South Downs
National Park Authority

Report to	**Planning Committee**
Date	**9 February 2017**
By	**Director of Planning**
Title of Report	**Revised Policies for the Pre-Submission South Downs Local Plan**
Purpose of Report	**Purpose of Report To comment on the revised policies of the Pre-Submission South Downs Local Plan**

Recommendation: The Committee is recommended to

1) **Endorse the direction of the policies as detailed in Appendices 1 to 7 of this report for inclusion in the Pre-Submission Local Plan document, subject to any comments made by the Planning Committee being addressed.**

2) **Note that the Pre-Submission Local Plan will be reported to Planning Committee for consideration prior to publication for public consultation, and**

3) **Note that the Pre-Submission Local Plan document will be subject to final approval by the National Park Authority.**

1.   **Summary**

1.1   This report introduces the following revised draft Local Plan policies, which are set out as appendices to this report:

Appendix 1: Development Strategy

Appendix 2: Homes (strategic)

Appendix 3: Gypsies, Travellers and Travelling Showpeople

Appendix 4: Employment

Appendix 5: Town Centres and Retail

Appendix 6: Infrastructure

Appendix 7: Implementation and Monitoring Chapter

1.2   The first recommendation is that they are endorsed for inclusion in the emerging Local Plan, subject to any comments made by the Planning Committee being addressed. This endorsement would also acknowledge that the policies may need further amendments prior to being incorporated into the whole document, in order to fit within other draft policies. Recommendations (2) and (3) also note that the complete draft Pre-Submission Local Plan will be reported to Planning Committee for consideration prior to final approval by the South Downs National Park Authority (SDNPA) for consultation. Include web links where appropriate

1.3   The policies forming appendices 1 to 5 were reviewed by the Local Plan Members Working Group (LPMWG) on 17 January 2017. The draft policies and chapter forming appendices 6 and 7 were reviewed by LPMWG on 22 November 2016.

1.4   A brief explanation of progress to date on the emerging South Downs Local Plan is set out below followed by introductory text on the draft chapter and policies.

2. Background

2.1 The draft policies form part of the Pre-Submission version of the Local Plan (subsequently referred to as the Local Plan) that will be published for public consultation under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. This version of the plan follows on from the Issues and Options and the Preferred Options documents that were published for public consultation in 2014 and 2015 respectively.

2.2 At the beginning of each policy is a table of changes. This lists provides a reason for all the changes that have been made to the policy as published in the Preferred Options Local Plan. Most of the changes are in response to representations made as part of the Regulation 18 consultation. The summary of representations were presented to LPMWG in February. The changes requested at LPMWG are listed at the bottom of the table. Any changes proposed at Planning Committee will also be added to the tables to ensure that a clear audit trail is made of all changes to the Local Plan.

2.3 A final batch of draft policies plus relevant supporting text will be reported to the Planning Committee in March ahead of being included in the Local Plan. This will be presented to the Planning Committee in its entirety in June for consideration and recommendation to the SDNPA to approve the document for consultation

2.4 Following the adoption of the Local Plan, it will be the first time that the National Park has been planned for as a single entity. It will also supersede all inherited Local Plans and Joint Core Strategies, which cover the National Park other than those dealing with minerals and waste. The Local Plan will be the key to delivering sustainable development in the National Park.

2.5 The Local Plan will form part of the 'development plan' alongside adopted neighbourhood development plans, which are being developed by local communities in many settlements across the National Park. The minerals and waste plans will also be part of the development plan. The new Local Plan should be consistent with the principles and policies of the National Planning Policy Framework (NPPF) (2012) and reflect the DEFRA Vision and Circular for National Parks (2010)

2.6 All the policies appended to this report will sit in the will sit in the eighth chapter of the Local Plan entitled Towards a Sustainable Future. This chapter includes all the strategic and development management policies relating to the socio-economic duty of national parks. The draft Implementation and Monitoring chapter will form the last chapter of the plan.

3. Draft Development Strategy policy

3.1 The key issues raised in this policy are the role of Whole Estate Plans, comments on settlements' inclusion as a settlement with a boundary, the way in which boundaries have been drawn and how settlements outside of the National Park are dealt with.

3.2 The key issues raised in this policy are the role of Whole Estate Plans, comments on settlements' inclusion as a settlement with a boundary, the way in which boundaries have been drawn and how settlements outside of the National Park are dealt with.

4. Draft Housing policies

4.1 A number of comments were made on the distribution of housing, and some questioned the basis of the Plan housing target, suggesting that a number closer to the Objectively Assessed Need set out in the Strategic Housing Market Assessment (SHMA) should be preferred.

4.2 In response to LPMWG the main change was to strengthen the policy and supporting text with respect to older people's housing.

5. Draft Gypsies, Travellers and Travelling Showpeople policy

5.1 The key issues addressed in this policy are the safeguarding of permanent sites from alternative development, the number of pitches the Local Plan will make provision for and the criteria against which planning applications will be considered.

5.2   At LPMWG a discussion was held over the ability to require that sites are in a location with access to services and facilities. As a result the policy includes a requirement to demonstrate that there are no alternative available pitches with better connections to services and facilities in the locality. Text has also been added to explain what facilities might be on a site.

6.   Draft Employment Policies

6.1   The focus of policy SD27 is on our duty to foster the social and economic wellbeing of our local communities. Policy SD28 sets out the same employment land requirements that were in the Preferred Options. We have updated our evidence on existing employment sites in the National Park and will now identify principal and local employment sites on our Policies Map. The policy set out marketing requirements for three categories of employment sites as follows:

- All employment sites (12 months)
- Principal employment sites (18 months and focus on B uses)
- Local employment sites (18 months and more flexibility on non B use commercial uses)

6.2   In response to LPMWG policy SD27(1)(b) was re-worded to 'promote and protect businesses linked to the National Park's key sectors of farming forestry and tourism.' The supporting text was also re-worded and re-ordered.   Further words were also added on the supporting text that ancillary facilities such as bottling plants will need to support local production.

7.   Draft Town Centres and Retail Policies

7.1   The key issues addressed in these policies are the establishment of a hierarchy of retail centres, the identification of town centre boundaries and shopping frontages boundaries and criteria against which development proposals will be considered in town and village centres.

7.2   There were limited changes made in response to the Preferred Options consultation, however, it was considered that the marketing for shops within smaller village centres should be for 24 months as they were such a limited resource and unlikely to be replaceable if lost. In response to LPMWG further supporting text has been added about the information that garden centres should be supplying to support an application.

8.   Draft Infrastructure Policies

8.1   The key issues addressed in these policies relate to infrastructure development proposals and supporting infrastructure within other development proposals. There is a strategic policy (SD42) which sets out an overarching approach to infrastructure against which all development proposals will be considered and two development management policies relating to community facilities (SD43) and telecommunications & utilities (SD44). It should also be noted that many types of infrastructure, for example highways, are also addressed by other specific draft Local Plan policies.

8.2   In response to LPMWG Policy SD44 has been expanded to set out an explicit requirement for all new residential development and most non-residential buildings to include a superfast broadband connection as a necessary utility. This will be secured through suitable conditions or obligations. For reference, this approach has successfully been taken through examination by the Yapton Neighbourhood Plan in Arun District. In addition, references to reservoirs and the use of camouflage (in terms of telecommunications design) have been deleted.

9.   Draft Implementation and Monitoring Chapter

9.1   The key issues raised in this chapter are the targets and monitoring indicators for the Local Plan. The chapter sets out a table in which each policy is related to one or more Local Plan objectives; targets and monitoring indicators are ascribed to most of the policies as appropriate, and the sources of each indicator stated.

9.2 In response to LPMWG the chapter has been thoroughly overhauled with the main table arranged by Local Plan policy rather than objective. This provides a clearer demonstration of the links between policies and the relevant targets and indicators, while avoiding repetition. In addition the proposed list of indicators has been revised according to SMART principles, with an emphasis on ensuring the easy and practical measurability of each.

10. Planning Committee Considerations

10.1 The policies forming appendices 1 to 5 were reviewed by the Local Plan Members Working Group (LPMWG) on 17 January 2017. The draft policies and chapter forming appendices 6 and 7 were reviewed by LPMWG on 22 November 2016. The changes requested at LPMWG are listed in the table of changes for each policy.

11. Other Implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	A final batch of draft policies plus relevant supporting text will be reported to the Planning Committee in March ahead of being included in the Local Plan. This will be presented to the Planning Committee in its entirety in June for consideration and recommendation to the SDNPA to approve the document for consultation in July.
Does the proposal raise any Resource implications?	The Local Plan is one of the top corporate priorities for the SDNPA with adoption timetabled for 2018, which has been reflected in approved budgets and the Medium Term Financial Strategy. Officers within the Planning Policy team are leading the work on developing the Local Plan and utilising expertise elsewhere within the Authority. Costs associated to the delivery of the Local Plan will be monitored and any variation to approved budgets will be reported as part of the budget monitoring process
Has due regard been taken of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Due regard, where relevant, has been taken to the South Downs National Park Authority's equality duty as contained within the Equalities Act 2010. An Equalities Impact Assessment is being prepared for the whole Local Plan.
Are there any Human Rights implications arising from the proposal?	These draft chapters and policies have been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.
Are there any Crime & Disorder implications arising from the proposal?	It is considered that the proposal does not raise any crime and disorder implications.
Are there any Health & Safety implications arising from the proposal?	None
Are there any Sustainability implications based on the 5 principles set out in the SDNPA Sustainability Strategy:	The South Downs Local Plan is a landscape led plan that seeks to deliver multiple eco system services within a nationally protected landscape.

12.

13.   Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
That the South Downs Local Plan is not found 'sound' at examination.	Medium	High	The policies are consistent with the NPPF and are based on robust evidence

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Appendices	1) Development Strategy
	2) Homes (strategic)
	3) Gypsies, Travellers and Travelling Showpeople
	4) Employment
	5) Town Centres and Retail
	6) Infrastructure
	7) Implementation and Monitoring Chapter
SDNPA Consultees	Legal Services; Chief Finance Officer; Monitoring Officer.
External Consultees	None
Background Documents	South Downs Local Plan: Preferred Options
	Summary of Responses on the South Downs Local Plan: Preferred Options

TOWARDS A SUSTAINABLE FUTURE

Change Table – Introduction and Local Plan Objectives

Change	Reason
Introduction – wording updated to refer to homes, jobs, green infrastructure and climate change	Reflect updated structure of LP chapter
Local Plan Objectives added as relevant to chapter	Factual update

Introduction

This chapter contains strategic and development management policies linked to the Partnership Management Plan's (PMP) third theme namely Towards a Sustainable Future. The chapter begins with the development strategy for the National Park and is followed by the strategic and development management policies relating to homes, jobs, infrastructure, green infrastructure and climate change.

Local Plan Objectives

6. To adapt well to and mitigate against the impacts of climate change and other pressures.

7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.

8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.

DEVELOPMENT STRATEGY

Changes between Regulation 18 and Regulation 19 Local Plan (Core Policy SD22 & supporting text – Development Strategy)

Change	Reason
Introduction: Update to reflect that former SD4 policies are now deleted.	SD4 policies are now deleted
Introduction: Delete section on National Policy Context	In line with agreed Plan-making guidelines. This will now be included in the Background Paper
Introduction: New paragraphs expanding on introduction to Policy SD22	To improve readability / user friendliness, link the policy to the plan objectives better, and explain relationship with NDPs
Introduction: Add map showing Policy SD22 settlements with broad areas	Adds clarity and better integrates policy and Broad Areas approach
Introduction: New paragraph and flow diagram on NDPs	To explain how NDPs and the Local Plan fit together in the SDNP
SD22: New wording for Part 1 of policy to replace previous (introduction to list of settlements with boundaries) and incorporate previous part 2	To read more like a planning policy and improve its operation. To reflect a 'brownfield first' approach and ensure appropriate and efficient use of land
SD22: Re-ordering of settlements by relevant Broad Area and deletion of Broad Area cross-reference for each policy. Addition of Owslebury and Slindon.	To better integrate policy with Broad Areas approach and reduce word count. Addition of new settlements to ensure a consistent approach as to which settlements have boundaries

Separation of Lower and Upper Farringdon into two separate settlements	
SD22: Delete part 2 of the policy	Partly merged with part 1, and to reflect that Broad Area policies deleted
SD22: Changes to old part 3 (new part 2) of the Policy (main text)	To bring into line with agreed plan-writing guidelines, and make clear that development outside settlement boundaries is exceptional
SD22: Delete sub-criteria (a) and (b) ("in accordance with Policy SD25 rural exception / Policy SD27 rural economy")	To bring into line with agreed plan-writing guidelines, i.e. remove unnecessary cross-reference to other LP policies which hold equal weight
SD22: New sub-criteria (b) referring to over-riding social need for community infrastructure	To allow for appropriate expansion of essential community facilities which may lie outside the settlement boundary
SD22 old part 4 (new part 3): wording changes	To make policy clearer, and ensure internal consistency with other local plan policies
SD22 part 5: Delete whole of this part	The allocations are themselves being made as part of the same Local Plan, therefore this is not required
Principles of development (para 7.2 & 7.8): comprehensive rewording of paragraph	To cut out unnecessary wording relating to Plan preparation stages, and make overall approach clearer
Settlement policy boundaries (para 7.9 & 7.10): rewording and re-ordering	To improve clarity
Exceptional development outside settlements (para 7.11): Some sentences reworded, others removed entirely, new sentences added to refer to the reworded SD22	To cut out unnecessary wording which duplicate other policies, and add cross-references to other policies which set out further exceptions not covered in SD22
New paragraph "Development on previously developed land"	New text to provide support and context to relevant parts of SD22
New paragraph "Efficient use of land"	New text to provide support and context to relevant parts of SD22
Whole estate and large farm plans (para 7.12): comprehensive rewording	To add clarity, in particular to clarify that WEPs are a means of demonstrating material considerations that point to an exceptional approach in the context of what is best for the National Park (as opposed to being a material consideration in their own right), and to clarify that the onus on providing affordable housing in line with other Plan policies equally applies
Settlements outside the National Park (para 7.14): comprehensive rewording	To add clarity, in particular explaining that NDPs for settlements outside and abutting the National Park should first consider allocating sites outside the NP ahead of those within the NP
Policy SD22 under sub-heading Scarp Slope: Lewes moved from Scarp Slope to River Valley (Ouse)	LPMWG change. Factual correction.
Policy SD22 part 2 (c): replace "an overriding social" with "proven"	LPMWG change. Previous wording considered too inflexible.
Policy SD22 part 2 (d): replace "preserves" with "conserves"	LPMWG change. In line with standard LP wording.

Policy SD22 part 3 (b): delete "and Duty"	LPMWG change. Makes clearer that Duty is subservient to Purposes, and relates better to ecosystem services.
Under sub-heading Whole Estate Plans and Large Farm Plans: delete "Duty" from second sentence.	LPMWG change. Makes clearer that Duty is subservient to Purposes, and relates better to ecosystem services.
Under sub-heading Whole Estate Plans and Large Farm Plans: delete last sentence relating to visitor accommodation.	LPMWG change. Cross-reference is unnecessary.
Under sub-heading Settlements outside the National Park: second sentence reworded. Add words "…within the <u>open countryside of the </u>National Park…"	LPMWG change: to improve sense of text. Further officer change: add ref to open countryside to clarify this does not relate to built-up areas within the NP.

Introduction

The development strategy provides the overall framework for guiding development across the South Downs National Park, by taking into account its characteristics as set out in the Spatial Portrait. In doing this, Policy SD22 reflects the vision and objectives of the Local Plan and promotes sustainable development. It should be read in conjunction with the Spatial Portrait relating to the five Broad Areas that characterise the National Park: the Coastal Plain, the Dip Slope, the Western Downs, the Scarp Slope, the Western Weald and the four river corridors formed by the Rivers Arun, Adur, Ouse and Cuckmere.
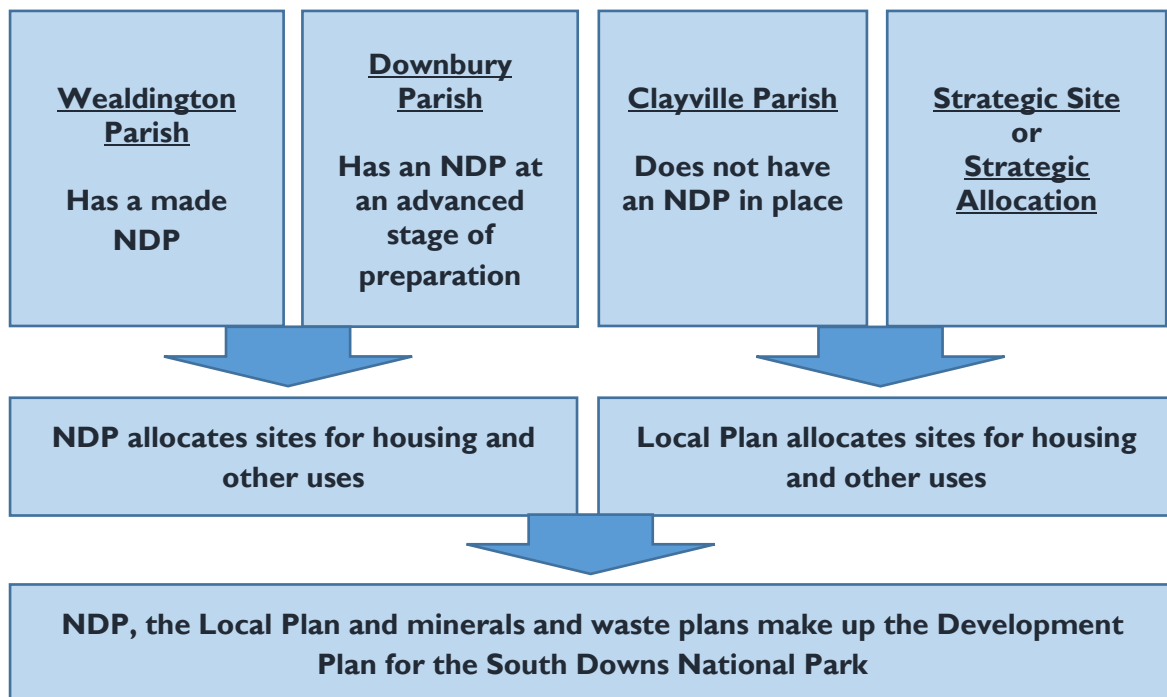
Policy SD22 responds to the Spatial Strategy to plan for a medium level of growth dispersed across the towns and villages of the National Park. This is achieved by identifying 53 settlements that are potentially well-placed to accommodate some level of growth. This sets a clear framework for accommodating the local housing, employment and other development needs of the communities within the National Park. In particular, it provides a starting point for positively identifying settlements that can help meet the Plan objectives, as set out in Policy SD23: Supply of Homes, Policy SD28: Employment and Policy SD29: Retail and Town Centres. **Figure 8.x** is a map of the 53 settlements distributed across the broad areas and river corridors of the National Park.

Figure 8.x Settlements identified in policy SD22 and their distribution across the National Park

SOUTH DOWNS
NATIONAL PARK

SDNP Spatial Portrait
SD22 Settlement Policies

Broad Areas

- The Coastal Plain
- The Dip Slope
- The River Valleys
- The Scarp Slope
- The Western Downs
- The Western Weald

Index	Settlement	Index	Settlement	Index	Settlement
1	Alfriston	15	East Dean and Friston	29	Liss (including Liss Forest and West Liss)	43	Singleton
2	Amberley	16	East Meon	30	Lodsworth	44	Slindon
3	Binsted	17	Farringdons (Lower & Upper)	31	Midhurst	45	South Harting
4	Buriton	18	Fernhurst	32	Milland	46	Stedham
5	Bury	19	Findon	33	Northchapel	47	Steep
6	Chawton	20	Fittleworth	34	Owslebury	48	Stroud
7	Cheriton	21	Funtington	35	Petersfield	49	Twyford
8	Cocking	22	Graffham	36	Petworth	50	Washington
9	Coldwaltham	23	Greatham	37	Poynings	51	Waterfield
10	Compton	24	Hambledon	38	Pyecombe	52	West Ashling
11	Corhampton and Meonstoke	25	Itchen Abbas	39	Rodmell	53	West Meon
12	Ditchling	26	Kingston Near Lewes	40	Rogate		
13	Droxford	27	Lavant (including East Lavant and Mid Lavant)	41	Selborne		
14	Eastbourne	28	Lewes	42	Sheet		

Scale at A3 300,000

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The Development Strategy recognises that neighbourhood development plans (NDPs) constitute an important and significant element of the development plan. A number of settlements listed in Policy SD22 are within parishes or town council areas that are developing or have made NDPs. These reflect the vision and objectives of the local community, whilst playing their part in delivering on the objectives and strategy of this Local Plan. As shown in **Figure 8.x** below, the South Downs Local Plan only seeks to allocate sites to meet development needs where a neighbourhood development plan (NDP) has not done so (usually because there is no made NDP, nor one being developed). An important exception to this is that the Local Plan will allocate strategic sites and strategic allocations, as required by national policy. These sites are considered critical, in their own right, for delivering on the objectives of the Local Plan.

Figure 8.x Neighbourhood Development Plans as part of the development plan

| Wealdington Parish

Has a made NDP | Downbury Parish

Has an NDP at an advanced stage of preparation | Clayville Parish

Does not have an NDP in place | Strategic Site or Strategic Allocation |
|---|---|---|---|

NDP allocates sites for housing and other uses

Local Plan allocates sites for housing and other uses

NDP, the Local Plan and minerals and waste plans make up the Development Plan for the South Downs National Park

Strategic Policy SD22: Development Strategy

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

   a) is of a scale and nature appropriate to the character and function of the settlement;

   b) makes best use of suitable and available previously developed land in the settlement, and

   c) makes efficient and appropriate use of land.

Coastal Plain

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

Western Weald

- Binsted
- Easebourne
- Fernhurst
- Fittleworth
- Greatham
- Liss (including Liss Forest and West Liss)

Dip Slope

- Compton
- Corhampton and Meonstoke
- Droxford
- East Dean and Friston
- Findon
- Hambledon
- Owslebury
- Pyecombe
- Singleton
- Slindon
- Twyford

Scarp Slope

- Buriton
- Bury
- Cocking
- Ditchling
- East Meon
- Graffham
-
- Poynings
- Selborne
- Steep
- Washington
- West Meon

Western Downs

- Chawton
- Cheriton
- Itchen Abbas
- Farringdons (Lower and Upper)
- Stroud

- Lodsworth
- Midhurst
- Milland
- Northchapel
- Petersfield
- Petworth
- Rogate
- Sheet
- South Harting
- Stedham

River Valley (Arun)

- Amberley
- Coldwaltham
- Watersfield

River Valley (Cuckmere)

- Alfriston

River Valley (Ouse)

- Kingston near Lewes
- Rodmell
- Lewes

2. Exceptionally, development will be permitted outside of settlement boundaries, where it complies with relevant policies in this Local Plan, responds to the context of the relevant Broad Area or river corridor, and:

   a) It is allocated for development or safeguarded for the use proposed as part of the Development Plan, or

   b) There is an essential need for a countryside location, or

   c) In the case of community infrastructure, there is a proven need for the development that demonstrably cannot be met elsewhere, or

   d) It is an appropriate reuse of a previously developed site which conserves or enhances the Special Qualities of the National Park.

3. In considering development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to the following:

    a) The development proposals are part of a Whole Estate Plan or Large Farm Plan that has been endorsed by the Authority; and

    b) The development proposals deliver multiple benefits in line with the Purposes and the special qualities of the National Park and in regard to ecosystem services.

Principles of development

Policy SD22 identifies towns and villages across the Broad Areas and river corridors of the National Park that are able to accommodate growth of a scale and nature appropriate to the their character and function.   These have been identified in line with two principle criteria:

- The future sustainability of the settlement, in terms of its facilities and services, and
- The form and character of the settlement within its landscape context.

Evidence to support the inclusion of these settlements includes the South Downs Integrated Landscape Character Assessment, and the Settlement Facilities Study. These form part of the Local Plan Evidence Base.

Settlement Policy Boundaries

Settlement policy boundaries are defined on the Policies Map. All the settlement boundaries have been comprehensively reviewed as part of the Local Plan process, apart from in areas where the boundary is to be determined by an NDP. The methodology for determining the boundaries is set out in the Settlement Boundary Methodology Paper, which forms part of the Local Plan evidence base. In respect of the settlements listed in Policy SD22, the Authority will work with all the neighbourhood planning groups on reviewing their settlement policy boundaries, where not already established by this Local Plan.

Policy SD22 sets a clear distinction between land within a settlement boundary and open countryside. Within the settlement boundary, the principle of further development is established subject to other policies in this Plan. Outside of settlement boundaries, land will be treated as open countryside. Settlements that are more scattered or diffuse in their form have not been given settlement policy boundaries, and will be treated as open countryside for the purposes of Policy SD22.

All sites that have been allocated for development are suitable in principle for the uses specified in the relevant allocation policy (see Chapter 10).

Exceptional development outside settlements

Policy SD22 acknowledges exceptional circumstances whereby development outside settlements may be acceptable. For example, particular uses of land relating to agriculture or countryside recreation may only be able to function successfully in fully rural locations. Community uses that are crucial for sustaining thriving communities, such as extensions to schools or health centres, may only be achievable through minor incursion into the countryside. Other exceptions to the development strategy are set out in other policies in this Local Plan, for example Policy SD20 (Sustainable Tourism), Policy SD25 (Rural Exception sites), and Policy SD27 (Sustaining the Rural Economy). Robust evidence will need to be provided to support applications for such developments to demonstrate that an exceptional approach is fully justified.

Development on Previously Developed Land

In order to preserve wider landscape character and minimise the footprint of development, it is important to focus development on previously developed land (often referred to as 'brownfield' land). Therefore the Authority will expect developers to make best use of previously developed land within settlement boundaries, subject to other locational and physical constraints. Policy SD22 also provides some limited flexibility, in exceptional circumstances, to allow 'brownfield' development outside settlement boundaries, where demonstrably necessary to meet the wider objectives of this Local Plan. An example would be where development necessary to uphold the Purposes of the National Park can be provided on previously developed land as an alternative to encroaching on undeveloped countryside.

However all development on previously developed land must always be within the context of a 'landscape first' approach whereby previously developed sites will not automatically be the best in landscape terms. Any proposal for re-use of previously developed land outside settlement boundaries must have full regard to Purpose 1, including the strong presumption in favour of preserving the agricultural character of most of the National Park. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.

Efficient use of land

Throughout the National Park, development pressures are great, whilst availability of land suitable for development is scarce. Furthermore, many villages and towns across the National Park are characterised by relatively densely clustered, small buildings. Therefore it is important to make efficient use of land that does become available and is suitable for development. This approach is likely to encourage design of new development that respects traditional patterns of built form, whilst reducing demand for additional land supply to meet local communities' needs.

It is equally important to recognise that efficient use of land does not translate to overdevelopment of sites in the context of the surrounding area and setting. In some contexts, a more diffuse built form may be more appropriate. Principles and criteria relating to design and mix of housing are set out elsewhere in this Local Plan.

Whole Estate Plans and Large Farm Plans

Estates and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD22 recognises that Whole Estate Plans and Large Farm Plans may be able to demonstrate particular material considerations, relating to the Purposes and special qualities of the National Park, that justify development outside of settlement boundaries. The Authority will only give weight to such Plans where they have been endorsed by the National Park Authority, in line with the Whole Estate Plan Guidelines published on its website.

Where new dwellings are proposed as part of a Whole Estate Plan or Large Farm Plan, these should meet the priority housing needs of the local area, hence should be affordable homes, or accommodate full-time, rural workers as defined by Policy SD48 and its supporting text. An exception may be made where to do so would make the delivery of multiple benefits to ecosystem services and the special qualities of the park unviable, provided clear evidence is provided in the endorsed Estate or Farm Plan.

Settlements outside the National Park

It is recognised that there are large settlements which abut the National Park boundary and are therefore not included in Policy SD22. Sites on the edges of these settlements, but encroaching into the National Park, may be considered as sustainable locations for further development. However they are often as sensitive in landscape terms as locations well within the open countryside of the National Park, and therefore generally unsuitable for further development.

This Local Plan does not set out a specific policy approach to development on the edge of such settlements. Where NDPs for these settlements consider sites within the National Park, it is expected that these will only be taken forward as allocations where all site options outside of the National Park suited to meeting the identified need have been exhausted.

SUPPLY OF HOMES

Change	Reason
Title – changed to 'Supply of Homes'	To better distinguish this section from other sections
Introduction – significantly expanded to concisely explain background to policy development with reference to key evidence, and to refer to made NDPs and JCS carry-over requirements.	To give a clearer sense of the basis and purpose of the approach to housing distribution and supply numbers
Introduction – National Policy Context deleted	To remove repetition of national policy and in accordance with agreed plan writing guidelines
SD23 – Replace previous overall housing target with new target. Insert new Plan period (19 years to 2033, increased from 18 years to 2032)	To reflect updated housing allocations, NDP housing allocations, monitoring of completions and extant permissions
SD23 – Add wording to part 4 of policy to refer to NDPs as well as LP allocations, and clarify cut-off date for counting permissions as commitments.	To add clarity and factually update.
List of settlements: • Chawton, Compton, Hambleton, Northchapel and Rodmell removed • Steep and West Ashling added • Numbers updated	Factual updates to reflect land availability at the relevant settlements
Subtitle 'Amount of housing' – expanded to explain more of the background to the way the housing figures were arrived at	To add clarity to the reasoning behind the policy
Table 7.1 – wording of table amended and figures updated	To update the housing figures, and simplify the table's meaning.
Subtitle – 'The location of housing' redrafted to remove reference to process (the SA) and now includes reference to ecosystem services, and explanation of capacity- and landscape-based assignment of housing numbers to settlements	To better explain the reasoning behind the policy
Subtitle 'Windfall allowance' – expanded explanation of windfall	To provide justification for a windfall allowance as required by national policy, and better explain its calculation
New section – MIX OF HOMES	Section added to require a specific mix of dwelling sizes on all housing sites, using evidence from the SHMA. Needed to ensure provision of a good number of smaller dwellings on new housing sites, and ensure efficient use of land whilst promoting mixed and balanced communities. New section also includes new supporting text to encourage opportunities to be taken to provide older people's housing and meet other specific community needs (as evidenced by the SHMA).
Introduction: New sentence to explain that local communities favoured this option when consulted.	LPMWG change: To add weight to the policy justification. 67% of respondents at Options stage considered that the policies should put an emphasis on the delivery of smaller properties for market tenures, and a mix of sizes for affordable tenures,

	unless otherwise indicated by local housing need information.
Introduction: New text introduced to give the headline outcomes from the SHMA.	LPMWG change: To outline key evidence on objectively assessed housing need.
New policy MIX OF HOMES: Add new part 3 to the policy to require development to respond to evidence of need for more older people's housing, and to promote delivery of adaptable homes. Introduce threshold of 5 units. Consequential deletion of text in part 1.	LPMWG change: To provide policy 'teeth' in relation to the supporting text introduced earlier on this matter. 5 unit threshold provides more certainty of what the policy seeks. Some of the text in part 1 no longer needed because of this.
New supporting text under heading 'Alternative mix of homes': minor rewording throughout paragraph.	LPMWG change: Officer change to improve sense of this sub-section.
New supporting text under heading 'Older people's housing': Further information added, including table detailing nature of need identified in the SHMA.	LPMWG change: More detail on evidence to provide more robust policy justification, and a better steer on types of older people's housing needed.
New supporting text under heading 'Older people's housing', last paragraph: additions to text to support policy	LPMWG change: to provide further interpretation in relation to new part 3 of the policy.

Introduction

Provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to maintain and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses, whilst conserving and enhancing the landscape of the National Park. Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise by providing homes for local workers.

The Local Plan determines the level of housing provision and types of homes to be delivered. To inform this, the Authority commissioned a Strategic Housing Market Assessment (SHMA), which forms part of the evidence base for this Local Plan. Over the 20 year period 2013-2033, the SHMA estimates a need for 294 new affordable homes each year within the National Park. Overall, the SHMA identifies an objectively assessed need of between 416 and 454 homes per year. The SHMA also recognises that the emphasis on seeking to meet full objectively assessed housing need does not apply in national parks, where it can be shown that this conflicts with the statutory Purposes.

Policy SD23 sets out the overall housing requirement for the National Park along with specific requirements for the market towns and a number of villages. The distribution of new housing sites responds to the Spatial Strategy to achieve a medium level of development dispersed across the towns and villages of the National Park. Policy SD22: Development Strategy provides the starting point with regards to settlements considered. A filtering process has then been undertaken, having regard to ecosystem services and the Special Qualities, and informed by assessments of landscape context, facilities and services, and land supply. Key evidence includes the Strategic Housing Land Availability Assessment (incorporating site-specific landscape assessments) and the Settlement Facilities Study, which form part of the Local Plan evidence base. Levels of local growth have additionally been informed by consultation with local communities, in particular with Parish and Town Councils.

The Local Plan incorporates the overall levels of housing proposed within the adopted Joint Core Strategies, updated where relevant by made NDPs. In particular, the requirements for the two largest settlements of Lewes (875 homes) and Petersfield (805 homes) have been carried forward from the Lewes Joint Core Strategy and Petersfield Plan respectively. This Local Plan also meets the commitments set out in adopted Joint Core Strategies to deliver a total of 1,694 dwellings in East Hampshire, which equates to approximately 100 dwellings per annum until the East Hampshire Joint Core Strategy end date of 2028.

Strategic Policy SD23: Housing

1. The SDNPA will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033.

2. These will be delivered through:
   (i) the development of strategic sites and the allocation of land for housing in the Local Plan and neighbourhood development plans;
   (ii) the implementation of planning permissions; and
   (iii) the development of land previously unallocated or identified (windfall).

3. Sites will be allocated in this Local Plan or in Neighbourhood Development Plans to accommodate approximately the following levels of housing in addition to extant planning permissions granted prior to 1st April 2015, and windfalls:

Settlement	Housing requirement
Alfriston	12
Amberley	6
Binsted	12
Buriton	11
Bury	6
Cheriton	10
Coldwaltham	28
Corhampton and Meonstoke	18
Ditchling	15
Droxford	22
Easebourne	47
East Dean and Friston (East Sussex)	11
East Meon	17
Fernhurst (including Syngenta)	220
Findon	31
Fittleworth	6
Greatham (Hampshire)	39
Itchen Abbas	8
Kingston near Lewes	6
Lavant (including Mid Lavant and East Lavant)	20
Lewes (including North Street Quarter)	875
Liss (including West Liss and Liss Forest)	150

Midhurst	168
Petersfield	805
Petworth	150
Pyecombe	8
Rogate	11
Selborne	6
Sheet	31
South Harting	14
Stedham	30
Steep	8
Stroud	30
Twyford	20
West Ashling	15
West Meon	16

4. Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and is in general conformity with the strategic policies of the development plan.

Supporting text

The Amount of Housing

The process for determining the amount of housing to be delivered in the National Park starts with the identification of the 'objectively assessed need' for housing. This is followed by consideration of the extent to which meeting need within the National Park can be reasonably met. The Local Plan must first and foremost reflect the Purposes of the National Park, and is therefore capacity-based. Pursuant to the Purposes, the Local Plan must also reflect the Duty of the National Park, and therefore should seek to foster the economic and social wellbeing of local communities.

Policy SD23 sets a level of new housing provision for the National Park which totals 4,750 over the Plan period, representing a net increase of 250 homes per year over the Plan period. This target is informed by the evidence from the Strategic Housing Market Assessment (SHMA), including the great need for affordable housing to meet locally generated housing needs. It is equally informed by a robust body of evidence on constraints and opportunities, which includes the Strategic Housing Land Availability Assessment (SHLAA) (incorporating site-specific landscape assessments), and the Settlement Facilities Study. These evidence based studies form part of the Local Plan evidence base. The components of supply to deliver the requirement set in Policy SD23 are set out in Table 7.1.

TABLE 7.1: ELEMENTS OF HOUSING DELIVERY IN THE SOUTH DOWNS NATIONAL PARK

	Element of Delivery	Dwellings
a	Allocations in the Development Plan, including those to come forward in NDPs and on strategic sites	2,668
b	Implementation of extant planning permissions granted before 1st April 2015 on sites that have not been allocated	908
c	Anticipated windfall development	663
d	**Completions in monitoring years 2014/15 and 2015/16**	**511**
	Total	**4,750**

The Location of Housing

Policy SD23 sets out specific housing requirements for individual settlements. This approach provides clarity to local communities on the amount of development to be provided in individual settlements, which will be of particular importance in designated neighbourhood plan areas. The starting point for the settlement specific housing requirements is the Spatial Strategy of the Local Plan for a medium level of dispersed growth across the National Park. A further key driver is the estimated capacity of each settlement to provide for growth, whilst safeguarding Purpose 1 of the National Park (with a particular focus on landscape), and reflecting an ecosystem services approach.

The requirements have been calculated firstly taking account of opportunities and constraints (primarily landscape context, then settlement facilities) and secondly the estimated supply of suitable and available housing land. The requirements are approximate, and actual delivery in individual settlements may vary should the land supply position change. Nevertheless, it is expected that the SDNPA, Parish and Town Councils and other partners will work together to deliver at least these numbers provided that there remain opportunities to do so.

Allocation of strategic sites and housing sites

An important element of housing delivery in the National Park is the allocation in the Local Plan of strategic sites to include provision of housing, and a number of smaller sites in settlements across the National Park.

There are three previously developed strategic sites allocated in this Local Plan: North Street Quarter in Lewes, the Syngenta site near Fernhurst, and the former Shoreham Cement Works. North Street Quarter and Syngenta will deliver a considerable number of houses as part of mixed use development schemes. There is one greenfield strategic housing allocation in Lewes, Old Malling Farm, which will deliver approximately 240 homes. These policies are set out in Chapter 9 of this Local Plan. Finally, there is a brownfield strategic housing allocation in Midhurst made up of the former Brickworks and West Sussex County Council Depot.

Non-strategic Local Plan housing site allocations are being made in areas of the National Park where there is currently no emerging Neighbourhood Plan, or where the emerging Neighbourhood Plan does not allocate land for the housing requirements in Policy SD23. In areas where Neighbourhood Plans are emerging or have been made, these are expected to allocate sites sufficient to meet the settlement level requirements set out in Policy SD23. This means that the Local Plan does not need to allocate sites to meet the housing requirements in these areas.

The allocation of land in a neighbourhood plan which will deliver a greater number of homes than is specified in Policy SD23 will be supported, where it meets an identified local housing need in that settlement or locality and is in accordance with this Local Plan.

A list of made and emerging Neighbourhood Plans set out in appendix XX pf this Local Plan and is maintained on the SDNPA website.

Windfall allowance

The development of previously unallocated or unidentified land (known as 'windfall sites') will count towards the requirement. This is known as a 'windfall allowance'. A review of past planning permission implementation (using dwelling completion records) has provided strong evidence that there has been consistent delivery on windfall sites as a proportion of total dwellings built, therefore allowance of a modest element of windfall housing supply is justified. However in the context of a National Park, it is appropriate to adopt a conservative allowance. The windfall allowance is calculated as 51 dwellings per year for the National Park area, based on an analysis of past trends, whilst taking into account the emphasis on future growth taking place primarily within tightly drawn settlement boundaries (generally in the form of infill development).

MIX OF HOMES

Introduction

National policy states that the Local Plan should plan for a mix of housing based on current and future demographic trends, market trends, and the need for different groups in the community. The SHMA identifies a need for a mix of dwelling sizes across the National Park, with a much greater level of need for small and medium-sizes homes, and limited need for larger houses of 4 or more bedrooms. Consultation on this local plan has indicated that local communities favour a policy that ensures a good mix of dwelling sizes to meet local needs.

Strategic Policy SDxx: Mix of homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals shall provide numbers of dwellings of sizes to accord with the relevant broad mix.
   a) Proposals for affordable housing delivered as part of a market housing scheme will provide the following approximate mix of units:

1 bedroom dwellings:	35% **[subject to checking with housing enablers]**
2 bedroom dwellings:	35%
3 bedroom dwellings:	25%
4 bedroom dwellings:	5%

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

1 bedroom dwellings:	at least 10%
2 bedroom dwellings:	at least 40%
3 bedroom dwellings:	at least 40%
4+ bedroom dwellings:	up to 10%

2. Planning permission will be granted for an alternative mix provided that:
   a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local or strategic needs, or
   b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met, or
   c) Robust evidence demonstrates that the mix of dwellings specified would make the proposal unviable, when combined with other requirements specified in the Local Plan.

3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.

Meeting the needs of local households

The precise mix of homes within each proposal should be informed by the latest evidence of strategic and local needs, including the currently published SHMA or future reviews as relevant. However, given clear evidence in the SHMA of future household needs, it is important that new housing development focuses on providing smaller and medium size dwellings, to reflect the National Park Duty to foster the well-being of the local communities within the National Park.

The mix of dwellings set out in Policy SDxx is in line with the recommendations of the SHMA, which is based on detailed modelling of housing market trends up until 2033. The SHMA recommends that market housing in particular should be explicitly focused on delivering smaller family housing for younger households. This approach also complements Policies SD45a and SD45b which similarly seek to retain smaller dwellings.

It is recognised that many housing sites in the National Park are small, in such instances it may not be possible to achieve the exact proportions set out in Policy SDxx. Nevertheless the requirements should be broadly met. For all proposals for standard occupancy housing, the onus will be on providing smaller homes, some of which should be suitable for families with children.

Alternative mix of homes

The Authority recognises that future development will need to respond appropriately to a changing market and changing household needs. Policy SDxx therefore allows for regard to be had to bespoke local evidence, or refreshed evidence on strategic need. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development.

The Authority also recognises that a scheme's viability may be affected by the mix of units on the site. If so, robust independent evidence to support this should be prepared at the expense of the developer, and an alternative mix proposed to meet as closely as possible local need, whilst achieving a viable scheme. For avoidance of doubt, the overall proportion of affordable housing with tenure mix to reflect Policy SD24 will be prioritised, if necessary, over the mix of market housing.

NDPs may also propose an alternative housing mix, provided this is based on robust local evidence. Well-evidenced alternative mixes as set out in NDPs should be used in place of the mix proposed in Policy SDxx.

The delivery of each element of supply will be subject to ongoing monitoring.

Older people's housing

The South Downs National Park has a higher than average proportion of its population within the 'older person' category of 55 years old or over, with further growth in this age demographic predicted. In particular, there is predicted to be strong growth in the 85+ age category.

The SHMA identifies an indicative demand for some 92 homes per annum suitable to meet the needs of older people. This represents some 20% of the total objectively assessed housing need. Figure x indicates the different types of older people's housing need. There is a particular need for more sheltered housing in future.

Figure xx - Estimated Need for Specialist Housing for Older People, SDNP 2013-33

	Affordable		Market		Total	
	2013-33	Per Annum	2013-33	Per Annum	2013-33	Per Annum
Sheltered	544	27	815	41	1,359	68
Enhanced sheltered	109	5	109	5	217	11
Extra-Care	136	7	136	7	272	14
Total	788	39	1,060	53	1,848	92

Source: South Downs National Park Strategic Housing Market Assessment, Sep 2015

The evidence from the SHMA demonstrates the importance of making provision for older people's housing. Furthermore, providing smaller homes suitable for older people encourages 'downsizing' which in turn frees up larger dwellings more suited to larger households.

All proposals for new residential development should include smaller homes that are designed to meet the living requirements of older people, for example allowing step-free access to and within the home. Proposals of 5 or more dwellings are considered most likely to provide opportunity to achieve this. Sites that can reasonably accommodate a comprehensive mix of housing types should demonstrate that opportunities for specialist older people's accommodation have been fully investigated and, where appropriate, incorporated into the development. This should be of a type which reflects local or strategic needs, including affordability.

Other housing needs

The Authority recognises that there are other specialist housing needs that exist in local communities. People with disabilities may have particular requirements in respect of how their homes are designed to function, that is, the need for 'accessible and adaptable homes'.

The national requirements and advice in respect of addressing such needs are set out in statutory building regulations (Approved Document Part M). The Authority is supportive of proposals that go beyond meeting the statutory minimum standards.

Note officers will be asking for further work to be carried out on older people's housing as part of the SHMA update. Any changes arising will be presented to Members as part of the whole plan sign-off.

GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

Changes from Reg 18 to Reg 19 Local Plan: Introduction

Change	Reason
Delete PMP outcomes and policies	Progress in plan to pre-Submission
New first paragraphs introducing policies. Removal of policy context, options considered.	Consistency across the plan, to improve flow of chapters and subsections
Update need table	Data brought up to date to take into account recent permissions etc.
Maps and supporting text removed	Updated and now contained within the South Downs National Park Traveller and Travelling Showpeople Background Paper 2016

Introduction

This sub-section contains the policy on Gypsies, Travellers and Travelling Showpeople. It safeguards permanent lawful sites, establishes the need for new sites and sets the criteria against which applications will be considered. Site specific policies are contained within the site allocations section of this Local Plan.

It is important to try to address the housing needs of all people within our community. This includes the needs of Gypsies, Travellers and Travelling Showpeople. The National Park has a small resident and transient communities of each group. There are currently 45 permanent pitches for gypsies and travellers, 30 transit pitches and 4 permanent plots for travelling showpeople.

The need for all types of sites is identified through Gypsy and Traveller Accommodation Assessments.   The SDNPA has worked in partnership with all local authorities across the National Park to identify the need for further accommodation. This has resulted in six studies which together combine to cover the National Park. There are inherent difficulties in obtaining accurate data given the transient activities of some groups and the level of statistical information available at a National Park level. Notwithstanding this, a proportionate approach has been taken in the various assessments, the results of which have been collated and are set out in the Gypsy, Traveller and Travelling Showpeople Background Paper 2016.

A summary of the need for permanent and transit pitches within the National Park as of the 1st December 2016 is presented in the table below. The slight variation in the periods covered reflects the different dates of the studies. The assessment of need is undertaken by the relevant Local Authority and any subsequent updates will need to be taken into account as appropriate.

Table xx: Permanent need within the National Park for Gypsies, Travellers and Travelling Showpeople

Area	Permanent Pitch Need	Showpersons Plot Need
Brighton & Hove	13 (2016 – 2028)	0
Coastal West Sussex (Arun, Adur, Chichester, Worthing)	0	0
East Sussex (Lewes, Eastbourne, Wealden)	8 (2016 – 2028)	0
Hampshire (East Hampshire, Winchester)	11 (2016 – 2027)	4 (2016 – 2027)
Horsham	0	0
Mid Sussex	0	0

In addition there is a need for around 8 transit pitches within the East Sussex area.

Work to identify suitable sites has been undertaken jointly with those groups of districts and boroughs where a need has been identified. The methodology used and the list of all sites considered is set out in the Gypsy, Traveller and Travelling Showpeople Background Paper 2016. The result of this work is:

- the allocation of a small number of sites within the National Park for permanent pitches;
- the intensification of the usage of some sites; and,
- the safeguarding of existing authorised sites from other uses.

Changes from Reg 18 to Reg 19 Local Plan: Policy SD26

Change	Reason
Revised to reflect standard policy wording suggested by PBA site assessment study. Minor textural changes.	Tried and tested wording / LPMWG comment.
Unnecessary detail and issues, such as character, appearance and amenity space, covered by other policies removed	Brevity
Requirement to demonstrate a local connection added.	As a National Park the Authority should only be allowing development, which is likely to be in a rural location, when there is an identified need. That need should be a local rather than regional or national one.
Requirement to consider the availability of other pitches with good connections to services and facilities added	Discussion through LPMWG
New supporting text added	To reflect policy wording including information on what facilities may be acceptable on site.
Add reference to full evidence base	For completeness
Include reference to Caravan Sites & Control of Development Act	Provides the only information there is on required distances between caravans.

Strategic Policy SD26: Gypsies and Travellers and Travelling Showpeople

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

2. The SDNPA will make provision, in the period to 2027/28, for approximately
    a) 10 pitches in that part of the National Park located in Brighton & Hove;
    b) 5 pitches in that part of the National Park located in Lewes District;
    c) 8 pitches in that part of the National Park located in East Hampshire and Winchester Districts.

3. Development proposals to meet the needs of the Gyspy, Traveller and Travelling Showpeople community (as defined in Planning Policy for Traveller Sites (2015) or any subsequent policy) will be permitted where they:

    a) can demonstrate a local connection;
    b) can demonstrate that there is no alternative available pitch with better access to services and facilities which could be used in the locality;
    c) do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;
    d) are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park;
    e) provide sufficient amenity space for residents;
    f) do not cause unacceptable harm to the amenities of neighbouring uses and occupiers and/or are not subject to unacceptable harm from neighbouring uses;
    g) have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
    h) restrict any permanent built structures in rural locations to essential facilities.

4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.

Supporting Text

Safeguarding

Given the limited availability of suitable and available sites it is important to safeguard all existing, lawful permanent and transit sites. Existing sites are identified in Appendix A of the Gypsy, Traveller and Travelling Showpeople Background Paper 2016. Where proposals involve the loss of a pitch or plot, applicants will need to identify a suitable alternative site or establish that the existing site is no longer required. This should be assessed against the relevant Gypsy and Traveller Accommodation Assessment and any subsequent update or assessment. Alternative sites should not be any less suitable than the existing pitch or plot proposed to be lost.

New Sites for Gypsies & Travellers

National policy makes clear that, as with any other form of development, planning permission for sites should only be granted in the National Park where it is demonstrated that the objectives of the designation will not be compromised by the development. As a result the National Park Authority will only permit a development, in addition to those sites allocated within the Local Plan, when there is an identified need. That need should be a local rather than regional or national one and will be judged on a case-by-case basis taking into account family history and the availability of alternative sites in the wider area.

New sites should respect the scale of, and not dominate, the nearest settled community. Observing this principle can help with community cohesion. Sites should be related to settlements with services and facilities.

On site built structures should be kept to a minimum but are likely to include a small amenity block containing a separate WC, bathroom and kitchen.

Any planning permission will include a planning condition or obligation to ensure that occupancy of the site is limited to persons as defined in Planning Policy for Traveller Sites (2015) or any subsequent policy. Applicants should also consider the Caravan Sites and Control of Development Act 1960 which specifies a separation distance of 6m or more between each caravan.

Evidence

- South Downs National Park Gypsy, Traveller and Travelling Showpeople Background Paper 2016
- Brighton and Hove *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, January 2015, University of Salford*
- Coastal West Sussex Authorities Gypsy and Traveller and Travelling Showpeople Accommodation Assessment: Update Report, December 2014, Peter Brett Associates
- East Sussex Joint *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment, January 2015, University of Salford*
- Travellers Accommodation Assessment for Hampshire, April 2013, Forest Bus Ltd
- Horsham District GTAA (2012).
- Mid Sussex GTAA (2013).
- Site Assessment Study (on behalf of East Hampshire District Council, SDNPA, Winchester City Council), July 2016
- Coastal West Sussex Authorities and SDNPA Gypsy, Traveller and Travelling Showpeople Sites Study, Sept 2013
- Brighton & Hove and SDNPA Traveller Sites Study (To follow)
- Lewes District Council and SDNPA Gypsy and Traveller Site Assessment Addendum, Dec 2012
- Site Assessment (version to inform Emerging Core Strategy), Lewes District Council, September 2011

Monitoring and Implementation

Gypsy and Traveller sites are allocated within this Local Plan.

Assessments of need will continue to be undertaken by Local Authorities across the National Park. The SDNPA will provide what information it can to support this work and will liaise with the Local Authority to revise any requirements that emerge over time.

EMPLOYMENT

Changes from Regulation 18 to Regulation 19 Local Plan: Introduction

Change	Reason
Delete PMP outcomes and policies	Progress in plan to pre-Submission
New first paragraph introducing policies	Consistency across the plan, to improve flow of chapters and subsections
Clarification on the role of the duty of national parks	Clarification and in response to reps
Options Considered and Preferred Approach deleted	Progress in plan to pre-Submission
Further information on ELR updates	Factual updates on evidence
Delete national policy context	Progress in plan to pre-Submission

Introduction

This sub-section includes two strategic policies relating to employment. The first policy is about sustaining the local economy. The second policy sets employment land requirements for the National Park and safeguards existing employment sites.

Within the National Park the challenge is to encourage sustainable development within the limits of the environment and to ensure the National Park's purposes are not compromised by meeting the socio-economic duty. It should be noted that the duty is pursuant to the purposes. A Local Plan objective derived from the Vision is to protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.

The South Downs National Park is home to about 10,000 businesses and generates £19,450 GVA per head. The National Park's business base is focused on small and micro businesses and there is a high level of self-employment. Although the main centres of employment are within the market towns, the National Park's economy is mainly rural.

The *Employment Land Review* (ELR) is the main evidence based study supporting the Local Plan policies on employment. A site focussed update of the ELR was undertaken in 2016 to support the allocation and safeguarding of employment sites in the Local plan. *A further update was undertaken in 2017 to update information on need and requirements (update to follow).*

Changes from Regulation 18 to Regulation 19 Local Plan: SD27 and supporting text

Change	Reason
Change title of policy Sustaining the ~~Rural~~ Local Economy	The term 'local' is more in line with the duty of national parks. There is confusion over what is meant by 'rural.' In response to the reps.
Re-word first line of policy Development proposals ~~for rural businesses~~ that foster the economic and social well-being of local communities within the National Park will be permitted provided that they ~~comply with other relevant policies and they, as appropriate~~ meet one or more of the following:	More in line with the duty of national parks and the Local Plan objective. There is confusion over what is meant by 'rural' expressed in the reps. Greater clarity over which of the criteria apply.
Re-word first policy criterion SD271a promote and protect the National Park's key sectors such as tourism and the visitor economy, forestry and wood-related activities, and local food and beverages including farming	Recognising the importance of farming to the National Park and in response to reps
Re-word third policy criterion SD271c support rural supply chains across the National Park and its environs and encourage closer ties between rural businesses;	Recognising how rural supply chains extend beyond National Park boundaries and in response to reps
Re-word fourth policy criterion SD271d encourage and support small and micro businesses through the provision of small, flexible, start-up and move-on business units	Recognising the importance of micro as well as small businesses in the National Park and in response to reps
New policy criterion SD271e provide support for established businesses to secure future resilience and protect local jobs	Recognising the importance of building business resilience and in response to reps
Delete policy criterion and supporting text on homeworking	Not needed as it duplicates other policies
New policy criterion SD271f intensify the commercial use of an employment site and make a more efficient use of brownfield land;	Encourages the more efficient use of brownfield land with an intensification of uses
Delete criterion SD27(2) ~~Business proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused~~	Standard wording
References added to broad areas of the National Park	Clarification
Reference to Visitor Survey deleted and signposting provided to Understanding and Enjoying the National Park	Reduce length and remove repetition

Delete supporting text that forestry sites are shown on the Policies Map	The main forestry sites will not be shown on the Policies Map.
Delete reference to FEZ	No longer relevant
Add reference to farming to supporting text on small businesses	Clarity and in response to reps
Add definition of smart economic growth to supporting text	Clarity and in response to reps
Re-word policy SD27(1)(b) <u>promote and protect businesses linked to the National Park's key sectors of farming forestry and tourism.</u> Supporting text also re-worded and re-ordered.	LPMWG and align policy more closely with Local Plan objective
The provision of ancillary facilities such as bottling plants <u>will need to support local production</u>	LPMWG and to provide clarification

Strategic Policy SD27: Sustaining the Local Economy

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

    a) promote and protect businesses linked to the National Park's key sectors of farming forestry and tourism;
    b) promote and protect green businesses linked to ecosystem services;
    c) support rural supply chains across the National Park and its environs and encourage closer ties between rural businesses;
    d) provide for and support small and micro businesses through the provision of small, flexible, start-up and move-on business units including incubator uses;
    e) provide support for established businesses to secure future resilience and protect local jobs;
    f) intensify the commercial use of an employment site and make a more efficient use of brownfield land; and
    g) promote smart economic growth and advances in information and communications technologies, particularly, superfast broadband.

The purpose of this policy is to promote and protect local businesses without compromising the purposes of the National Park. The policy is consistent with the Spatial Strategy of a medium level of development dispersed across the National Park. It should be read in conjunction with the

development strategy set out in policy SD22, which identifies settlements across the National Park where the principle of development is accepted.

Key sectors

Following on from the *State of the Park Report* the Local Plan identifies three key sectors or clusters of economic activity within the National Park namely farming, forestry and tourism. These sectors are all rooted in the National Park purposes and are linked to ecosystem services, particularly, provisioning and cultural services. This Local Plan supports the expansion of these existing business sectors where to do so is compatible with the landscape and special qualities.

Food and beverages form an important economic sector. The *State of the Park Report* states that around 85 per cent of land within the National Park is farmed. Vineyards and wineries are an expanding part of this sector with the soils and weather patterns on the south facing dip slopes being ideal for grape production. The provision of ancillary facilities such as bottling plants will need to support local production and be compatible with and not harm the special qualities of the National Park. Climate change and market forces will continue to influence the landscape leading to new enterprises, and increasing opportunities for producing alternative energy, for example, wood fuel.

The South Downs is England's most wooded national park, and wood-related activities are located primarily in the Western Weald. The specific development requirements for agriculture and forestry are set out in Policy SD46: Agriculture and Forestry.

Policies on tourism and the visitor economy are set out in the Local Plan section on Understanding and Enjoying the National Park.

Green businesses

The SDNPA will encourage green business proposals particularly when they are linked to the special qualities of the National Park. A green business is defined as an enterprise that has a positive impact on the local and/or global environment. Green businesses are linked to ecosystem services, for example, a coppicing business provides 'provisioning' services with a renewable source of wood.

Rural supply chains

Rural supply chains link products, services, finance and information from the producer to the customer. Policy SD27 seeks to encourage rural supply chains within and across the National Park in order to nurture and grow rural businesses. This is particularly important for the local food network. Rural supply chains are not, however, linked exclusively to food and drink, for example, the use of local building materials contributes positively to sustainable landscape management and local employment. The market towns of the National Park have both a traditional and future role as hubs for rural supply chains including traditional markets but also networking, training and services.

Small and micro businesses

There are thousands of small and micro businesses in the National Park; a small business employs less than 10 people and a micro business employs less than 5. Although the main centres of employment are within the market towns, there are a significant number of rural business units. The ELR found that 88 per cent of workplaces within the National Park employ fewer than 10 people and 98 per cent of enterprises employ fewer than 50 people. These proportions are significantly higher than national and regional levels. It indicates a strong entrepreneurial employment base reliant on small companies and start ups.

Policy SD27 seeks to promote and protect small businesses. This could be through the provision of affordable 'move on space' for expanding home-based businesses and flexible 'move in/move on' accommodation for start-up companies. Policy SD47 deals with small businesses as part of farm diversification.

Many micro businesses are home based and collectively they make a significant contribution to the local economy. Home working provides a cost-effective solution to finding accommodation for new and micro businesses, and reduces the need to travel from home to the workplace. It is important that home based businesses do not cause unacceptable harm to the amenity of neighbours in terms of traffic, smell, loss of privacy, outlook, noise and overlooking.

Resilience

Provision of workspace is only one part of encouraging new business start-ups and developing existing businesses. It is also important that businesses in the National Park are resilient to changes in the local and international economy. The availability of advice and training, and on-going business support help to ensure the survival and development of small businesses and thus improve their resilience.

Intensification

The development strategy for the National Park set out in policy SD22 prioritises the development of previously developed land. Commercial development on existing employment sites should make an efficient use of existing buildings and previously developed land through intensifying uses providing this does not compromise the special qualities of the National Park.

Smart economic growth

Smart economic growth seeks to achieve economic growth at a lower environmental cost and with a more positive impact on quality of life. Superfast broadband is key ingredient for achieving it, but significant areas of the National Park are currently severely disadvantaged by slow and unreliable internet connections. The proliferation of 'not spots' is a major barrier to sustainable economic growth particularly for home-based businesses. The SDNPA is seeking to improve access to superfast broadband in partnership with the county councils and the LEPs. Policy SD55 deals with telecommunications and other utilities.

Changes from Regulation 18 to Regulation 19 Local Plan: SD28 and supporting text

Change	Reason
Change end of plan period from 2032 to 2033 in SD28(1)	Update following change in Local Plan timetable
Minor changes to wording of SD28(2) to provide consistency with other Local Plan policies	Clarification and in response to reps
New policy requirements on principal and local employment sites in SD28(3)	Progress from Preferred Options which said that key employment sites would be shown on the Policies Map. New policy requirements builds on evidence from site focussed update of ELR.
Slim down supporting text on employment land requirements	Brevity
Update on policy context for strategic sites in the supporting text on employment land requirements	Factual updates
Updates to table 7.3	Factual updates
Explanation of principal and local employment sites	Greater clarity and in response to new evidence in site focussed ELR update (2016)
Reference to new appendix XX setting out marketing requirements for change of use applications	Reference to new appendix and in response to reps
Definition added of 'fit for purpose'	Clarity

Strategic Policy SD28: Employment Land

1. The SDNPA will make overall provision for the following amounts of new employment land between 2014 and 2033:
    - Office (B1a/b): approximately 2 to 3 hectares.
    - Industrial (B1c/B2) and small-scale warehousing (B8): approximately 5 hectares. (Subject findings of ELR update)
2. Development proposals for the change of use of redundant B2 premises and land to accommodate the need for new offices and/or warehousing will be permitted providing that there would not be a potentially adverse impact on the landscape and other special qualities of the National Park including by reason of traffic, noise or pollution.
3. The Authority will safeguard all existing employment sites and allocations that are fit for purpose from development proposals for non-employment uses. Change of use applications that would result in a loss of employment land will only be permitted providing that evidence of a robust marketing campaign of at least 12 months clearly demonstrates that there is no market demand for the business premises.
4. The principal and local employment sites are shown on the Policies Map and further protection applies as follows:
    a) B class employment uses will be safeguarded from development proposals for non-B class uses on principal employment sites and evidence of a robust marketing campaign of at least 18 months will be required.

    b) Commercial uses will be safeguarded from development proposals for non-commercial uses on local employment sites and evidence of a robust marketing campaign of at least 18 months will be required.

Details of marketing requirements are set out in appendix XX.

Supporting text

The purpose of this policy is to set out employment land requirements for the National Park and safeguard existing employment sites.

Employment land requirements

Policy SD28 sets out the employment land requirements, which meet the objectively assessed need for employment land identified in the ELR. *Add findings of ELR update (2017)* The SDNPA believes that it is possible to accommodate this amount of development on sites across the National Park and, particularly in the market towns, without harming the special qualities.

The methodologies for calculating the employment land requirements and the use of the Wider South Downs Area (WSDA) are explained in full in the ELR. The requirements build upon the evidence supporting the employment policies in the East Hampshire, Winchester and Lewes Joint Core Strategies. Due to the difficulties of undertaking economic forecasts in a national park, the need figures should be treated with a certain level of caution and will be kept under review. It is important to take a flexible approach to the allocation and designation of employment land to ensure that the National Park's purposes are not compromised in order to meet its socioeconomic duty.

A sufficient supply of employment sites is available to meet the requirements set out in Policy SD27. The new employment provision is focused in Petersfield, Lewes and the smaller market towns of Midhurst and Petworth. These sites fall within the Functional Economic Market Areas (FEMA) of Central Hampshire, Brighton and Chichester/Bognor respectively. There are three tranches of future employment land supply, which make up the core supply. These are set out in Table 7.3. The first tranche of sites is made up of sites with planning permission that are not allocated in this plan or an NDP. The second tranche is NDP allocations most notably the Petersfield Plan, which allocates approximately 3 hectares of land for employment and the Petworth NDP which allocates about a hectare as an extension to an existing site. There is one Local Plan allocation in Lewes, which is set out in chapter 9 of this plan.

In addition, there is limited additional potential supply on the strategic sites of Shoreham Cement Works and the former Syngenta site. The redevelopment of North Street Quarter in Lewes will deliver higher-quality business premises. All these sites are allocated for exceptional mixed-use redevelopment in this Local Plan. The detailed policy for Syngenta is set out in the Fernhurst Neighbourhood Development Plan, the strategic policy for Shoreham Cement Works is set out in policy SDXX and detailed policies will be contained in the Area Action Plan and finally policy SD34 forms the detailed policy for North Street Quarter.

TABLE 7.3: EMPLOYMENT LAND SUPPLY IN THE SOUTH DOWNS NATIONAL PARK

Source of employment land	Amount (hectares)
Sites with extant planning permission for employment development (excluding Local Plan and NDP allocations)	2.37
NDP allocations	4.69
Local Plan allocations	1.72
Total	**8.78**

Flexible approach to change-of-use applications

The ELR forecasts a growth in demand for both office (use class B1[1]) and small-scale warehouse accommodation (use class B8). Business support services, head office and management consultancy and other professional services are the major growth sectors underpinning the demand for office floorspace. A growth in warehousing and the postal sector along with a smaller growth in wholesale trade underlies the forecast need for warehouse floorspace.

In contrast, the ELR forecasts that there will be a continued and significant decline in employment in manufacturing, although manufacturing may contribute to growth in economic output linked to productivity improvements. This, in turn, will lead to a decline in demand for B2 floorspace although some manufacturing businesses may see a decline in jobs which does not translate directly through to floorspace.

The Authority will take a flexible and pragmatic approach to change of use applications in order to maximise the opportunities to re-use existing but vacant manufacturing premises for other forms of employment for which there is a demand. This will make an efficient use of previously developed land and will reduce the impact of new development on the landscape. It may also offer opportunities to remediate land contamination. Some of the predicted losses in B2 accommodation could be converted into meeting the need for small-scale B8 uses. Both uses broadly require similar premises in locational terms – out of centre with strategic road access.

Robust evidence will need to be submitted and approved by the Authority that there will be no adverse effect on the landscape and other special qualities through traffic, noise or pollution. Advice on these matters will be sought from other statutory bodies, particularly the county councils and Highways England on the amount and type of traffic generation and the impact on the National Park's rural roads.

Safeguarding

It is important to safeguard premises for local businesses that are fit for purpose both within the National Park's towns and the wider rural area. In order to be considered fit for purpose the business premises need to be of a necessary standard for its intended use as defined by the Use Class Order (UCO). This will help to support the long-term future of communities providing local employment opportunities for local residents and reducing out commuting to employment centres outside the National Park. This is in line with the socio-economic duty of the National Park. The ELR and its site focused update provide robust information on existing employment sites across the National Park.

Change of use applications that would result in the loss of employment land need to be supported by robust evidence. Full information on the evidence required to prove that a robust marketing exercise has been carried out to support the change of use application is set out in appendix XX. Advice should be sought from the local planning authority at the earliest opportunity to agree the details of the exercise.

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[1]   The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories known as 'Use Classes'.

There are a small number of principal employment sites in Petersfield, Midhurst and Lewes, which are large-scale, good-quality employment sites providing jobs and services across a wide area. The NPA supports the continued use of these sites for B class employment and will resist development proposals for alternative commercial uses and housing. Principal employment sites are identified on the Policies Map and safeguarded under Policy SD28.

There are a number of local employment sites located in towns and villages identified in policy SD22. It is important to protect these sites as they contribute to the sustainability of the settlements in which they are located by providing jobs and services to the local community. Many of these local employment sites are protected in neighbourhood development plans (NDP). The Local Plan will safeguard those local employment sites outside neighbourhood planning areas that are identified on the Policies Map. The NPA will take a more flexible approach to change of use applications on these sites by allowing other forms of economic development that provide jobs, generate wealth or produce an economic output. Proposals for alternative uses will need to provide evidence that the proposed uses will not adversely impact on the existing and future B class uses. Any proposals for main town centre uses will need to comply with Policy SD22 on town and village centres.

Because the National Park's economic base is focused on small businesses it is not practicable to identify all these sites on the Policies Map. It is, nevertheless, important to protect existing business premises unless it can be proved that the site and the premises are not fit for purpose. Proposals that would result in a loss of employment floorspace will need to provide evidence in line with appendix XX.

Evidence

- Employment Land Review (ELR) (2015)
- Site Focused Update of ELR (2016)
- ELR Update (2017)

Monitoring and Implementation

TOWN CENTRES AND RETAIL

Changes from Regulation 18 to Regulation 19 Local Plan: Introduction

Change	Reason
Inclusion of new sections of text drawing from new retail study about quantitative and qualitative need for retail floorspace	Update to reflect new evidence
National Policy Content section deleted	To avoid unnecessary repetition

Introduction

This sub-section contains the strategic policy on town and village centres and a development management policy that sets out more detailed criteria for development in these centres. There is a further development management policy on shops outside centres, which sets out requirements for retail impact assessments.

The market towns of Petersfield, Midhurst, Petworth and Lewes are the principal town centres within the South Downs National Park. A brief description of each town centre along with the village centre of Liss is set out below along with the main findings of the recent retail evidence study for Liss, Midhurst and Petworth.

Lewes

The county town of Lewes offers a special shopping environment, with many shops and services occupying listed buildings and lying in the Lewes Conservation Area. The historic retail units have facilitated small, independent and niche retailers. There are also a range of larger multiple chain stores in the town. The independent shops are intrinsic to the town's character, however, the evidence shows that there is also a need for additional purpose built retail units in order to claw back expenditure that is currently being leaked to bigger centres outside the district, such as Brighton and Eastbourne. This is primarily for comparison goods, but there is also a limited, largely qualitative, need for convenience floorspace. In order to address this, policy SDXX of this Local Plan allocates land at North Street Quarter and the adjacent Eastgate area. Both this and the town centre boundary, primary and secondary shopping frontages are shown on the Policies Map. Lewes NDP does not deal with retail and the town centre.

Liss

Liss village centre contains a mix of Victorian and modern premises. The modern development in the centre of the village has not been sympathetic to the character of the village. For its size, Liss has a good representation of national multiples and provides for the day-to-day retail needs of the community but residents also depend heavily on Petersfield.   The town centre of Liss has a vacancy rate that is higher than the national average and the profile of the centre has been impacted by the loss of several small convenience stores.

Further planning policies including the village centre boundary are contained within the Liss NDP. No primary or secondary frontage are identified.

Midhurst

Midhurst has a very traditional, attractive, linear shopping street, with the addition of a beautiful market square, which feels a little divorced from the main shopping area. The town has low vacancy rates overall. The comparison goods offer is largely comprised of high end clothing, vintage clothing, furnishings and gifts. There is little by way of provision for everyday fashion items, electrical items or other more bulky items. The convenience goods sector is dominated by Budgens and Tesco Metro, with a range of supporting smaller independent stores. The centre performs a healthy top-up function for local residents.

A town centre boundary has been established for Midhurst and is shown on the Policies Map. It incorporates land at the Grange in order to encourage a new medium sized supermarket. Should permission be sought, the SDNPA would expect the development to be accompanied by a range of measures to ensure there is improved connectivity between the site and the historic town centre. There will also be a need to consider parking provision and landscaping particularly incorporating the South Pond improvements as well as the more day-to-day development management issues such as design, noise, drainage (ensuring it does not pollute the pond) and amenity.   Primary and secondary frontages for Midhurst are also shown on the Policies Map.

Petersfield

Petersfield's historic centre attracts visitors to enjoy food and drink in attractive and pleasant surroundings. The demand for retail space is buoyant with very low vacancy rates.   The town is well supplied with supermarkets with the main competition being from Chichester, Portsmouth/Southsea and Southampton. The town centre is well equipped with pubs, restaurants and cafes which have increasingly boosted the night-time economy.   The profile of the shops has changed over the years but Petersfield has weathered this well by offering increased numbers of specialist shops that appeal to leisure shoppers at weekends and leisure-based services such as beauty, hairdressing and cafés, whilst at the same time retaining the larger chains. Planning policies for Petersfield town centre are contained within the made Petersfield NDP, which designates a town centre boundary along with primary and secondary frontages.

Petworth

Petworth is an attractive, historic market town and is heavily accented towards the antique sector, reflective of its appeal to visitors to Petworth House, and to the town centre itself. The centre contains a small convenience store, DIY store, bank and a range of restaurants, pubs and community buildings. There are also a large number of independent shops. The centre has low vacancy rates but there is a lack of diversity in its comparison goods offer. The convenience goods offer is limited, with the small Co-op store providing only for top-up shopping.

Further planning policies including the town centre boundary and primary shopping frontage for Petworth town centre are contained within the Petworth Neighbourhood Development Plan.   No secondary frontage is identified.

2016 Retail Evidence Study

The 2016 Retail Study considered the Midhurst, Petworth and Liss centres. It concluded that there was capacity for up to 1,200 sq m net of new convenience goods floorspace in the Midhurst / Petworth area within the plan period. This would equate to a single store of approximately 2,500 sqm gross or two smaller food stores. Although the development of a main food store within the Midhurst / Petworth area would be highly desirable, there have been no deliverable sites identified at this point in time. Therefore the Local Plan identifies a town centre boundary for Midhurst which is sufficiently broad to facilitate this type of development within the town centre should market forces become more favourable later in the plan period. This includes the inclusion of land next to The Grange within the Midhurst town centre, which may have potential for a new medium sized supermarket development. A similar approach is taken to the boundary of Petworth Town Centre in the Petworth NDP.

In terms of comparison goods, the assessment shows that there is capacity for between 2,700 and 4,300 sq m net of new floorspace in the plan period in the Midhurst / Petworth area. However, meeting this capacity would require building a development tantamount to a small retail park, which is undesirable and inappropriate within a National Park.

The potential for town centre floorspace development is highly constrained with all centres containing significant numbers of listed buildings and an already tightly packed street scene. There are few areas of derelict land of any significant size, nor are there opportunities for larger-scale

redevelopment with the exception of land at North Street Quarter and adjacent Eastgate area in Lewes. Edge of or out of centre opportunities are not currently available and the SDNPA considers that it would be highly unlikely that proposals for large-scale out of centre retail parks / supermarkets would ever be appropriate in the context of a National Park.

Smaller Village Centres

Across the National Park there are a number of smaller village centres. These centres offer vital rural services and contain small collections of shops but are not sufficient to meet the day-to-day needs of the community.   The National Park is also home to many individual shops sometimes run by the local community; farm shops, which support farm diversification; and, garden centres which vary in their size and scope and can be accompanied by shops selling a range of goods. The SDNPA recognises that diversification supports farm incomes and in relation to garden centres helps to even out the seasonal fluctuations and meet customer expectations. These can be of value to local communities and visitors alike but can also lead to increases in traffic and activity in previously tranquil areas. In some cases they detract from the primary purpose of a garden centre, which is to sell plants and gardening related products, and become intrusive urbanisation in an otherwise rural landscape.

Changes from Regulation 18 to Regulation 19 Local Plan: Policy SD29 and SD30

Change	Reason
Policy	
This policy has been split and two policies created. The resulting policy has been shortened to remove unnecessary detail	To more clearly split the strategic element from the DM element. For clarity and ease of reading
Merged two criteria into criteria 1)	Said the same thing but in different ways
SD30 (1) Changed 'size and scale…..' to just scale	No practical difference and eases ambiguity
SD30 (1) Changed 'retail and town centre uses' to 'main town centre uses'	In line with NPPF definition
Guidance on marketing requirements moved to an appendix. Length of marketing period increased to 24 months.	Similar safeguarding applies to many forms of development. Increase in marketing responds to consultation responses and consultants advice.
SD30 (6) Merged criteria relating to markets and independent traders	Brevity
Remove 'where they comply with other policies'	Agreed formatting of policy wording

Strategy Policy SD29: Town and Village Centres

1. Development proposals for town centre development will be permitted where they promote or protect the following hierarchy of identified centres:
   a) Market Town Centres: Petersfield, Midhurst, Petworth and Lewes;
   b) Larger Village Centre: Liss;
   c) Smaller Village Centres: Alfriston, Ditchling, Fernhurst and Findon

Supporting text

The purpose of this policy is to identify a hierarchy of existing town and village centres. Town centre boundaries and primary and secondary shopping frontages have been identified and are shown on the Policies Map. Policy SD30 sets the more detailed criteria against which development in these centres will be judged.

Development Management Policy SD30: Development in Town and Village Centres

1. Within the town and larger village centres as shown on the Policies Map, development proposals for main town centre uses will be permitted providing they do not harm the retail function of the centre and are compatible with its scale and historic nature.

2. Within the defined primary shopping frontages as shown on the Policies Map, the loss of units in Use Class A will not be permitted.

3. There will be a presumption in favour of non-retail main town centre uses within the secondary shopping frontage.

4. Development that supports the evening economy within the defined town and larger village centre, particularly for visitors/tourists, will be permitted provided the use would not result in adverse impacts on the amenity of residents and businesses.

Smaller village centres

5. Within the smaller village centres, development proposals for retail purposes will be permitted where they are of a scale appropriate to the community they sit within. Such development should be well related to any existing shops and services within the village unless it can be demonstrated that this is not possible.

6. The loss of units in Use Class A that are fit for purpose will not be permitted unless evidence of a marketing campaign of at least 24 months demonstrates that there is no market demand for the premises and its continued use for retail purposes is not viable.

Markets and Independent Retailers

7. Development proposals that promote or protect local markets and independent retailers, particularly those linked to supply chains across the National Park will be permitted.

   Details of marketing requirements are set out in appendix xxxxx

Supporting text

The purpose of this policy is to recognise and support the vitality and viability of the retail function of the Market Town and Village centres. It is important that all residents within the National Park have access to a range of essential services and facilities, where possible, and the smaller village centres have a vital role to play. Proposals that would result in the loss of these services and facilities will not be supported unless there is evidence of marketing and that alternative uses have been sought in the first instance as set out in Appendix xxxxx.

Changes from Regulation 18 to Regulation 19 Local Plan: Policy SD31

Change	Reason
Guidance on marketing requirements moved to an appendix	Similar safeguarding applies to many forms of development
Minor changes to phrasing	Response to reps and LPMWG
Additional wording in SD51 'or are complementary to the main garden centre function'	Response to reps
Remove 'where they comply with other policies'	Agreed formatting of policy wording
Farm shops – remove detail relating to re-use of buildings and refer to Farm Diversification policy instead	Reduces duplication and inconsistency of approach
Garden Centres – incorporate text relating to the re-use of buildings from the Farm Diversification policy	Reduces duplication and inconsistency of approach
Local food definition changes to 30 miles radius	CPRE definition
Supporting Text	
Various minor changes	Brevity
More prescriptive definition of regional	So that the difference between regional and local is not as considerable and relates better to the National Park
Put references to the need to support the special qualities of the National Park moved to supporting text	Can relate to all developments within this policy not just garden centres. Not a requirement against which planning applications are likely to be refused and therefore goes in the supporting text
Expanded supporting text relating to garden centres	As a response to LPMWG in order to add information on what the expectations of the SDNPA will be.

Development Management Policy SD31: Shops Outside Centres

1. Development proposals for small convenience stores will be permitted where they:
    a) have a net sales area less than 150m2; and
    b) are to meet the everyday shopping needs of the local community.

2. The loss of units in Use Class A that are fit for purpose will not be permitted unless evidence of a marketing campaign for at least 12 months demonstrates that there is no market demand for the premises and its continued use for retail purposes is not viable.

   Details of marketing requirements are set out in appendix xxxxx.

Farm Shops

3. Development proposals for new farm shops or extensions to existing farm shops will be permitted provided the scale and scope would not harm the retail offer in the immediate area. Such shops should aim to sell:

   • at least 40 per cent of goods that are own produce plus local foods;

   • 40 per cent of goods that are regional; and

   • 20 per cent are from elsewhere.

4. In the first instance applicants should explore the re-use of existing buildings.

Garden Centres

5. Development proposals which ensure the primary purpose of a garden centre remains the sale of plants and gardening related products will be permitted.

6. Development proposals for new garden centres will be permitted if it can be demonstrated that it is required in order to support a local horticultural business and is of a scale and scope appropriate to the location.

7. Development proposals for extensions for horticultural or complementary uses will only be permitted where this will not introduce inappropriate types and levels of use in the area.

8. Developments should re-use or replace existing buildings where possible. Where this is not possible the development should be related physically and functionally to existing buildings associated with the enterprise.

Retail Impact Assessments

9. A retail impact assessment will be required for retail development outside of the defined Market Town and Larger Village Centre boundaries but within the settlement policy boundaries, where the proposal exceeds the following thresholds for retail floorspace:
    a. Market Town: 750 sqm
    b. Larger Village: 500 sqm

10. In all other locations (including farm shops, garden centres and smaller village centres) the threshold is 150 sqm

Supporting Text

The purpose of this policy is to support the development and expansion of small-scale shops that meet day-to-day shopping needs. However, their development needs to be carefully considered in order not to put at risk an existing shop that might be the only service within a small village.

In all retail development outside centres the National Park Authority would encourage applicants to consider and take opportunities to increase people's awareness, understanding and enjoyment of the special qualities of the National Park. This might range from leaflet distribution to cycle hire or facilities for walkers and horse riders.

Farm shops

To be considered a farm shop, a premises should aim to sell fresh produce and/or local foods that are grown, picked, reared or produced on the farm or on land close to where the shop is located. However, the percentages given in the policy are a guideline and it is acknowledged that seasonal variation does occur. Whether the percentage is measured by volume or floor area will have to be considered on a case by case basis due to the varying nature of the goods sold. For the purposes of this policy local food is considered to be that which has come from no further than 30 miles away[1] and regional is considered to be that which has come from Hampshire, Surrey, West Sussex and East Sussex i.e. counties that are covered by or abut the National Park. Wherever possible development proposals for farm shops should utilise disused or obsolete agricultural buildings in accordance with Policy SD47 on Farm Diversification.

Garden centres

The expansion or diversification of a garden centre should be part of a long term strategy for the business. The preparation of a business plan or similar document identifying how the development supports the long term viability of the business, complies with the relevant parts of SD31 and justifies development outside of the settlement boundary will assist in the consideration of an application.

Retail Impact Assessments

The purpose of this test is to assess whether the impact of a proposal for retail development outside the defined market town and village centres would have an adverse impact on an existing retail centre. Due to the nature of the town and village centre within the National Park and the limited opportunities for retail development in these locations any significant retail development outside of these centres would probably divert trade from existing retail locations. As a result it is appropriate to set lower thresholds than the NPPF default position as developments considerably smaller than this could have a substantial effect on the role and function of the centres. In addition any assessment should also consider the impact on nearby essential rural services.

Evidence
- Retail Evidence Study on behalf of South Downs National Park Authority, July 2016
- Lewes District Shopping and Town Centre Study, 2012
- Petersfield Retail Study, 2012

Monitoring and Implementation
These policies will be delivered through:
- Decisions made on planning applications

They will be monitored through:
- The monitoring of planning applications and decisions
- The monitoring of appeal decisions relating to major development
- The monitoring of premises us

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[1] CPRE definition of local food.

INFRASTRUCTURE

Changes from Reg. 18 to Reg.19 Local Plan: Introduction

Change	Reason
Delete PMP outcomes and policies	Progress in plan to pre-Submission
New first paragraphs introducing policies. Set out major development in relation to infrastructure. Removal of policy context, options considered.	Consistency across the plan, to improve flow of chapters and subsections

Introduction

This section of the Local Plan includes three policies relating to infrastructure development. Strategic Policy SD42 sets out an overarching approach which should be applied to both major and minor infrastructure development proposals alike. For the purposes of policy SD42, infrastructure includes development relating to the following:-

- Community Facilities;
- Flood Mitigation and Coastal Defences;
- Green Infrastructure;
- Highways and Transport Schemes;
- Telecommunications;
- Utilities; and
- Renewable Energy

The strategic policy is followed by two development management policies which relate to proposals for community facilities (SD43) and telecommunications & utilities (SD44). It should be noted that many types of infrastructure, including highways and green infrastructure, are also addressed by specific Local Plan policies with which development proposals should also comply.

Infrastructure is the services and systems that communities both within and outside the National Park need to function, including the natural environment, roads, schools, community services, sports and leisure facilities and green spaces. Fully operational, well-planned and well-maintained infrastructure networks are at the heart of good planning in the National Park.

Impact of Infrastructure Development

However, the impact of new infrastructure and the expansion of existing infrastructure on the Special Qualities of the National Park are a particular concern. Under Section 62 of the 1995 Environment Act there is a duty for all relevant bodies, including statutory infrastructure providers, to have regard to National Park purposes and, as such, all infrastructure development proposals should reflect the nationally protected landscape, be appropriately designed and consider carefully the impact upon the natural beauty, wildlife and cultural heritage of the area in accordance with the relevant Local Plan policies.

Major Infrastructure Development

Some infrastructure development proposals, by virtue of their size, character or highways implications, will likely be deemed to comprise 'major' development. This is because they are considered to have a potential adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. In line with national policy there is a presumption against major infrastructure development in the National Park and, as such, proposals will be subject to the tests set out in policy SD3 of this plan.

Major infrastructure development projects are often, but not exclusively, of a strategic nature and serve communities across administrative boundaries. This is particularly relevant in the National Park with its complex geography, dependency on services provided in urban areas close to but outside its boundary, and regionally important infrastructure crossing the park. Such development should be subject to the most rigorous examination and only approved when all reasonable alternatives have been explored.

In considering applications for major infrastructure development the National Park Authority will require information to be provided as part of an application to enable the assessment of whether there are alternative solutions to developing within the National Park, including the cost and scope for developing elsewhere outside the National Park or meeting the need for new infrastructure in some other way.

Types of major infrastructure development

The main categories of potential major infrastructure development which may be proposed in the National Park are listed briefly below:-

- Major new trunk roads, which should not be constructed through National Parks unless there is a compelling national need and no reasonable alternative. The up-grading of existing routes and improvements to major roads, both within and closely related to the National Park may also have significant environmental implications.

- Major utility development includes energy generation, power lines, telecommunications masts, aerials and radar equipment. New power stations and transmission lines will inevitably be incompatible with National Park purposes. Similarly, the modern structures required for telecommunications and radar systems introduce an alien feature in the open landscape of the Park and should be subject to the most rigorous scrutiny.

Changes between Regulation 18 and Regulation 19 Local Plan (*Policy SD30 & SD54*)

Change	Reason
Replace, where appropriate, the term 'strategic infrastructure', which is not defined in Preferred Option policy SD30, with 'major (infrastructure) development'	Policy SD30 conflates 'strategic' infrastructure with 'major development'. NPPF Para.116 is clear that the exceptional circumstances and public interest tests apply to 'major development'. Strategic infrastructure, while referenced in the NPPF Para. 162, will often comprise major development, but not, it is considered, exclusively and, as such, SD30 needs to be reworded accordingly.
Amalgamate Preferred Option policies SD30 (Strategic Infrastructure Provision) and SD54 (Supporting Infrastructure for new Development)	Given the above, it is considered that rather than distinct policies relating to 'strategic' infrastructure and 'supporting infrastructure for new development', the delivery of infrastructure to support sustainable development would be better served by a broader, <u>over-arching</u> policy which recognises the potential for:- - Proposals to be potentially deemed to be 'major development' or not; - The potential for shared impacts by 'major' and smaller infrastructure development proposals <u>alike</u>; - A significant proportion of the total new infrastructure will come forward, on-site and off-site, in conjunction with or (part) funded by new development; - All infrastructure development proposals, irrespective of size, should be the least environmentally harmful option; - All infrastructure will need to be suitably phased – this is not something unique to major ('strategic') infrastructure development proposals
Revise Policy SD30 criterion (1) and (2)	Policy SD30 includes text relating to Design in criterion (1) and (2). It is considered that this should be revised.
Policy SD54 criterion (2)	This criterion can be removed. It is considered more appropriate for the supporting text of Policy SD57. In reality, few if any, new dwellings are built without suitable service connections.

Policy SD54 criterion (5)	Remove specific references to Section 278, CIL and such like in the policy; instead use the more generic terms 'planning obligations' and 'tariffs' which encompass these mechanisms and any potential replacements within the plan period.
Policy SD54 criterion (6)	Remove this criterion which relates to broadband and include within a (revised) policy SD57 (Telecommunications) policy. Be aware that by the end of the Plan Period that "superfast broadband" may not be technologically advanced.
Policy SD54 criterion (7)	Remove this criterion. Revised design criterion to be incorporated within the over-arching policy, as per SD30 criterion (1) and (2) above
Policy SD3 to reference infrastructure.	Advice from LPMWG (22/11/16)

Strategic Policy SD42: Infrastructure

1. Development proposals for new or improved infrastructure and supporting infrastructure for major projects will only be permitted where:

    a) It represents the least environmentally harmful deployment option reasonably available having regard to the applicable operational requirements, technical limitations and the special qualities of the National Park; and
    b) The design minimises the impact on the landscape, character, features of natural beauty, wildlife, cultural heritage and the general amenity of communities; and

2. Development proposals will only be permitted where appropriate, necessary and reasonable infrastructure investment has been secured either in the form of suitable on-site or off-site works, and/or financial contributions to mitigate its impact.

3. Infrastructure delivery should be integrated with development phasing to ensure timely provision and commuted payments will, where necessary, secure future infrastructure maintenance.

Supporting Text

The purpose of this policy is to support the development of appropriate new infrastructure that will improve the quality of life for those living, working or visiting the National Park, while seeking to conserve and enhance the National Park.

Infrastructure investment

New development should be adequately supported by existing infrastructure, or make sufficient provision for any new infrastructure that is required to make the development acceptable in planning terms. As such, the SDNPA will negotiate, where appropriate, a suitable package of supporting infrastructure to mitigate the impact of development to make it acceptable in planning terms. Necessary infrastructure will be secured through a suitable combination of planning obligations, for example, Section 106 Agreements, and tariffs, for example Community Infrastructure Levy (CIL), contributions.

A live document known as the Infrastructure Delivery Plan (IDP) sets out existing infrastructure deficiencies and what is required to support sustainable development in the plan period. Given the limited level and scale of development in the National Park and that most of the local infrastructure is owned and/or managed by other local authorities or service providers, the National Park Authority will need to work with partners and review the IDP periodically to inform its position on the CIL. For example, the SDNPA will publish an up-to-date Regulation 123 list to clearly define what infrastructure is to be provided through either planning obligations or CIL.

Phasing

The final phasing, timing, funding and construction details of infrastructure is complex and should be worked up during pre-application discussions. Where appropriate, infrastructure will be co-ordinated and delivered in partnership with site promoters, public agencies, the County Council and other relevant authorities.

Where infrastructure is considered to be essential and it is necessary to be delivered within the early phase of a development or prior to occupation, the Authority will work closely with site promoters to source other funding or innovative means to enable delivery and may enter into negotiations over phasing and delivery of some other elements of infrastructure. In such circumstances, the Authority will require a proactive approach from site promoters and land owners.

Commuted payments may also be sought when future maintenance of infrastructure is required to ensure that the development proposal is acceptable in planning terms and the body carrying out the maintenance would not be the developer.

Changes between Regulation 18 and Regulation 19 Local Plan (*Policy SD54*)

Change	Reason
Delete the distinction in Policy SD53 between the settlements in criterion 1 (Lewes, Petersfield et al) and all other settlements.	No rationale is provided in the PO supporting text justifying why the same criteria are not applied to all infrastructure proposals irrespective of location.
Incorporate Policy SD53 criterion 4 in the supporting text of Policy SD43.	Ensure issue is addressed
Add definition in supporting text of the different types of community infrastructure.	Not in PO
Add supporting text relating to Localism Act and Assets of Community Value.	Not in PO
Revise supporting text (Para. 10.192)	The SDNPA shouldn't support proposals just because they are community-run services – the proposal might not otherwise be acceptable

Development Management Policy SD43: New and Existing Community Facilities

1. Development proposals for new and/or expanded community facility infrastructure will be permitted where they:-

   a) Demonstrate a local need;
   b) The scale of the proposed infrastructure is proportionate to the local area;
   c) There has been prior local community engagement;
   d) Are accessible and inclusive to the local communities they serve; and
   e) Appropriate consideration has been given to the shared use, re-use and/or redevelopment of existing buildings in the host community

2. Development proposals that would result in the loss of, or have an unacceptable adverse impact upon, an existing community facility, will not be permitted unless it can be demonstrated that the facility or land could not fulfil, or is not needed for, an alternative community facility, and:

   a) There is a clear, demonstrable lack of demand for the existing use; or
   b) Alternative provision is accessible, inclusive and available without causing unreasonable reduction or shortfall in the local service provision.

Details of the marketing requirements are set out in appendix XX.

Supporting Text

The purpose of this policy is to provide appropriate new community infrastructure and to protect existing community infrastructure from development that would result in their loss, or would other otherwise undermine their viability.

There are a wide range of community infrastructure facilities in the South Downs that are vital in maintaining the sustainability of both larger settlements and rural communities. Community infrastructure facilities enable essential public services to be provided as locally as possible and, as such, there is a presumption that they should be retained or replaced with proposals of at least an equivalent standard. Appropriately sized proposals which would provide inclusive shared services through the joint use of facilities in accessible locations will be supported in principle.

For the purposes of policy SD43, community infrastructure facilities include:-

- Education;
- Healthcare;
- Town and village halls;
- Sports pitches, pavilions and leisure centres;
- Recreational open space;
- Libraries; and
- Cultural facilities

Decisions need to be made in light of prior community engagement undertaken and recorded by the applicant. As such, it is expected that applicants will have undertaken a community engagement exercise to gauge the need for the current or alternative community uses and any relevant requirements that may likely arise.

Loss of a Community Facility

Where a development proposal could lead to the loss of a community facility or reduce its scope and/or viability, the SDNPA will expect applicants to provide very strong justification for this loss or diminishment. Policy SD43 particularly seeks to guard against short-termism, since loss is often irreversible.

Proposals for losing a community facility must not revolve around the needs of the current owner/tenant, their chosen business model, or a narrow consideration of operational models. Suitable evidence of an appropriate marketing campaign (of at least 12 months) will be required to demonstrate that there is no market demand for the existing community use.

Applicants will also need to look at a full range of potential uses or ways of operating a business or facility, in order to demonstrate that it isn't workable in the long term. We will expect applicants to commission suitable independent planning, financial or option assessments undertaken by suitably qualified individual(s) of the facility in both its current and alternative roles, to assess the potential for continued or alternative community uses.

Assets of Community Value

As an adjunct to this policy, the SDNPA encourages communities to register important community infrastructure facilities as 'Assets of Community Value' under the 2011 Localism Act. This could ensure an added layer of statutory protection against possible harmful losses of these facilities, and could offer communities the opportunity to formulate their own proposals to safeguard the future of that facility. However, the absence of an entry on the register will not be taken as meaning a facility does not have intrinsic value to the local community. Where the exercise of a permitted development right for a change of use could threaten a valued local community infrastructure facility, the SDNPA will consider whether an immediate Article 4 Direction should be made to protect the sustainability of local communities.

Telecommunications and Utilities Infrastructure Development

Changes between Regulation 18 and Regulation 19 Local Plan (*Policy SD57*)

Change	Reason
Set out a criteria based approach to both telecommunications and utilities infrastructure development proposals.	Preferred Option policy SD57 sets out criteria for telecommunications but not utilities infrastructure. It is considered appropriate to structure the draft policy to address both alike, given the shared issues.
Delete criterion 1(c).	The criterion does not make sense.
Revise the supporting text.	Specifically, remove references to particularly types of telecommunications technology which may become rapidly obsolete.

Add new criterion (2) setting out that all new residential development, and most non-residential buildings, should be provided with a superfast broadband connection.	Suggested at LPMWG (22.11.16) given the critical importance of broadband to residents, communities and businesses in the park, it should be treated as an essential utility of the same ilk as, for example, water/wastewater.

Development Management Policy SD44: Telecommunications and Utilities Infrastructure

1. Development proposals for new telecommunications and/or utilities infrastructure will be permitted where an identified need cannot be met using existing infrastructure or other appropriate structures, and where it:-

    a) Is of an appropriate design that would not have a potential adverse impact on the special qualities of the National Park;
    b) Makes use of all available technologies and suitable mitigation designed to minimise the impact on the landscape and general amenity;
    c) Minimises other relevant environmental impacts; and
    d) Takes all available opportunities for the removal, reduction in the prominence, or undergrounding of previously permitted infrastructure

2. All new residential dwellings should be served by a superfast broadband connection, or an equivalent alternative technology, installed on an open access basis. All other non-residential buildings proposed to be regularly occupied should also be provided with this standard of connection when available, unless it can be demonstrated through consultation with relevant service providers that this would not be deliverable.

Supporting Text

Policy SD42 (Infrastructure) sets out the approach that will be taken on a site-by-site basis to ensure that new developments are adequately provided for in terms of infrastructure. However, telecommunications and other utilities infrastructure often constitutes development in its own right, and this policy (SD44) relates to such development. The purpose of this policy is to provide appropriate new telecommunications and utilities infrastructure without harm to the special qualities of the National Park. Access to superfast broadband is an issue within the National Park, which currently has more 'not spots' than 'hot spots' and as such the key sectors of farming, forestry and tourism are notably disadvantaged by slow and unreliable internet connections.

Telecommunications and utilities infrastructure development proposals should be supported by a suitable survey setting out the potential deployment options and justification for the selected option. Applications must also be accompanied by full details of all new landscaping, screening and of any trees or vegetation to be retained on the site, and also of associated developments, including access roads and other ancillary buildings to service the development, and their likely impact upon the environment. All cabling should be undergrounded.

Before the establishment of the National Park, infrastructure, in particular telecommunications masts and electricity pylons, were erected that have a negative impact on the landscape. If opportunities arise, for example, through new development, to remove or underground such facilities, screen them with appropriate landscaping in compliance with

Policy SD5 (Landscape Character) or replace them with facilities that are less prominent or otherwise have a less negative impact, these should be taken. Undergrounding and/or landscape screening will be supported provided that this is compatible with relevant policies, for example biodiversity and archaeology.

Telecommunications

Telecommunications infrastructure includes development proposals related to the supply and management of broadband, mobile services and telephone land lines. The maximum possible use should be made of technologies with lower landscape impact, before technologies with greater landscape impact are considered. Proponents of new telecommunications masts must demonstrate that they have exhausted all the opportunities for use of existing masts and other structures, including buildings where the impact of the use of a roof for telecommunications infrastructure would not be as detrimental in landscape terms as the erection of a new mast. The visual impact of telecommunications infrastructure will generally be lower when it can be located in close proximity to existing buildings, where this would not damage the setting of buildings that contribute to the special qualities.

Given the critical importance of internet access to communities in the National Park, all new residential dwellings, irrespective of their location, should be provided with suitable superfast broadband connectivity as an essential utility. Non-residential buildings, particularly those for commercial or community use should also have superfast broadband connectivity unless it can be clearly demonstrated that this is not viable. If technological advancements are made within the plan period all relevant proposals should provide suitable up-to-date alternatives. The broadband connectivity will be secured through suitable planning conditions and/or obligations.

Utilities

Utility infrastructure includes development proposals related to the supply and management of water, waste water, gas and electricity. The development, or expansion of, facilities for utilities, either where needed to serve existing or proposed development, or in the interests of long-term utility management, will be permitted where they comply with other relevant policies. Such proposals will be required to minimise environmental harm and provide adequate mitigation measures. They will be assessed in the light of the operational requirements and technical limitations of the technology.

CHAPTER 11   MONITORING AND IMPLEMENTATION FRAMEWORK

The policies of the Local Plan will be implemented in three main ways:

- Core and strategic policies set the overall context and parameters for appropriate land use and will guide the type, location and nature of future development proposals across the National Park.
- Development management polices set detailed criteria for types of development or specific planning issues, against which planning applications for development will be assessed.
- Allocation policies allocate land for specific types of development and set site specific development requirements.

The Local Plan will be subject to regular monitoring over the plan period through the use of targets and indicators. This will assess its impact and whether or not the delivery of the vision and Local Plan objectives are being achieved.

Table 11.1 sets out the Local Plan policies and relates them to the objectives listed in chapter 3.   It lists the targets set out to achieve the policies and individual indicators that will be used to measure policy performance. Further work is underway on how to monitor other potential indicators that are more closely aligned with National Park purposes (marked †). Finally, the source of the data is set out for each indicator.

These indicators and targets will be reported on once a year in the Authority Monitoring Report (AMR). Many of the indicators are already monitored through the South Downs Partnership Management Plan, the SDNPA Corporate Plan and other internal monitoring. Other indicators are specific to the Local Plan. The indicators presented here also relate to those used to monitor the Sustainability Appraisal, and may be appropriate for the monitoring of Neighbourhood Development Plans.

Policy	Objective	Target	Indicator	Data source
Core Policy SD1: Sustainable Development	Not applicable		No indicator proposed	
Core Policy SD2: Ecosystems Services	1. To conserve and enhance the landscapes of the National Park. 3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape. 4. To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing.	Ensure that all development has a net positive impact on the ability of the natural environment to deliver ecosystem services	SDLP1: Citation of policy SD2 in planning decisions † SDLP2: Increase in multiple provision of ecosystem services †	Uniform data Evidence base work (Ecoserve mapping)
Core Policy SD3: Major Development in the South Downs National Park	Not applicable	Avoid major development, other than in exceptional circumstances.	SDLP3: Citation of policy SD3 in planning decisions †	Uniform data
Strategic Policy SD4: Landscape Character	1. To conserve and enhance the landscapes of the National Park.	100% of farmland in the National Park managed under agri-environment schemes	SDLP4: Change in land use by category † SDLP5: Percentage of farmland and of woodland area that is managed under agri-environment or other schemes † SDLP6: Citation of policy SD4 in planning decisions †	Land use monitoring Corporate Plan indicator Uniform data

Policy	Objective	Target	Indicator	Data source
Strategic Policy SD5: Design	1. To conserve and enhance the landscapes of the National Park.	No development proposals permitted contrary to the advice of the Design Review Panel	SDLP7: Applications granted contrary to the advice of the Design Review Panel †	Internal monitoring of DRP process
Strategic Policy SD6: Safeguarding Views	1. To conserve and enhance the landscapes of the National Park.	Conservation and enhancement of views and landmarks	SDLP8: Changes to views identified in the Viewshed Characterisation Study †	Evidence base work (Viewshed Characterisation Study)
Strategic Policy SD7: Relative Tranquillity	1. To conserve and enhance the landscapes of the National Park.	Conservation and enhancement of relative tranquillity	SDLP9: Percentage of the National Park that is relatively tranquil for its area †	Evidence base work (Tranquillity study)- PMP indicator
Strategic Policy SD8: Dark Night Skies	1. To conserve and enhance the landscapes of the National Park.	Maintain the percentage of the National Park with skies of bronze level darkness, and increase the percentage with skies of silver level darkness	SDLP10: Percentage of the National Park considered to have a dark night sky	Evidence base work (Dark Night Skies assessment)- PMP indicator
Strategic Policy SD9: Biodiversity and Geodiversity	3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.	A well-managed and better-connected network of habitats in the National Park Increased populations and distributions of priority species An increased number of SSSIs in favourable condition Any developments within, or within impact zones or buffers (as relevant) for, designated wildlife sites, to conform with policies SD9 Biodiversity and	SDLP11: Area, condition and connectivity of target priority habitats* SDLP12: Population and distribution of target species SDLP13: Condition of Sites of Special Scientific Interest SDLP14:: Developments granted planning permission contrary to ecological advice from Natural England or county councils†	PMP indicator PMP indicator PMP indicator Uniform data Uniform data/GIS

Policy	Objective	Target	Indicator	Data source
		Geodiversity and/or SD10 International Sites. No net loss of biodiversity as a result of any development.	SDLP15: Developments granted planning permission within designated wildlife sites† SDLP16: CIL funds spent on wildlife projects by the SDNPA†	CIL database
Strategic Policy SD10: International Sites	3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.	No more than 30 new dwellings permitted within 400m of the Wealden Heaths Phase II SPA	SDLP17: Number of dwellings completed and permitted within zones of proximity to internationally designated wildlife sites identified in Local Plan as requiring such monitoring	Housing monitoring data/ GIS
Development Management Policy SD11: Trees, Woodland and Hedgerows	1. To conserve and enhance the landscapes of the National Park. 3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape. 6. To adapt well to and mitigate against the impacts of climate change and other pressures.	A well-managed and better-connected network of habitats in the National Park	SDLP18: Proportion of woodland in active management † SDLP5: Percentage of farmland and of woodland area that is managed under agri-environment or other schemes[1]†	Corporate Plan indicator PMP indicator
Strategic Policy SD12: Historic Environment	2. To conserve and enhance the cultural heritage of the National Park.	Conservation of the historic environment	SDLP19: CIL funds spent on cultural heritage projects by the SDNPA †	CIL database

[1] Also used to monitor Strategic Policy SD5

Policy	Objective	Target	Indicator	Data source
Development Management Policy SD13: Listed Buildings	2. To conserve and enhance the cultural heritage of the National Park.	A reduced percentage of listed buildings at risk of being lost as a result of neglect, decay or inappropriate development.	SDLP20: Percentage of Listed Buildings at risk SDLP21: Developments granted planning permission for enabling development †	PMP indicator DM officer knowledge
Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings	2. To conserve and enhance the cultural heritage of the National Park.	None	No indicator	
Development Management Policy SD15: Conservation Areas	2. To conserve and enhance the cultural heritage of the National Park.	Conservation Area Appraisals and Management Plans for all conservation areas in the National Park	SDLP22: Conservation Area Appraisals and Management Plans written	Internal monitoring
Development Management Policy SD16: Archaeology	2. To conserve and enhance the cultural heritage of the National Park.	Protect archaeological heritage assets in a manner appropriate to their significance.	SDLP23: Developments granted planning permission with a condition requiring archaeological assessment † SDLP24: Number of additions to the Historic Environment Record †	Uniform data Information held by partners
Strategic Policy SD17: Transport and Accessibility	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Provide good facilities at gateway and hub points for visitors to the National Park Increase the proportion of journeys made within the National Park by public transport	SDLP25: CIL funds spent on transport and access projects † SDLP26: Developments granted planning permission for transport infrastructure †	CIL database Monitoring of weekly lists

Policy	Objective	Target	Indicator	Data source
	6. To adapt well to and mitigate against the impacts of climate change and other pressures.		SDLP27: Proportion of visits to the National Park by public transport	Evidence base (Visitor Survey)
Strategic Policy SD18: Walking, Cycling and Equestrian Routes	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Increase the proportion of journeys made within the National Park by non-motorised means.	SDLP28: Gross increase in non-motorised multi-user routes (km) SDLP29: Proportion of visits by non-motorised means	Internal monitoring Evidence base (Visitor Survey)
Development Management Policy SD19: Public Realm, Highway Design and Public Art	2. To conserve and enhance the cultural heritage of the National Park. 5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Protect and enhance peoples' experience of the public realm	SDLP30: Visitor enjoyment levels †	Evidence base (Visitor Survey)
Development Management Policy SD20: Parking Provision	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Increase the proportion of journeys made within the National Park by non-motorised means.	SDLP31: Proportion of visits by private car†	Evidence base (Visitor Survey)

Policy	Objective	Target	Indicator	Data source
	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.			
Strategic Policy SD21: Sustainable Tourism	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public	SDLP32: CIL funds spent on leisure and recreational projects connected with the National Park's Special Qualities † SDLP33: Developments granted planning permission for visitor accommodation facilities SDLP34: Developments granted planning permission for community, culture, leisure and recreation facilities SDLP35: Average length of visitor stay and spend per visitor per day	CIL database Monitoring of weekly lists Monitoring of weekly lists Evidence base (Visitor Survey)
Development Management Policy SD22: Equestrian Uses	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	Promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public	SDLP36: Developments granted planning permission for equestrian facilities †	Monitoring of weekly lists

Policy	Objective	Target	Indicator	Data source
Strategic Policy SD23: Development Strategy	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.	Delver a medium level of development dispersed across the towns and villages of the National Park, while protecting the National Park's Special Qualities.	SDLP37: Percentage of permissions for new homes within and outside settlement boundaries† SDLP38: Number and percentage of housing completions on previously developed land (net)	Uniform/GIS data Housing monitoring information
Strategic Policy SD24: Supply of Homes	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.	Make overall provision for approximately 4,750 additional homes between 2014 and 2033	SDLP39: Plan period and housing target for Local Plan SDLP40: Number of dwellings completed (net) SDLP41: Dwellings with extant planning permission (net) SDLP42: Net additional dwellings expected to come forward within the next five years from the date of monitoring SDLP43: Net additional dwellings expected to come forward between five and fifteen years from the date of monitoring	Local Plan Housing monitoring information Housing monitoring information Housing monitoring information Housing monitoring information

Policy	Objective	Target	Indicator	Data source
Strategic Policy SD25: Mix of Homes	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Protect and increase the proportion of small and medium sized dwellings in the dwelling stock	SDLP44: Number of dwellings completed (net), by number of bedrooms†	Housing monitoring information
Strategic Policy SD26: Affordable Housing and Strategic Policy SD27: Rural Exception Sites (Monitored together)	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Deliver new affordable homes to meet local need between 2014 and 2033	SDLP45: Number of affordable dwellings completed (net)	Housing monitoring information
Development Management Policy SD28: Replacement Dwellings	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Protect and increase the proportion of small and medium sized dwellings in the dwelling stock	SDLP46: Number and size of replacement dwellings completed in the reporting year†	Housing monitoring information
Development Management Policy SD29: Extensions to existing dwellings, annexes and outbuildings	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Protect and increase the proportion of small and medium sized dwellings in the dwelling stock	No indicator proposed	
Development Management Policy SD30: New Agricultural and Forestry Workers Dwellings	9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.	Maintain and increase the viability of sustainable farming in the National Park	SDLP47: Net additional agricultural and forestry workers' dwellings granted planning permission † SDLP48: Permissions for the removal of agricultural or forestry worker occupancy conditions†	Monitoring of weekly lists

Policy	Objective	Target	Indicator	Data source
				Monitoring of weekly lists
Strategic Policy SD31: Gypsies and Travellers and Travelling Showpeople	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Gypsies and Travellers: Provide for 13 pitches in Brighton and Hove (2016-28), 8 pitches in East Sussex (2016-28) and 11 pitches in Hampshire (2016-27) Travelling Showpeople: Provide for 4 plots in Hampshire (2016-27)	SDLP49: Net additional permanent Gypsy or Traveller pitches and Travelling Showpeople plots with extant planning permission SDLP50: Net additional transit pitches with extant planning permission	Gypsy/Traveller monitoring system Gypsy/Traveller monitoring system
Strategic Policy SD32: Sustaining the Local Economy and Strategic Policy SD33: Employment Land (monitored together)	9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.	Accommodate approximately 2 to 3 hectares of office development Accommodate approximately 5 hectares of industrial and small-scale warehousing development Any developments involving the loss of employment land to conform with policy SD33: Employment Land	SDLP51: Total net and gross new employment floorspace completed SDLP52: Total net and gross new employment floorspace extant permissions	Employment /Retail monitoring system Employment /Retail monitoring system
Strategic Policy SD34: Town and Village Centres	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.	Focus development of main town centre uses in town and village centres	SDLP53: Total net and gross new retail floorspace completed SDLP54: Total net and gross new retail floorspace extant permissions	Employment /Retail monitoring system Employment /Retail monitoring system

Policy	Objective	Target	Indicator	Data source
Development Management Policy SD35: Development in Town and Village Centres	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.	Protect units in use class A within defined primary shopping frontages	SDLP55: Developments granted planning permission for developments affecting A use space within defined primary shopping frontages †	Employment /Retail monitoring system
Development Management Policy SD36: Shops Outside Centres	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.	Protect and enhance the provision of small convenience stores to meet the everyday shopping needs of local communities.	SDLP56: Developments granted planning permission for developments affecting A use space outside market town and larger village centre boundaries †	Employment /Retail monitoring system
Development Management Policy SD37: Agriculture and Forestry	1. To conserve and enhance the landscapes of the National Park. 9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.	100% of farmland in the National Park managed under agri-environment schemes	SDLP57: Developments granted planning permission for agricultural developments in the reporting year. † SDLP4: Change in land use by category † SDLP5: Percentage of farmland and of woodland area that is managed under agri-environment or other schemes † SDLP18: Hectarage of woodland in active management †	Monitoring of weekly lists Land use monitoring PMP indicator Corporate Plan indicator
Development Management Policy SD38: Farm Diversification	9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the	Maintain and increase the viability of sustainable farming in the National Park	SDLP58: Citation of policy SD38 in planning decisions †	Uniform data

Policy	Objective	Target	Indicator	Data source
	landscapes and special qualities of the National Park.			
Development Management Policy SD39: Conversion of Redundant Agricultural or Forestry Buildings	9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park. 2. To conserve and enhance the cultural heritage of the National Park.	Protect the agricultural character of the National Park.	SDLP59: Employment and housing completions resulting from conversion of agricultural or forestry buildings†	Employment and housing monitoring systems
Strategic Policy SD40: Infrastructure	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	All development is supported by infrastructure as far as necessary no mitigate its impact	SDLP60: Total CIL monies gathered and spent†	CIL database
Development Management Policy SD41: New and Existing Community Facilities	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	Protect and enhance the provision of community facilities to meet the everyday needs of local communities.	SDLP34: Developments granted planning permission for community, culture, leisure and recreation facilities[2]	Monitoring of weekly lists
Development Management Policy SD42: Telecommunications	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local		No indicator proposed	

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[2] This indicator is also used to monitor Strategic Policy SD21 and DM Policy SD44, due to the overlap between facilities for community use and those for the use of visitors.

Policy	Objective	Target	Indicator	Data source
and Utilities Infrastructure	jobs, affordable homes and local facilities			
Strategic Policy SD43: Green Infrastructure	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities. 8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	To be confirmed following drafting of SD43	SDLP61: CIL funds spent on green infrastructure projects†	CIL database
Development Management Policy SD44: Provision and Protection of Open Space, Sport and Recreational Facilities	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities	To be confirmed following drafting of SD44	SDLP34: Developments granted planning permission for community, culture, leisure and recreation facilities[3] SDLP62: Developments granted planning permission within recreational areas, as mapped in the HLC †	Monitoring of weekly lists Uniform/GIS data
Development Management Policy SD45: Local Green Spaces	5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.	To be confirmed following drafting of SD45	SDLP63: Developments granted planning permission within Local Green Space †	Uniform/GIS data

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[3] This indicator is also used to monitor Strategic Policy SD21 and DM Policy SD41, due to the overlap between facilities for community use and those for the use of visitors.

Policy	Objective	Target	Indicator	Data source
	8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities			
Strategic Policy SD46: Climate Change and Sustainable Use of Resources	6. To adapt well to and mitigate against the impacts of climate change and other pressures	Residential development to achieve 19% carbon reduction improvement against Building Regulations Part L (2013) and consumption of no more than 110 litres of water per person per day Non-residential development to achieve BREEAM Very Good	SDLP64: Decisions on planning applications that cite Strategic Policy SD46 †	Uniform data
Strategic Policy SD47: Flood Risk Management	6. To adapt well to and mitigate against the impacts of climate change and other pressures	Reduction in the impact and extent of all types of flooding	SDLP65: Developments granted planning permission contrary to the advice of the Environment Agency in Flood Risk Zones 2 and 3 †	Uniform/GIS data, plus subsequent analysis
Development Management Policy SD48: Sustainable Drainage	6. To adapt well to and mitigate against the impacts of climate change and other pressures	No net increase in surface water run-off as a result of new development	SDLP66: Decisions on planning applications that cite Strategic Policy SD46	Uniform data
Development Management Policy SD49: Renewable Energy	6. To adapt well to and mitigate against the impacts of climate change and other pressures	Delivery of renewable energy installations where compatible with the Special Qualities of the National Park	SDLP67: Number of full planning permissions for renewable energy development. †	Monitoring of weekly lists
Development Management Policy SD50: Shop Fronts	2. To conserve and enhance the cultural heritage of the National Park.	None	No indicator proposed	

Policy	Objective	Target	Indicator	Data source
	9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.			
Development Management Policy SD51: Adverts	1. To conserve and enhance the landscapes of the National Park. 9. To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.	None	No indicator proposed	
Development Management Policy SD52: Pollution and Air Quality	6. To adapt well to and mitigate against the impacts of climate change and other pressures.	Improvements in air quality	SDLP68: Number and status of Air Quality Management Areas	Information from partners
Development Management Policy SD53: Contaminated Land	6. To adapt well to and mitigate against the impacts of climate change and other pressures.	None	No indicator proposed	
Strategic Site Policy SD54: Shoreham Cement Works		Restoration of the site in accordance with Strategic Site Policy SD54	SDLP69: Progress of restoration of Shoreham Cement Works†	Officer knowledge./ employment monitoring system

Policy	Objective	Target	Indicator	Data source
Strategic Site Policy SD55: North Street Quarter and adjacent Eastgate area, Lewes	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.	Redevelopment of the site in accordance with Strategic Site Policy SD55	SDLP70: Progress of redevelopment of North Street Quarter and adjacent Eastgate area†	Officer knowledge./ employment/housing monitoring systems
Allocation Policies	7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses. 8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.	Development of the allocated sites for housing, Gypsy and Traveller accommodation or employment, as relevant	SDLP71: Progress of development on the allocated sites†	Officer knowledge./ employment/housing/Gypsy and Traveller monitoring systems