the needs of Gypsies and Travellers and Travelling Showpeople. The National Park has resident and transient communities of each group who, whilst sharing a travelling way of life, have different cultures and site needs. For these reasons, they are also recognised as separate communities in planning legislation. In the same way as for bricks and mortar housing if it is demonstrated that the number of pitches required cannot be sustainably accommodated the SDNPA will need to work with adjoining authorities to consider whether any unmet need can be met elsewhere within each housing market area.
- 4.25 Under the theme 'Towards a Sustainable Future' the SDNP Local Plan includes policies on:
- The Development Strategy
 - Housing
 - Affordable Housing Provision
 - Rural Exception Sites
 - Gypsies, Travellers and Travelling Show People
- 4.26 In order to start its consideration of these key issues a number of pieces of evidence have been prepared, some jointly and others will be consulted on as part of the consultation on the Local Plan: Preferred Options.

Evidence of co-operation

Joint Evidence	
Housing	<p>Strategic Housing Market Assessments (SHMAs) establish the housing need of the Housing Market Area to assess:</p> <ul style="list-style-type: none"> • How many homes? • What mix of homes? • Needs of different groups within the population <p>Across the National Park a number have been prepared jointly with other Authorities / group of Authorities:</p> <ul style="list-style-type: none"> • Coastal West Sussex Strategic Housing Market Assessment (GL Hearn, 2012) – carried out jointly with Adur, Arun, Brighton and Hove, Chichester, Lewes and Worthing. • East Hampshire Strategic Housing Market Assessment (NLP, 2013) – A joint study prepared to support the Joint Core Strategy covering the whole of the District, both within and outside the National Park. • Winchester Housing Market and Housing Need Assessment Update (DTZ, 2012) – A joint study prepared to support the Joint Core Strategy covering the whole of the District, both within and outside the National Park. <p>The South Downs National Park Authority has also prepared a SHMA to cover the entire National Park. This followed the</p>

	<p>extensive joint studies carried out across the National Park. The park-wide SHMA brings together this existing evidence to establish the best fit of housing market areas and levels of both objectively assessed need and affordable housing need. This has been published as the main evidence base document on housing need for the Local Plan: Preferred Options. The headline figures were presented to officers from the Local Authorities that adjoin or are near to the National Park in July 2015 and comments were invited.</p> <p>In addition to the preparation of SHMAs a number of other studies / statements have been prepared jointly with other Authorities:</p> <ul style="list-style-type: none"> • Coastal West Sussex Housing Study (Duty to Co-operate) (GL Hearn, 2013) – This piece of evidence was carried out jointly between the South Downs National Park Authority and adjoining authorities within the Coastal West Sussex HMA (Adur, Arun, Brighton and Hove, Chichester, Lewes and Worthing). It was commissioned to bring together evidence from a range of studies to provide a consistent and objective assessment of housing requirements in each authority and across the HMA, addressing the need and demand for market and affordable housing. It also looked at land supply for development and existing constraints to development including landscape and infrastructure. • Chichester District Local Housing Requirements Study: Final Report, Chichester District Council & South Downs National Park Authority (2011) informed the Chichester Local Plan preparation and some of the early Coastal West Sussex work. • Statements of Common Ground and Memorandums of Understanding (e.g. Lewes JCS Examination, see later in Statement).
<p>Gypsies, travellers and Travelling Show People</p>	<p>Gypsy and Traveller Accommodation Assessments (GTAA's) identify the permanent and transit accommodation needs across the National Park and its adjoining Planning Authorities. Across the National Park a large number of joint studies have been prepared:</p> <ul style="list-style-type: none"> • Brighton and Hove City Council and the South Downs National Park Authority GTAA (2014). • Coastal West Sussex GTAA (2012). • Coastal West Sussex Site Study (2013) • East Sussex and the South Downs National Park Authority GTAA (2015). • Hampshire GTAA (2013). • Horsham District GTAA (2012). • Mid Sussex GTAA (2013) – updated in 2014 in respect to Mid Sussex District outside the National Park) <p>These studies and future site assessment work will inform how future need is addressed. A site search and assessment has been carried out, which covers the Coastal West Sussex area. This identified suitable sites within the study area, both within and outside of the National Park. A joint study is already being undertaken with East Hampshire and</p>

	<p>Winchester for the Hampshire area of the National Park. Discussions are being held with other local authorities in East Sussex and with Brighton and Hove City Council regarding joint site assessment studies. The SDNPA will assess how all or a proportion of this need could be accommodated in the National Park. This assessment will be landscape led and will seek to accommodate sites where they are needed and in the most sustainable locations.</p> <p>Transit sites serve wider areas and operate on a countywide basis. There are two existing large transit sites within the National Park, in East Sussex and Brighton and Hove. There is also a site in West Sussex (outside the National Park). These 3 sites serve a need for transit pitches at a strategic county level. The current studies identify a need for new transit pitches which will be carried forward through future site assessment work and joint working with local authorities.</p>
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- 4.27 A key mechanism through which these issues are considered is through the Coastal West Sussex & Greater Brighton Planning Board. Within Hampshire the Hampshire and Isle of Wight Local Authorities Chief Executives group provides strategic and cross boundary overview of work across the authorities, more information on which is contained in the later sections of this statement

Outcomes from strategic working and how they have influenced the Local Plan to date.

- 4.28 Housing is a key issue and how any unmet need for homes might be accommodated is challenging in relation to a protected landscape.
- 4.29 In support of the recent (2015) Lewes Joint Core Strategy Examination the 'Duty to Cooperate: Statement of Common Ground, Cross-Boundary Working and Meeting Housing Needs' paper has been prepared and agreed with:
- Lewes District Council
 - South Downs National Park Authority
 - Adur District Council
 - Arun District Council
 - Brighton and Hove City Council
 - Chichester District Council
 - Crawley Borough Council
 - Eastbourne Borough Council
 - Hastings Borough Council
 - Horsham District Council
 - Mid Sussex District Council
 - Rother District Council
 - Wealden District Council
 - Worthing Borough Council

- 4.30 The Statement of Common Ground agrees that despite extensive work, Lewes District Council and the SDNPA consider that, due to environmental and infrastructure constraints, objectively assessed housing needs in Lewes district cannot be met within the sustainable development requirements of the National Planning Policy Framework. The Statement of Common ground highlighted that the other authorities face similar constraints to Lewes district, leaving them unable to meet their objectively assessed housing needs. It is also very likely, as documented in the Sussex Coast HMA Duty to Cooperate Housing Study, that the Sussex Coast authorities will be unable to meet the combined housing need of the Sussex Coast HMA.
- 4.31 The extent to which any undersupply in the delivery of housing in the National Park can be met outside of the National Park and within the 4 HMAs varies. In some cases those Authorities with only small areas of National Park within their District boundaries have taken into account the needs from communities within the National Park and included them within their SHMA (e.g. Mid Sussex – North West Sussex HMA). In other cases the level of housing delivery has already been agreed through the preparation of Joint Core Strategies and the issue of unmet need has been considered through the examination of those Plans (e.g. East Hants and Lewes). There therefore remains a number of areas for which this issue has yet to be addressed. However the fact that most neighbouring authorities as evidenced by the recent statements to the Lewes Joint Core Strategy have been unable to plan to meet their own need or that of other Authorities in the same HMA indicates that it is very likely that no spare capacity exists to deliver unmet housing need generated within the National Park.
- 4.32 This is a pressing issue for all local planning authorities in the south and south east of England. To try to address the situation many are working together to plan in a more strategic way, this includes the preparation of Local Strategic Statements such as that being produced by the Coastal West Sussex and Greater Brighton Strategic Planning Board.
- 4.33 These issues are discussed at various forums including:
- Coastal West Sussex & Greater Brighton Planning Board
 - East Sussex Strategic Planning Managers Group
- 4.34 The responses to the Local Plan: Preferred Options will help to inform the formulation of the National Park's housing requirement and how close it can get to meeting its objectively assessed need without compromising the purposes of the designation.
- 4.35 The provision of permanent and transit sites for Gypsies and Travellers is at various stages across the National Park. At this stage no sites have been identified and the consultation on the Local Plan: Preferred Options therefore includes a call for sites. Once the supply of land is better known the ability or otherwise of the National Park to meet the needs of the Gypsy and Traveller community will be better understood. Joint working is currently taking place with a number of Authorities on site assessment work and will inform the next stage in the preparation of the Local Plan.

The promotion of sustainable tourism

- 4.36 The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. A significant proportion of visits are day trips from those living in or close to the National Park. Tourism and visitors make a positive contribution to the

overall local economy. 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. By increasing the level of accommodation provision within the National Park, it may be possible to increase the number of visitors who stay within the National Park who spend on average four times more than those on day visits.

4.37 In support of this area of work a number of pieces of evidence have been prepared by the National Park:

- South Downs Visitor and Tourism Economic Impact Study (2013) summarises a series of research studies commissioned by the SDNPA. This included a study of visitor-related businesses in the South Downs, visitor and resident survey and a value and volume modelling exercise to calculate the economic impact of tourism.
- South Downs Visitor Accommodation Review (2014) considered the potential for visitor accommodation development across all parts of the South Downs National Park both in terms of the expansion, development and upgrading of existing accommodation businesses and the development of new ones. In preparing the study a review of previous hotel and visitor accommodation studies covering parts of the National Park and adjacent areas in Hampshire, East and West Sussex was undertaken.

4.38 This work has informed the SDNPA's Sustainable Tourism Strategy which establishes core objectives for tourism, and explains the delivery tools that are needed to shape tourism with partners and the themes that will engage the visiting public. The Sustainable Tourism Strategy suggests distinct themes that visitors can easily recognise in order to build their knowledge and patronage. It also identifies the delivery tools that will govern our working relationships with partners. In practical terms these themes: working land, cultural land, adventure land and natural land, provide a succinct basis upon which to build future projects.

4.39 Under the theme People Connected with Places the SDNP Local Plan includes a policy on Sustainable Tourism and the Visitor Economy.

4.40 The Preferred Options: Local Plan recognises that tourism in the National Park cannot be seen in isolation from the surrounding areas. The areas immediately bordering the South Downs act as important gateways and provide significant levels of accommodation and it is recognised that there is a need for the SDNPA to work with local authorities to support the visitor economy of the entire region. The outcome of the studies and the main thrust of the proposed policy were shared with District and Borough representatives at a Duty to Co-operate event in July 2015.

Development of the rural economy.

4.41 The rural economy is formed of many elements, but for the purposes of compliance with the duty it is those elements that may have strategic cross boundary implications which are specifically considered in this statement i.e. the supply of employment land.

4.42 In support of this area of work an Employment Land Review was prepared in 2015. It highlights that the National Park's business base is focused on small businesses many of

which are home based and simply do not have the requirements for large scale allocations of employment land. Under the theme 'Towards a Sustainable Future' the Local Plan includes policies on 'Sustaining the Rural Economy' and 'Employment Land' in order to address sustainable economic development in the National Park.

- 4.43 The Local Plan: Preferred Options sets out the following requirements for new employment land:
- Offices: 2-3 ha
 - Industrial/warehousing: 5ha
- 4.44 The requirements meet the objectively assessed need for employment as calculated in the ELR and carry forward employment figures from adopted and emerging Joint Core Strategies. The South Downs Local Plan has incorporated as far as possible the policies within the adopted and emerging Joint Core Strategies where the evidence base is up to date and the principles of a landscape led Local Plan are indoctrinated into the relevant policies. The South Downs Local Plan does not itself allocate any employment sites as the requirements are met entirely through extant permissions and allocations in Neighbourhood Development Plans.
- 4.45 To date the National Park is not aware of any requests to consider the allocation of further land for employment to accommodate the unmet needs of adjoining Authorities.

5: Key relationships

- 5.1 The following are the key relationships and bodies that the SDNPA has worked with on strategic planning issues.
- 5.2 Due to the nature and scale of the National Park there is no one approach to strategic planning across the Authority area. The SDNPA has to adapt its approach depending on which part of the National Park is being considered as the way of working. The Authority has tried to make best use of existing groups rather than establishing new.
- 5.3 The following section sets out the groups through which strategic cooperation has been taking place across the National Park and its constituent and adjoining Local Authorities.

a) Coastal West Sussex and Greater Brighton

- 5.4 The CWS and Greater Brighton (CWS & GB) Strategic Planning Board comprises lead councillors from each of the local planning authorities across Coastal West Sussex (Adur, Arun, Chichester, Worthing) with West Sussex County Council, Brighton and Hove City Council, Lewes, Mid Sussex and the South Downs National Park. Horsham has also recently joined the Board.
- 5.5 The Board is currently an advisory body with a remit to:
- Identify and manage spatial planning issues that impact on more than one local planning area across the Coastal West Sussex and Greater Brighton area; and
 - Support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area.
- 5.6 The Board was established in 2012 and has signed a Memorandum of Understanding and agreed Terms of Reference which has established a framework for co-operation. The Board is advisory and decision-making remains with the individual 'legally' responsible bodies. The Board meets quarterly and is supported by officer led working groups.
- 5.7 In January 2013 the Board agreed that in order to fulfil its role, a new framework was needed in the form of a Local Strategic Statement (LSS). There was commitment from all authorities to develop a LSS that had a direct influence on individual local plans but also highlighted the strategic challenges along the coast, with possible ways of addressing these.
- 5.8 It was also agreed that the LSS should be 'evidence-based' and deliverable, with significant importance attached to the need for a delivery plan. A vital part of the evidence was a study undertaken by GL Hearn on behalf of the LPSs to assess the housing needs of the area and any potential barriers to delivery. In addition a CWS Gypsy and Traveller Accommodation Assessment was prepared in 2012 and identified an overall need for the area (not including Horsham & Mid Sussex at the time of preparation)
- 5.9 The Local Strategic Statement sets out the long term Strategic Objectives for the period 2013 - 2031 and the Spatial Priorities for delivering these in the short to medium term (2013-2020) to support regeneration, providing jobs and homes that are needed for its residents and businesses, whilst at the same time, protecting the high quality environment that provides the essential foundations for sustainable growth.

- 5.10 The LSS is now being revised and will be supported by evidence on housing, employment and transport.

b) East Sussex

- 5.11 Collaborative working among planning policy officers across East Sussex has been long-established through the Planning Liaison Group (chief planning officers) and the East Sussex Local Plan Managers Group. In addition, the East Sussex Strategic Planning Members Group (ESSPMG) was set up in 2013 to enhance and endorse cooperation at the political level. The group consists of the portfolio holders for planning assisted by officers from all local authorities in East Sussex, including SDNPA.
- 5.12 All ESSPMG member authorities are signatories to a memorandum of understanding, which was drawn up to formalise and give direction to ensure active, constructive and ongoing joint working arrangements. The memorandum of understanding sets out the group's key purposes as raising awareness of cross boundary issues; and to explore any matters of concern to understand how they are affecting development and/or delivery of plans.
- 5.13 Through the ESSPMG work is underway on establishing a common evidence base and planning policy direction for specific topics that have commonality across East Sussex.

c) Hampshire and Isle of Wight Local Government Association (HIOWLGA)

- 5.14 The Hampshire and Isle of Wight Local Government Association group comprises lead officers from each of the Local Planning Authorities across Hampshire. It was set up prior to the establishment of the South Downs National Park Authority to address strategic, cross boundary issues. The South Downs National Park Authority has since become a member and sits on the HIOWLA Chief Executive Officers group.
- 5.15 The focus for particular pieces of research comes from HIOWLA and feeds into a number of officer task and finish or working groups. These include:
- JAGTP - Joint Gypsy and Traveller Panel, which oversaw the Hampshire GTAA
 - HIPOG – Hampshire & Isle of Wight Planning Officers Group
 - Development Plans Group – (sub group of HIPOG)
 - Planning Research Liaison Group – (sub group of HIPOG)
- 5.16 This work supported the development of the two joint core strategies (East Hampshire and Winchester) which cover the whole of the National Park area within Hampshire and are described further in the sections below.

d) Joint Core Strategies (JCS)

- 5.17 All JCS by virtue of the fact they are prepared jointly with the SDNPA take into account the purposes and duties of the National Park. Each contains policies requiring that the need to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park is at the forefront of decision making. As is the need to promote opportunities for the understanding and enjoyment the special qualities of the National Park by the public.
- 5.18 The following sets out the various Joint Core Strategies that exist across the National Park and the development strategies insofar as they relate to the National Park.

i) East Hampshire District Local Plan: Joint Core Strategy 2014

- 5.19 There is a close functional relationship between EHDC and the SDNPA that has long been recognised in planning terms. The two planning authorities worked together to prepare the Joint Core Strategy that set a clear development strategy for East Hampshire.
- 5.20 Policy CPI0 of the JCS sets an overall minimum target of 10,060 new homes to be built over the plan period (up to 2028). The housing land supply for the district as a whole is made up of a minimum of 8,366 dwellings outside the SDNP and a minimum of 1,694 dwellings within the SDNP.
- 5.21 The relevant housing market area (HMA) for the District is East Hampshire and its objectively assessed needs are set out in the updated Strategic Housing Market Assessment 2013 (SHMA). EHDC and the SDNPA adopted a requirement of 592 dwellings per annum (dpa) from 2011-2028.
- 5.22 Whilst the SDNPA covers 57% of East Hampshire District the JCS does not expect the National Park to meet this need in full. In the JCS the district-wide need of 592 dpa is being provided for in full but allocations to meet it have been distributed between sustainable settlements to take account of constraints, including the National Park, and opportunities (including the Strategic Allocation at Whitehill and Bordon). This distribution gives a total requirement for new allocations (not including Whitehill and Bordon) for a minimum of 2250 dwellings outside the National Park and 950 dwellings within the National Park.
- 5.23 The JCS requires allocations to be made to meet the following levels of housing in the SDNP:
- a minimum of 700 dwellings at Petersfield;
 - a minimum of 150 dwellings at Liss
 - a minimum of 100 dwellings at other villages in the National Park.
- 5.24 These sites are being identified through the SDNP Local Plan and various Neighbourhood Development Plans including one at Petersfield which has just been subject to an Examination.
- 5.25 The East Hampshire Housing and Employment Allocations Plan was submitted in July 2015, with adoption likely in January 2016.
- 5.26 Allocations are in addition to dwellings completed, committed and allowed for as windfalls. Of the minimum 10,060 figure to be provided from various sources in the JCS, the Park's share is 1,694 (17%) or 100 dwellings per annum. This compares with 8,366 (83%) outside the National Park, which is equivalent to 492 dwellings per annum.
- 5.27 A Memorandum of Understanding exists between the SDNPA and EHDC in relation to the preparation of the East Hampshire Housing and Employment Allocations Plan. It will be updated as both Authorities continue with the preparation of their plans.

ii) Emerging Lewes District Joint Core Strategy

- 5.28 There is again a close functional relationship between LDC and the SDNPA. The two planning authorities are working together to prepare the Joint Core Strategy that set a clear development strategy for Lewes District.
- 5.29 The Joint Core Strategy was submitted in September 2014 and the examination hearings took place in January 2015. The Inspector's Initial Findings are that the district's housing target should be 6,900 in the period 2010-2030. LDC and SDNPA are considering

modifications in response to the Inspector's findings, which are scheduled to be consulted upon in July-September 2015. The Inspector is provisionally satisfied that all other elements of the JCS are 'essentially sound'. The Inspector's Final Report is expected by the end of 2015 with adoption anticipated in early 2016.

- 5.30 The Objectively Assessed housing Need for Lewes District has been agreed by Lewes District Council and South Downs National Park Authority to be in the range of 460 to 520 homes per annum (2011-2031). The Joint Core Strategy aims to deliver 345 per annum (6,900 over the plan period). Significant work was carried out by officers to identify suitable sites within the district as part of the SHLAA process to identify capacity for new development, both within and outside the National Park.
- 5.31 Concurrently, Lewes District Council is preparing a Site Allocations and Development Management Policies DPD, which will only apply to the areas of the district for which Lewes District Council is the local planning authority. The proposed submission version of this DPD is due to be published for representations in spring 2016.
- 5.32 The need for permanent Gypsy and Traveller accommodation in Lewes district is assessed in the 2014 East Sussex and South Downs National Park Gypsy, Traveller and Travelling Showpeople Accommodation Assessment to be 13 permanent pitches to 2030 (of which 5 will serve the area of the district outside the national park and 8 will serve the area within the national park). No Gypsy and Traveller sites have been proposed for allocation in the Joint Core Strategy. Lewes District Council and South Downs National Park Authority propose to subsequently allocate specific deliverable sites in their respective Site Allocations/Local Plans, unless they are allocated in neighbourhood plans. At present, no need has been identified in the district for Travelling Show People's accommodation.

iii) Wealden Core Strategy Local Plan 2013

- 5.33 The Wealden Core Strategy Local Plan comprises a long-term spatial vision and strategic objectives for the whole of Wealden District for the period 2013 to 2027, including the part of the district within the South Downs National Park. The Core Strategy was significantly advanced when the National Park Authority became the Local Planning Authority in 2011. Following discussions between the two Authorities it was agreed to continue development of a district-wide Local Plan, working jointly. South Downs National Park Officers were involved in the latter stages of the Local Plan preparation process as well as appearing at the Examination in Public.
- 5.34 To help address the need for homes and to ensure the economic prosperity of the District whilst protecting the valued environment the plan provided for at least 9440 homes within Wealden from 2006 to 2027. The delivery of on average 450 dwellings per annum. The majority of new housing is to be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development. Land was to be identified in subsequent Development Plan Documents for the provision of some 4525 net additional dwellings in Wealden over the period 2006-2027. Provision would also be made for some net additional 40,000 sq. metres of employment floorspace and 17,000 sq. metres net additional retail floorspace over the period 2006-2027. Within the National Park East Dean is proposed to accommodate 10 homes by 2027 and permission for such a development was recently granted.
- 5.35 The Wealden Strategic Sites Local Plan which was predicated upon the Joint Core Strategy was submitted for independent examination in March 2014. However in May 2015 it was withdrawn in favour of preparing a new Local Plan for Wealden (outside of the National Park).

- 5.36 Work on the new Wealden Local Plan is now commencing and the SDNPA and Wealden District will continue to work to ensure that strategic cross boundary issues are considered in the plan making process through mechanisms such as the East Sussex Local Plan managers Group. However these issues are well understood and much of the work on the existing Joint Core Strategy and the withdrawn Strategic Sites Local Plan will be rolled forward into the preparation of this new Local Plan for the District.

iv) Winchester District Joint Core Strategy 2013

- 5.37 The Winchester District Joint Core Strategy was adopted in 2013. Its vision in relation to the market towns and villages is to enable them to remain viable settlements offering where possible a range of local services and facilities, that are allowed to grow to respond to local needs, whilst retaining their individual identity and rural character. Development in those settlements that lie in the South Downs National Park should respect the purposes of the National Park.
- 5.38 The principal focus for new development across the District will be within the urban areas of Winchester City and south Hampshire (PUSH) These will accommodate the bulk of the objectively assessed development needs of the District, including the requirement for 12,500 new dwellings and about 20 hectares of new employment land.
- 5.39 More locally focussed development will occur in the Market Towns and Rural Area reflecting the needs and requirements of those communities and to ensure that they offer a range of services and facilities and sustainable opportunities for change, consistent with their scale and function. Sufficient housing was allocated to settlements outside of the National Park to meet the whole housing requirement for the area. The JCS policy in relation to settlements within the National Park therefore requires that any development should be to meet local needs and should be commensurate with their size, character and function. No specific development requirements are identified. Through the JCS there is therefore an agreed approach to housing provision for this part of the National Park.
- 5.40 Other development proposals may be supported to reinforce a settlement's role and function, to meet a community need or to realise local community aspirations. These should be identified through a Neighbourhood Plan or process which demonstrates clear community support.

e) Housing Officers Working Group

- 5.41 Albeit that the South Downs National Park Authority is the Planning Authority for the area the role of Housing Authority remains with the 12 local authorities (District, Borough, and City Councils). The existing policies across the 12 housing authorities vary in their requirements for levels of affordable housing and thresholds for contributions of monies towards affordable housing provision. In order to gain advice from housing officers across the National Park and to discuss the options for housing policies within the emerging South Downs Local Plan Officers at the National Park established a Housing Officers Working Group, inviting housing managers from all 12 housing authorities as well as from the Hampshire Alliance for Rural Affordable Housing (HARAH) and Action in Rural Sussex (AirS).
- 5.42 Members of the group have met to discuss the relationship between the SDNP as LPA operating within a system of 12 separate Housing Authorities; the initial identification of policy options (during development of the South Downs Local Plan Options document) and; the development of the draft CIL charging Schedule, which will operate across the whole of the National Park.

- 5.43 This liaison will continue with our housing authorities as the Local Plan and CIL Charging Schedule develops. Consultation on the CIL Draft Charging Schedule is running concurrently with the Local Plan: Preferred Options.

f) Other Authority specific work

Adur – Worthing Districts

Joint strategic planning is predominantly considered through the Coastal West Sussex Planning Board (see above). Individual meetings have been held with officers from both Adur and Worthing Councils to discuss locally significant issues, in particular limited capacity for housing within the Worthing area outside the National Park, and sites for development on the edge of the town which now fall within the SDNP.

Arun District

Joint strategic planning is predominantly considered through the Coastal West Sussex Planning Board (see above)

Brighton & Hove

Joint strategic planning is predominantly considered through the Coastal West Sussex Planning Board (see above). However, during the development of the Brighton and Hove City Plan Part I, there was significant involvement by SDNPA Officers in reviewing potential sites for development (housing, employment and Gypsy and Traveller sites) particularly on the rural-urban fringe. These were predominantly adjacent to the boundary of the National Park and an assessment of their impact on the open countryside around the City was provided.

The Brighton & Hove Transport Team has also been involved in the development of the transport policies in the South Downs Local Plan and joint work has been carried out to identify Gypsy and Traveller Need within Brighton and Hove City (within and outside the SDNP), as referenced above.

Chichester District

Joint strategic planning is predominantly considered through the Coastal West Sussex Planning Board (see above).

The Chichester District Local Plan 2014 - 2029 was adopted in July 2015 and excludes the area of the National Park. Discussions were held following the establishment of the National Park Authority to determine whether the long term planning of Chichester District should be within a single district wide local plan or in line with the new LPA boundaries. It was considered appropriate for each authority to plan for their separate areas and at this time a joint Housing Needs Study (2011) was carried out. For the first time this looked at the northern area of the district (predominantly that which fell within the SDNPA) and separated this out from need generated in the south of the district (outside the SDNP). This work informed the preparation of the Chichester District Local Plan and the Coastal West Sussex SHMA.

The Chichester District Local Plan includes a commitment to an early review of the Plan in recognition of the limitations of the transport study that accompanied it and to enable full and detailed consideration of the potential offered through proposed government funding for upgrading of the A27.

Eastbourne

The Eastbourne Core Strategy Local Plan sets out the key direction and planning framework for Eastbourne. It was adopted in 2013. The National Park has been excluded from the area to which

this Core Strategy applies. However, because of the relationship with the urban area, the National Park was shown on the key diagram and is referred to throughout the plan. In the meantime, the policy framework for the National Park in this area is provided by national planning policy and the relevant saved policies of the Eastbourne Borough Plan. The Eastbourne Core Strategy acknowledges the need for the Borough Council and National Park Authorities to work closely together on cross-boundary planning (and other) issues in recognition of the important relationship between the town and the Downs. However, it should also be recognised that there are no communities within the Eastbourne Borough part of the National Park. It contains a number of farms and extensive tracts of public land, golf courses, footpaths and coastal walks.

Horsham District

Horsham District Council is preparing a new planning framework (HDPF) which will contain the planning policies for the District (excluding the SDNPA area) and will be used to help decide what development can take place and where.

The Council submitted the Horsham District Planning Framework 2014 for independent examination and a series of public hearing sessions were held in November 2014 followed by further sessions in July 2015.

The SDNPA attended a series of workshops hosted by HDC and PAS in relation to the Duty to Cooperate and the need to identify shared strategic priorities.

The SDNPA provided detailed comments at various stages through the preparation of the Planning Framework. No outstanding issues remain between the Authorities in relation to this plan, which is anticipated to be adopted by the end of 2015.

Joint strategic planning will in the future be mostly considered through the Coastal West Sussex

Mid Sussex District

Mid Sussex District consulted on their Pre-submission District Plan in June / July 2015. The plan covers the period to 2031. A Memorandum of Understanding has been agreed between Mid Sussex and the SDNPA and Mid Sussex, Lewes and the SDNPA which seeks to identify the common ground between the Authorities.

Joint strategic planning in the future will mostly considered through the Coastal West Sussex Planning Board.

West Sussex County Council

Joint strategic planning is mostly considered through the Coastal West Sussex Planning Board (see above). West Sussex County Council have been actively engaged in the development of the transport policies of the Local Plan and scoping for traffic modelling.

East Sussex County Council

Joint Strategic Planning is mostly considered through the East Sussex Strategic Planning Members Group. East Sussex County Council have been actively engaged in the development of the transport policies of the Local Plan and scoping for traffic modelling.

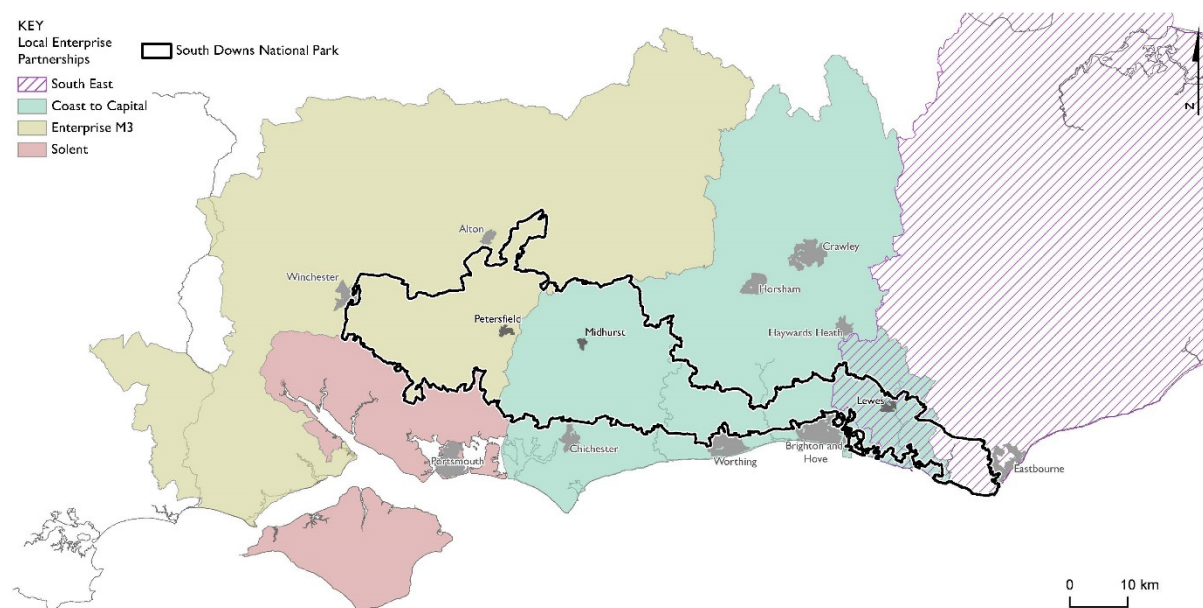
Hampshire County Council

The main involvements of Hampshire County Council has been in the preparation of a number of pieces of evidence that have then informed the preparation of the South Downs Local Plan. This includes Landscape Character Assessment Work and Gypsy & Traveller Accommodation

Assessments. Hampshire County Council have also been consulted on the development of the transport policies of the Local Plan and have been actively involved in scoping for traffic modelling.

Local Enterprise Partnerships (LEPs)

LEPs are not covered by the 'duty to cooperate'. However, LEPs are identified in the regulations as bodies that those covered by duty 'should have regard to' when preparing local plans and other related activities. LEPs are playing an increasingly important role in the funding of infrastructure and other development to support long term sustainable growth. The National Park crosses 3 LEPs, the main being the Coast to Capital LEP.



To date the specific involvement of the LEPs in the preparation of the Local Plan has been limited, but they have been and will continue to be consulted at each key stage and they were invited to attend the Duty to Cooperate Session held by the National Park in July.

The level of development being proposed in the emerging South Downs Local Plan is unlikely to require the investment in hard infrastructure of other Plans in the south / south-east of England. However, site specific schemes such as the three strategic sites allocated in the Local Plan namely, Shoreham Cement Works, Syngenta and North Street Quarter in Lewes may be an area of future interest going forwards and significant investment may also be sought for landscape led initiatives in order to fulfil the aim of achieving bigger, better, more joined up landscapes.

The LEPs are engaged more actively with the National Park in the delivery of a number of topic / area specific projects including:

- Super Fast Broadband
- Food Enterprise Zone

g) Other Organisations

Natural England and the Environment Agency

Both organisations are members of the South Downs Partnership and are therefore integral to many of the projects taking place within the National Park, not just the formation of the Local Plan. In addition to this both organisations have been involved as required in the preparation of individual

policies throughout the Local Plan. They both provided responses relating to their area of expertise to the Options consultation in 2014. Their continued involvement will be important going forwards.

Historic England

Historic England (formerly English Heritage) are a statutory consultee and responded to the Options consultation in 2014 with extensive and detailed comments.

Civil Aviation Authority

The Civil Aviation Authority did not provide a response to the Options Consultation in 2014.

Homes and Communities Agency

The National Park is not a housing authority. This function falls to the constituent Districts and Boroughs as a result the involvement of the Homes and Communities Agency to date has been limited

The Homes and Communities Agency did not provide a response to the Options consultation in 2014.

Clinical Commissioning Groups and National Health Service Commissioning Board

The level of housing being proposed throughout the National Park is generally very small in scale. To date the involvement of the clinical commissioning groups and commissioning boards has been limited and no responses were received to the Options consultation in 2014.

Office of the Rail Regulator

The Office of the Rail Regulator did not provide a response to the Options consultation in 2014.

Highways England

The A27 runs predominantly to the south of the National Park but in a number of locations crosses or comes close to its boundaries. This is the key east-west route along the south coast and is the subject of a number of studies at various points along its route in relation to easing congestion. The SDNPA has an adopted position statement on the A27 which has been widely shared with interested parties and which will determine its response to any such proposals.

Highways England did not respond to the Issues Consultation in 2014 but they have since been in contact with the NPA, were consulted on the development of the transport policies.

Marine Management Organisation

The Marine Management Organisation (MMO) responded to the Options consultation in 2014 drawing attention to the remit of the organisation.

The latest round of preparing marine plans for the South began in 2013 and includes the area running from Folkestone to the River Dart and therefore includes parts of the South Downs National Park and will be an important consideration in the preparation of any policies which relate to the coastline.

6: Monitoring

- 6.1 The preparation of the South Downs Local Plan to date has been informed by joint working on key evidence base documents, the Partnership Management Plan, the preparation of Joint Core Strategies, and will continue to be subject to detailed consultation with stakeholders throughout the various stages in its preparation. The SDNPA by virtue of its very nature will continue to work cooperatively with local authorities and other partners both in its work on the Local Plan and its wider work throughout the South Downs.
- 6.2 The outcomes and delivery of both the Local Plan and the Partnership Management Plan will be monitored and reported in the Authority Monitoring report.

APPENDIX I – Other strategic issues considered

A1: The following table takes the Sustainability Appraisal objectives established at the Issues and Options stage of the preparation of the Local Plan and identifies those that might be considered to be a strategic issue where cooperation will be appropriate. These have formed the basis of the key cross boundary strategic issues being addressed through the duty to cooperate work.

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
1. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability.	<p>1.1: Enhance rural communities by providing good quality affordable housing for local people which meets the needs of communities now and in the future.</p> <p>1.2: Create communities characterised by integrated development which takes account of local housing needs and delivers the widest possible range of benefits consistent with NP purposes & duty.</p> <p>1.3: To make suitable provision for transit and permanent traveller sites based upon projected need.</p>	<p>Yes – The provision of new homes in the National Park will raise issues that need to be considered at a strategic level and across boundaries. The National Park will not be in a position to accommodate the objectively assessed housing needs (being established through the SHMA) and neither will it be in a position to accommodate the unmet needs of neighbouring Local Authorities.</p> <p>The provision of sites for travellers also raises cross boundaries issues that the National Park cannot address in isolation.</p>
2. To improve the health and wellbeing of the population and reduce inequalities in health and wellbeing.	<p>2.1: Optimise the benefits that the natural environment offers to contribute to peoples' health and well-being.</p> <p>2.2: Use environmental and building standards to ensure that places promote health and wellbeing.</p> <p>2.3: To contribute to a reduction in all</p>	<p>No – although there are clearly benefits to neighbouring communities, many of which are large and densely populated, of having a National Park on their door step, the meeting of this objective does not raise strategic issues for which significant cross boundary cooperation will be required. However the provision of green infrastructure which may contribute to this objective is identified as a potential key strategic issues.</p>

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
	aspects of rural crime through effective enforcement in partnership with other enforcement agencies.	
3. To create and sustain vibrant communities which recognise the needs and contributions of all individuals	<p>3.1: Supporting communities where children grow up and go to school.</p> <p>3.2: Supporting and empowering local communities to shape their own community (recognise the value of community and neighbourhood planning)</p>	No – these are not strategic matters that require significant cross boundary cooperation.
4. To improve accessibility to all services and facilities.	4.1: Encourage partnership initiatives for the development of community facilities to meet local needs guided by the Community Hierarchy Study.	No – these are not strategic matters that require significant cross boundary cooperation.
5. To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism.	<p>5.1: A sustainable tourism strategy that supports recreation businesses.</p> <p>5.2: Access to and representation of all sections of the community in NP facilities.</p> <p>See also S.O. 4.1</p> <p>See also S.O. 6.2</p>	Possibly – Albeit that the overall objective does not in itself lead to issues that require significant cross boundary cooperation, individual site specific proposals may. This will be considered on a site by site basis.
6. To encourage development of the rural economy in a manner that balances agricultural and other business interests to	6.1: Encourage development of efficient broadband throughout the area to encourage small business,	Possibly – Albeit that the overall objective does not in itself lead to issues that require significant cross boundary cooperation, individual site specific proposals may. This will be considered on a site by site basis.

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
maintain a living, valued landscape.	<p>communities & tourism in the Park.</p> <p>6.2: Encourage local industry and maintenance of a living cultural skills base that forms part of heritage now and into the future.</p> <p>6.3: Recognise and support core sectors of the South Downs economy such as food production, tourism and land management.</p> <p>6.4: Promote agri-environmental businesses and diversification that focuses on ecosystem services and enhancement of the local supply chain.</p> <p>6.5: Market towns to provide services to the rural hinterland.</p>	<p>It will also be necessary to work closer with the LEPs as they continue to establish their priorities.</p> <p>The policy of the National Park to focus on development of the rural economy may mean that other forms of economic development that may not be compatible with the National Parks purposes, will not be located within its boundaries and this may lead to further development pressure on adjoining Local Authorities. However, the majority of the National Park was previously designated as AONB, giving it the highest level of landscape protection and it would therefore never have been the location for allocations of employment land of a strategic nature and this will have been considered in the preparation of Local Plans by other Authorities in the Region. It should be recognised that the National Park includes the large towns of Lewes, Midhurst and Petersfield which accommodate significant amounts of employment, much of which will not be focused on the rural economy.</p>
7. To address the causes of climate change through reducing emissions of greenhouse gases and the consequences through adaptation measures.	<p>7.1: Promote appropriate retrofitting and upgrading of the existing housing stock and other buildings informed by the sense of place.</p> <p>7.2: Implement policy of zero carbon new build homes by 2016 in accordance with government policy.</p> <p>7.3: Supporting communities with the right Low Carbon / Renewable</p>	No – these are not strategic matters that require significant cross boundary cooperation.

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
	<p>Energy infrastructure in the right place.</p> <p>7.4: Extension of wood planting, where appropriate both for carbon storage opportunities and to provide woodfuel sources.</p>	
<p>8. To ensure the SDNP communities are prepared for the impacts of climate change.</p>	<p>8.1: Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>8.2: Promote the uptake of sustainable drainage systems.</p> <p>8.3: The achievement of integrated coastal zone management.</p> <p>8.4: Promote the incorporation of rainwater harvesting in the built environment and measures to reduce water demand. Promote consideration of farm reservoirs and on-farm boreholes for local efficient abstraction under an “Abstract Well and Use Well” basis.</p>	<p>No – these are not strategic matters that require significant cross boundary cooperation. However the preparation of the SFRA will require the significant involvement of the Environment Agency.</p>
<p>9. To conserve and enhance the region’s biodiversity.</p>	<p>9.1: Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitats, cognisant of the full range of stakeholder issues.</p>	<p>Yes – networks of habitat do not stop at the National Park boundaries. There is a need to ensure that where possible a consistency of approach exists across the Authorities boundaries. However much of the protection of important habitats and species is guided by Regulations and therefore this should ensure some degree of consistency.</p>

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
	<p>9.2: Conserve, enhance, restore, expand and reconnect areas of priority habitat (<i>'Bigger, better, more and joined'</i>).</p> <p>See also S.O. 8.2, 8.3 and 8.4.</p> <p>9.3: Address both water supply and demand issues for water supply in the context of NP purposes in partnership with water companies.</p>	<p>In addition the supply and demand for water is also clearly an issue that extends beyond the National Park boundaries.</p>
<p>10. To protect and enhance the National Park's countryside and historic environment and its enjoyment.</p>	<p>10.1: Provision for equine and golfing recreational activities without compromise to the landscape and historic environment.</p> <p>10.2: Achieve repair and / or enhancement of heritage assets currently identified as "at risk" to the extent that this status no longer applies.</p> <p>10.3: Help the HE adapt to changing conditions arising from CC (warmer, wetter, infestations etc.).</p>	<p>Yes – the first purpose of the National Park is to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. The National Park cuts across and abuts many Authority areas. In terms of strategic planning it is the overriding objective of the Local Plan to help to deliver this purpose.</p>
<p>11. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.</p>	<p>11.1: Provide sustainable access to services through community transport, neighbour care car schemes, high speed broadband and mobile community facilities.</p> <p>11.2: Work with other partners to develop a</p>	<p>Possibly – Albeit that the overall objective does not in itself lead to issues that require significant cross boundary cooperation in relation to the preparation of the Local Plan, individual site specific proposals may. It should be noted that the National Park Authority through partnership working outside of the remit of planning undertakes significant work on improving transport networks and increasing the use of sustainable mode of</p>

South Downs Local Plan SA Objective	SA sub-objectives	Is this a strategic issue where cooperation will be appropriate?
	<p>high quality, safe access network and better links between bus and trains and cycling opportunities.</p> <p>11.3: Minimising the impact of vehicle infrastructure on landscape and communities.</p> <p>11.4: A sustainable transport infrastructure for 2020 and beyond to accommodate increased movements to / from and between South Coast centres that affords protection for the SDNP landscape.</p>	<p>travel. The achievement of improved sustainable transport networks across the National Park depends on gateway railway stations many of which lie outside the Park boundary.</p>

APPENDIX 2 - Glossary of key bodies engaged in the preparation of the Local Plan so far

- Adur and Worthing Borough Council
- Arun District Council
- Brighton and Hove City Council
- Chichester District Council
- Eastbourne District Council
- East Hampshire District Council
- Horsham District Council
- Lewes District Council
- Mid Sussex District Council
- Wealden District Council
- Winchester City Council
- West Sussex County Council
- East Sussex County Council

- Hampshire County Council
- Environment Agency
- Historic England
- Natural England
- Highways Agency
- Marine Management Organisation