



South Downs National Park Duty to Cooperate Statement

Summer 2017

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I. Introduction to the Duty to Cooperate

- I.1 The Duty to Cooperate is enshrined in law through Section 33A of the Planning and Compulsory Purchase Act 2004 (inserted by Section 110 of the Localism Act 2011). It is also included within the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), specifically in terms of planning strategically across local boundaries. The duty to co-operate 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 requirement on all such bodies to engage constructively and actively on cross boundary matters.
- I.2 This is the South Downs National Park Authority's Interim Duty to Cooperate statement of compliance on strategic planning matters that require cross-boundary working. It has been published as part of the Core Document Library to support the publication of the Pre-Submission South Downs Local Plan in September 2017. It has been prepared in accordance with the NPPF and accompanying guidance. It sets out the strategic issues where cooperation might be required.
- I.3 This is an updated interim statement which has been prepared in order to outline the work done to date in order to respond to the requirements of the duty. The Duty to Cooperate is ongoing until the submission of the Local Plan to the Secretary of State for examination, therefore full details of joint working outcomes will be provided in an updated Duty to Cooperate Statement at the time of submission.
- I.4 This statement sets out:
- Context
 - National Park Governance and working relationships
 - Cross boundary strategic planning priorities
 - Key relationships
 - Evidence Gathering
 - Examples of how cooperation has produced effective policies on cross boundary strategic matters
 - Ongoing work and Outcomes

2. Context

- 2.1 The South Downs National Park covers over 1,600 square kilometres of England's most valued lowland landscapes. It has been shaped by the activities of farmers and foresters, its large estates, communities and local businesses.
- 2.2 Stretching from Winchester in the west to Eastbourne in the east, it is situated in a part of Britain that is under intense development pressure. On the one hand, there is a very significant need for new housing and economic development in the south-east region. On the other hand, the impacts of development, people, water extraction and many other factors can be significant and need to be addressed where possible. This is especially the case for the South Downs National Park.
- 2.3 The South Downs is heavily populated compared to other national parks with a population of around 112,000 residents, and a further 2 million people live within 5 kilometres of its boundary. Its social and economic interactions are, and will continue to be, very interdependent with the areas and communities that surround it.
- 2.4 The National Park covers parts of Hampshire, West and East Sussex and Brighton & Hove and stretches over parts of 12 local authorities. Figure 1 provides the context of the relationship between the partner local authorities and the National Park.

Figure 1 Administrative Boundaries throughout the South Downs National Park



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 such as housing, transport and education are carried out by the other local authorities. Partnership working and cooperation is therefore fundamental given the responsibilities of these different organisations, the size of the National Park and the number of local authorities it covers.

3.2 The Environment Act 1995 sets out the statutory purposes and duty for national parks as follows:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

3.3 The National Park Authority also has a duty when carrying out the purposes:

- To seek to foster the economic and social well-being of the local communities within the National Park.

3.4 In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes.

i) The South Downs National Park Authority

3.5 The South Downs National Park Authority (SDNPA) is a statutory public body and the local planning authority. It is funded by government, and 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.

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

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

ii) South Downs Partnership

3.8 The South Downs Partnership is the key mechanism through which partnership working with stakeholders occurs. It is made up of representatives from different sectors, all with an

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.

important stake in the future of the South Downs National Park. This includes representatives from Natural England, the Environment Agency, the National Trust, Land Owners Association, farmers' representative, heritage groups, Association of Parish Council and water authorities.

3.9 The Partnership members work closely with each other, and with the SDNPA, 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 and Local Plan, monitoring their delivery and working in task and finish sub-groups when appropriate;
3. act as ambassadors for the National Park, working for its success.

3.10 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 Partnership Management Plan and 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

3.11 The SDNPA is responsible for planning across the entire National Park but have agreed partnership arrangements with the local authorities within the National Park boundaries. For seven of these Authorities the National Park deals directly with all planning questions, advice and applications. The other five authorities deal with the majority of these applications within their respective administrative areas on behalf of the National Park through hosted arrangements. This way of working requires considerable cross-authority understanding of the issues, and coordination is managed through regular meetings and working groups of officers (including Heads of Service) across the National Park. The SDNPA deals with all minerals and waste applications.

iv) Joint Plans

3.12 A key part of the work of the SDNPA in the earliest years of its existence was the preparation of a number of joint plans. The adopted plans 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)
- Lewes Joint Core Strategy (2016)²
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (2017)
- Hampshire Minerals and Waste Plan (2013)
- West Sussex Waste Plan (2014)

² Policies SD1 and SD2 of the Lewes JCS in so far as they relate to the South Downs National Park were quashed at the High Court in February 2017.

- 3.13 In addition, the SDNPA and West Sussex County Council have prepared a Joint Minerals Local Plan. This was submitted for examination to the Secretary of State in May 2017.
- 3.14 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.
- 3.15 The South Downs Local Plan has carried forward as far as possible the policies within the Joint Core Strategies where the evidence base is up to date and the principles of a landscape led policy approach has been central. This includes the levels of employment, retail and housing. Upon the adoption of the South Downs Local Plan the Joint Core Strategies and all other saved Local Plan policies will be superseded apart from for Minerals and Waste plans.
- 3.16 The existence of the these Joint Core Strategies fulfils many of the requirements of the Duty. It demonstrates the level of joint working and a shared understanding of the issues facing the National Park and its surrounding areas.

v) Planning Committee and Local Plan Members Working Group

- 3.17 Planning Committee is comprised of Authority Members including those appointed by the relevant local authorities. 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. Cross boundary strategic planning priorities

- 4.1 The purposes and duty of the National Park along with the South Downs Partnership Management Plan, the sustainability appraisal of the Local Plan and the responses to the various consultations on the South Downs Local Plan helped to establish the key strategic planning issues that have been considered through the work on the duty to cooperate. These are in turn also influenced by the ecosystem services approach to the preparation of the plan.
- 4.2 The key strategic issues 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 Gypsies, Travellers and Travelling Showpeople.
 - The promotion of sustainable **tourism**.
 - Development of the **local 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 2015³. No new issues were identified at that point.
- 4.4 There is a range of other less strategic issues that have been raised by the Duty to Cooperate bodies, which may or may not have cross boundary implications. These have been dealt with through representations and amendments to the Local Plan during its preparation.
- 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.
- 4.6 The following section of this report takes each key strategic issue in turn. For each of these it provides a brief background; summarises what actions have been undertaken; sets out any joint evidence prepared; lists other evidence studies for which the input of a number of other bodies has been sought, and summarises the outcomes to date of discussions.

³ Preparing the South Downs Local Plan – Duty to Cooperate Session (1st July 2015, South Downs Centre, Midhurst) – see Appendix 2 for full details

Conserving and enhancing the natural beauty of the area

- 4.7 The landscape of the South Downs is recognised as being of national importance and conserving and enhancing its natural beauty forms part of the first purpose of the National Park. It is therefore the key strategic issue that guides all the work of the Authority. As a consequence, the Local Plan is a landscape-led plan. Under Section 62 of the Environment Act 1995 authorities outside of the National Park are required to 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
 - Design
 - Relative Tranquillity
 - Dark Night Skies
- 4.9 This strategic issue has close ties to the cultural services category within ecosystem services which relates to people’s enjoyment of the National Park and its special qualities.

Strategic issues	Development both within and outside the National Park has the potential to impact individually or cumulatively on the natural beauty of the area. The impacts of such developments must be carefully managed and mitigated.
Partners	<ul style="list-style-type: none"> • All Local Authorities • Historic England • Natural England • Marine Management Organisation • Parish Councils • CPRE • The High Weald Partnership • Chichester Harbour Conservancy
Actions/outcomes	<p>Jointly prepared evidence base</p> <p>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 the Countryside Agency, English Heritage, Hampshire County Council, West Sussex County Council and East Hampshire District Council.</p> <p>Open Coast - Seascape Assessment for the South Marine Plan Areas, MCA 7: Selsey Bill to Seaford Head and MCA 8: South Downs Maritime (2014) – The 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.</p> <p>SDNPA studies involving ongoing cooperation</p> <p>International Dark Skies Reserve project (promotion and evidence gathering) - The National Park is an International Dark Sky Reserve. A key</p>

part of the successful application was the need to demonstrate the support of not only the NPA but also Authorities surrounding or near to the park where development now and in the future might impact on the level of light. This took the form of written letters of support / evidence from relevant Local Authorities and Parish Councils. Many neighbouring Authorities are now looking to incorporate policies into Local Plans that support the Reserve status and such policies are regularly included in Neighbourhood Plans.

South Downs National Park: View Characterisation and Analysis (2015) –

This study report provides information about, and mapping of, the major views and visibility within, to and from the National Park. It acts as a shared evidence base, and is used by not only the National Park but also adjoining Planning Authorities. Its preparation included joint working with the High Weald AONB Board and the Chichester Harbour AONB Board, to address and understand fully the intervisibility issues with these designated landscape areas.

Conserving and enhancing the region’s biodiversity including green infrastructure issues

- 4.10 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. As the most highly populated National Park in the UK, and due to its location in the equally populated south east of England, the South Downs National Park is under significant pressures.
- 4.11 Under the themes ‘A Thriving Living Landscape’ and ‘Towards a Sustainable Future’, the SDNP Local Plan includes policies on:
- Biodiversity and Geodiversity
 - International Sites
 - Trees, Woodland and Hedgerows
 - Protection of the Water Environment
 - Green Infrastructure
- 4.12 This strategic issue has close ties to all categories of ecosystem services, and in particular the benefits that people and society get from the natural environment.

Strategic issues	<p>The strategic issues relating to biodiversity, geodiversity, habitat protection, the water environment and green infrastructure are wide-ranging in the context of the SDNPA’s National Park status. They can be summarised as follows:</p> <ul style="list-style-type: none"> • Wildlife habitats are subject to a range of pressures including population growth, recreational visitors, new development and traffic growth. International nature conservation designations are particularly vulnerable, and require careful attention to the in-combination effects of human influence, requiring joint strategies and mitigation plans. • Water resources, both above and below ground, provide highly valuable ecosystem services. The National Park includes two regionally important aquifers, and 11 main rivers flow through the National Park. These resources need protecting for future generations. • The South Downs National Park is a nationally significant green infrastructure asset. As levels of development outside of, but close to the National Park boundary continue to grow these communities increasingly rely on and utilise the green infrastructure provided by the National Park. The South Downs along with the New Forest National Park and the two AONBs can be considered to form the ‘green heart’ of the sub-region.
Partners	<ul style="list-style-type: none"> • All Local Authorities • Natural England • Environment Agency • Local Nature Partnerships

Actions/outcomes	<p>Joint projects</p> <p>Heathlands Reunited - Eleven organisations led by the South Downs National Park Authority have joined forces to expand and connect the existing 1% of heathland left in the national park. The project will create wildlife corridors forming an area of heathland greater than 1,200 football pitches by the end of the five year project, which will reduce the vulnerability of some of Britain's rarest wildlife including all twelve of our native reptiles and amphibians. The project is being led by the SDNPA and involves 10 other partners: Natural England, Hampshire County Council, Ministry of Defence, Forestry Commission, the National Trust, RSPB, and local wildlife trusts and conservation societies.</p> <p>Jointly prepared evidence base</p> <p>Green infrastructure Framework - 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. This has involved joint working with other local authorities and relevant bodies to provide an agreed and co-ordinated position on the strategic principles and priorities for planning, investment and delivery of green infrastructure. The shared objective is 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> <p>South Downs Open Spaces Study – The SDNPA has prepared a report that brings together the approaches of the various local authorities in respect of open space provision as part of new development. This has involved liaison with the partner authorities, as appropriate to ensure an up-to-date evidence base.</p> <p>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 strategy has been 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, Winchester City Council, Natural England, the Royal Society for the Protection of Birds, Hampshire & Isle of Wight Wildlife Trust, and Chichester Harbour Conservancy. The definitive strategy is due to be published in draft 2017, and will be subject to consultation. Work is ongoing to seek mitigation through financial contribution to the strategic measures set out in the strategy.</p> <p>Wealden Heaths Phase II SPA – The Habitats Regulations Assessment (HRA) for the East Hampshire/South Downs Joint Core Strategy (JCS) identified recreational pressure and urbanisation is an issue for the Wealden Heaths Phase II SPA. Other similar European sites where this issue has also</p>
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been identified (such as the Thames Basin Heaths) has employed a development exclusion zone within 400m of the site. However at the examination of the JCS it was determined that such an exclusion was not necessary as a specific constraint in the JCS due to the small number of housing proposals expected within that zone (approximately 30 dwellings). Since this time, An increase in housing numbers from 30 to 43 dwellings within 400m has been agreed between Natural England and East Hampshire District Council.

SDNPA studies involving ongoing cooperation

Ashdown Forest SPA – Whilst the Ashdown Forest SPA is some 18 km from the edge of the National Park, there are known to be potential impacts on its integrity arising from a wide area around as a result of development pressure. This was recognised in preparing the Lewes Joint Core Strategy, and the jointly prepared HRA tested the potential impact of development proposed. However, in recent months, a successful legal challenge to the Lewes JCS has identified that joint working over a much larger area, and across many planning authorities, is needed to ensure that the ‘in-combination’ effects of various development plans (specifically their traffic impacts) on the Ashdown Forest are sufficiently mitigated. As a result, the SDNPA has led on convening an Ashdown Forest working group, which has the shared objective of ensuring that impacts on the Ashdown Forest have been properly assessed through HRA, and that a joint action plan is put in place to safeguard the Ashdown Forest for future generations.

Habitats Regulation Assessment (HRA) - A HRA of the Local Plan has been prepared. The recommendations of this report have been taken into account in the Pre-Submission version of the Local Plan. The HRA has incorporated jointly agreed principles centred around in-combination testing of traffic impacts, as discussed at meetings/telecoms with both with individual local authorities (e.g. Lewes DC) and the joint working group set up in relation to the Ashdown Forest. It has been reviewed by Natural England.

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.

Wealden Heaths Phase II SPA – SDNPA has agreed with East Hampshire to produce an SPD on the matter focusing on the number and type of new dwellings that can be built in the buffer coming forward both through planning applications and Local Plan allocations.

A Cross Boundary Habitats Regulations Working Group is attended by officers of East Hampshire District Council, Waverley Borough Council, South Downs National Park Authority and Natural England. This group works jointly to share information and monitoring data, and to explore evidence and policy options as required.

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

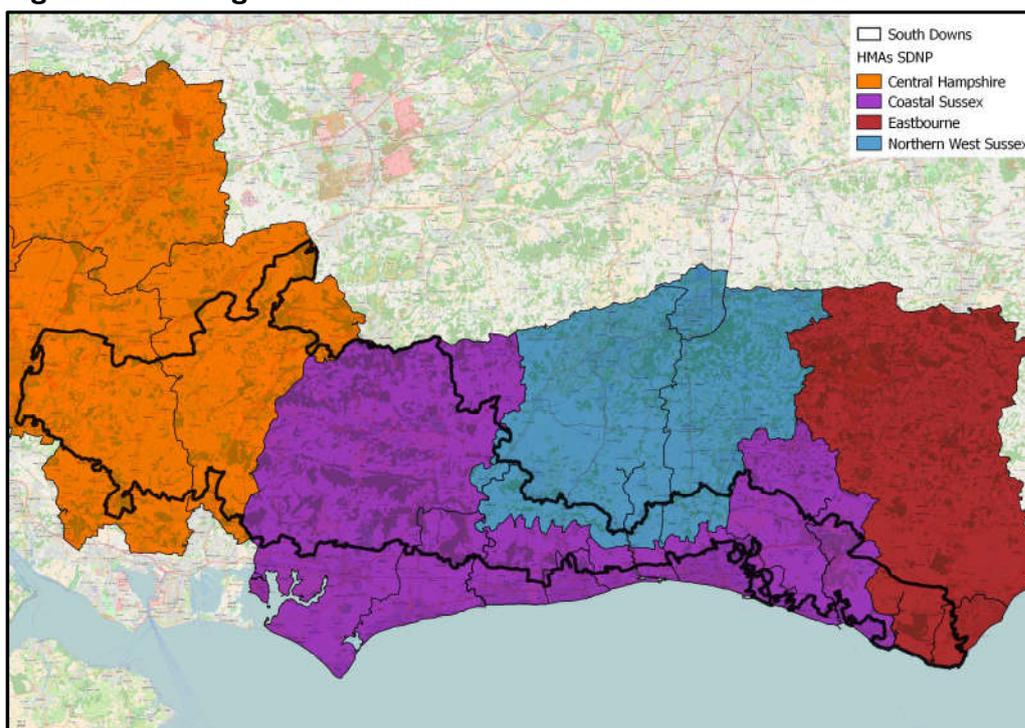
- 4.13 The provision of new housing is a major issue across the country, but in National Parks the focus is on the provision of affordable housing as stated in the *National Parks Vision and Circular* (DEFRA, 2010). The NPPF also states in Footnote 9 (page 4) that the general requirement for local planning authorities to meet objectively assessed needs does not apply where NPPF policies restrict development, giving as an example sites within a National Park. House prices across the National Park are well above the national and regional averages, and there are significant differences in prices between the towns and surrounding rural areas. The provision of some new housing to meet local needs is crucial to ensuring the sustainability and vitality of communities within the National Park. This policy approach is made clearer in the White Paper *Fixing our broken housing market* published in 2017. Paragraph A38 of the document says: 'The Government proposes to clarify which national policies it regards as providing a strong reason to restrict development when preparing plans...it is proposed that these are limited to the policies currently at footnote 9 of the NPPF, with the addition of Ancient Woodland and aged or veteran trees; and that these are no longer set as 'examples' but as a clear list.'
- 4.14 The Local Plan must determine the level of housing provision and types of homes to be delivered. The NPPF states that for a local plan to be considered 'sound' at examination, the plan should be positively prepared. The NPPF also states that the local plan should be 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. In the case of the South Downs, the Local Plan must first and foremost reflect the statutory purposes of the National Park, therefore the spatial strategy must be based on the capacity of the landscape to accommodate growth (landscape-led). Pursuant to this, the Local Plan must reflect the statutory duty of the National Park, by seeking to foster the economic and social wellbeing of **local** communities across the breadth of the National Park.
- 4.15 Hence the South Downs Local Plan development strategy is **capacity-based**. To seek to meet the full, objectively assessed needs for the area would conflict with the statutory purposes and duty. It follows that there is very limited scope to help meet the development needs of surrounding areas within the South Downs National Park, which would also go beyond the statutory duty relating to local communities. Nevertheless, the National Park Authority is committed to working positively with local authorities which fall partly within the National Park, and beyond, in addressing the pressing need for new homes.

Housing Market Areas (HMAs)

- 4.16 The South Downs HEDNA⁴ evidence that the South Downs National Park falls within 4 HMAs, as illustrated in the map below. This makes the issue of identifying and addressing unmet housing needs particularly complex. It is particularly important, therefore, that the National Park Authority continues with joint working within each of the HMAs, whilst recognising that this wider strategic need will ultimately be addressed in locations outside of the National Park.

⁴ South Downs National Park Housing and Economic Development Needs Assessment (GL Hearne, 2017)

Figure 3 Housing Market Areas and the South Downs National Park



Source: South Downs National Park HEDNA, 2017

Addressing unmet housing need

4.17 Housing numbers and distribution have previously been addressed to varying degrees in parts of the National Park through the preparation of Joint Core Strategies in East Hampshire, Winchester, Lewes⁵, Wealden and Worthing. These are incorporated into the relevant Local Plan where the evidence base is up to date, and the principles of a landscape led Local Plan are already integrated into the relevant policies. However there remains an unmet housing need relating to the wider HMAs within which these local authority areas sit. Most local authorities within the housing market areas that the National Park forms part of are also constrained to some degree or another, and therefore face challenges in meeting their full assessed need.

4.18 Table I below summarises the level of housing need within different parts of the National Park that relate to district, borough or unitary council boundaries. The table also shows the supply of housing allowed for in the relevant district/borough/unitary-level Local Plan, against the respective housing supply already being planned for. This gives an indication of the level of unmet housing need arising from within the South Downs National Park, for each of those areas. It is anticipated that Memoranda of Understanding will be agreed with all relevant local authorities to set out clearly how this unmet need will be addressed, in the context of the relevant housing market area.

⁵ Policies SD1 and SD2 of the Lewes JCS in so far as they relate to the South Downs National Park were quashed at the High Court in February 2017.

Table I Unmet housing need per annum in HMAs that include part of the South Downs National Park, by district/borough/unitary area

HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (total provision divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./HMA ⁶	Total annual unmet need by L.A./HMA
East Hampshire	1504	79	112	33	492	592	-	21
Winchester	257	14	31	17	625	625	14	-
Test Valley	n/a	n/a	n/a	n/a	588	588	0	-
Basingstoke & Deane	n/a	n/a	n/a	n/a	850	850	0	-
Central Hants HMA	1761	93	144	50	2555	2655	-	7
Wealden	41	2	10	8	450	698	-	246
Eastbourne	0	0	5	5	222	800	-	578
Eastb'/Weald' HMA	41	2	14	13	672	1498	-	824
Horsham	96	5	9	4	800	636	169	-
Mid Sussex ⁷	23	1	5	4	876 / 1090	876	89	-
Crawley	n/a	n/a	n/a	n/a	340	675	-	335
Northern WSx HMA	119	6	14	8	2104	2187	-	77
Adur	11	1	8	7	177	325	-	147
Arun	108	6	15	9	1000	919	87	-
Brighton & Hove	0	0	9	9	660	1506	-	846
Chichester	1169	62	125	63	492	575	-	21
Lewes	1208	64	114	50	298	520	-	158
Worthing	0	0	3	3	200	636	-	436
Sussex Coast HMA	2496	131	274	143	2827	4481	-	1523
Total	4417	232	447	214	8158	10821	-	2431

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Housing provision targets based on most recent adopted or post-examination strategic local plan. Note that only East Hampshire JCS includes significant housing supply within SDNP (100 dpa over the Plan period) so the total annual provision outside the SDNP has been discounted accordingly (from 592 dpa to 492 dpa)

⁵ Taken from the most recent SHMA or HEDNA. Where the study has not included the area within SDNP, the OAN inside SDNP as stated in the South Downs HEDNA 2017 has been added. OAN for East Hampshire accords with the JCS Inspectors Report.

⁶ This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

⁷ The latest outcome from the Mid Sussex Examination is a stepped annual provision of 876 dpa for the first 10 years of the 17-year Plan period, and 1,090 dpa thereafter. This calculates as an annualised oversupply of 88 dpa, however no oversupply is expected until at least 2024/25.

*note that due to rounding, some totals will vary slightly from the sum of figures to which the total corresponds

Addressing unmet gypsy and traveller need

- 4.19 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.
- 4.20 Table 2 summarises the level of need for gypsy and traveller accommodation relating to different parts of the National Park (based on the boundaries for accommodation needs studies undertaken), compared with the supply provided by allocations in the South Downs Local Plan. This shows that some, but not all, of the need can be met. It is anticipated that Memoranda of Understanding will be agreed with all relevant local authorities to set out clearly how unmet Gypsy, Traveller and Travelling Showpeople accommodation needs will be addressed.

Table 2 Unmet Gypsy, Traveller and Travelling Showpeople need arising from the South Downs National Park, by area

Area (Within National Park)	Permanent Gypsy & Traveller Pitch Need	Permanent Showpersons' Plot Need	Allocations in the Local Plan	Remaining unmet need
Brighton & Hove	13 (2016 – 2028)	0	0	13
Coastal West Sussex (Arun, Adur, Chichester, Worthing)	0	0	0	0
East Sussex (Lewes, Eastbourne, Wealden)	8 (2016 – 2028)	0	5	3
Hampshire (East Hampshire, Winchester)	11 (2016 – 2027)	4 (2016 – 2027)	8 (Gypsy & Traveller)	3 Gypsy & Traveller, 4 Travelling Showpeople
Horsham	0	0	0	0
Mid Sussex	0	0	0	0
Total	32	4	13	19 (Plus 4 Travelling Showpeople)

Evidence of Duty to Cooperate

4.21 Under the theme ‘Towards a Sustainable Future’ the South Downs Local Plan includes policies on:

- The Development Strategy
- Homes
- Affordable Homes
- Rural Exception Sites
- Gypsies, Travellers and Travelling Show People

4.22 This is supplemented by the allocation of sites distributed across the National Park for housing and Gypsies & Travellers; further housing sites are allocated in neighbourhood development plans.

Strategic issues	<ul style="list-style-type: none"> • The appropriate provision of housing towards meeting local needs is crucial to ensuring the sustainability and vitality of communities within the National Park • Where it is demonstrated that housing development cannot be sustainably accommodated, the SDNPA with adjoining authorities need to consider whether any unmet need can be met elsewhere within each housing market area. • Where it is demonstrated that Gypsy & Traveller and Travelling Showpeople sites cannot be sustainably accommodated, the SDNPA with adjoining authorities need to consider whether any unmet need can be met elsewhere within the locality.
Partners	<ul style="list-style-type: none"> • All Local Authorities falling within one or more of the four HMAs within which the National Park Authority falls • Local Enterprise Partnerships (LEPs)
Actions/outcomes	<p>Joint working arrangements</p> <p>A key mechanism through which these issues are considered is through the Coastal West Sussex & Greater Brighton Planning Board. Strategic matters are also addressed through the East Sussex Strategic Planning Managers Group. Within Hampshire the Hampshire and Isle of Wight Local Authorities Chief Executives group provides strategic and cross boundary overview of work across the authorities. See Section 5 for further details.</p> <p>Jointly prepared evidence base</p> <p>Housing - Strategic Housing Market Assessments (SHMAs). 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.

• Defining the HMA and FEMA (GL Hearne, February 2017) – a study which defined the housing market areas and functional economic market areas across the Coastal West Sussex and Greater Brighton area. The purpose of this study was to enable a clearer definition of the boundaries of the area that should be covered by the Local Strategic Statement update.

• 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.

The South Downs National Park Authority also prepared a SHMA in 2015 to cover the entire National Park. This followed on from and incorporated the joint studies carried out across the National Park. The SHMA has been updated in 2017 and incorporated into a Housing and Economic Development Needs Assessment (HEDNA).

In addition to the preparation of SHMAs a number of other studies / statements have been prepared jointly with other Authorities:

• 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.

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:

• Brighton and Hove City Council and the South Downs National Park Authority GTAA (2014).

• Coastal West Sussex GTAA (2012).

• 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)

These studies and the resulting site assessment work has informed how future need is addressed. Site search studies have been carried out jointly in the , Coastal West Sussex area and with the East Hampshire and Winchester; Lewes; and, Brighton and Hove City Council Authorities.

New GTAAs are being prepared by Districts and Boroughs across various parts of the National Park.

Development plan outcomes

Lewes Joint Core Strategy - In support of the Lewes Joint Core Strategy Examination in 2015, the 'Duty to Cooperate: Statement of Common Ground, Cross-Boundary Working and Meeting Housing Needs' paper was 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

The Statement of Common Ground agreed 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 NPPF. 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. The Lewes JCS has subsequently been adopted having received a positive report from the Inspector on this issue.

Local Strategic Statements - 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. 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 the Coastal West Sussex and Greater Brighton Local Strategic Statement ⁶ .
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⁶ Coastal West Sussex and Greater Brighton Strategic Statement (Updated January 2016) Delivering Sustainable Growth 2015-31 (Coastal West Sussex and Greater Brighton Strategic Planning Board, January 2016)

The promotion of sustainable tourism

- 4.23 The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. Approximately 2 million people live within 5km of the South Downs National Park, with the coastal urban areas that sit close to the southern boundary being particularly populous. Hence there are both opportunities to promote enjoyment and understanding of the National Park, and pressures arising from impact of recreation and tourism on the special qualities. The cooperation of partners in striking the right balance is clearly, therefore, important.
- 4.24 Under the theme People Connected with Places the SDNP Local Plan includes a policy on Sustainable Tourism.

Strategic issues	<ul style="list-style-type: none"> • Tourism in the National Park cannot be seen in isolation from the surrounding areas. The areas immediately bordering the South Downs are heavily populated. The spatial portrait of the Pre-Submission Local Plan shows the wider South Downs area including important gateways into the National Park. 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, whilst preserving and enhancing the special qualities of the National Park.
Partners	<ul style="list-style-type: none"> • All Local Authorities, particularly southern Authorities • Local Enterprise Partnerships • National Parks England • Visit England • Charitable landholding trusts, including The National Trust, English Heritage, RSPB, and local wildlife trusts. • Public land owners/stewards, including the Forestry Commission and parish councils. • Private landowners, including farms and estates
Actions/outcomes	<p>SDNPA and other studies involving ongoing cooperation</p> <p>South Downs National Park Sustainable Tourism Strategy 2015-20 – this seeks to work with a range of partners in enabling enjoyment of the area, and guide the tourism activities of the South Downs National Park Authority. The strategy identifies the delivery tools that will govern our working relationships with partners. Outcomes from this work have fed into the Local Plan, but relate also to a wide range of SDNPA’s activities.</p> <p>Whole Estate Plans (WEPs) – Whole Estate Plans and Large Farm Plans describe these organisations’ plans for the future, and are a tool to encourage open dialogue between land owning organisations and the National Park, to look at land holdings in a holistic way that supports the wider purposes of the National Park. Whilst not falling within the prescribed Duty to Cooperate bodies, it is particularly important to partner with these bodies which have the main stewardship responsibilities and provide access to recreational visitors.</p>

Development of the local economy and improving the efficiency of transport networks

- 4.25 The local economy is formed of many elements. For the purposes of compliance with the statutory duty, this statement only considers elements that may have strategic cross boundary implications, namely, the supply of strategic employment land, and the infrastructure to support it. The National Park covers parts of six Functional Economic Market Areas: Brighton, Chichester & Bognor, Eastbourne, Worthing, Central Hampshire and Northern West Sussex.
- 4.26 In support of this area of work an Employment Land Review was prepared in 2015. This has been updated by two studies: the South Downs Housing and Employment Development Needs Assessment (HEDNA), and the ELR Focused Review of Sites⁷.
- 4.27 Under the theme ‘Towards a Sustainable Future’ the Local Plan includes the following policies. ‘Sustaining the Local economy’ and ‘Employment Land’ in order to address sustainable economic development in the National Park. These policies, in tandem with neighbourhood plans and South Downs Local Plan site allocations, allocate a limited amount of land to support growth of local businesses and protect existing sites.
- Sustaining the Local economy
 - Employment Land
- 4.28 The efficient operation of transport networks is a matter that closely relates to economic growth, and is therefore covered in this section. The key cross-boundary strategic issues relating to this relate to improving the strategic road and rail networks, improving the accessibility of the National Park to visitors from outside, and the effect of housing and employment growth outside the National Park boundary on traffic within it. Proposals for road and railway infrastructure that involve significant works are likely to be classed as major development, and therefore be assessed against Local Plan Policy SD3: Major Development.

Strategic issues	<ul style="list-style-type: none"> • Provide for new B-class employment provision focused in Petersfield, Lewes, Midhurst and Petworth. These sites fall within the Central Hampshire, Brighton and Chichester/Bognor FEMAs respectively. Draft policy SD35 sets out the following employment land provision figures : <ul style="list-style-type: none"> ○ Office (B1a/b): approximately 5.3 hectares ○ Industrial (B1c/B2): approximately 1.8 hectares. ○ Small-scale warehousing (B8): 3.2 hectares • Long-term development of transport and green infrastructure to support wider economic growth • Improvement of access to the National Park for visitors by sustainable means, including reducing the barrier effect of major transport routes
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⁷ South Downs National Park Authority Employment Land Review 2017 Update (SDNPA, 2017)

	<p>to walkers, cyclists, and equestrians, the creation and improvement of non-motorised routes from adjacent urban areas into the National Park, and the development of infrastructure for sustainable access to the National Park focussed on hubs and gateways.</p> <ul style="list-style-type: none"> • Finding ways to limit any negative impacts on the National Park’s special qualities of traffic generated by new development elsewhere.
Partners	<ul style="list-style-type: none"> • All Local Authorities • Local Enterprise Partnerships • Local Transport Authorities • Network Rail • Highways England • Public transport operating companies and community transport groups (e.g. Community Rail Partnerships)
Actions/outcomes	<p>Jointly prepared evidence base</p> <p><i>Defining the HMA and FEMA</i> (GL Hearne, February 2017) – a study which defined the housing market areas and functional economic market areas across the Coastal West Sussex and Greater Brighton area. The purpose of this study was to enable a clearer definition of the boundaries of the area that should be covered by the Local Strategic Statement update.</p> <p><i>Local Plan Transport Assessment</i> - This assessment of the impact of Local Plan traffic on particular junctions in the National Park was carried out in close cooperation with the relevant Local Highway Authorities and involved input from a large number of local authorities and Highways England. It uncovered significant impacts on traffic levels arising from development outside the National Park, and recommended mitigating actions for the LHA.</p> <p>Joint working arrangements</p> <p>The SDNPA is part of two LEPs: the South East LEP, and Coast to Capital. Whilst the National Park will never be a focus for significant strategic economic growth, it nevertheless has an important role in providing green infrastructure and recreational opportunities which support the wider principles of sustainable economic growth. The National Park also has passing through it a number of strategically important transport lines, such as the A3, A23, A24 and A27 strategic roads, and mainline railways connecting large centres of population.</p> <p>Therefore the SDNPA has and will continue to work through the LEP, and through various working groups, to coordinate these matters.</p>

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 the Duty to Cooperate 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 joint working is not consistent. The Authority has, in general, made the best use of existing groups rather than establishing new ones.
- 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 in West Sussex (Adur, Arun, Chichester, Worthing, Mid Sussex and Horsham) with West Sussex County Council, Brighton and Hove City Council, Lewes, and the South Downs National Park.
- 5.5 The aims and objectives of the Board are to:
- The Strategic Planning Board will identify and manage spatial planning issues that impact on more than one local planning area within Coastal West Sussex and the Greater Brighton area
 - The Strategic Planning Board will support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.
- 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 a 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 set 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 was updated in January 2016 and covers the period 2015 – 2031. Of principal importance to the SDNP is Spatial Priority 9 regarding rural Sussex, copied below.
- 5.11 In addition to this formal partnership working, the following informal, but established, working groups meet regularly with the aim of coordinating work projects, sharing information and helping to identify strategic work priorities:
- West Sussex Chief Planning Officers Group (CPOG)
 - West Sussex Planning Policy Officers Group (PPOG)
- 5.12 There have also been previous project-related networks across the Coastal West Sussex and Brighton & Hove area to address the following:
- Community Infrastructure Levy Officer Network
 - Gypsy & Traveller Officer Network.

CWS SPATIAL PRIORITY 9: RURAL SUSSEX

The local authorities and the South Downs National Park Authority will work together with partners to ensure that the rural parts of the sub-region benefit from long term sustainable growth through:

- Supporting delivery of affordable housing.
- Improving connectivity between the priority sectors of the rural economy, including tourism, leisure, agriculture and horticulture.
- Identifying priority infrastructure needs to support rural businesses, including home-workers, particularly in relation to communications infrastructure which improves accessibility to the main employment centres within the sub-region.
- Facilitating a good supply of small business, retail and community facilities to support the sustainability of rural communities,
- Supporting existing and proposed land management and land based businesses that protect and enhance the landscape character of the countryside
- Safeguarding mineral sites and areas with potentially economically viable minerals from alternative forms of development to ensure a steady supply of minerals for use in construction and industrial purposes
- Improving access to the South Downs National Park particularly by sustainable modes of transport from key gateway locations

Implementing Spatial Priority 9

The Strategic Planning Board will:

- (1) Work with the LPAs, the Rural Partnership and other partners to identify the strategic development contribution of rural areas towards supporting long term sustainable growth of the sub-region and how this should be reflected in the relevant local plans and in the devolution proposals as they are taken forward and developed. This will inform the assessment of the role and character of the sub-region which is proposed as part of the implementation of Strategic Objective 1.
- (2) Work with West Sussex County Council and Local Infrastructure Boards to ensure that the strategic priorities are included in the West Sussex Growth Plan and Place Plans.

A significant proportion of the CWS & GB sub-region is rural, much of which is designated as part of the SDNP or is within the two AONBs. These areas already contribute significantly to the overall economy of the area, particularly with regards to tourism and leisure, but also in other priority sectors such as horticulture. In many parts of the rural area, small businesses are considered to be the lifeblood of the economy and contribute significantly to the local communities and a significant number of residents are 'homeworkers'.

The LSS aims to ensure that these areas do not stagnate and that the rural economy is supported as much as the wider economy, for example, through ensuring that they are properly connected, particularly with broadband and other telecommunications. It is vital that as part of this approach, the need to support growth and therefore new development is balanced with the need to protect and enhance the significant landscape and environmental assets of these areas.

b) East Sussex

- 5.13 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 and meets as required.
- 5.14 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.
- 5.15 The work of the East Sussex Local Plan Managers group is particularly focused on issues of commonality between the authorities. For example establishing a common evidence base and planning policy direction for specific topics such as older persons housing and Gypsy & Traveller Transit sites. Of particular importance is the recently started work on the Ashdown Forest impact and mitigation.

c) Ashdown Forest Officer Working Group

- 5.16 The recent successful legal challenge to the Lewes JCS has identified that joint working over a much larger area, and across many planning authorities, is needed to ensure that the 'in-combination' effects of various development plans (specifically their traffic impacts) on the Ashdown Forest are sufficiently mitigated. As a result, the SDNPA has led on convening an Ashdown Forest working group which first met in April 2017.
- 5.17 The shared objective of the working group is to ensure that impacts on the Ashdown Forest have been properly assessed through HRA, and that a joint action plan is put in place to safeguard the Ashdown Forest for future generations. At this early stage, the working group has agreed to work collaboratively, and has so far focused on sharing and exploring expert advice, research and data, in particular sharing baseline information.
- 5.18 Further details on Ashdown Forest are set out in section 4 of this report.

d) Hampshire and Isle of Wight Local Government Association (HLOWLA)

- 5.19 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 HLOWLA Chief Executive Officers group.
- 5.20 The focus for particular pieces of research comes from HLOWLA 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)

5.21 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.

e) Joint Core Strategies (JCS)

5.22 All JCS by virtue of the fact they are prepared jointly with the SDNPA take into account the purposes and duty of the National Park. They are key to demonstrating that the duty to cooperate has been met in significant parts 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.

5.23 All the JCSs have now either been adopted or submitted to the Secretary of State. This in itself demonstrates the success of joint working between the respective local authorities on each JCS. Moreover, it provides a common set of objectives for each pairing, which the parties are jointly responsible for implementing, and around which the parties can coalesce.

5.24 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*

5.25 The East Hampshire District Local Plan: Joint Core Strategy was adopted in June 2014. It sets out a development strategy and high-level policies for the whole of East Hampshire district. This JCS has in turn informed the Petersfield Neighbourhood Plan, covering the settlement of Petersfield which is the largest settlement in East Hants district, and falls entirely within the National Park. The policies fully reflect both authorities' objectives; development is focused at the main settlements in the district (especially Petersfield), but with appropriate housing growth in smaller villages both inside and outside the National Park. The main proposals within the National Park is for a minimum 700 dwellings at Alton and Horndean and Petersfield, about 3 hectares of employment land in Petersfield, and a minimum 100 dwellings at other villages in the National Park. These high-level apportionments have been carried forward into the South Downs Local Plan.

ii) *Lewes District Joint Core Strategy 2016*

5.26 The Lewes District Local Plan Part I Joint Core Strategy 2010-2030 was adopted in May 2016. It sets out a development strategy and high-level policies for the whole of Lewes district. This JCS has in turn informed the emerging Lewes Neighbourhood Plan, covering the district's main settlement of Lewes. The policies fully reflect both authorities' objectives: a large part of the overall housing supply is to be delivered in Lewes town, and in particular on the strategic sites North Street Quarter (415 dwellings) and land at Old Malling Farm (240 dwellings). These high-level apportionments are proposed to be carried forward into the South Downs Local Plan. However it should be noted that Spatial Policies 1 and 2 have been quashed by the High Court, insofar as they apply to the South Downs National Park, due to failings relating to the Habitat Regulations Assessment.

iii) Wealden Core Strategy Local Plan 2013

5.27 The Wealden District (Incorporating Part of the South Downs National Park) Core Strategy Local Plan was adopted in February 2013. It establishes a long-term spatial vision and strategic objectives for the whole of Wealden District for the period 2013 to 2027. The policies fully reflect both authorities' objectives; nearly all development is to be delivered outside of the National Park, reflecting the unsuitability of this part of the National Park to accommodate growth. The plan provides for at least 9440 homes within Wealden from 2006 to 2027. Of this total, within the National Park, only East Dean is required to accommodate a modest 10 homes by 2027 and permission for such a development was recently granted.

iv) Winchester District Joint Core Strategy 2013

5.28 The Winchester District Local Plan Part I – Joint Core Strategy was adopted in March 2013. It sets out a development strategy and high-level policies for the whole of Winchester City's area. The policies fully reflect both authorities' objectives: the urban areas of Winchester City and Hampshire (PUSH) 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. 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.

f) Hampshire Alliance for Rural Affordable Housing (HARAH)

5.29 HARAH is a formally constituted partnership of local authorities and rural housing providers, which enables rural affordable housing schemes through joint coordination of funding sources and project coordination. SDNPA is a full member of HARAH. This is an important joint working mechanism for SDNPA, as the Authority is not in itself a local housing authority. It therefore relies on the work of the district/borough/unitary authorities and housing associations to deliver much of the affordable housing that is required in the National Park. The SDNPA attends regular officer meetings and an annual Business Planning Meetings.

g) Action in Rural Sussex (AiRS)

AiRS is a similar organisation to HARAH, but covering the eastern part of the area. SDNPA works with AiRS on a regular basis to facilitate the delivery of affordable housing.

6. Ongoing work and outcomes

6.1 The Duty to Cooperate requires evidence of ongoing cooperation with partners. The following section details the key projects and working arrangements that will ensure effective joint working past the point of Local Plan submission.

Conserving and enhancing natural beauty, biodiversity and green infrastructure

6.2 The Authority will continue to work closely with relevant organisations on protecting and enhancing internationally designated sites in particular. Ongoing cooperation is shaping the assessment of in-combination impacts on the Ashdown Forest SPA, and will produce a mitigation strategy and action plan which safeguards the Forest's future integrity. Joint working will proceed on the SPD to clarify the approach to the Wealden Heaths Phase II buffer with the Cross Boundary Habitats Working Group for this area.

6.3 Maintaining and enhancing the value of the National Park as a significant piece of green infrastructure is an emerging priority. The draft South Downs Green Infrastructure Framework sets out a roadmap for green infrastructure planning for the National Park and the wider sub-region. It aims to 'create, protect and enhance a connected network of multifunctional assets; which sustainably meet the needs of local communities and supports the special qualities of the South Downs; by achieving a consensus about the strategic principles for planning, delivery and management of green infrastructure'.

The delivery of new homes and addressing unmet housing need

6.4 The delivery of new homes is clearly a key Duty to Cooperate issue, given the requirement in the NPPF to address unmet housing needs on a cross-boundary basis, within identified housing market areas (HMAs).

6.5 The SDNPA is in a unique position with regards this issue. As set out in Section 4, the National Parks Vision and Circular (DEFRA, 2010) and NPPF (page 4, footnote 9) make clear that provision of housing in a national park should focus on affordable housing needs, and that the purposes of a national park should take precedent over development needs. However evidence supporting the SDLP (in particular the HEDNA) shows very clearly that the objectively assessed need for both affordable and market housing arising in communities within the SDNP cannot be wholly met within the boundaries of the SDNP without damaging the nationally protected landscape. Tables 1 and 2 in Section 4 of this report shows the estimated amount of unmet SDNP need relating to housing, and Gypsy and Traveller pitches respectively, broken down by district area and by HMA. This is in addition to the unmet needs that already exists in all of the HMAs.

6.6 The following processes are in place to address these issues. Clearly, given its National Park status, the National Park Authority will be looking to its constituent and neighbouring authorities

to address this. The SDNP will therefore continue to engage as appropriate, and will seek agreed, positive outcomes.

a) Coastal West Sussex and Greater Brighton Local Strategic Statement

In October 2012 the local planning authorities (LPAs) in Coastal West Sussex and Greater Brighton agreed to establish a new Strategic Planning Board to facilitate joint work on strategic planning priorities. The local authority partners represented on the Board are:

- Adur District Council
- Arun District Council
- Brighton and Hove City Council
- Chichester District Council
- Horsham District Council
- Lewes District Council
- Mid Sussex District Council
- Worthing District Council
- West Sussex County Council
- South Downs National Park Authority

The area covered by the board expanded in 2015 to include both Mid Sussex and Horsham Districts, reflecting the functional strategic relationship these areas have with Coastal West Sussex and Greater Brighton. The Board's remit is to:

- identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
- support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

The Board comprises lead councillors from each of the LPAs and works in an advisory capacity with all decision-making through the individual member authorities; this is set out in a Memorandum of Understanding.

The Local Strategic Statement (LSS) for CWS&GB is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. The LSS reflects the local planning authorities' clear aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the CWS&GB area. The LSS is not a statutory document and therefore relies on the voluntary consensus of all partners around the shared ambitions and priorities. A number of stakeholders have therefore been involved in its preparation, particularly those with a role to play in its delivery.

The LSS was endorsed by the SDNPA and the other members of the CWS&GB in 2013. The document builds upon the long term aims and objectives of successive strategic plans for the area and was informed by the key strategic research including a Duty to Cooperate Housing Study (GL Hearn on behalf of the Coastal West Sussex Authorities, May 2013).⁸

In 2015 the LSS was updated to reflect the change in strategic area covered, which now includes Horsham and Mid Sussex, and to take account of local plan progress and

⁸ <http://coastalwestsussex.org.uk/about-us/cws-strategic-planning-board/>

implementation of the Greater Brighton City Deal which was at an early stage when the LSS was initially prepared. The updated Strategic Objectives cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025. The Board felt it was important to balance having an up to date and 'fit for purpose' strategic framework with the need to support the current round of local plan reviews which are delivering the LSS priorities. The 2015 review was therefore managed as a focused 'refresh' rather than a full review. The shared ambition set out in the LSS is considered to provide a reasonable approach to the significant challenges the area faces, particularly in terms of housing provision, infrastructure delivery and balancing competing demands for land.

It is acknowledged that, in time, a full review of the LSS will be needed to address the longer term issues and that this may require a different spatial strategy. This will need to be accompanied by an up to date strategic evidence base to help the local authorities ensure that their approach continues to be in the best interests of the people that live and work in the area, and provides a sustainable approach to growth. The Board met on 04 September 2017 and agreed to:

- robustly and creatively explore options for meeting the unmet needs across the Board area, starting by leaving 'no stone unturned' within the respective administrative boundary for the period up to 2030 and for these options to inform Local Plan reviews
- prepare a Local Strategic Statement 3 covering the period 2030 to 2050
- to provide an evidence base for the preparation of a Local Strategic Statement 3

The full report is set out as Appendix 4 of this report.

Chichester are commencing a Local Plan Review now. Arun and Adur are at examination.

b) Northern West Sussex Housing Market Area

Horsham adopted the Horsham District Planning Framework in 2015. It sets out the strategy for the years to 2031 and seeks to meet the Authority's own need for housing as well as approximately half of the unmet need arising from Crawley. A review of this plan started at the beginning of 2017. Whilst there is a very small unmet need within Horsham that relates to the South Downs National Park (4 dwellings per annum), given an oversupply within Horsham district, and the much bigger issues of unmet need from other areas within the North West Sussex HMA, it is not considered that paragraph 179 of the NPPF in relation to unmet housing needs need be engaged for the National Park specifically.

The Mid Sussex District Plan is currently being examined. Key matters being discussed relate to housing delivery and the implications for the Ashdown Forest – any conclusions may have consequences for SDNP and other adjoining authorities. At the time of writing, a revised policy position is proposed by Mid-Sussex District Council that would meet the full OAN of 14,892 dwellings, and an additional 1,498 dwellings to address unmet need in the Northern West Sussex Housing Market Area. It also includes a commitment to reviewing the Local Plan starting in 2021, with submission in 2023, to ensure that unmet housing need arising from the Coastal West Sussex and Greater Brighton area is addressed in line with the work of the Strategic Planning Board.⁹

Table I shows that the need arising in Mid Sussex within the National Park is very low. It is also important to note that the Mid Sussex HEDNA published in February 2015¹⁰ included

⁹ Core Document MSDC20 Revised Policy DP5 published 17th August 2017

¹⁰ Mid Sussex Housing and Economic Development Needs Assessment (HEDNA) (MSDC, 2017)

the whole of the district, including the area within the National Park, and this approach has been maintained as the evidence has evolved in the course of examination. Furthermore, very limited populations in these areas live within the National Park. It is therefore considered that the small amount of housing need relating to the National Park within Horsham and Mid Sussex is already being met elsewhere in these districts, and the provision being made in the SDLP is going beyond the wider need identified.

c) Central Hampshire Housing Market Area

East Hants completed the Local Plan Part 1 with the adoption of the Joint Core Strategy in May 2014. This sets the planning strategy for the area, including within the SDNP up until 2028. East Hants then completed the Local Plan Part 2 with the adoption of the Local Plan: Housing and Employment Allocations in April 2016. These allocations have only been made in East Hants outside of the National Park. The preparation of the Local Plan Part 3: Development Management Policies and Other Allocations is currently progressing.

Table 1 identifies a housing shortfall within the part of the National Park falling within East Hants of 33 dwellings per annum, and an overall shortfall of 21 dwellings per annum overall across the whole district. This is a modest shortfall which is a result of updated evidence on suitable housing sites leading to slightly less land being allocated in the National Park than was anticipated at the time of the East Hants JCS, which has been necessary to uphold the purposes and duty of the National Park. The Authority will explore with EHDC, and with other partners within the Central Hampshire HMA, opportunities to address this shortfall within their Local Plan Part 3.

Winchester has adopted the Joint Core Strategy (2013) and Development Management & Allocations Plan (2017). They are now preparing a Gypsy and Traveller Development Plan, to address unmet Gypsy and Traveller accommodation needs. In relation to housing need, the Winchester JCS meets objectively assessed needs for the whole district, including the area falling within the National Park. The SDLP makes provision for an additional 14 dwellings per annum to meet local need. As such, the unmet need evident in Table 1 has been counted already in the OAN covering the whole of Winchester City Council area, and the National Park is effectively oversupplying when considering housing need just within Winchester,

d) Eastbourne and Wealden Housing Market Area

Eastbourne Borough Council and Wealden District Council are neighbouring local authorities, and work closely on strategic planning issues. Wealden District Council is currently reviewing its Local Plan (as applies outside the SDNP) and will be consulting on its Pre-submission Local Plan in the near future. However a key issue is the impact of development on the Ashdown Forest Special Protection Area, which Wealden District Council considers is a significant constraint that has meant the unmet housing need for the area cannot be met without compromising other key requirements of national policy and of European environmental protection legislation. The unmet housing need arising within the National Park in Wealden is very low, and is considered negligible when compared with the wider district and HMA, but may need to be addressed together with the wider unmet need through the local plan process outside of the National Park.

Eastbourne Borough Council is beginning a review of its Local Plan. This review will need to consider the unmet need issue, taking account of neighbouring authorities' unmet development needs, including the SDNP. The authority will work positively with EBC and other partners within the HMA to seek to address this unmet need.

Sustainable tourism, the local economy, and transport

Sustainable tourism

- 6.7 Going forward, joint working on sustainable tourism will follow the South Downs National Park Tourism Strategy 2015-20 (see Section 4). There are a number of partners that are crucial to effective working on this issue, however achievement of this objective through cross-boundary working relates less to plan-making and more to land stewardship, and managing existing local and regional transport networks.

Transport and the Economy

- 6.8 As set out in the Local Plan, the spatial strategy seeks to provide local employment and facilities primarily to address the social and economic wellbeing of local communities, and to provide for local businesses that contribute to the special qualities of the National Park. The *Employment Land Review*, *Employment Land Review Update* and *HEDNA* provide evidence that the need identified for employment land can be fully met within the National Park. Hence there are no specific cross-boundary strategic issues identified that require the Duty to Cooperate to be engaged for the purpose of plan-making.
- 6.9 The Authority sits on two Local Enterprise Zones (LEPs): the South East LEP, encompassing Essex, Kent and East Sussex, and Coast to Capital, which covers West Sussex, Brighton & Hove, Lewes East Surrey and the London Borough of Croydon. The National Park is recognised by these bodies as an important contributor to tourism related economic activity, and contributing to the economic attractiveness of the wider area in its role as a 'green heart'. It is also under significant development and recreational pressure arising from the success of the wider economy. It will be important to continue to work with the LEPs as key Duty to Cooperate partners to ensure that these strategic cross-boundary issues continue to be addressed.
- 6.10 In terms of transport, strategic transport modelling of the limited growth proposed in the National Park has demonstrated overall relatively limited impacts on strategic transport networks. Nevertheless, large-scale growth proposed just outside of the National Park – particularly along the coastal strip – may have significant impacts on the roads and other transport networks within the National Park. It will therefore be important for the Authority to play a strong role in the implementation of the Coastal West Sussex and Greater Brighton Local Strategic Statement. A particularly challenging area for all the partners is the significant congestion on the A27 primary route, and the appropriateness of schemes currently being developed to begin to address this (such as the proposed Arundel Bypass).
- 6.11 Both in the Coastal Sussex area and in the other FEMAs within which the National Park sits, the Authority will continue to work closely with both the County Councils (who are the Local Highway Authorities), Highways England, and our other partner local authorities. It will be important to understand through these discussions the impacts on the special qualities of the National Park, arising both from increased movement and traffic, and from major transport schemes to address the issues. The partnership groups listed in Section 5, together with issue-specific meetings as appropriate, provide opportunity for this.

Strategic Sites

- 6.12 The Authority will continue to work closely with the relevant local authorities and other organisations on the delivery of the key strategic sites within the National Park.
- 6.13 For Shoreham Cement Works, the Authority's main objective for this site is to secure a significantly enhanced landscape. It accepts that major development provides the opportunity to achieve this and that any scheme has to be viable to ensure delivery. Therefore, the Authority has committed to producing an 'Area Action Plan' (AAP). Through the AAP process, the Authority will work in partnership with all the relevant public bodies and organisations together with the landowner and the local community to demonstrate the delivery of a viable scheme which is compatible with its sensitive location and the proposed uses meet the purposes of the National Park.
- 6.14 For North Street Quarter, the Authority will continue to work with Lewes District Council and its developer partners to deliver the scheme granted planning permission in May 2016 and it will continue to support the redevelopment of the neighbouring Eastgate area. The Authority recognises that whilst the majority of the site has planning permission (a mixture of full and outline permission) other proposals may come forward. Therefore, Policy SD57 has been designed to be sufficiently flexible to allow other proposals to come forward to achieve National Park objectives, should the consented scheme (or phases of the consented scheme) not proceed and/or other proposals come forward.

APPENDIX I – Sustainability appraisal objectives and the Duty to Cooperate

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?
<p>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>	<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>
<p>2. To improve the health and wellbeing of the population and reduce inequalities in health and wellbeing.</p>	<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	3.1: Supporting communities where children grow up and go to school. 3.2: Supporting and empowering local communities to shape their own community (recognise the value of community and neighbourhood planning)	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.	5.1: A sustainable tourism strategy that supports recreation businesses. 5.2: Access to and representation of all sections of the community in NP facilities. See also S.O. 4.1 See also S.O. 6.2	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 local 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 local 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 local 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 – Schedule of key Duty to Cooperate events and their outcomes

Organiser or Chairing Body	Date (s) of meeting or event	Name and/or purpose of activity	Organisations involved	Outcome(s)
Coastal West Sussex & Greater Brighton Strategic Planning Board (CWS&GBSPB)	27 June 2012	Inception meeting	All members of Coastal West Sussex & Greater Brighton Planning Board	Future arrangements discussed.
Brighton & Hove City Council	October 2012	Request to SDNPA to accommodate some of BHCC housing needs	SDNPA	Letter confirming that the SDNP is not an appropriate location for meeting the housing needs and requirements of areas outside the National Park. This in turn influenced the BHCC City Plan.
CWS&GBSPB	Apr, Jul, Oct 2013	Local Strategic Statement I	All members	Progress on LSS
Planning Advisory Service / Horsham District Council	July 2013 onwards, 3 sessions in total.	Sub Regional Planning: Duty to Cooperate Workshop - Incorporating Strategic Issues into Local Plans	Horsham DC, Crawley BC, Mid Sussex DC, Mole Valley DC, Tandridge DC, Reigate & Banstead DC, Waverley DC, Chichester DC, Brighton & Hove CC, SDNPA, Gatwick Diamond, West Sussex CC, Surrey CC, C to C LEP	<p>Agree to share understanding about methodologies used for SHMAs and agree joint approach.</p> <p><u>Other key issues identified:</u></p> <ul style="list-style-type: none"> Affordable housing is a critical issue. There is need for effective engagement with the LEP. Reduce over-reliance on small number of large employers. There is lack of tertiary education in parts of the area. Constrained land supply

Adur & Worthing Councils	9 August 2013	Duty to Co-operate Meeting	Horsham DC, Crawley BC, Arun DC, Mid Sussex DC, Chichester DC, Brighton & Hove CC, Lewes DC, SDNPA, West Sussex CC	Agree to produce MoU to commit relevant Authorities to producing a strategy for the Coastal West Sussex and Gatwick Diamond areas.
Brighton & Hove City Council	September 2013	Statement of Common Ground	Brighton & Hove CC, Adur DC, Arun DC, Chichester DC, Crawley BC, Eastbourne BC, Horsham DC, Lewes DC, SDNPA, Wealden DC, Worthing BC	SoCG set out the steps taken to comply with the Duty in relation to housing, and key strategic cross-boundary issue in the Brighton & Hove sub-region. It provided a basis for further cooperation on strategic issues in the future.
Brighton & Hove City Council	October 2013	Statement of Common Ground	Brighton & Hove CC & SDNPA	SoCG agreed in relation to Examination into the City Plan Part One. In particular "Policy SA5 The South Downs"
CWS&GBSPB	October 2013	Terms of reference		The CWS&GB Strategic Planning Board agreed terms of reference. See http://coastalwsx.wpengine.com/wp-content/uploads/2014/02/CWS-Strategic-Planning-Board-TOR-Oct-13-Final-Version.pdf
SDNPA	2013	Planning Committee	None	Endorsed Local Strategic Statement I
Winchester City Council	7 February 2014	Duty to Co-operate Meeting	SDNPA	To update on the progress of respective Local Plans and to discuss strategic issues surrounding, or arising from, the Duty to Co-operate.
East Sussex CC	April 2014	Memorandum of Understanding	All East Sussex Authorities	Agreement of the creation of a Joint Portfolio Holders Members Group to underpin the co-operation, collaboration and joint working arrangements between the parties.

SDNPA	15 September 2014	Duty to Co-operate Meeting	East Hampshire District Council	Discussion of South Downs Options consultation and East Hampshire Allocations Plan
Winchester City Council	19 September 2014	Duty to Co-operate Meeting	SDNPA	To update on the progress of respective Local Plans and to discuss strategic issues surrounding, or arising from, the Duty to Co-operate. Gypsy & Traveller site assessment work discussed and funding between 2 authorities agreed.
East Sussex County Council	28 Jan 2015	Duty to Cooperate meeting	All East Sussex LAs, Environment Agency	Agreed to accept Gypsies & Travellers study recommendations regarding permanent pitch provision.
Brighton & Hove City Council	22 Apr 2015	Review results of joint Gypsy & Traveller needs assessment	B&HCC	Principles of further joint work agreed.
CWS&GBSPB	2015	Horsham & Mid-Sussex join the group	n/a	Board membership extended to reflect reach of cross-boundary issues
East Hampshire District Council	June 2015	Memorandum of understanding relating to housing numbers and distribution	SDNPA	<p>To ensure that the requirement of 10,060 new dwellings between 2011 and 2028 within East Hampshire (JCS area) is met by delivery in the two authority areas</p> <p>To confirm that within the delivery figure of 8,366 for East Hampshire, 2,725 homes will be focused on a new strategic development area at Whitehill & Bordon. This development will meet some of the housing need arising from the wider area, including the SDNP.</p> <p>To recognise that the disaggregated minimum housing requirements identified will be the requirement used when producing housing trajectories and calculating the five year housing land supply for each area.</p>
Wealden District Council	30 Jun 2015	Wealden Local Plan early stages	SDNPA	Emerging plans discussed. Considered need for Ashdown Forest SPA issues to be addressed.

SDNPA	1 July 2015	<p>Preparing the South Downs Local Plan – An update for Local Authority Officers and key partners.</p> <p>(Duty to Cooperate Session)</p>	<p>Adur& Worthing DC; Arun DC; Brighton and Hove CC; Chichester DC; East Hampshire DC; East Sussex CC; Eastleigh BC; Hampshire CC; Horsham DC; Lewes DC; Mid Sussex DC; Southampton CC; Wealden DC; Winchester DC; C2C LEP; West Sussex CC; Waverley BC; Environment Agency; New Forest National Park; Chichester DC</p>	<p>All to understand:</p> <ul style="list-style-type: none"> • the basis on which the plan has been prepared (Ecosystem services approach) • the methodology and results of the SHMA and how these impact on plan making outside the SDNP. • of what the key cross boundary / strategic level planning issues are considered to be. • the support available on issues relating to Dark Night Skies and Green Infrastructure
Mid Sussex District Council	July 2015	Duty to Cooperate – Memorandum of Understanding	Mid Sussex / Lewes District Council / SDNPA	<p>Ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future. Relevant cross-boundary strategic planning issues identified as:</p> <ul style="list-style-type: none"> • Housing provision – how unmet needs in Lewes / SDNP might be accommodated elsewhere. • Cross-boundary infrastructure, particularly relating to transport. • Gypsies and Travellers (both permanent pitches and transit sites). • Ashdown Forest SPA and SAC. • Impacts of housing development proposed in towns within Mid Sussex on neighbouring communities in Lewes and vice versa. • Impacts of Burgess Hill strategic allocation.

				<ul style="list-style-type: none"> • Impact of the Mid Sussex Local Plan on the Purposes and Duty of the South Downs National Park. • The need to have regard to the setting of the National Park for development proposals close to the park boundary, in particular recognition of the emerging National Park Local Plan policies in relation to conserving and enhancing the natural beauty of the landscape, cultural heritage and the region's biodiversity. <p>Detail of outcomes set out in MoU.</p>
Mid Sussex District Council	July 2015	Duty to Cooperate – Memorandum of Understanding	Mid Sussex / SDNPA	<p>The Objectively Assessed Need figure for Mid Sussex was 656 homes per year. Mid Sussex is not able to contribute towards meeting neighbouring authorities' housing needs. The figure for the objectively assessed housing need for Mid Sussex includes the communities within the National Park, and therefore its very low level of needs will be met alongside those of the planning authority area of Mid Sussex.</p> <p>The following have been identified as Strategic Planning Issues:</p> <ul style="list-style-type: none"> • MSDC are required to have regard to the dual Purposes and Duties of the South Downs National Park as set out in the Environment Act 1995. • Impact of development in Mid Sussex on the South Downs National Park, including development in and adjacent to settlements abutting the National Park boundary. • The need to have regard to the setting of the National Park for development proposals close to the park boundary, in particular recognition of the emerging National Park Local Plan policies in relation to landscape quality, biodiversity, dark night skies, tranquillity and green infrastructure. • Provision for Gypsies and Travellers. • Development of the rural economy.

				<ul style="list-style-type: none"> Improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel.
Waverley Borough Council	30 September 2015	Duty to Cooperate Workshop	Surrey Authorities.	To consider the most appropriate groupings/mechanism for joint working on these issues.
SDNPA	Oct / Nov 2015	Preferred Options Consultation 1-2-1 / small group meetings	All key parties and Authorities	Various – see response to Preferred Options consultation Appendix 3.
Coastal West Sussex & Greater Brighton Strategic Planning Board (CWS&GBSPB)	Late 2015	CWS&GBSPB MoU	CWS&GBSPB	<p>A memorandum of understanding was signed by all members including the SDNPA. It establishes a framework for co-operation between the eight local planning authorities with respect to strategic planning and development issues.</p> <p>See http://coastalwsx.wpengine.com/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf</p>
East Hampshire District Council / SDNPA	Approximately 3 times a year	Duty to Cooperate meeting	EHDC / SDNPA	<p>Various topics including:</p> <ul style="list-style-type: none"> continue joint work on Wealden Heaths SPA GTAA progress and site allocation Local Plan progress and emerging issues. Data monitoring and evidence sharing.
Eastleigh BC	Various in 2016	Duty to Cooperate / Local Plan update	SDNPA	<p>Eastleigh sought early landscape advice in the preparation of their Local Plan.</p> <p>Eastleigh to ensure that transport studies consider impacts on SDNP from development proposals.</p>
CWS&GBSPB	18 January 2016	Endorse the refresh of Local Strategic Statement 2 (LSS2)	All members of Coastal West Sussex & Greater Brighton Planning Board	Each authority to approve the LSS

Mid Sussex District Council	January 2016	Revised Memorandum of Understanding	Mid Sussex / Lewes / SDNPA	Update to MoU from 2015, principally related to revised housing numbers and Local Plan progression.
SDNPA	11 February 2016	Planning Committee	n/a	<p>Planning Committee agreed the following recommendations:</p> <ol style="list-style-type: none"> 1) Endorse the Coastal West Sussex and Greater Brighton Local Strategic Statement 2) Consider the issues and options related to a full review of the Local Strategic Statement <p>Link to the document: http://coastalwsx.wpengine.com/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf</p>
SDNPA	9 May 2016	Duty to Co-operate meeting	Adur & Worthing DC	<ul style="list-style-type: none"> • Confirmed that Adur and Worthing Authorities both have a shortfall of employment and housing land, there is pressure to look to Shoreham Cement Works to provide employment capacity. The proposed redevelopment at Shoreham Harbour results in a need to relocate uses on a temporary basis, and whilst Shoreham Cement Works remains undeveloped, they saw some potential for the site meeting this need. • The outcomes of the Local Growth Fund bids to the LEP and any changes to land ownership in the future would be important in determining the future of the Shoreham Cement Works site. • SDNPA to be aware of the new Monks Farm proposals which abut the boundary of the National Park. • Adur / Worthing queried whether small sites on the edge of communities within Adur / Worthing contribute to their OAN? No conclusion drawn. Also queried who would have nomination rights for affordable housing within allocations. • SDNPA will be asking other authorities to endorse the GI Framework.

				<ul style="list-style-type: none"> SDNP asked to reconsider SHLAA site AD002. Only part of the site has been assessed. It is a site identified by people / Members in the District in the past.
Brighton & Hove City Council	28 Jul 2016	Park & Ride Options	Brighton & Hove CC	Agreed need for detailed discussion should proposals be developed further.
SDNPA	30 Jan 2017	Duty to Co-operate meeting	East Sussex County Council	<p>Agreed ESCC to provide informal written input into draft LP policies.</p> <p>ESCC to provide evidence on older people's housing needs when available.</p> <p>ESCC confirmed that level of housing development proposed in SDNP is too low to cause major issues with regards school provision.</p>
SDNPA	31 Jan 2017	Duty to Co-operate meeting	Hampshire County Council	<p>Agreed HCC to provide informal written input into draft LP policies.</p> <p>Likelihood of impact of development proposals on educational provision was low.</p> <p>HCC sought a charge on new development to fund rights of way improvement. Considered better dealt with on case by case basis.</p> <p>Discuss older persons policy.</p> <p>HCC may be able to provide feedback in relation to the needs of CCGs in the area.</p>
CWS&GBSPB	06 February 2017	Endorse the report Defining the HMA and FEMA; invite Crawley Borough Council to join the group and consider ways forward with LSS3	All members of Coastal West Sussex & Greater Brighton Planning Board plus Crawley Borough Council	<p>The Board agreed the following:</p> <ul style="list-style-type: none"> Endorsed the GL Hearn report Invited Crawley Borough Council to join the group Agreed to consider ways forward with LSS3

Arun District Council	14 March 2016 / 12 October 2016 / 16 May 2017	Arun District Local Plan and the Duty to Cooperate Workshops	All authorities with interest in strategic planning in Arun	<ul style="list-style-type: none"> • Arun amended boundaries and capacities of strategic sites to find more housing capacity overall. • Arun have a shortfall on supply within first 5 years due to reliance on strategic sites. • Key constraints are lack of water treatment capacity, and landscape impact on SDNP • Aruns Local Plan will contribute to meeting needs of other Authorities. This includes the SDNP. • SDNPA have raised concerns about recent major modification to emerging plan.
SDNPA	18 May 2017	Duty to Cooperate meeting	East Hampshire District Council	<ul style="list-style-type: none"> • Agreed to refresh of the current MoU relating to housing delivery. • Agreed further exchange of data regarding Wealden Heaths SPA mitigation measures in planning policy & implementation.
SDNPA	09 May 2017	Ashdown Forest Officer Working Group	Natural England, Wealden DC, Tunbridge Wells BC, Mid Sussex DC, East Sussex CC, Lewes & Eastbourne Councils, Tandridge DC, SDNPA, Rother DC	<p>First meeting of the group and the following was agreed:</p> <ul style="list-style-type: none"> • All agreed to acknowledge the ruling and agreed to move forward together to address the in combination effects of traffic generation on Ashdown Forest SAC and other SACs • All agreed to set up a working group on Ashdown Forest • Wealden to send an email to all setting out the details of methodology of work undertaken so far on Ashdown Forest
SDNPA	21 June 2017	Ashdown Forest Officer Working Group	As above	<p>Second meeting of the group and the following was agreed:</p> <ul style="list-style-type: none"> • Crawley BC, West Sussex County Council and Brighton & Hove to be invited to join the group • Kent and Surrey County Councils to be made aware of the group • All agreed to share the gist of legal advice with the group • All agreed to share data inputs for traffic models

SDNPA	30 August 2017	Ashdown Forest Officer Working Group	As above plus Tonbridge & Malling DC	<p>Third meeting of the group and the following was agreed:</p> <ul style="list-style-type: none"> • WDC to share air quality and ecology monitoring for Ashdown Forest first with NE then the wider group in September or shortly afterwards. • All agreed to consider support for the draft wording of support for expression of interest bids to the Housing & Infrastructure Fund by ESCC and WDC on the introduction of mitigation and compensatory work for Ashdown Forest . <p>It was agreed to start work on a statement of common ground (SoCG) on Ashdown Forest hopefully with the support of PAS. The following was agreed:</p> <ul style="list-style-type: none"> • To be completed and agreed by January 2018 • It would set out matters that the group agreed and didn't agree on. • It would cover air quality matters only and not other matters such as recreational pressure • It would relate only to Ashdown Forest but there was the potential to replicate it for other international designations • It would agree the methodology assumptions for transport and air quality • It would agree housing numbers for all the LPAs to be used for traffic modelling • It would agree to share evidence • It would explain the role of the officer working group • It would cover planning policy and not planning applications. Neighbourhood plans would be covered under planning policy • NE to consider whether it should be a signatory. The feeling of the group was that NE is a very necessary partner to the statement • All LPAs present happy to progress and be signatory subject to content
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CWS&GBSPB	04 September 2017	Agreed to prepare an LL3 and commission supporting evidence base	All members of Coastal West Sussex & Greater Brighton Planning Board plus Crawley Borough Council	Agreed to prepare an LL3 and commission supporting evidence base. Full report forms appendix 4 of this paper.
SDNPA	To be held 13 October 2017	Ashdown Forest Officer Working Group	As above plus West Sussex CC and Crawley BC	Focus of meeting will be the Statement of Common Ground

Local Plan Liaison with Specific and General – Up to Feb 2016

The following organisations were all consulted as set out in the Regulations. Many also attend group meetings such as the East Sussex Local Plan Managers Group or the West Sussex Principal Planning Policy Officers Group, this is not recorded below.

The following bodies were invited in writing during December 2016 to meet with SDNPA to discuss the emerging Local Plan policies and draft site allocations:

- Environment Agency
- Highways England
- Historic England
- Homes & Communities Agency
- Natural England
- Sport England
- East Sussex CC
- Hampshire CC
- West Sussex CC
- Portsmouth Water
- South East Water
- Southern Water

Further bodies as follows were invited to flag up particular issues that they considered needed further attention:

- Coast to Coast Capital
- Enterprise M3
- South East LEP
- Brighton & Hove Clinical Commissioning Group
- Coastal West Sussex Clinical Commissioning Group
- Eastbourne, Hailsham & Seaford Clinical Commissioning Group
- High Weald, Lewes Havens Clinical Commissioning Group
- Horsham & Mid Sussex Clinical Commissioning Group
- South Eastern Hants Clinical Commissioning Group
- English Heritage
- National Trust
- Hampshire Wildlife Trust
- Sussex Wildlife Trust

The following organisations were all consulted as set out in the Regulations. Many also attend group meetings such as the East Sussex Local Plan Managers Group or the West Sussex Principal Planning Policy Officers Group, this is not recorded below.

Environment Agency involvement in the Local Plan

- 13 Oct 2014 – Workshop on GI Framework – EA in attendance
- 30 Mar 2015 - Workshop on Reasonable Alternatives for the Preferred Options Local Plan – EA in attendance
- Mar-Sep 2015 – EA has sat on Working Group and Steering Group Meetings for the GI Framework.
- Jan-2015 – Consultation on the GI Framework – EA Response received.
- 31 Jan 2015 – Meeting on emerging Local Plan policies

Forestry Commission involvement in the Local Plan

- 13 Oct 2104 – Workshop on GI Framework – FC in attendance.

Highways England

- 10 Feb 2017 – Local Plan Transport Assessment, allocations, Shoreham Cement Works.

Historic England

- Regular and ongoing dialogue between Historic Buildings Officers and Cultural Heritage Strategy Lead, including updates on Local Plan progress and on Neighbourhood Planning issues.
- 13 Oct 2014 – Workshop on GI Framework – HE in attendance
- Mar-Sep 2015 – HE has sat on Working Group and Steering Group Meetings for the GI Framework.
- 20 Nov 2015 – Meeting held between SDNPA and HE. Detailed discussion on HE comments and how these can be incorporated at next stage. Agreed action at meeting for SDNPA officers to share draft policies for informal comment prior to being incorporated into the submission version of the Local Plan.
- 25 Jan 2017 – Meeting on emerging Local Plan policies

Marine Management Organisation

- Oct 2013, May 2014, Feb 2015 - SDNPA attended workshops for the South Marine Plan and provided formal input to the Seascape Evidence, Vision and Objectives and Options for the South Marine Plan.
- 21 Oct 15 - Meeting with MMO held during Preferred Options Consultation to discuss Local Plan and integration within South Marine Plan and their draft comments.

Natural England

- 13 Oct 2014 – Workshop on GI Framework – NE in attendance
- Mar-Sep 2015 – NE has sat on Working Group and Steering Group Meetings for the GI Framework.
- July/August 2015 - Various iterations of the Biodiversity and International Sites policy shared and advice sought on key issues, particularly relating to the emerging recommendations of the HRA.
- July/August 2015 - NE consulted on the draft HRA for the Preferred Options.
- September 2015 - Meeting with NE during the consultation to discuss their draft response.
- Jan 2016 - NE contacted to outline some of the issues raised during the consultation and agree circulation/review of revised policies.
- SDNPA has attended regular HRA Cross Boundary meetings for the Wealden Heaths SPA Phase II, involving representatives from Waverley Borough Council, East Hampshire District Council and Natural England.
- June 2015 - Meeting to discuss draft Preferred Options policies. Draft polices circulated to relevant officers at NE prior to this meeting.
- 7 Feb 2017 – Meeting on emerging Local Plan policies

County Council

- Meetings held with Hampshire, West Sussex and East Sussex County Council in Jan & Feb 2017 to discuss emerging Local Plan policies. Written responses were received and fed into the Local Plan as appropriate.

Appendix 3 Schedule of key changes to Local Plan policies arising from the Duty to Cooperate

The table below highlights some key points raised in response to the Preferred Options consultation in September 2015. It then summarises how the policies have been changed in direct response to these comments.

Policy (references as per Pre-submission version)	Comments at Preferred Options stage	Outcome (changes made to the Local Plan)
SD2: Ecosystem Services	Some partners requested further clarity on ecosystem services, in particular clearer links to ecosystem services through the document.	The introduction section on ecosystem services has been re-written to better explain the concept of ecosystem services. This has reinforced the reader's understanding of this aspect of the strategy.
SD6: Safeguarding Views	A partner local authority expressed concern that this policy might have a negative impact on proposals within the areas outside of the National Park or on its ability to determine development proposals on the edge of the Park.	The Viewshed Characterisation Study has been published on the evidence page of the Authority's website. Paragraph 5.48 which refers to outside of the National Park is deleted due to lack of clarity as part of the overall restructure of supporting text.
SD9: Biodiversity and Geodiversity	In relation to a successful legal challenge of the Lewes Joint Core Strategy on the grounds the Habitat Regulations Assessment was flawed, a period of intense and detailed work has occurred with partner local authorities affected by the judgement.	Policy SD10 has been reviewed in light of the legal judgement relating to HRA. The policy was found to be appropriately worded, however partly as a result of the joint working, additional supporting text has been introduced to state that the National Park Authority will work with partners to consider the best way to monitor changes in air quality and nitrogen deposition on all European designated sites. This
SD10: International Sites		

		<p>includes long term monitoring of the main roads that fall within 200 metres of these European sites.</p> <p>The HRA has been fully reviewed for the Regulation 19 consultation version of the Local Plan, to ensure that the in-combination effects of traffic and resultant changes to air quality, deposition rates and other potential impacts are fully taken account of.</p>
SD19: Transport and Accessibility	<p>A partner local highway has noted need to consider the impact of development sites within the park on the external / neighbouring transport network as well their own internal network. It also noted the need to take into account neighbouring strategic documents such as the Local Transport Plan, and both Winchester and East Hants Transport Statements.</p> <p>Partner local authorities have also made comments relating to specific site allocations' implications for traffic movements and wider impacts of development on the road network.</p>	<p>The introduction to Chapter 6a Sustainable Transport now clearly highlights the evidence which demonstrates no unacceptable impacts on traffic levels, both within and outside the National Park (i.e. the <i>Transport Study Phase 1</i>, and the <i>Local Plan Transport Assessment</i>). It also now states that the impact of traffic generated from a development should be considered cumulatively by taking account of all committed development in the area.</p> <p>The Local Plan also references the Transport Assessment of the South Downs Local Plan, and the Site Allocations Highways Assessment.</p>
SD20: Walking, cycling and equestrian routes	<p>Natural England advised that the policy needs to be revised to demonstrably consider the presence of internationally important wildlife at the Singleton and Cocking Tunnels.</p>	<p>A new paragraph 6.18 specifically excludes Singleton and Cocking tunnels from the safeguarding (this is also reflected on the Policies Map).</p>
SD33: Gypsies and Travellers	<p>This policy has drawn from evidence base studies that have been led by a number of partner local authorities, which in turn have fed into the figures set out in the</p>	<p>Refinement of numbers relating to need and supply, and allocation of sites for Gypsy and Traveller accommodation in the final version of the Local Plan.</p>

and Travelling Showpeople	policy. Discussion with the partner authorities has in some cases identified which sites can be taken forward (taking into account the intentions of public landowners and a higher level of information on site constraints).	
Site allocations	Feed-in from DtC partners (in particular national agencies) has been invaluable in shaping the site allocation policies.	Development requirements and, in some cases, detailed site boundaries, have been informed by information and advice provided by national agencies. For example these may relate to mitigation of impact on nationally designated sites, specific requirements to ensure appropriate flood mitigation to ensure adherence to nationally issued advice, and vehicular access mitigation.

Appendix 4 Report for West Sussex and Greater Brighton Strategic Planning Board meeting held 04 September 2017

WEST SUSSEX & GREATER BRIGHTON STRATEGIC PLANNING BOARD

Title: Future direction and role of the Strategic Planning Board

Paper prepared on behalf of the officer group supporting the Strategic Planning Board

Purpose: The intention of this paper is to clarify the role and function of the Board in the delivery of strategic planning for the board area.

1. At the last meeting of the Board, members considered a report produced by GL Hearn that reviewed the geographic extent of both the Housing Market Area and the Functional Economic Market Area. This report highlighted that there were three identifiable functional areas operating within the current Strategic Planning Board area, with some overlap between functional areas within the Board area but also stretching beyond it (see box below).

2. Therefore in high level planning terms it made sense that all the authorities covered by the 'Western' And 'Coastal' functional areas together with those authorities in the West Sussex part of the 'Inland' functional area come together to discuss the 'larger than local' issues with the objective of finding common solutions. However, it is also important to recognise that the 'Inland' functional area also includes authorities in Surrey and therefore the 'Gatwick Diamond Strategic Planning Board' will take the lead on work for this area. However, it is important that representatives of this Board engage extensively and proactively with representative of the Gatwick Diamond Strategic Planning Board to co-ordinate work programmes.

West Sussex & Greater Brighton Strategic Planning Board		Gatwick Diamond Strategic Planning Board
Western	Coastal	Inland
Chichester Part of Arun Part of SDNPA Part of WSCC	Arun Worthing Adur Brighton & Hove Lewes Part of Mid Sussex Part of Horsham Part of SDNPA Part of WSCC & ESCC	Horsham Mid Sussex Crawley Part of WSCC Part of SDNPA <hr style="border-top: 1px dashed black;"/> Various Surrey Councils

3. To this end, Crawley Borough Council (CBC) has initially agreed to join the Board with the status of an as an observer similar to ESCC. It is hoped that in due course they become a full Board member.

4. Thus, having established that from a strategic planning perspective all of the relevant authorities are involved it is important that the Board (and the constituent authorities) determine firstly what the future role and function of the Board should be going forward and secondly how might this be successfully implemented.

5. Members may recall that last year the Board considered a discussion paper prepared by an external consultant on the future of strategic planning in the Board area. The decision at that time was to postpone consideration of the paper until the question of the geographical coverage of the Board had been addressed and the Housing White Paper had been released. With the first issue having now been resolved, and the White Paper having now been released, it is now considered time to reconsider the discussion paper.
6. The Housing White Paper expresses the Government's view that Local Plans will need to be kept up to date and to that end should be reviewed every 5 years. The paper also advises that the Government would like to see more and better joint working where planning issues go beyond individual authorities, building on the existing duty to co-operate. This comment would on face value seem to support the concept of strategic planning. However, instead the paper suggests that in future each local planning authority will be required to maintain a set of key strategic policies, with flexibility over whether these are in a plan produced by an individual authority, in a joint local plan produced by a group of authorities, or in a spatial development strategy produced by a combined authority.
7. It is noted that areas not subject to combined authority status will not have the ability to produce spatial development strategies. However, that might change once the responses to the paper are considered. What has been suggested is that in a strengthening of the Duty to Cooperate, authorities are required to produce a Statement of Common Ground setting out how authorities intend to work together to meet housing requirements that cut across authority boundaries. Producing such a document will be an opportunity for the constituent authorities of the Board to demonstrate their willingness to work collaboratively on strategic planning matters.
8. For the Board area, a combined authority approaches remain in development, for the Greater Brighton area¹¹. The outcome for this initiative plus the supporting activity developing economic strategies, investment prospectuses, and infrastructure delivery programmes across the whole area will also inform the strategic planning of the Board area.
9. All of the above, plus the acquired learning from individual Local Plan examinations is providing a context for the Board to inform its consideration of how it wishes to develop in order to effectively meet the challenges ahead.
10. The purpose of the paper is therefore to consider how the authorities that make up the Board can positively tackle the need for improved cross boundary working to address the many 'larger than local issues' that we collectively face. It is important to stress that this is not just a question of housing supply and delivery, but also about delivering an improved economy and the required infrastructure to support all forms of growth, whilst at the same time protecting the environment.
11. The Board has championed the creation of a Local Strategic Statement (LSS) to set out our collective high level objectives and spatial priorities. The original award winning document has recently been updated to reflect not only the passage of time and changing priorities but also the growth in the Board membership (and thus area). However, LSS2 remains very much a document which brings together the respective work of individual areas. For example it does

¹¹ Work on a different combined authority approach for a large part of the Board area is currently suspended.

not set out any mechanisms for addressing the under provision of housing in certain areas when measured against the Objectively Assessed Needs of individual authorities. This is a significant risk for all the authorities in the Board area for either the soundness of the plans they are working on or any reviews which are undertaken.

12. The challenge for the future is to create an approach which allows all the authorities in the Board to work collectively on developing a new high level plan which will seek to address the 'larger than local' issues that are currently holding back the potential of the sub region. From this new strategic plan (referred to as LSS3) each individual authority would be able to prepare their own plans to not only address their own local issues but also set out how they intend to address the cross boundary issues set out in the LSS3.
13. It is recognised that some authorities may find the concept of working across the three Housing Market Areas a very challenging principle to accept because of a concern that they might be faced with taking on additional growth beyond their own needs. However, it is important that the authorities have a forum to enable them to work together collaboratively to address the high level pressures that we all face and to ensure that we can work together in a consensual manner. The LSS3 will facilitate this discussion to reassure authorities that every authority has done everything it can to meet their own housing needs within their own administrative area in the first instance. It will then enable discussions to take place, around joint evidence, to consider how the unmet need remaining within an authority can be met elsewhere.
14. Being part of the Board allows all the authorities to help shape the key decisions of the Board. The alternative is to withdraw or fragment into the separate HMA areas. However, such approaches also has risks, notably that the very notion of taking such an approach could be misinterpreted in respect of the authorities' willingness to work together and the danger of losing influence over the future. Current Local Plan Examinations have highlighted the need for a mechanism to be in place to review and seek to deliver unmet housing need within the identified housing market areas across the area.
15. One of the many challenges in successfully achieving a collective approach to strategic planning this is that not all authorities are working to a common timeline with some having had their plans adopted, whilst others are due to be examined in 2017 and 2018, whilst others have yet to reach that stage. For any collective approach to work it is vital that all accept that the Board needs to work with a dual focus. Firstly, all need to commit towards working on the joint commissioning of evidence to deliver the required outputs and more importantly joint solutions in the form of a new strategic plan (LSS3) and secondly, all need to assist, and recognise that individual authorities will need to progress the completion of their current plans or any reviews that have commenced. The alignment of plans to a common time horizon is an outcome which will take time to achieve and therefore the creation of LSS3 will inevitably be an evolutionary process.
16. The Government view is that all Local Plans should be reviewed every 5 years and therefore it is suggested that the conclusions drawn to support the preparation of a LSS3 also be also expressed in 5 year time horizons.
17. The diagram attached as Appendix 1 shows the intended lifetime of each of the current adopted or emerging plans. Some authorities have already commenced their reviews. Therefore, whilst it is recommended that the Board should focus the core of its work on the 20 year period beyond 2030 covering the period up to 2050 it must be recognised that there may be implications arising from the work which impacts upon the period up to 2030. This may be

of assistance for any authorities with a shortfall in their OAN who are undertaking a review of their plan.

18. To illustrate how a LSS3 might help address larger than local issues between 2030 and 2050, consideration could be given for example to, in consultation with the NHS, the location of any expanded or new acute health provision, informed by decisions around the likely distribution of any housing growth for the period. Whilst, planning for health provision does happen at a local scale within individual areas there is currently no systematic approach to addressing the 'larger than local' issues such as acute hospital provision.
19. To inform the creation of a LSS3, work will need to be commissioned to understand and answer the following:
 - i. A baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - ii. The capacity of the Board area to absorb further growth in this period
 - iii. Undertake a rigorous assessment of every potential site within each authority to meet existing and future needs;
 - iv. The likely required level of growth between 2030 and 2050 having regard to any under provision of need up to 2030;
 - v. The strategic options available to deliver additional growth;
 - vi. The investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.
20. In undertaking the work to resolve points i – iv above this work could be undertaken separately within each of the identified Housing Market Areas. However, if this were to be done it would only be a robust analysis if the work was undertaken using an agreed methodology and a consistent approach so that the overall conclusions could be used to inform a future LSS3 across the wider Board area. Inevitably there will be a tension where different authorities have reached different points in the Local Plan preparation cycle. Compromise will be needed from all parties for joint working to be effective. Those who are at an early stage will need to be prepared to take the initiative in developing and seeking agreement on the use of common methodologies for other to use.
21. If the principle of such an approach is agreed then the Board needs to determine what governance arrangements would best suit the intended approach and how the work of the Board will be funded.
22. With the continuing uncertainty regarding the Government's approach to strategic planning it is considered that the most appropriate way forward for the present is to maintain the 'status quo', with the Board making recommendations to the constituent authorities to consider. To assist the Leaders and Chairman of the SDNPA together with the Chief Executives of each authority to understand how these important strategic issues are being addressed by the Board it is also recommended that they receive a quarterly report from the Board.
23. At present the work of the Board is supported by officers from the constituent authorities and some funding has been provided by the same authorities to support individual commissions of work. However, officers are unable to sustain that level of support in the long term and dedicated support is needed to deliver the required outcomes. Furthermore, the current budget reserves are limited (approximately £55k) and could not fund any future work of

significance. Therefore, the Board ideally needs to consider both the funding of an 'Advisor' and the resourcing of a fund to commission technical work as and when required.

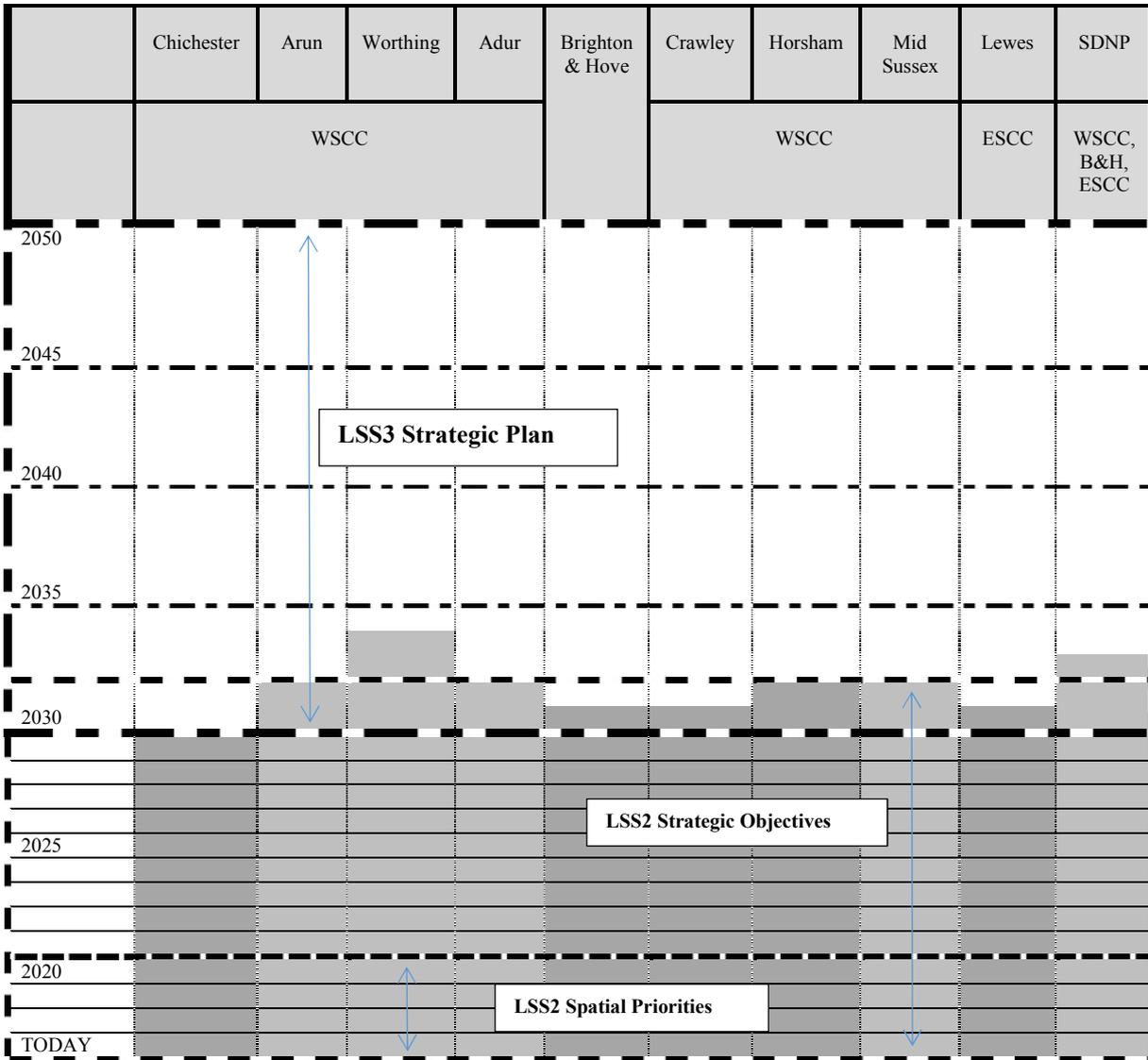
24. If each constituent member was to commit to the sum of £15k per annum for an initial 3-year period, this would be sufficient to fund both the advisor (including on-costs) and commission an initial programme of technical work. This approach would also allow the administrative burden of running the Board to transfer from the Coastal West Sussex Partnership to the role of the Board's advisor.
25. It is recognised that Council budgets are under significant financial pressure at present. However, such costs could be funded from the recent approval given to each authority to increase their planning fees by 20% or in the case of the West Sussex Councils from the Business Rates Pool. In any event, the cost of committing to this approach cumulatively is likely to be less than that each authority would incur undertaking the same work individually.
26. It is important that the Board makes a firm recommendation on this matter at the meeting in order to inform the budget setting process for 2018/19. Any expenditure would not be incurred until April 2018.

Recommendations

- A) That the Board agrees to robustly and creatively explore options for meeting the unmet needs across the Board area, starting by leaving 'no stone unturned' within the respective administrative boundary for the period up to 2030 and for these options to inform Local Plan reviews
- B) That the Board agrees to prepare a Local Strategic Statement 3 covering the period 2030 to 2050 with an appropriate level of stakeholder participation to ensure that all those with an interest in LSS3 have an opportunity to engage in the development of the strategy
- C) That the Board agrees to commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following,
 - A baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - A common methodology for determining the 'no stone unturned' approach to identifying possible locations to meet any unmet need.
 - The capacity of the Board area to absorb further growth in this period;
 - The likely required level of growth between 2030 and 2050;
 - The strategic options available to deliver additional growth;
 - The investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.
- D) That the Board agrees to continue with the current governance arrangements and provide Leaders/Chairman and Chief Executives with a quarterly report.
- E) The Board supports the appointment of an 'Advisor' to the Board from April 2018 for a three-year period subject to funding being agreed and for a constituent member to be the employing body.

- F) That the Board agrees to request each full member of the Board to contribute the sum of £15,000 per annum for three years support the cost of employing the Board's Advisor and to fund the commissioning of technical work.
- G) The Board reviews the Terms of Reference to ensure that they remain fit for purpose having regard to the proposed changes.
- H) Representative of the Board engage with representative of the Gatwick Diamond Strategic Planning Board to co-ordinate work programmes.
- I) That the Board agrees the responses to the recommendations to the report prepared by Catriona Riddell Associates as set out in Appendix II below.

Future direction and role of the Strategic Planning Board Appendix I



Note: Shading relates to current Local Plan timescales. Dark grey signifies the plan has been adopted, light grey signifies the anticipated end date.

Future direction and role of the Strategic Planning Board Appendix II

Catriona Riddell Associates Report Recommendations

Recommendation 1

It is recommended that the status of LSS3 continues to be non-statutory but that mechanisms are put in place to ensure that there is a high level of confidence that the strategic priorities will be collectively developed, supported and delivered. The recommended mechanisms include:

- Strong governance and working arrangements to ensure that LSS3 has the highest level of commitment and ownership from local authorities, and that key partners have a much more integral role in its development and implementation.
- A robust strategic evidence base to develop the spatial options and ensure that LSS3 provides a framework capable of supporting local plans through their examination testing process.
- An appropriate level of stakeholder and public participation to ensure that all those with an interest in LSS3 have an opportunity to engage in the development of the strategy.

The underlying sentiments behind this recommendation are noted. However, it is recommended that the work required and steps undertaken to produce a LSS3 should be based on the future possibility that the document might be a statutory document.

Recommendation 2

There are two, potentially significant, factors in the form and content of LSS3 that remain unknown; the outcome of the Expert Panel's recommendations and of the devolution negotiations. It is therefore further recommended that a risk management assessment is embedded into the work of LSS3 to ensure that it can adapt to changing circumstances as it evolves.

Agreed.

Recommendation 3

A new governance structure is put in place to support work on LSS3 ensuring that there is clear corporate commitment and ownership to help build consensus around the long term spatial strategy and strategic priorities. This should be supported by strong officer working arrangements, including a project board comprising members of the Strategic Leadership from each authority and a project sponsor. A suggested structure is set out in the diagram below.

The covering report recommends retaining the current governance arrangements pending clarity on the Government's position on Strategic Planning. However, to ensure that Leaders and Chief Executives are suitably informed about the work of the Board and its progress on addressing strategic planning issues it is recommended that they receive a quarterly report. The board would welcome an opportunity for a representative of the Board to be able to make an annual presentation to both the West Sussex Leaders Group and the Greater Brighton Economic Board.

Recommendation 4

A project manager and project assistant should be appointed as soon as possible either through an internal secondment(s) or through a competitive tender / external appointment process.

At this time, it is proposed to only recommend the creation of a Board Advisor post from April 2018 for a 3-year period. In due course the Board can consider the need for possible secondments to support the work of the Board.

Recommendation 5

A workshop for Leaders, Chief Executives and the SPB should be arranged as soon as practically possible (after the April 18th meeting) to outline the SPB's recommendations for taking forward work on LSS3 and agree the governance arrangements.

At the time the report was initially considered in 2016 there didn't appear to be a significant desire to hold such a workshop. It is considered that this position hasn't changed.

Recommendation 6

Local authority membership should be reviewed as part of the new governance and working arrangements to ensure all the relevant authorities are involved. Specifically, East Sussex County Council should be invited to participate in the LSS3 process.

Agreed. Both East Sussex CC and Crawley BC currently have observer status.

Recommendation 7

A budget is agreed to cover the full LSS3 expenses including evidence base and external support. This should be procured at the start of the process and reviewed every 6 months to ensure that adequate resources are available to cover the costs on a shared basis.

Agreed

Recommendation 8

A full review of evidence should be undertaken at the start of the process to identify what is already available, where the gaps are and potential opportunities to work in partnership to develop new evidence.

Agreed

Recommendation 9

A project plan and timetable should be prepared as soon as possible following a decision on LSS3. This should reflect the urgent need to move forward with LSS3 but also recognises the need to get all the right arrangements in place to ensure the process is owned and effective, and the need to have a robust evidence base in place.

Agreed