

4. CORE POLICIES

- 4.1** The core policies set out in this chapter provide the overarching framework for evaluating all development proposals in the National Park. These core policies will be used in the assessment of all planning applications and thereby avoids the need for duplicating criteria in other policies. The core policies apply equally across the National Park. The three core policies relate to sustainable development, ecosystem services and major development.
- 4.2** These core policies are relevant to all the Local Plan objectives.

MANAGING DEVELOPMENT IN THE NATIONAL PARK

Introduction

- 4.3** The NPPF sets out how the presumption in favour of sustainable development is a golden thread running through both plan-making and decision-making. This means that local planning authorities should positively seek opportunities to meet the development needs of their area. They should also take a positive approach when deciding planning applications. Core Policy SDI and its supporting text reflects these principles, within the context of the National Park's statutory purposes and duty. The supporting text also provides general guidance to clarify on the development management process.

Core Policy SDI: Sustainable Development

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

4.4 The purpose of this policy is to reflect the three guiding principles of this Local Plan. The three principles are reflected in the policies that appear throughout the Local Plan. These are:

- Firstly, the presumption in favour of sustainable development set out in the *National Planning Policy Framework* (NPPF);
- Secondly, the statutory duty of the Authority to have regard to National Park purposes when determining planning application and;
- Thirdly, the great weight to be attached, in the determination of planning applications, to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

National Park purposes and duty

4.5 The Authority will seek to achieve the right balance between conservation and recreation in the National Park when delivering the purposes of the National Park. However, at times this can cause conflict. To help national park authorities make decisions relating to conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as the '*Sandford Principle*'. This principle was included in the *Environment Act 1995 (as amended)* which states that: "If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area"

4.6 The *Environment Act 1995 (as amended)* states that a national park authority, in pursuing the purposes, shall seek to foster the economic and social well-being of local communities within the national park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the national park.

Cumulative impacts of development

4.7 **It is important to consider the impact of cumulative development in the National Park. Cumulative impacts can be defined as the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments.**

Determination of planning applications

4.8 On adoption, the *South Downs Local Plan* will form part of the statutory development plan for the whole of the National Park, along with the minerals and waste plans and 'made' (adopted) Neighbourhood Development Plans. It is important that the Local Plan should be read as a whole because all relevant policies apply to all planning applications.. Decisions on planning applications must be taken in accordance with the development plan unless material planning considerations indicate otherwise. It is implicit within criterion 1 of Policy SD1 that if a development proposal does not comply with key policies in the development plan, then it will be contrary to the development plan, and may therefore be refused. The Authority is committed to working with applicants to find solutions where they are seeking to conserve and enhance the landscapes of the National Park and in accordance with the development plan.

- 4.9** The application of planning policies will be proportionate to the nature and scale of development proposals, and the combination of policies will depend on the details of the development proposal.
- 4.10** A material planning consideration is one which is relevant to making the planning decision in question, and will generally be concerned with ensuring that land use is in the public interest. The weight attached to material considerations in reaching a decision is a matter of judgement for the decision-maker.
- 4.11** The National Park Authority will work positively and in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes. *Section 62 of the Environment Act 1995* requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes.

ECOSYSTEM SERVICES

Introduction

- 4.12** Ecosystem services are the benefits that people and society get from the natural environment. An ecosystems approach helps us to identify the benefits we get from nature, value them and build them into planning, decision making and management. The National Park Authority adopted an ecosystems approach to the *South Downs Partnership Management Plan (PMP)*²⁴, and this is embedded into the Local Plan. This has been achieved in three main ways:
- Firstly, there is a core policy on ecosystems services (SD2)
 - Secondly, an assessment has been made of all the strategic and development management policies, to identify those that make a positive contribution to a significant number of ecosystem services; these are identified with the icon ☆
 - Thirdly, consideration was given to the site allocations, the settlements within which they sit and the ability to deliver multiple ecosystem services. Icons and site specific development requirements relating to specific ecosystem services indicate how these sites in particular are expected to contribute
- 4.13** A GIS based tool (EcoServ GIS) has been developed to provide supporting evidence for the Local Plan on ecosystem services. The EcoServ models and maps have been used to map and understand the delivery of ecosystem services within the National Park in spatial terms. Ecoserv maps have been generated, which have informed the spatial portrait and all the allocations in the Local Plan. Further details are set out in the evidence based study *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*.²⁵

²⁴ Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019 (South Downs National Park Authority, 2013)

²⁵ Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

4.14 In Chapter 1, Figure 1.3 - The Four Aspects of Ecosystem Services illustrates how the landscapes of the South Downs provide a multitude of ecosystem services. Figure 4.1 below illustrates the inter-relationships between ecosystem services and people's enjoyment and understanding of the National Park. Figure 4.2 provides further detail on ecosystem services within the National Park.

FIGURE 4.1: 'PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE



FIGURE 4.2: THE FOUR ASPECTS OF ECOSYSTEM SERVICES IN THE SDNP

The Four Aspects of Ecosystem Services in the SDNP

There are four main categories of ecosystems services, namely, supporting, provisioning, regulating and cultural services. The natural environment is a dynamic system and these four services cannot be viewed in isolation from one another. They are ecologically and functionally interdependent.

Supporting services offered by flora and fauna and micro-organisms are essential for healthy soils, habitats and nutrient cycling, which underpin the environment's natural goods and services which benefit people. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality.

Provisioning services relate to the products and productivity of the natural environment. Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. Approximately 25 per cent of the National Park is wooded, which contributes renewable fuel like biomass. The chalk hills, which sweep across the National Park, filter and store fresh water, providing us with high-quality drinking water.

Regulating services are the controls from the natural environment. For example, rivers which help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere support habitats and biodiversity. Enhancing species like bees and other pollinators are vital for food crops as well as other plants and wildflowers. Woodland also prevents soil erosion and is an important resource for carbon storage which helps to mitigate climate change. These services also regulate pollution in the air, water and on land. These include regulating carbon dioxide and air quality from cars and industry, chemicals from the treatment of agricultural fields or viticulture or surface water run-off and percolation from the urban environment into rivers and ground water.

Cultural services relate to people's enjoyment of the National Park and its special qualities. The distinctive landscape of the Western Weald, the chalk ridge, scarp and dip slopes and the dramatic Seven Sisters cliffs are of inspirational value through their sense of place and tranquillity, including dark night skies. Embedded in the landscape is important cultural heritage which is rich in arts and literature, archaeological remains, traditional historic towns and villages and architecture. These special qualities and an extensive network of bridleways and footpaths enhance people's health and wellbeing.

All of these ecosystem services can be utilised and enhanced to provide for sound growth within properly understood limits. The services described above are assets that should guide all growth, hence their thinking underpins this Core Policy. Through careful management of development, the various provisions of ecosystem services can be used to ensure that the multiple benefits they give to society are supported and protected.

Core Policy SD2: Ecosystem Services

- I. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.

Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

4.15 The purpose of this policy is to embed a holistic approach to managing our natural resources sustainably for the future. Its criteria encapsulate the ecosystem services that the natural environment contributes to people. This integrated approach is important because development can have multiple effects across these services. Development proposals should take a positive approach to the delivery of ecosystem services and take adequate account of the economic benefit of enhancing ecosystem services. There are many ways to deliver on these criteria. These should be delivered on a site by site basis with reference to the aspects of ecosystem services set out in Figure 4.2.

4.16 All planning applications should be accompanied by a statement that sets out how the development proposal impacts, both positively and negatively, assessing the impact on ecosystem services. The preparation of the statement should be proportionate to the impact. Use should be made of the Ecoserve GIS maps, when available. A technical advice note will be produced by the National Park Authority to provide further guidance to applicants on this policy.

- 4.17** This core policy should not be read in isolation but instead linked to all other Local Plan policies. For example, criterion (d) of policy SD2 is about managing and mitigating the risk of flooding and is linked to the ecosystem services of water flow and flood. The relevant Local Plan policies are SD45: Green Infrastructure, SD17: Protection of the Water Environment, SD48: Climate Change and Sustainable Use of Resources. It should be noted that where more detailed applicable criteria are contained in other policies within the Plan, SD2 should be read as supporting and not weakening that detailed criteria.

MAJOR DEVELOPMENT

Introduction

- 4.18** The NPPF (paragraph 116) sets out the approach local planning authorities should take to development in national parks. The *National Planning Practice Guidance* (NPPG) states that: “Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.”
- 4.19** The NPPF does not define major development. The National Park Authority has sought legal opinions²⁶ on what constitutes major development. These opinions are that the definition of “major development” is based on whether, prima facie, the development might potentially have adverse impacts on a national park, rather than whether, after a careful and close assessment, it will have such adverse impacts.
- 4.20** Major development can include various forms of both infrastructure and works associated with infrastructure projects. Development proposals should address the requirements of policies SD3: Major Development, SD42: Infrastructure and any other specific policy relevant to that form of infrastructure.

²⁶ Legal Opinion In the matter of the South Downs National Park Authority and in the matter of paragraph 22 of PPS7 (James Maurici, 2011); Legal Opinion In the matter of the National Planning Policy Framework and In the matter of the South Downs National Park Authority (James Maurici, 2014); Further Opinion In the matter of the National Planning Policy Framework and In the matter of the South Downs National Park Authority (James Maurici, 2014)

Core Policy SD3: Major Development

1. In determining what constitutes major development the National Park Authority will consider whether the development, by reason of its scale, character or nature, has the **potential** to have a serious adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.
2. Planning permission will be refused for major developments in the National Park except in exceptional circumstances, and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
3. If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities should be sought. Development proposals should be sustainable as measured against the following factors:
 - Zero Carbon
 - Zero Waste
 - Sustainable Transport
 - Sustainable Materials
 - Sustainable Water
 - Land Use and Wildlife
 - Culture and Community
 - Health and Wellbeing

4.21 The purpose of this policy is to set out how the National Park Authority will determine what constitutes major development and, if an application is deemed to constitute major development, how that application will be considered.

Major Development Test

4.22 Core Policy SD3 sets out the two stages of decision making in relation to major development. Firstly, an assessment will be made to determine whether development constitutes major development. For the purposes of this policy, all of the following principles will be applied when determining whether an application constitutes major development:

- A judgement will be made in light of all of the circumstances of the application and the context of the application site

- The phrase ‘major development’ will be given its common usage, and will not be restricted to the definition of major development in the *Town and County Planning (Development Management Procedure) (England) Order 2015*, or to proposals that raise issues of national significance
- The determination as to whether the development is major development will consider whether it has the potential to have a serious adverse impact. It will not include an in-depth consideration of whether the development will in fact have such an impact
- The application of other criteria may be relevant to the considerations, but will not determine the matter or raise a presumption either way

4.23 It is important to consider the impact of cumulative development in the National Park. An individual development viewed in isolation may, in itself, constitute minor development, but when viewed with neighbouring development within the National Park could be considered to form part of a major development. In such cases the National Park Authority will apply all of the principles in paragraph 4.21 to assess whether major development is proposed.

4.24 All allocations, including those for strategic sites, within this Local Plan have been screened to determine if they would constitute major development. If development on the site is expected to constitute major development then the second part of Core Policy SD3 will have been applied when the allocation was made. This is set out in detail in the evidence-based study, *Assessment of Site Allocations against Major Development Considerations – Technical Report*.²⁷

Consideration of major development proposals

4.25 If the proposal is considered to be major development, then the second part of the policy will apply. It will then be assessed against the following considerations which are consistent with paragraph 116 of the NPPF:

- The need for development in the location proposed. Where residential development is proposed, taking account of any local need identified by the relevant housing authority and bearing in mind that housing in the National Park should focus on the needs of its local communities;
- The possible impact on the local economy, in particular any that is specific to the site or location as opposed to general benefits such as on the construction industry;
- The cost of, and scope for, meeting the need in some other way, on the assumption that it is a local need which should ideally not be met outside the designated area (the National Park);
- Detrimental effects on the environment, including wildlife and cultural heritage, and the extent to which the effects can be moderated;
- Detrimental effects on the landscape and the extent to which the effects can be moderated; and

²⁷ *Assessment of Site Allocations against Major Development Considerations – Technical Report (Envision, 2015 and update 2017)*

- Detrimental effects on recreational opportunities and the extent to which the effects can be moderated.

4.26 A consideration will then take place as to whether there is a reasonable expectation that the exceptional circumstances exist, and that it could be demonstrated that development would be in the public interest.

Principles of Sustainable Development

4.27 The third part of the policy applies to applications for major development for which the Authority considers exceptional circumstances exist and would be in the public interest. The extent to which mitigation can overcome any detrimental effect on the environment, the landscape and recreational opportunities will be taken into account when considering proposals. Any short-term and long-term harm or adverse impact will need to be minimised and it should be clearly demonstrated how the proposals have incorporated all opportunities to conserve and enhance the special qualities of the National Park.

4.28 The sustainability of the development proposals will be measured against the following principles of sustainable development:

- Zero Carbon - Making buildings energy efficient, supplying energy from on-site renewable sources, where possible, and seeking to deliver all energy with renewable technologies
- Zero Waste - Reducing waste generation through good design, encouraging reuse, recycling and composting and seeking to send zero waste to landfill
- Sustainable Transport - Reducing the need to travel and dependence on fossil fuel use and encouraging low and zero carbon modes of transport to reduce emissions
- Sustainable Materials - Where possible, using local, reclaimed, renewable and recycled materials in construction and products, which minimises transport emissions, encourages investment in local natural resource stocks and boosts the local economy
- Sustainable Water - Implement water use efficiency measures, reuse and recycling and minimise the need for water extraction. Designing to avoid local issues such as flooding, drought and water course pollution
- Land Use and Wildlife - Protecting and restoring biodiversity and creating new natural habitats through good land use and integration into the built environment
- Culture and Community - Celebrate, respect and revive cultural heritage and the sense of local and regional identity. Encourage the involvement of people in shaping their community and creating a new culture of sustainability
- Health and Wellbeing - Promote healthy lifestyles and physical, mental & spiritual well-being through design and community engagement

5. A THRIVING LIVING LANDSCAPE

- 5.1 The theme for this chapter, Thriving Living Landscape, is primarily based on the first purpose of the National Park. The policies in this chapter are divided into four sub-sections: Landscape, Biodiversity, Historic Environment and Water.
- 5.2 Conserving and enhancing the natural beauty of the area and the region's biodiversity, including green infrastructure, are both key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the Duty to Cooperate.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 1: To conserve and enhance the landscapes of the National Park.

Objective 2: To conserve and enhance the cultural heritage of the National Park.

Objective 3: To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.

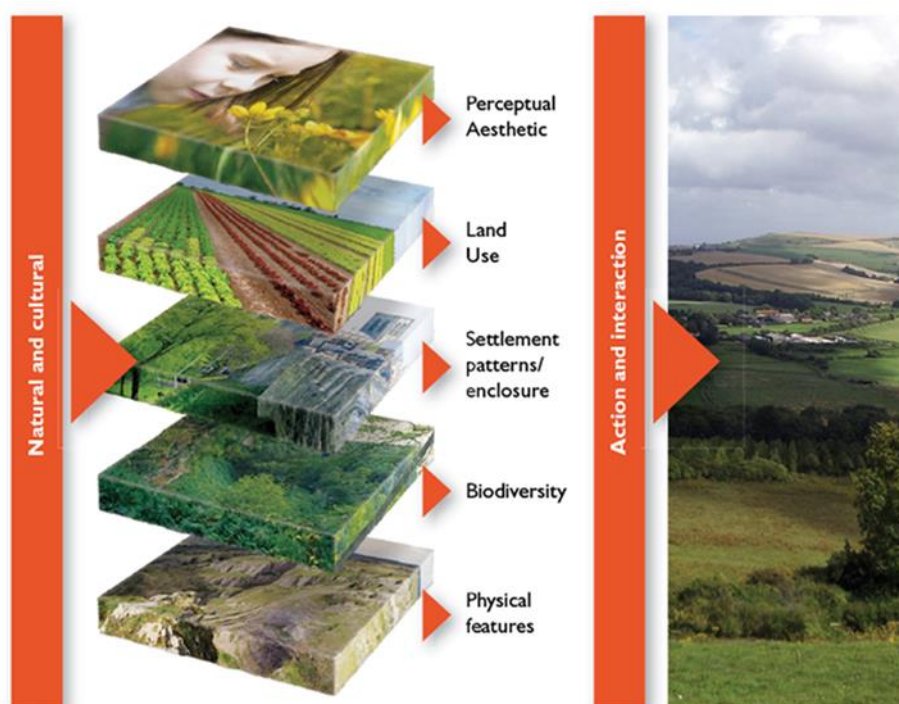
Objective 4: To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing.

5a. LANDSCAPE

Introduction

- 5.3** This section of the Local Plan includes five strategic policies which relate to the landscape and associated special qualities of the National Park. These set a positive strategy for conserving and enhancing landscape character (SD4), views (SD6), relative tranquillity (SD7) and dark night skies (SD8), and sets out a landscaped-led approach to design (SD5).
- 5.4** The diverse and inspirational landscapes of the National Park are defined as one of its special qualities. The landscape is also the foundation for the other special qualities of the National Park, including its views, tranquil and unspoilt places and its distinctive towns and villages. As set out in Chapter 4, Spatial Strategy and Portrait, the varied landscapes of the National Park collectively contribute to the range of ecosystem services which the National Park provides. The condition of landscape features, and their management, is therefore essential to the continued function of ecosystem services and the benefits they provide. Any development in the National Park has the potential to cause harm to the landscape both individually and cumulatively. These policies seek to ensure that development avoids having a detrimental impact on the landscape and its special qualities, and, wherever possible, enhances the landscape. Figure 5.1 explains how the landscape is formed.

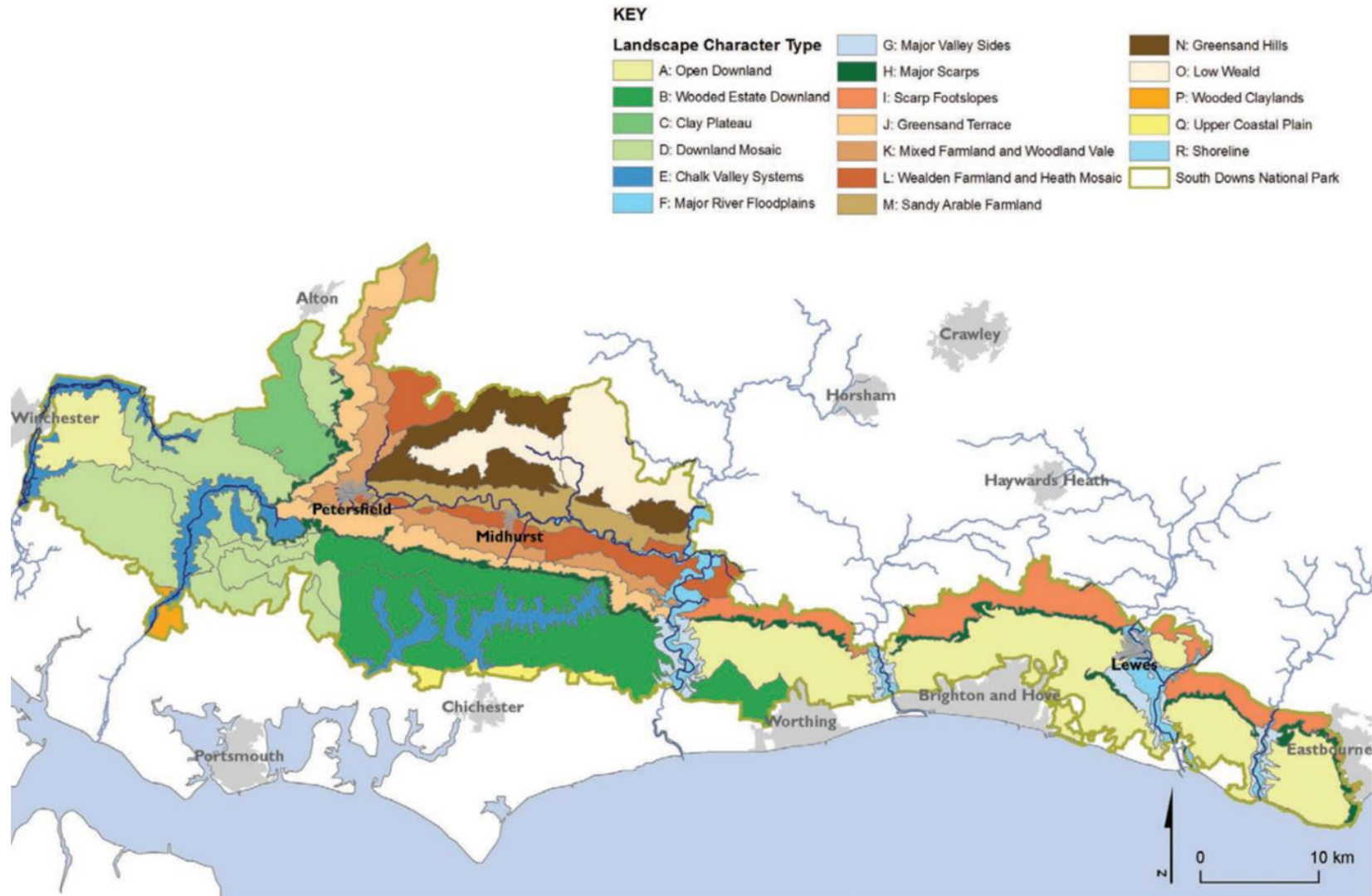
FIGURE 5.1: LANDSCAPE



- 5.5** The *South Downs Integrated Landscape Character Assessment (SDILCA)*²⁸ divides the rich and complex landscape character of the National Park into 18 general landscape types (as shown in Figure 5.2) and 49 more place-specific 'character areas'. It identifies the features that create local distinctiveness, a 'sense of place' and is an aid to decision making.

²⁸ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

FIGURE 5.2: LANDSCAPE CHARACTER TYPES²⁹



²⁹ <https://www.southdowns.gov.uk/planning/planning-advice/landscape/>

★ Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
 - a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
 - b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
 - c) They will safeguard the experiential and amenity qualities of the landscape;
 - d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of green infrastructure and uses native species, unless there are appropriate and justified reasons to select non-native species; and
2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the *Historic England Register of Historic Parks and Gardens*) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
3. The individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.
4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green corridors.
5. The restoration of landscapes where either natural or cultural heritage features have been lost or degraded will be supported where it contributes positively to landscape character.

5.6 The purpose of Policy SD4 is to set out how development proposals will be expected to conserve and enhance landscape character in the National Park.

Understanding of landscape context and character

5.7 The ability of proposals to meet the requirements to enhance landscape character in Policy SD4 will be considered in proportion to the size, scale and likely impacts of the proposals.

5.8 It is important that proposals are based on a meaningful understanding of the context and character of an area and those positive characteristics which define local distinctiveness. The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Therefore, this policy is closely linked to Policy SD5: Design, and they need to be read together.

5.9 Proposals should be informed by the SDILCA, community-led / local landscape character assessments and appropriate site-based investigations. Local landscape character assessments may include community, parish or Village Design Statements and other community planning documents. However, references to these will not be a substitute for appropriate professional site based assessment and research.

5.10 Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in

accordance with the *Guidelines for Landscape and Visual Impact Assessment*³⁰ and successor documents. If the proposals require a full Environmental Impact Assessment then a Landscape and Visual Impact Assessment undertaken by a Chartered Landscape Architect will be required. Most applications will be likely to require a bespoke Landscape Appraisal. Applicants are advised to consult the Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the *Landscape and Biodiversity Baseline Checklist* which is available on the Authority's website in the first instance. Further study may be required following on from completion of the checklist which the Authority would advise on.

- 5.11** The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many cultural features in the landscape these contribute to local distinctiveness reflecting the time depth which is present in the landscape.

Design and layout

- 5.12** The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

Designed landscapes

- 5.13** There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the *Historic England Register of Historic Parks and Gardens*³¹, for example, Petworth Park, designed by Capability Brown. In addition, there are many other sites which are identified as being designed landscapes, but not included on the Historic England list. These are identified in the *Historic Landscape Character Assessments*³² for the National Park and are important cultural heritage assets.
- 5.14** Policy SD12: Historic Environment, sets relevant requirements for heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts, which are independent charities engaged in caring for gardens and designed landscapes.
- 5.15** Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed

³⁰ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEMA, 2013)

³¹ Link to the Historic England website to view / search the Historic Parks and Gardens Register:
<https://historicengland.org.uk/listing/the-list/>

³² Link to the Sussex Historic Landscape Characterisation study: <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/>; the Historic Landscape Assessment of Hampshire is underway.

landscape. This process should ensure that development will enhance the designed character of the landscape.

The individual identity of settlements

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

Green and Blue Corridors

5.17 Green and blue corridors are areas or linear features which connect habitat and wildlife populations and can provide opportunities for walking and cycling, and also facilitate the movement of wildlife. Green and blue corridors are an essential component of the National Park's green infrastructure, and can provide benefits for people and wildlife at both the landscape scale and more local scale. More information is provided under policy SD45: Green Infrastructure.

Landscape features

5.18 Natural and historic features such as trees, woodlands, hedgerows, historical water systems, chalk pits and sandpits, should be conserved and enhanced through design. Reference should be made to the *Pan Sussex Historic Landscape Character Assessment* and other appropriate research material to identify the relevant natural and historic key features this should be used to inform development proposals.

Strategic Policy SD5: Design

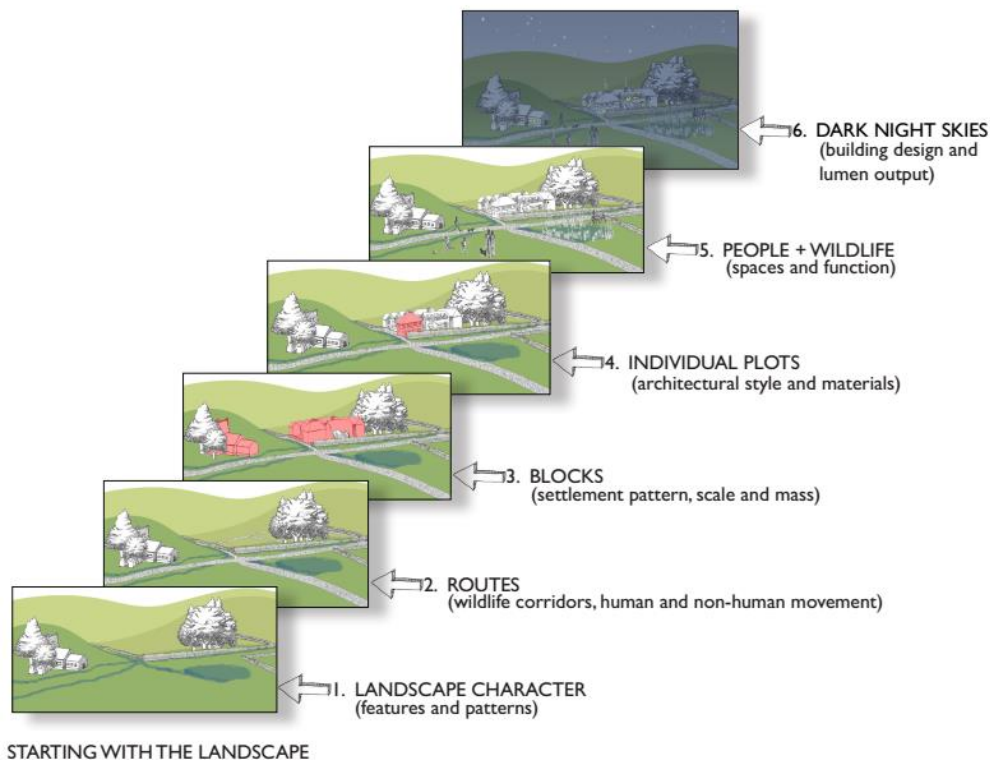
- I. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:
 - a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
 - b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect green infrastructure;
 - c) Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features.
 - d) Create high-quality, clearly defined public and private spaces within the public realm;
 - e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances green infrastructure, and is consistent with local character;
 - f) Utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
 - g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;
 - h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
 - i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
 - j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
 - k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

5.19 The purpose of Policy SD5 is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park. Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future. The definition of landscape encompasses all types and forms, including townscape. This refers to areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.

A landscape-led approach

- 5.20** Development should enhance, respect and reinforce the landscape through a landscape-led design approach, informed by contextual analysis of the local landscape character and built character, as set out in Figure 5.3. This contextual analysis should include considerations, as relevant, of topography, landscape features, the water environment, biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportions, pattern, and vernacular architecture and materials. The surrounding mix of uses should also inform proposals. Appropriate study areas and methodology would be determined in discussion with the Authority and will be dependent on the size, height and location of proposals.
- 5.21** Individual design elements, such as use of materials and detailing of elements such as windows, are critical to the success of the overall design and should be considered once the character of the area has been assessed.
- 5.22** Supporting information accompanying planning applications should be proportionate to sensitivity of the location and the scale of what is being proposed. The Authority will engage with applicants and agents to offer advice on what is required. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Some schemes may be asked to go through the National Park Authority's Design Review Panel process. Depending on the scale of development, a comprehensive masterplan outlining the principles for a site should address all of these elements and any other site-specific issues, to achieve an exemplary design.

FIGURE 5.3: A LANDSCAPE-LED APPROACH TO DESIGN



Connections for people and wildlife

- 5.23** Good design provides effective and high quality connections for people and wildlife, ensuring sustainable ease of movement. Opportunities should be identified and taken to connect green infrastructure assets and make a positive contribution to local character. The purpose of an open space, for example a playground or orchard, should be clear, otherwise it will most likely become a forgotten space which serves no purpose or benefit. Open spaces should be connected to the existing environment, for example by footpaths or cycleways. Where public open spaces are provided, there should be no restrictions, such as locked / keypad entry gates, to accessing these areas, and they should be accessible to all. Policies SD45 and SD46 set out criteria related to the provision of green infrastructure and open space, respectively.

High quality landscape and architectural design

- 5.24** The Authority will seek the highest quality design for development proposals in line with the first purpose of the National Park. This includes truly outstanding or innovative design and contemporary design which reinforce local distinctiveness, taking reference and visual cues from the landscape and local settlement identity and character. The Authority will encourage the use of locally sourced materials to support local character and distinctiveness, and to reduce the cost both financially and environmentally of transporting materials long distances. Reference should be made to the respective strategic stone studies for each of the three counties.
- 5.25** The design of streets has a significant influence on the layout and setting of development, and should respect local character, and respond to the historic form and layout of existing streets. Further criteria relating to the public realm and street design is set out in Policy SD21: Public Realm, Highway Design and Public Art.
- 5.26** The spaces around new buildings are integral to the success of new development and should be well designed to create a high quality built environment. This includes the gaps between houses, gardens, driveways, parking areas, waste and recycling storage, street composition and open space / amenity space. Careful consideration should be given to the siting, use / function and materials used. Spaces should be defined through use of suitable landscaping, such as boundary treatments, planting and varied use of materials, which differentiate between private and public areas. The use of hard and soft landscaping should be consistent with local character and enhance green infrastructure. Existing features such as trees, hedges and walls which are characteristic of the streetscape and local area should be retained. The long term maintenance of landscape features should be addressed, for example through a legal agreement.
- 5.27** Development should comply with design policies set out in Neighbourhood Development Plans, and take into account village and town design statements.

Adaptable, durable, and sustainable design

- 5.28** New housing needs to be appropriate for the widest range of households and should therefore be adaptable, accessible and durable over time to accommodate people of all ages and abilities, without diminishing overall appearance and function.
- 5.29** Development should maximise sustainable technologies. The sourcing and performance of materials, and construction methods, should maximise energy and resource efficiency. The wood fuel economy is one example of this. Dwellings which utilise local sustainable wood fuel schemes support the local economy, repurpose what would otherwise be a waste product and

can support reductions in fuel poverty. This should be undertaken in accordance with Policy SD48: Climate Change and Sustainable Use of Resources.

- 5.30** Development should be durable and adaptable to change. The ongoing management and long term maintenance of the scheme, including all design elements, should be addressed.

Amenity and functional needs

- 5.31** It is important that all types of development meet the day-to-day functional needs of its users, and of those responsible for its servicing. Internal space should have internal proportions that allow quality of experience for its occupiers and users. High quality, accessible, secure and where possible integrated on site storage should be available for the storage of transport equipment which includes bicycles, mobility scooters, push chairs and wheelchairs. Refuse and recycling storage should take account of the operational requirements of refuse collection services.
- 5.32** High quality garden, terrace or balcony space should be provided for residential occupiers, of a size and nature that befits future occupiers' needs, for example families with children. Other uses may need to provide outdoor space for staff and / or visitors depending on the use and context.
- 5.33** In addition, the privacy and amenity of existing neighbours and future occupiers should be respected. Proposals should ensure good natural light for new and, where relevant, existing buildings and their occupiers. Proposals affecting residential properties in particular should not be unduly overbearing, or compromise others' reasonable privacy, unless outweighed by innovative design solutions that mitigate these impacts.
- 5.34** Reference should also be made to policies SD30 and SD31 on Replacement Dwellings and Extensions to Existing Dwellings, Annexes and Outbuildings.

Strategic Policy SD6: Safeguarding Views

1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.
2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the *Viewshed Characterisation Study*:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the *Viewshed Characterisation and Analysis Study*, heritage assets (either in view or the view from) and biodiversity features.
3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

5.35 The purpose of Policy SD6 is to ensure that development does not harm views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

Landscape and Visual Impact Assessment

5.36 The *View Characterisation and Analysis Study*³³ provides baseline information about the major viewtypes, and about possible and likely ranges of visibility within, to and from the National Park. Proposals should take into account the *View Characterisation and Analysis Study* and the *Seascape Assessment for the South Marine Plan*³⁴. However, representative views and landmarks set out in the *View Characterisation and Analysis Study* do not provide an exhaustive list and reference to these studies will not be a substitute for appropriate site based assessment in accordance with the *Landscape Institute & IEMA's Guidelines for Landscape and Visual Impact Assessment (LVIA)*. A LVIA should be carried out in accordance with these guidelines, and should be proportionate to the size and likely impacts of the scheme. If the applicant can demonstrate to the satisfaction of the Authority that an LVIA is not required, a simple landscape assessment may be appropriate. More information on landscape assessments is available in the supporting text of Policy SD4: Landscape Character. Applicants are advised to consult the Authority on proposed viewpoint locations to inform such studies at the earliest opportunity.

³³ South Downs National Park: View Characterisation and Analysis (LUC, 2015)

³⁴ Draft South Marine Plan (Marine Management Organisation, 2016)

- 5.37** The SDILCA, Village Design Statements, conservation area character appraisals, conservation area management plans, local landscape character assessments, parish plans and Neighbourhood Development Plans may provide evidence on views and should be referred to. This information, together with essential field and desktop studies which are undertaken at an appropriate level to the application, should be provided at the earliest possible stage in the planning application process and would form part of LVIA.
- 5.38** Zone of Theoretical Visibility (ZTV) analysis is the process of determining the visibility of an object in the surrounding landscape and illustrates the potential (or theoretical) visibility of an object in the landscape, based on topography. The use of digital ZTV data is recommended for larger applications in order to identify potential visibility and to demonstrate areas of zero visibility.
- 5.39** Sequential views are the series of views which we see unfold when moving through the landscape, for example, when walking along a footpath or travelling along a road. Impacts on these views can arise frequently or occasionally, and may be generated by periodic views of the same development or by more than one development. Sequential visibility can be assessed by use of transect ZTVs.

Strategic Policy SD7: Relative Tranquillity

1. Development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider the following impacts:
 - a) Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;
 - b) Indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements; and
 - c) Experience of users of the Public Right of Way network and other publicly accessible locations.
2. Development proposals in highly tranquil and intermediate tranquillity areas should conserve and enhance, and not cause harm to, relative tranquillity.
3. Development proposals in poor tranquillity areas should take opportunities to enhance relative tranquillity where these exist.

5.40 The purpose of Policy SD7 is to ensure that development does not harm the relative tranquillity of the National Park and to encourage the conservation and enhancement of positive tranquillity factors.

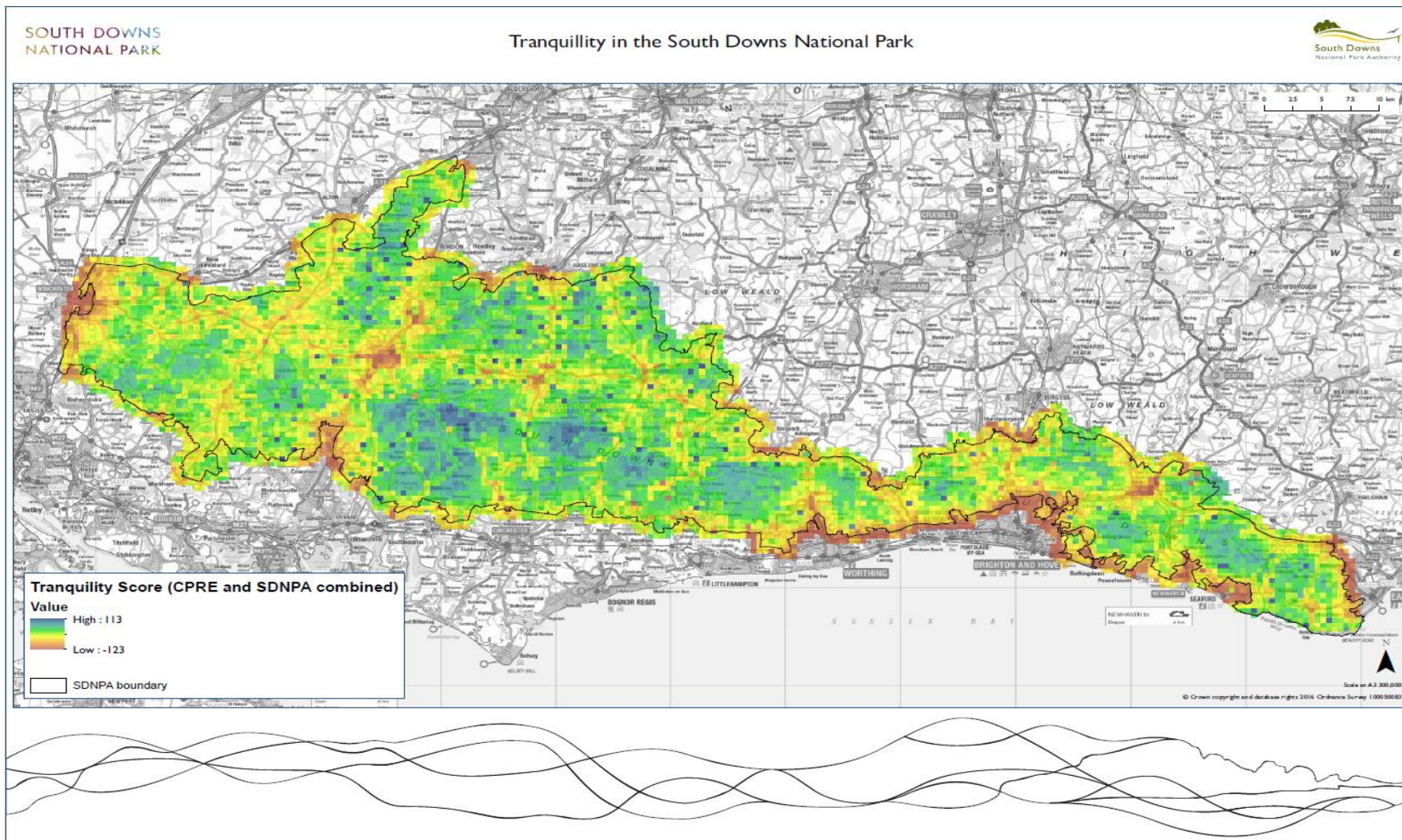
5.41 Tranquillity is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. The tranquillity scores apply specifically to the South Downs National Park; they are therefore to be considered relative to the National Park area only. They are not intended to be comparative or considered in relation to tranquillity scores for other national parks or other areas of the country.

The South Downs National Park Tranquillity Study

- 5.42** In preparing proposals, applicants are advised to take into account the evidence of relative tranquillity in the *South Downs National Park Tranquillity Study*³⁵. For the *Tranquillity Study*, positive and negative tranquillity factors at locations across the National Park were scored on a sliding scale. The tranquillity scores from the study are shown on the map in Figure 5.4. In order to assess impacts on relative tranquillity the *South Downs Tranquillity Study* should be used as a baseline from which to assess changes in the aural and visual environment which are likely to result from the proposals, including considerations of temporary / permanent or varying nature of the impact.
- 5.43** The assessment of impacts on relative tranquillity is not the same as a noise assessment, and the assessment of zero noise impact for an application will not be taken necessarily as meaning that there would be a similar impact on relative tranquillity.
- 5.44** The Tranquillity Study identified areas which are highly tranquil, of intermediate tranquillity, and those of low tranquillity. Applications for development proposals in highly tranquil areas should demonstrate that they conserve and enhance, and do not harm, relative tranquillity. Development proposals in areas of intermediate relative tranquillity are the areas which are most vulnerable to change, and should avoid further harm to relative tranquillity and take every opportunity to enhance it. Development proposals in areas of poor tranquillity are often located within or on the edge of urban areas and thus there may be limited scope for enhancing relative tranquillity in these areas; opportunities to enhance relative tranquillity should be taken wherever possible.
- 5.45** The extent that proposals conserve and enhance relative tranquillity will be determined by an assessment of the impact on relative tranquillity, which is proportionate to the scale and expected impact of the development in relation to the surrounding context.

³⁵ South Downs National Park Tranquillity Study (South Downs National Park Authority, 2017)

FIGURE 5.4: TRANQUILITY SCORES IN THE NATIONAL PARK



Strategic Policy SD8: Dark Night Skies

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

Location	Requirements for level of protection				
Dark Sky Zone Description	ILP Guidance ³⁶	Landscape Impact	Maximum Lux Level (Suggested 10 Lux)	Evening Curfew	Astronomical Darkness Curfew
E0 Dark Sky Core and areas outside this zone with a SQM ³⁷ of 20.5+	✓	✓	✓		✓
E1 (a) 2km Buffer Zone and areas outside this and the above zone which are of intrinsic rural	✓	✓	✓	✓	

³⁶ Institute of Lighting Professionals (ILP) guidance GN01:2011 Guidance Notes for the Reduction of Obtrusive Light

³⁷ Sky Quality Measurement (SQM). The latest version of the Sky Quality Measurement map should be used as the reserve is subject to ongoing measurement.

darkness with a SQM range of 20 to 20.5					
EI (b) Transition Zone and areas outside this and the above zones with a SQM range of ~15 to 20	✓	✓	✓		
E3/4 Urban zone with an SQM of < 15	✓	✓			

4. Outdoor lighting proposals are required to provide a statement to justify why the proposed lighting is required.

5.46 The purpose of Policy SD8 is to ensure that development does not harm the quality of dark night skies. It also encourages enhancement of the dark night skies of the National Park, for the benefit of people and wildlife. The policy seeks to do this by ensuring that proposed lighting is necessary, and by reducing the unnecessary light spill that is often a result of poor design, in order to minimise the overall impact of light.

5.47 Policy SD8 applies across the International Dark Sky Reserve which covers the entirety of the National Park. It applies to any proposals which involve the installation of external lighting and where the design of developments may result in light spill from internal lighting. It will also apply to specific lighting schemes which require planning permission or listed building consent, including installing:

- A lighting scheme of such nature and scale that it would represent an engineering operation³⁸;
- Lighting such as the floodlighting of sports pitches, car parking or menages; and
- A lighting scheme on a listed building that would significantly affect its character.

5.48 Mapping has been undertaken of the quality of dark skies across the entire National Park, as set out in the *South Downs Dark Night Skies Guidance Document*³⁹. These measurements have been used to categorise the National Park into a number of dark sky zones which reflect the quality of the dark night skies overhead and the level of street lighting. These zones are:

- E0 Dark Sky Core - there are large areas which have skies that can be classified as intrinsically dark. These areas form a continuous dark sky core (and 2km buffer zone) to

³⁸ such as requiring a separate structure and typically be undertaken by specialist lighting engineers

³⁹ South Downs Dark Night Skies Guidance Document (South Downs National Park Authority, 2017)

the International Dark Sky Reserve, as shown on the Policies Map, which contain some of the darkest areas of the National Park.

- E1 (a) 2km Buffer Zone and (b) Transition Zone— areas that lie between the larger urban settlements and the surrounding darker skies notably vulnerable to light pollution. These areas are generally in the Buffer Zones and Rural Transition areas. Generally this will be where the sky quality changes from poor to the edge of an intrinsic dark sky zone typically with Sky Quality Meter⁴⁰ (SQM) values of 20 Lux.
- E3/4 Urban – the towns and villages of the National Park have lower quality of dark night sky, primarily due to street lighting and light spill from buildings

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

Hierarchy of lighting

5.50 In order to ensure that dark night skies are protected and enhanced, the hierarchy as set out in criteria (2) is applied across the National Park. Installation of lighting should be avoided and, where lighting is demonstrated to be necessary, the design and installation should be such that adverse impacts are avoided or, if not achievable, mitigated to the greatest possible extent. The hierarchy should be applied in conjunction with the requirements for protection for the relevant dark sky zone as set out in criteria (3) of this policy.

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

5.52 In some circumstances it may be possible to reduce the impact of existing lighting by removal in return for new lights.

Requirements and guidance for proposed lighting in dark sky zones

5.53 Much of the rural landscape is part of the Dark Sky Core, but this should be checked prior to an application. In the preparation and determination of development proposals, the latest version of the Sky Quality Measurement map should be used as the reserve is subject to ongoing measurement. To provide some indication of sky quality and zoning:

- An intrinsic dark zones is where the Milky Way can be seen with the naked eye and in an area with no street lighting
- If there is a provision of highways authority street lighting, the zoning will usually be E3

5.54 In addition to the application of the lighting hierarchy and avoidance and mitigation measures which may be required with regard to impacts on landscape and habitat, development proposals will be subject to particular requirements at a level of protection appropriate to the dark sky zone, as set out in Policy SD8, which is based on the measured sky quality.

⁴⁰ A Sky Quality Meter measures the brightness of the night sky in magnitudes per square arcsecond.

- 5.55** Proposals within the Dark Sky Core and 2km buffer zone will be subject to maximum protection using the full weight of mitigation options, with a relaxation as light quality decreases further into urban areas.
- 5.56** Any Dark Sky that measures 20.5 Lux and above, should be considered as core quality, irrespective of whether it is within or outside the Dark Sky Core. In general, lighting under the best quality skies should cease on the onset of astronomical darkness, in addition to basic principles of good lighting (ILP) and appropriate rural illuminance levels. The time of astronomical darkness varies throughout the year, but marks the point at which dark skies are defined. In intrinsic skies, 20 to 20.5 Lux, an evening curfew should be set, for example, 9pm.
- 5.57** The Authority will encourage further reductions, for example towards the limits of an E0 dark sky zone, or by removing below or near horizontal light paths from fixtures. Often this can be achieved with little further disruption. Examples of how this can be done include:
- Lighting should be subject to control measures to reduce unnecessary light pollution. Examples include:
 - ‘Curfews’ or automatic timers;
 - Proximity ‘PIR’ sensors, timers or any additional shielding or coving, including angling the front surface of lights to the horizontal;
 - Different surface types to reduce the amount of reflectivity;
 - Appropriate use of glazing to reduce light transmittance; and
 - Screening or shielding to reduce the impact of reflectivity.

Lighting assessments

- 5.58** Where a proposal involves outdoor lighting, a statement will be required to justify why the proposed lighting is required for its intended use and that shows every reasonable effort has been made to mitigate skyglow and light intrusions. This should be accompanied by a computer calculation indicating task luminance, uniformity, horizontal values of overspill beyond the property line and vertical luminance values of light intrusion on adjacent property windows. Any statement should be proportionate to the size and likely impacts of the scheme.
- 5.59** Habitats, particularly woodlands, should not be considered as a ‘natural shield’ to lighting, because of the impact on an unlit habitat. Lighting that would spill into sensitive habitats should be shielded or removed particularly if nocturnal species are present. Direct illumination of bat roosts must be avoided.
- 5.60** Proposals should take due consideration of the overall visual impact that the lighting will have on the landscape. This may include ground surface reflectivity, the number of lights, the daytime intrusion and the general overall footprint of the lighting. It is also necessary to consider the visibility of the lights from the surrounding landscape particularly from viewpoints in accordance with Policy SD6: Safeguarding Views.
- 5.61** The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Consequently, it is important to control the lighting coming from these types of developments. The design of buildings should reduce the impact of light spill from internal lighting or suitable mitigation measures should be put in place.

5b. BIODIVERSITY

Introduction

- 5.62** This section of the Local Plan includes three policies relating to the wildlife of the National Park. Strategic Policy SD9: Biodiversity and Geodiversity relates to the conservation and enhancement of biodiversity and geodiversity across the National Park and sets out a hierarchy for designated sites. Strategic Policy SD10: International Sites provides further specific requirements for particular International Nature Conservation Designations. Development Management Policy SD11: Trees, Woodland and Hedgerows provides further detail regarding these assets. These policies all relate to the first purpose of the National Park.
- 5.63** The term biodiversity includes all species, communities, habitats and ecosystems, whereas the term geodiversity includes all features of geological and geomorphological interest including rocks, fossils, landforms and natural processes which create them.
- 5.64** The biodiversity and underlying geodiversity of the National Park directly provide or underpin many ecosystem services that people depend on. Together, these include the filtering and storage of water for clean water supplies, water management and flood alleviation, and also the provision soils in which we grow our food and other produce, such as timber. In addition, biodiversity also underpins air quality regulation, pollination and pest control. The geology of the National Park provides aggregates and stone for building and other material uses. These local materials contribute to the economy of the National Park and have had a strong influence on the built vernacular.
- 5.65** The combination of geology and micro-climates has created a diverse mosaic of habitats that supports many rare and important wildlife species. Many of these are recognised through various international, national and local nature conservation designations. They form essential components of ‘ecological networks’, helping species to adapt to the impacts of climate change and other pressures; evidence for this is provided in the *Habitat Connectivity Study*⁴¹. Designated sites within the National Park are shown on the Policies Map and more information on the types of designations is set out in the Glossary.
- 5.66** Wildlife habitats are subject to a range of pressures, including those from development, and are often degraded and fragmented. A landscape-scale approach is needed to conserve, restore and reconnect habitats across the National Park. As well as causing direct loss of wildlife habitats and geodiversity, development can have a wide range of other negative impacts, for example, housing developments can result in disturbance to wildlife on sensitive sites by dogs and cats as well as increased recreational pressure from the local population; evidence for this is set out in the *Access Network and Accessible Natural Greenspace Study*⁴².
- 5.67** Development can also have a positive impact on biodiversity and geological features. The impact on and conservation of geological features, landforms and processes is a crucial consideration when planning for coastal defences and re-engineering of river catchments. By restoring an interconnected network of wildlife sites and achieving net gains in biodiversity, species will be more resilient to adapt to pressures such as climate change. Urban habitats such as gardens,

⁴¹ Habitat Connectivity and Habitat Opportunity Mapping Report (Thomson Ecology, 2015)

⁴² Access Network and Accessible Natural Greenspace Study (South Downs National Park Authority, 2014)

parks and buildings can act as ‘stepping stones’ and ‘wildlife corridors’ to enable wildlife to move from one place to another. If development is planned and delivered with these in mind, it can conserve and even enhance biodiversity and geodiversity.

- 5.68** International sites support populations of species that are particularly threatened and/or vulnerable to disturbance. Under the *Habitats Regulations*, the Authority is required to demonstrate that proposals for new development avoid or adequately mitigate against impacts on these sites. A *Habitats Regulations Assessment*⁴³ (HRA) of the *Preferred Options Local Plan* was prepared in 2015, and its recommendations have been taken into account in this version of the Local Plan. An HRA of the *Pre-Submission Local Plan* was published in 2017.
- 5.69** Trees, woodland and hedgerows are distinctive features of the National Park. Non-woodland trees, including those in hedgerows and street trees, make an important contribution to landscape character the historic environment and ecosystem services . Hedgerows, in particular, have an important role, by providing connections between habitats, and these need to be managed and maintained. Trees and woodland are important for adaption to the impacts of climate change. For example, trees in urban areas moderate summer temperatures and new tree planting in well-chosen locations can stabilise slopes and reduce the impacts of flooding.

⁴³ South Downs National Park Authority Local Plan Habitats Regulations Assessment (AECOM, 2015 and 2017)

★ Strategic Policy SD9: Biodiversity and Geodiversity

1. Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation, and should:
 - a) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features. Opportunities for net gains in biodiversity should be identified and incorporated;
 - b) Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks;
 - c) Seek to eradicate or control any invasive non-native species present on site; and
 - d) Be required to contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by enhancing Biodiversity Opportunity Areas, delivering Biodiversity Action Plan targets and delivering green infrastructure.
2. The following hierarchy of designation will apply in the consideration of development proposals:
 - a) **International Sites**, as shown on the Policies Map (Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites, or candidate and formally proposed versions of these designations):
 - i. Development proposals with the potential to impact on one or more international sites(s) will be subject to a Habitats Regulations Assessment to determine the potential for likely significant effects. Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment
 - ii. Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured
 - b) **National Sites** (Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Marine Conservation Zone (MCZ)) as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect on national sites will be required to assess the impact by means of an Environmental Impact Assessment
 - ii. Development proposals where any adverse effect on the site's notified special interest features is likely and which cannot be either avoided or adequately mitigated will be refused, unless the benefits of the development clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites

- c) **Local sites** (Sites of Nature Conservation Importance (SNCl)s / Local Wildlife Sites (LWS) / Sites of Importance for Nature Conservation (SINCl)s, Local Nature Reserves (LNR and Local Geodiversity Sites (LGS)) as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect local sites will be required to assess the impact by means of an Ecological Impact Assessment
 - ii. Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the adverse effects are clearly demonstrated
- d) **Irreplaceable Habitats** (including ancient woodland as shown on the Policies Map, and the loss of veteran trees): Development proposals which result in the loss or deterioration of irreplaceable habitats, including ancient woodland and veteran trees will be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss
- e) **Outside of designated sites** (including Biodiversity Opportunity Areas (BOA) and habitats listed in the *Biodiversity 2020*, protected species and priority species, and habitats list): Development proposals must have particular regard to their effects on species and habitats which have been designated in law as requiring protection or priority. Development proposals that affect those interests will be assessed strictly in accordance with legal requirements and will – as a minimum - be required to avoid adverse impacts or, if unavoidable, adequately mitigate those adverse impacts. Development proposals should not prejudice the aims of BOA and should take opportunities to deliver on the aims of the BOA where possible

Supporting Text

- 5.70** The purpose of Policy SD9 is to set out a positive strategy to ensure the conservation and enhancement of biodiversity and geodiversity across the National Park. It also sets out the hierarchy of designated sites.
- 5.71** The aim is to achieve a ‘net gain’ in biodiversity by encouraging all opportunities to enable conservation and enhancement as part of development proposals, planning at landscape-scale and taking opportunities to improve connections between habitats and designated sites.
- 5.72** All applications for development must ensure that sufficient and up to date information is provided regarding the wildlife sites or species or geodiversity sites that may be affected by a proposal prior to determination of the development proposals. A landscape and ecology management plan must be provided which includes mechanisms for management in the long term.

Designated sites

5.73 The National Park has a very high density of sites designated for their wildlife and geodiversity value. This includes the following types of designation:

International designations

5.74 Under the *Conservation of Habitats and Species Regulations 2010 (Habitats Regulations)* (as amended) the Authority has a duty to give these areas⁴⁴ the strongest protection against damaging development. If a development proposal is assessed to be likely to have a significant effect on one of these sites, either alone or in combination with other plans or projects, an Appropriate Assessment is required to establish the implications of the scheme for the identified nature conservation interests of the site.

5.75 Normally, the Authority cannot consent to plans or projects without first having ascertained that they will not have an ‘adverse effect on the integrity’ of the site. *Article 6(4) of the Habitats Directive* provides an exemption which would allow a plan or project to be approved in very limited circumstances even though it would or may have an ‘adverse effect on the integrity of a European site’. A plan or project can only proceed provided three sequential tests are met (see *Article 6(4)*⁴⁵). These tests must be interpreted strictly and can only be formally considered once an appropriate assessment has been undertaken.

5.76 Applicants should work with the Authority in the screening and assessment process and provide the necessary information for the Authority to make a determination. To avoid any damage to the integrity of these areas and the species they support, mitigation measures or contributions to such measures from new development may be required.

5.77 The HRA has assessed the impacts arising from traffic movements on air quality and nitrogen deposition at a number of international nature conservation designation sites and identifies a need for monitoring. The National Park Authority will work with partners to consider the best way to monitor changes in air quality and nitrogen deposition on all these European sites. This would include long term monitoring of the main roads that fall within 200 metres of these European sites. Further information is set out in the Implementation and Monitoring chapter of this plan.

5.78 Policy SD10: International Sites, sets out specific requirements for development in relation to the following international nature conservation designations: The Mens SAC and Ebernoe Common SAC, Singleton and Cocking SAC, Arun Valley SPA, Wealden Heaths Phase II SPA, and the Solent Coast SPA’s.

⁴⁴ International nature conservation designations covered by the Habitats Directive include: special areas of conservation (SACs), special protection areas (SPAs), sites of community importance (SCIs), and candidate SACs. As a matter of Government policy, possible SACs, potential SPAs and listed and proposed Ramsar sites and sites identified or required for compensatory measures for adverse effects on such sites are also treated as internationally designated sites.

⁴⁵ European Commission (1992) 92/43/EEC Habitats Directive

National designations

5.79 These sites are designated under UK legislation as being of national importance for biodiversity or geodiversity and are protected from any operations likely to cause damage to the designated features. For any development to be permitted that is likely to damage these sites, the developer must demonstrate to the satisfaction of the Authority and Natural England that:

- There are no alternative solutions; and
- The reasons for the development clearly outweigh the nature conservation value of the site and the national policy to safeguard the national network of such sites.

Irreplaceable habitats

5.80 Development proposals that could impact upon irreplaceable habitats (including ancient woodland and veteran trees), should note that the significance of irreplaceable habitats may be derived from habitat age, uniqueness, species diversity and / or the impossibilities of re-creation. The term ancient woodland also includes Ancient Semi-Natural Woodland and Plantations on Ancient Woodland Sites and these should be treated equally in terms of the level of protection afforded to ancient woodland and veteran trees.

Local designations

5.81 Locally designated geological and wildlife sites are valuable as a node or link in the local habitat network. These sites can provide valuable stepping stones as part of a wider green infrastructure network. On-going surveys can reveal new areas that warrant such protection. Policy SD9 will be applied to any new sites or extensions to existing site.

5.82 Ecological Impact Assessment (EclA) is the ecological component of Environment Impact Assessment (EIA) and is also applied outside the EIA process to identify, quantify and evaluate the potential impacts of a project on any ecosystem.

Geological conservation interests

5.83 The geological conservation interests of the National Park form an important part of the landscape identity and underpins the biodiversity of the National Park, for example, the river corridors and chalk which underpins the species rich chalk grassland. It is therefore important that the integrity of the natural function of these features is conserved and enhanced. Designated geological sites must be conserved and enhanced in accordance with this policy. Wider landscape geological features and their associated habitats must be conserved and enhanced in accordance with this policy and with SD4: Landscape Character.

Outside of designated sites and ecological networks

5.84 There are other biodiversity assets in the National Park which are not designated or legally protected, but which form an important element of the collective nature conservation resource. For example, the *Habitats Directive* highlights the need for effective management of linear or continuous features essential for species migration, dispersal and genetic exchange. Such features, like rivers, mature trees and hedgerows, extend across designated and non-designated areas. These features, in particular, will provide the building blocks for achieving the Government's objective to restore and connect wildlife habitats and contribute towards a net gain for biodiversity. They are also important in providing corridors or stepping stones for species and to allow species to adapt to climate change. The maintenance and enhancement of

these networks will be encouraged. These undesignated biodiversity assets are important components of green infrastructure.

- 5.85** The National Park Authority has worked closely with partners to map and identify priority habitats, habitat connectivity, and local ecological networks in and beyond its boundaries. Areas with high connectivity and / or high potential for priority habitat restoration or creation will be given due weight in the planning process. These areas are outlined in the *Habitat Connectivity Study*. The Biodiversity Opportunity Area maps for Hampshire and Sussex will also be considered by the National Park Authority.

Protected and Priority Species

- 5.86** Some species have special protection under national legislation. This is usually because of their vulnerable conservation status. All wild birds are protected along with a wide range of other plants and animals, and there is specific legislation for the protection of badgers. Legally protected species which are prominent in the National Park and which could be affected by new developments include but are not restricted to all wild birds, all native species of bat, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel.
- 5.87** Protected species are a material consideration when considering planning applications. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made.

★ Strategic Policy SD I0: International Sites

The Mens SAC and Ebernoe Common SAC

1. Development proposals on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat (including mature vegetative linear features such as woodlands, hedgerows riverine and wetland habitats) within 9km of the Mens SAC or 7km of the Ebernoe Common SAC, as shown on the Policies Map, should have due regard to the possibility that barbastelle and Bechstein Bats will be utilising the site. Such proposals will be required to incorporate necessary surveys and ensure that key features (foraging habitat and commuting routes) are retained, in addition to a suitable buffer to safeguard against disturbance⁴⁶.

Singleton and Cocking SAC

2. Proposed use or development of the tunnels comprising the Singleton and Cocking Tunnels SAC will be required to demonstrate that there is no adverse effect on the conservation features, including hibernation habitat for Barbastelle and Bechsteins Bats, or on the integrity of the site. Suitable commuting and foraging habitat for the site that lies within or in close proximity to any proposed development needs to be retained, in addition to a suitable buffer

⁴⁶ The scale of the buffer will need to be determined on a case-by-case basis, informed by bat activity survey work and would take account of the species involved and their sensitivity to disturbance / artificial lighting and the natural screening provided by existing surrounding vegetation. It would need to be devised in consultation with the SDNPA (in addition to Natural England, as required).

to safeguard against disturbance. This will ensure no loss or severance of existing commuting and foraging routes occurs either from direct land take or disturbances from lighting, noise and vibrations both during construction and operational phase of any development.

Arun Valley SPA

3. Development proposals on greenfield sites within 5km of the Arun Valley SPA, as shown on the Policies Map, will undertake an appraisal as to whether the land is suitable for wintering Bewick Swan. If it is suitable then surveys will be undertaken to determine whether the fields are of importance to the swan population. If so, appropriate alternative habitat would be required before development could proceed.

Wealden Heaths Phase II SPA

4. Development proposals resulting in a net increase in residential units within 400m of the boundary of the Wealden Heaths Phase II SPA, as shown on the Policies Map, will be required to undertake a project-specific Habitats Regulations Assessment (HRA). Development proposals resulting in a net increase in residential units within 5km of the boundary of the Wealden Heaths Phase II SPA will be required to submit a screening opinion to the Authority for a project-specific Habitat Regulations Assessment (HRA) which, in consultation with Natural England, will determine whether a likely significant effect on the integrity of the site will result. Likely significant effects will be assessed through the HRA and any requirement for mitigation identified.

Solent Coast SPAs

5. Development proposals resulting in a net increase in residential units, within the Solent Coast Special Protection Area's (SPA) (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA) zone of influence shown on the Policies Map, defined as 5.6km from the boundary of these sites, may be permitted where 'in combination' effects of recreation on the Solent Coastal Special Protection Areas are satisfactorily mitigated through the provision of an appropriate financial contribution to the delivery of strategic mitigation. In the absence of a financial contribution toward mitigation, an appropriate assessment may be required to demonstrate that any 'in combination' negative effects can be avoided or can be satisfactorily mitigated through a developer-provided package of measures.

- 5.88** The purpose of Policy SD10 is to set specific requirements relating to the Mens, Ebernoe Common, and Singleton and Cocking Special Areas of Conservation (SAC), and the Arun Valley, Wealden Heaths Phase II, and Solent Coast Special Protection Areas (SPA), as recommended by the Habitat Regulations Assessment (HRA). There are many other international nature conservation designation sites in and near the National Park, and requirements for these are set out in Policy SD19: Biodiversity and Geodiversity.

Habitats Regulations Assessment (HRA)

- 5.89** Policy SD9: Biodiversity and Geodiversity, sets out the general requirements with regard to International Nature Conservation Designations and their protection under the Habitats Directive (2010). Development proposals which are likely to have significant effects on international sites are required to undergo an appropriate assessment in order to ascertain that there will not be adverse impacts on the integrity of the site.
- 5.90** The requirements set out in criteria 1-5 of this policy seek to ensure that development will not have an adverse impact on the integrity of the relevant sites, in line with the requirements of the Habitats Directive (2010).
- 5.91** As identified in Policy SD9 and its supporting text, the Habitats Directive contains an exemption to this, under very limited circumstances. The following sequential test applies:
- There must be no feasible alternative solutions to the plan or project which are less damaging to the affected European site(s)
 - There must be “imperative reasons of overriding public interest” (IROPI) for the plan or project to proceed
 - All necessary compensatory measures must be secured to ensure that the overall coherence of the network of European sites is protected
- 5.92** In practice it is likely that only a small minority of plans and projects will of a nature to reach this stage of consideration.

Special Areas of Conservation (SAC's)

- 5.93** Policy SD10 protects bat populations for which the Mens, Ebernoe Common and Singleton and Cocking Tunnels SACs are designated. In the absence of research detailing both flight lines and distances travelled by bats commuting to and from the hibernation sites at Singleton and Cocking Tunnels SAC, and buffer distances in relation to disturbance of bat for the three SACs, these parameters will need to be determined on a case-by-case basis, informed by bat activity survey work and would need to take account of the species involved and their sensitivity to disturbance / artificial lighting and the natural screening provided by existing surrounding vegetation. Surveys would need to be devised in consultation with the National Park Authority and Natural England, as required.

Special Protection Areas (SPA's)

- 5.94** A very small area of the National Park is located within the zone of influence of the Solent Special Protection Areas (SPAs) as identified in the Solent Recreation Mitigation Partnership (SRMP). Through work on the SRMP, it has been concluded that any net increase in residential development will give rise to likely significant effects on the Solent SPAs, either ‘alone’ or ‘in combination’ with other development proposals. All new residential development within this zone of influence will be required to mitigate the negative impact. This mitigation can be provided through financial contribution to the strategic measures set out in the emerging SRMP (or as subsequently adopted).

5.95 Consistent with the Habitat Regulations Assessment undertaken for the East Hampshire Joint Core Strategy, the potential cumulative impact of development within 400m of the Wealden Heaths Phase II SPA is recognised. To avoid likely significant effect upon the SPA, the National Park Authority will monitor all development within the 400m zone in liaison with East Hampshire District Council, Waverley District Council and Natural England. The National Park Authority has worked with East Hampshire District Council on the preparation of a Supplementary Planning Document (SPD) that provides guidance to applicants where development proposals in East Hampshire District, including the area that falls within the South Downs National Park, will result in a net increase in residential development within 400m of the Wealden Heaths Phase II SPA. Any development proposed within the 400 metre buffer zone will need to be tested through a Habitats Regulations Assessment (HRA).

★ **Development Management Policy SD I I: Trees, Woodland and Hedgerows**

1. Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.
2. Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan, and include a management plan.
3. The felling of protected trees, groups of trees or woodland will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.
4. A minimum buffer of 15 metres will be required between the development and ancient woodland or veteran trees. Development proposals should also provide adequate protection zones and buffers around hedgerows and other woodland and trees to prevent damage to root systems and taking account of future growth.
5. A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required.
6. Development proposals must demonstrate that appropriate protection measures are in place prior to any work on site throughout the development process as part of a comprehensive landscaping plan, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated.

5.96 The purpose of Policy SD I I is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting is realised. This policy should also be considered alongside Policies SD4: Landscape Character and SD9: Biodiversity and Geodiversity.

- 5.97** The South Downs is the most wooded national park in England and Wales. The trees and woodland are significant features of the landscape, with a high proportion of ancient and veteran trees. Trees and woodland are a significant asset with regard to ecosystem services, contributing to many supporting, provisioning, regulating, and cultural ecosystem services, including for example carbon storage, biodiversity, air quality, and tranquillity. Hedgerows are a priority habitat and provide an important function as wildlife corridors. They have an important role for ecosystem services such as genetic dispersal and should be protected from severance.
- 5.98** All development must be undertaken in line with the *British Standard 5837* and all tree works must be carried out in accordance with *British Standard 3998*.⁴⁷ Ancient woodland is recognised as an irreplaceable habitat – please see policy SD9.
- 5.99** Forestry is one of the key sectors of the National Park’s economy, supplying the provisioning ecosystem services of sustainable timber and wood fuel. *The South Downs National Park Renewable and Low Carbon Energy Study* highlights the potential and importance of supporting the biomass / woodfuel market, and recommends that development of this market should be supported in principle. Policy requirements and guidance on these matters are primarily addressed through policies SD4 (Landscape Character), SD5 (Design), SD39 (Agriculture and Forestry), and SD51 (Renewable Energy).

Planting new trees

- 5.100** The Authority will support all suitable opportunities for new planting as part of development schemes, and their protection via Tree Preservation Orders, where appropriate⁴⁸. Policies SD4: Landscape Character, SD5: Design, SD9: Biodiversity and Geodiversity, SD45: Green Infrastructure should also be considered with regard to new planting as part of development schemes.

Buffer zones

- 5.101** It should be clearly demonstrated how development proposals will avoid any potential adverse impact on trees, woodland and hedgerows. Where development is permitted, mitigation measures may be sought and secured through condition and / or planning obligation. Mitigation of impacts may include the use of a buffer zone of semi-natural habitat between any significant development and an area of woodland with amenity or biodiversity value.
- 5.102** A minimum buffer of 15 metres will be required between the development and ancient woodland or veteran trees. What is an appropriate buffer will depend on the local circumstances, the species and size of trees, the form and nature of the trees or woodland and type of development. This buffer zone should not normally include residential gardens and will require appropriate management after the completion of the development. The height of development should allow adequate sunlight to reach the buffer zone.

⁴⁷ British Standards Institute (2010 and 2012) BS5837:2012 Trees in relation to design, demolition and construction—recommendations; and BS3998:2010 Tree Work Recommendations.

⁴⁸ Sections 197 and 198 of the 1990 Planning Act

5c. HISTORIC ENVIRONMENT

Introduction

5.103 This section of the Local Plan includes five policies relating to the historic environment of the National Park. Strategic Policy SD12 sets out a positive strategy for conservation and enhancement of the historic environment. This is followed by four development management policies. The first two relate to specific designated heritage assets namely listed buildings (Policy SD13) and conservation areas (Policy SD15). There are two further development management policies relating to climate change mitigation and adaptation of historic buildings (Policy SD14) and archaeology (Policy SD16).

5.104 The National Park has a rich and varied cultural heritage ranging from historic settlements and buildings to archaeological sites of all periods. It is critical that the historic environment is regarded as a positive and irreplaceable asset, valuable not only in cultural and economic terms, but as a frame and reference point for the creation of attractive places for current and future generations to enjoy.

5.105 The term cultural heritage, which is part of Purpose 1 of the National Park, includes physical features such as archaeological sites and finds, historic buildings, fields and settlements, and more hidden evidence of how people used to live such as folk traditions, customs and work by creative people. The term 'historic environment' is used in the NPPF and is a more specific and relevant term when setting policies relating to heritage-related planning consents. The term 'heritage assets' refers to any buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include listed buildings, scheduled monuments, archaeological remains, conservation areas, historic parks and gardens and battlefields. A distinction is made between 'designated' and 'undesignated' heritage assets.

5.106 The Authority will proactively seek to conserve and enhance heritage assets by:

- Identifying heritage assets which are considered to be at risk of irreversible harm or loss;
- Encouraging owners to maintain their heritage assets; and
- The use of Article 4 directions where the exercise of permitted development rights would undermine the aim to conserve and enhance the historic environment.

Strategic Policy SD12: Historic Environment

1. Development proposals will only be permitted where they conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.
2. Applicants will be required to provide a Heritage Statement sufficient to allow an informed assessment of the impact of the proposed development on the significance of the heritage asset(s).
3. Development proposals which affect heritage assets (whether designated or non-designated) or their setting will be determined with regard to the significance of the asset, including the long-term conservation and enhancement of that asset.
4. Development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss.
5. Development proposals which appropriately re-use redundant or under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting, will be supported.
6. Development proposals for enabling development that would otherwise conflict with other planning policies but which would secure the future conservation of a heritage asset will be permitted provided:
 - a) The proposals will not materially harm the heritage values of the asset or its setting;
 - b) It can be demonstrated that alternative solutions have failed;
 - c) The proposed development is the minimum necessary to protect the significance of the heritage asset;
 - d) It meets the tests and criteria set out in Historic England guidance *Enabling Development and the Conservation of Significant Places*⁴⁹ (or guidance superseding it);
 - e) It is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and
 - f) It enables public appreciation of the saved heritage asset.

5.107 The purpose of Policy SD12 is to set out a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets.

5.108 It is important that proposals are based on a meaningful understanding of the historic context and character of an area. Proposals should be informed by Historic Landscape Character Assessments (HLCA), SDILCA, Historic Environment Records, conservation area character appraisals and the Extensive Urban Survey.

Optimum viable use

5.109 Sustaining heritage assets in the long term often requires investment and putting heritage assets to a viable use is likely to enable the maintenance necessary for their long-term conservation. Certain heritage assets may have limited or no scope for new uses and indeed may be so

⁴⁹ Enabling Development and the Conservation of Significant Places (English Heritage / Historic England, 2008)

sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

5.110 It is important that any use is viable, not just for the owner, but also the future conservation of the asset. The optimum viable use may not necessarily be the most profitable one. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. Where relevant, reference should also be made to policy SD41: Conversion of Redundant Agricultural or Forestry Buildings. The National Park Authority will publish guidance on viability matters in due course.

Significance of heritage assets

5.111 Development proposals can affect the significance of heritage assets in a range of different ways. Physical impacts can range from minor alterations to the complete loss of the asset. Other impacts may not physically alter the asset but may affect its setting, which in turn may impact the significance of the heritage asset. Carefully considered changes to setting may well prove to be sympathetic and positive, but adverse impacts can create negative perceptions, a long-term decline or loss of significance, or of understanding and appreciation of that significance. In determining applications likely to have a bearing on the setting of heritage assets, guidance published by Historic England will be used to assess impact.

5.112 In order to assess significance it is essential to have a sound understanding of the original purpose, development, use and history of the historic asset. All planning applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential, must be supported by a Heritage Statement. The Heritage Statement should identify the significance of the asset and set out the impact of the development. The applicant should consult the relevant Historic Environment Record (HER). The level of detail required to support the application should be proportionate to the significance of the heritage asset and the impact of the development. In all but the most trivial cases, assessment of potential impact on the significance of the asset will require input from conservation professionals with appropriate qualifications and experience.

5.113 It is important to distinguish between potential harm that is 'substantial' and that which is 'less than substantial.' Substantial harm will relate to those impacts which wholly or partially destroy the significance of the heritage asset, or impinge upon the role of its setting to an extent which undermines its essential appreciation. However, it should be noted that less than substantial impacts may still prove significant, with some heritage assets being highly sensitive to change

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

5.115 On occasion, the significance of a site or building may only become apparent when a development proposal is conceived. These discoveries at a pre-application or application stage of the development process will constitute ‘non-designated heritage assets’. The lack of a previous designation will not necessarily imply lesser importance and the asset may sometimes possess great or even national historical significance. The significance of non-designated heritage assets must be carefully assessed and the desirability of their conservation will be weighed against wider public benefits as planning applications are considered and determined.

Enabling development

5.116 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. This is a result of the disparity between the costs of renovating the asset in a suitable manner and the final end value. This disparity is known as the ‘conservation deficit’. In extreme cases, a recognised way of addressing this is to allow development in a location, or of a nature or form, that would normally be considered unacceptable in planning policy terms, which would generate sufficient funds to cover the shortfall in the renovation costs, and where it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. This approach is known as ‘enabling development.’

5.117 Enabling development should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted. Development should constitute the minimum required to cover the conservation deficit. It should also not materially harm the heritage significance of the place (including its setting where relevant), and should produce public benefits which outweigh the dis-benefits of conflicting with other policies. Enabling development should contribute to the special qualities of the National Park and allow public appreciation of the saved heritage asset.

5.118 The Authority will use the detailed and rigorous tests set out by Historic England in order to determine planning applications that propose enabling development.

Development Management Policy SD13: Listed Buildings

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

5.119 The purpose of Policy SD13 is to set out more detailed criteria for to development proposals affecting listed buildings. This policy should also be read alongside Policy SD5: Design.

5.120 There are more than 5,000 listed buildings and structures within the National Park and these form an important part of the historic character, sense of place, and wider cultural heritage of the National Park. It is necessary to consider the character and significance of listed structures in a holistic manner; the character of their interiors can be as important as their external appearance. The protection and enhancement of all aspects of significance should be considered and great weight will be given to their preservation and, where appropriate, their restoration to optimal condition.

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

5.122 Where listed structures are at risk of loss through decay or neglect, the Authority will use its statutory powers to serve Urgent Works or Repair Notices, where appropriate, to arrest decay of the asset.

Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings

- I. Development proposals will be permitted, and where relevant listed building consent granted, for works to heritage assets to adapt to, or mitigate the effects of, climate change where it can be clearly demonstrated that this is consistent with all of the following:
 - a) The preservation and enhancement of the heritage asset's significance, character and appearance;
 - b) The preservation and enhancement of the heritage asset's special architectural or historic interest;
 - c) The long-term preservation of the historic built fabric; and
 - d) The setting of the heritage asset.

5.123 The purpose of Policy SD14 is to set out more detailed criteria for development proposals that seek to improve the energy efficiency or adaptation of heritage assets to adapt to or mitigate the effects of climate change. It should be read alongside Policy SD12: Historic Environment, Policy SD5: Design and SD48: Climate Change and Sustainable Use of Resources.

Assessment of energy efficiency of historic buildings

5.124 Opportunities to reduce carbon dioxide emissions through improvements to energy efficiency of existing buildings are in principal to be welcomed. However, it is incorrect to assume that the older a building is, the less energy efficient it is. Many historic buildings perform well in terms of energy efficiency. Interventions to improve energy efficiency can have potential to adversely impact the breathability of built fabric or harm features of interest. It should also be recognised that historic building materials are often more durable than modern replacements and more cost-effective in energy terms.

Alterations and adaptations of historic buildings

5.125 Alterations to historic buildings should always be considered carefully to ensure that they do not cause buildings that were previously functioning well to fail. There are various adaptations which can improve energy efficiency of buildings or improve low carbon performance, such as insulation to walls and roofs, solar panels and alterations to windows.

5.126 These alterations and adaptations can significantly impact the features and subsequently the overall character, historic interest and integrity of built fabric historic building. Changes to specific features must be considered in assessing the significance of the historic asset. For example, traditional windows and their glazing make a hugely important contribution to the value and significance of historic areas. They are an integral part of the design of older buildings and can be important artefacts in their own right. Minor changes to windows can have a dramatic impact.

Development Management Policy SD15: Conservation Areas

1. Development proposals within a conservation area, or within its setting, will only be permitted where they preserve or enhance the special architectural or historic interest, character or appearance of the conservation area. Sufficient information to support an informed assessment should be provided on the following matters:
 - a) The relevant conservation area appraisal and management plan;
 - b) Overall settlement layout and relationship to established landscape setting;
 - c) Historic pattern of thoroughfares, roads, paths and open spaces, where these provide evidence of the historic evolution of the settlement, and the historic street scene;
 - d) Distinctive character zones within the settlement;
 - e) Mix of building types and uses, if significant to the historic evolution of the settlement;
 - f) Use of locally distinctive building materials, styles or techniques;
 - g) Historic elevation features including fenestration, or shop fronts, where applicable;
 - h) Significant trees, landscape features, boundary treatments, open space, and focal points; and
 - i) Existing views and vistas through the settlement, views of the skyline and views into and out of the conservation area.
2. Within a conservation area, development proposals which involve the total or substantial demolition of buildings or structures will only be permitted where it is sufficiently demonstrated that:
 - a) The current buildings or structures make no positive contribution to the special architectural or historic interest, character or appearance of the conservation area; and
 - b) The replacement would make an equal or greater contribution to the character and appearance of the conservation area.

5.127 The purpose of Policy SD15 is to set out more detailed criteria for development proposals within or affecting conservation areas. Reference to character zones relates to the discrete character areas described within some individual conservation area appraisals.

5.128 Some historic settlements within the National Park are small or diffuse in nature. The conservation area boundaries of these diffuse settlements may not reflect the broader heritage interest of their surrounds. Policy SD15 reflects the importance of setting and extends consideration to such locations.

5.129 More information on trees within conservation areas is provided in the introductory text for Policy SD11: Trees, Woodland and Hedgerows. Appendix 5 provides a list of conservation areas within the National Park.

Development Management Policy SD16: Archaeology

1. Development proposals will be permitted where they do not cause harm to archaeological heritage assets and / or their setting. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance.
2. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance.
3. Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm / loss, also meet the following requirements:
 - a) There is no less harmful viable option; and
 - b) The amount of harm has been reduced to the minimum possible.

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required.

5.130 The purpose of Policy SD16 is to set out more detailed criteria for development proposals affecting heritage assets with archaeological interest. Archaeological sites are finite, irreplaceable and fragile resources which are vulnerable to damage, either from specific works or from gradual degradation over time. Archaeology is not just the ancient remains of early people but also includes the recent evidence of industry and housing.

5.131 When considering archaeological resources, the Authority will consider advice from the relevant curatorial / development management archaeologist for that purpose.

Significance of archaeological heritage assets

5.132 The most significant known archaeological heritage assets are usually designated as scheduled monuments, and are of national or international importance. It is widely recognised that there are sites which have an equal significance, but which are non-designated heritage assets. If the significance of such sites have been demonstrated, they will be treated in the same way as scheduled monuments. In addition, there are many other archaeological sites which do not have such a great significance but which form a valuable part of the National Park's historic environment. These may also be referred to as non-designated heritage assets. The relevant historic environment record (HER) is the definitive record of all known archaeology, including such sites. The nature of the archaeological record also means that there are many sites of which nothing is presently known, which may be revealed during development works.

- 5.133** Planning decisions will take account of the significance of remains, including the wider benefits that conservation of the historic environment can bring. Development proposals potentially affecting known or suspected archaeological resources will be required to include a Heritage Statement.
- 5.134** The level of detail required in a Heritage Statement should be proportionate to the heritage asset's importance. It may comprise a desk-based assessment, using the known archaeology recorded in the HER, but it can also extend to various forms of field evaluation.

In-situ archaeological heritage assets

- 5.135** Preservation of archaeological assets in situ is the preferred position. In respect of scheduled monuments or non-designated heritage assets of equivalent significance, the preservation of the archaeological remains in situ and undisturbed will usually be required. In some cases this can be achieved by avoiding sensitive areas. It should be noted that development which affects a scheduled monument and its setting will require permission from the Secretary of State.
- 5.136** If a development cannot preserve archaeological assets in situ, the significance of those assets should be established through a desk-based assessment, and where necessary field evaluation including geophysical survey and / or trial trenching. From this a series of mitigating measures can be identified. The scope of these mitigation works will be set out in a Written Scheme of Investigation in accordance with the professional standards of the Chartered Institute for Archaeology. Information from this investigation and recovered archaeological assets should be made available as appropriate, for public understanding and appreciation.

Written Scheme of Archaeological Investigation

- 5.137** Any projects where significant archaeological interest has been established, such as projects involving major infrastructure, and/or within historic urban centres (particularly those which are the subject of an extensive urban survey), may require a programme of archaeological work. The details must be set out in the Written Scheme of Investigation. This will include a programme which promotes a wider understanding and appreciation of the site's archaeological heritage in a local and regional context.
- 5.138** The Written Scheme of Investigation must provide for the deposition of the record created by any investigation or recording in a publicly accessible institution such as a Record Office or accredited museum. It must also provide for the publication and dissemination of the information gathered through the Written Scheme of Investigation.
- 5.139** In addition to direct physical impacts on archaeology, development can potentially impact on the setting of archaeological sites and this will be assessed. Where there is evidence of deliberate neglect or damage to archaeology, its deteriorated state will not be taken into account in any decision.
- 5.140** The Authority will require all archaeological works to be undertaken to proper professional standards, as defined by the Chartered Institute for Archaeologists (CIfA).

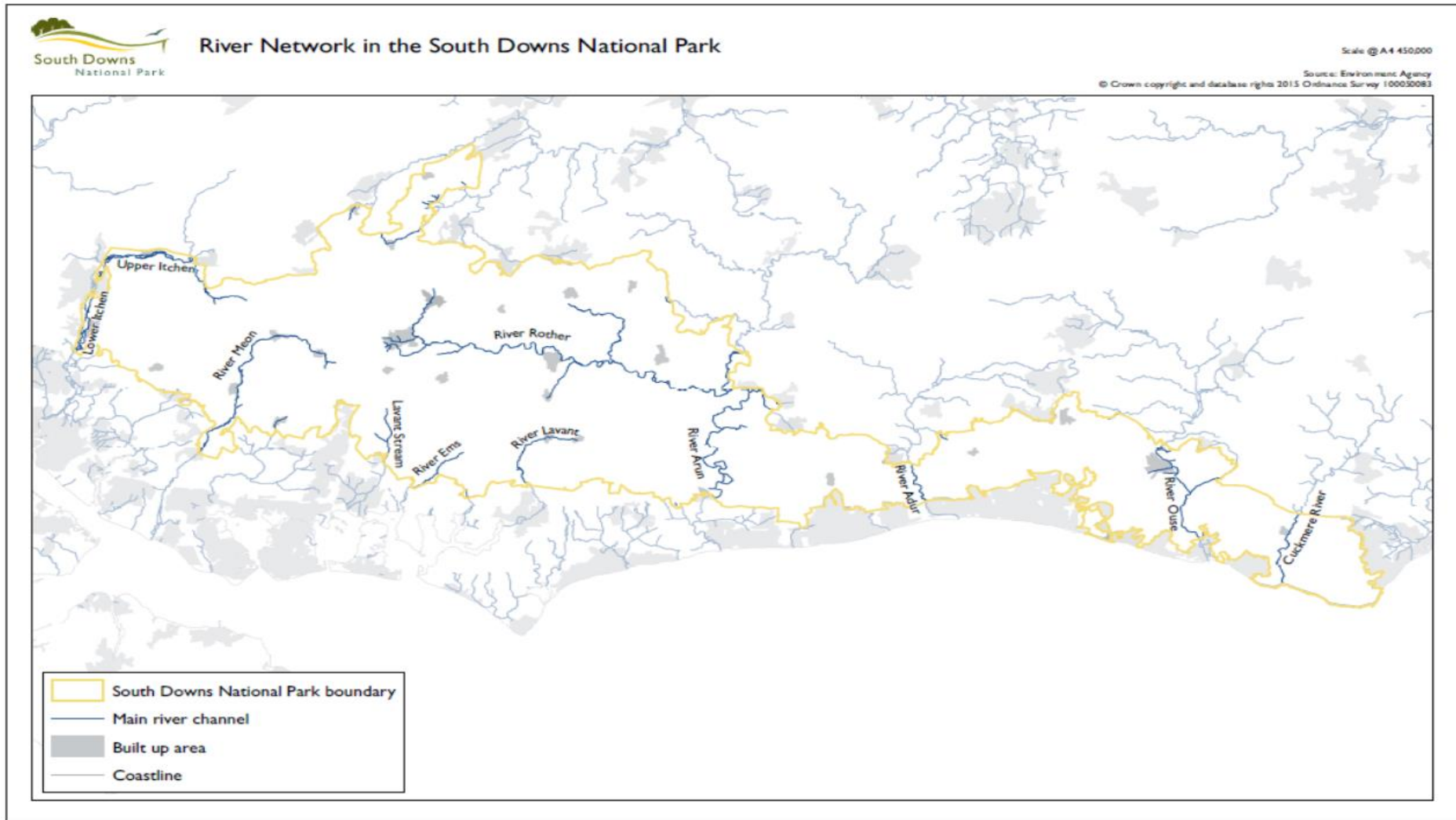
5d. WATER

Introduction

- 5.141** This section of the Local Plan includes two strategic policies relating to the protection of water assets. Policy SD17 seeks to protect the quality of groundwater and surface water features. Policy SD18 seeks to protect the open and undeveloped nature of the National Park coastline. These policies are interrelated through the water cycle, ecosystem services and marine planning, which applies up to the tidal extent of seawater in the estuaries of the rivers within the National Park.
- 5.142** The National Park contains a diverse range of groundwater and surface water features. Groundwater is the water which is held underground in the soil or in pores and crevices in rock. Groundwater features include aquifers and sources such as headwaters and springs. Surface water features include rivers, lakes, winterbournes, estuaries and open coastline. Water plays an important role in the special qualities of the National Park and also offers essential supporting, provisioning and cultural ecosystem services.
- 5.143** Groundwater is a key part of the water cycle: it provides an important source for rivers, sustaining flows in dry periods, and thus supporting wildlife habitats. Two aquifers, one chalk and one greensand, supply people inside and outside of the National Park with high-quality drinking water. Both aquifers are under stress. Ground water is a key part of the water cycle: it provides an important source for rivers, such as sustaining flows in dry periods, and for wildlife habitats. The future demands of development from inside and outside of the National Park from water abstraction poses risk. The quality of ground water is easily polluted directly and indirectly. It is therefore better to prevent or reduce the amount of contamination at source rather than treat it afterwards.
- 5.144** There are eleven main rivers⁵⁰ flowing through the National Park shown in Figure 5.4 and numerous other important watercourses and other surface water features. These do not function in isolation and have complex and dynamic interactions with the landscape.
- 5.145** The National Park has 17.5km of largely undeveloped open coastline incorporating the whole of the Sussex Heritage Coast, the iconic coastline between Eastbourne and Seaford where the South Downs meets the sea. Heritage coasts have four purposes, three of which align with NP purposes and duty. The additional purpose is to maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures. Figure 5.5 is a map of the National Park's coastline showing its designations and attractions.

⁵⁰ Main rivers are usually larger streams and rivers but also include smaller watercourses of strategic drainage importance. It is defined as a watercourse as shown on a main river map and whereby the Environment Agency has powers to carry out flood defence works.

FIGURE 5.5: MAP OF THE MAIN RIVERS ACROSS THE NATIONAL PARK



★ Strategic Policy SD17: Protection of the Water Environment

1. Development proposals that affect groundwater, surface water features, and watercourse corridors will not be permitted unless they conserve and enhance the following:
 - a) Water quality and quantity, and help achieve requirements of the *European Water Framework Directive*, or its replacement;
 - b) Ability of groundwater, surface water features and watercourse corridors to function by natural processes throughout seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal; and
 - c) Specifically for surface water features and watercourse corridors:
 - i. Biodiversity;
 - ii. Historic significance;
 - iii. Character, appearance, and setting;
 - iv. Public access to and along the waterway for recreational opportunities; and
 - v. Ability for maintenance of the watercourse, including for flood risk management purposes.
2. Development within Groundwater Source Protection Zones will only be permitted provided that there is no adverse impact on the quality of the groundwater source, and provided there is no risk to its ability to maintain a public water supply.
3. Development proposals must incorporate measures to eliminate risk of pollution to groundwater and surface water features which would harm their ecological and / or chemical status.
4. Development proposals for the provision of agricultural reservoirs that aid demand management, water efficiency and water storage will be permitted where they are compatible with the National Park purposes.

5.146 The purpose of Policy SD17 is to protect groundwater and surface water assets; ensuring that proposed development, either individually or cumulatively, does not cause the quality of groundwater and surface water assets to deteriorate. Development should also seek to deliver enhancements to groundwater and surface water features and should incorporate an ecosystems services approach as set out in policy SD2: Ecosystem Services. This policy therefore applies to any development proposals which may impact on groundwater or surface water features.

5.147 Coastal waters are included in this policy because the *Water Framework Directive* (WFD) extends to cover coastal waters.

Watersources and watercourse corridors

- 5.148** The corridor of a watercourse can be defined as the width of the channel in which water flows, plus its extensive influence on its surrounding landscape that is necessary for its natural functioning. This is characterised by many natural interactions between topography, hydrology, flooding hazards, geology, soils, climate, flora and fauna.
- 5.149** The location and design of development alongside watercourses must ensure that the watercourse corridor is protected and must positively respond to their character and appearance, setting and functions, making the most of opportunities to enhance the watercourse environment, including public access.
- 5.150** The character, appearance and setting of watercourses reflect both natural and human influence over time. Requirements regarding landscape character and appearance and setting are found in policies SD4: Landscape Character and SD5: Design. Reference should be made to the SDILCA and South Coast Seascape Character Analysis when assessing the impact of potential development on landscape character.
- 5.151** Opportunities to access and enjoy rivers relate to the second purpose of National Parks with many recreational opportunities such as canoeing, fishing, walking or observing their wildlife. All development proposals alongside watercourses should maximise opportunities to enhance recreational public access, whilst ensuring biodiversity is conserved.
- 5.152** Where a watercourse is present on a development site, it should be retained or restored into a natural state and enhanced where possible. Any enhancements and mitigation should inform the earliest stages of the design process. The culverting of watercourses will not be permitted, and development should wherever possible remove existing culverts.
- 5.153** Development should be laid out to enable maintenance of the watercourse, including for flood risk management purposes where appropriate. In order to protect the watercourse and its corridor from pollution, to allow for the natural function, to protect biodiversity and to support long term management, development should not be located within a distance of 8 metres of the watercourse. Wider buffer strips may be appropriate, depending on the nature of the topography or sensitivity of habitat. These buffer strips should form part of the overarching landscape design of the site and arrangements should be made for long-term management.

Groundwater / aquifers

- 5.154** The quality of groundwater is easily polluted directly and indirectly from many types of development, and is difficult to remediate. It is therefore better to prevent or reduce the amount of contamination at source. Consideration should be given to the requirements in Policies SD9: Biodiversity and Geodiversity and SD48: Change and Sustainable Use of Resources.
- 5.155** The Environment Agency provides information on areas which are sensitive to groundwater pollution. It defines Source Protection Zones (SPZ's) for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. Maps of SPZ's are available on the Environment Agency's website. These show three main zones (inner, outer, and total catchment) and a fourth zone of special interest to a groundwater source, which usually represents a surface water catchment that drains into the aquifer feeding the groundwater supply.

5.156 The Environment Agency may be consulted during the determination of planning applications, and conditions directed at preventing deterioration of water quality and quantity may be imposed on any approved development. This may also be achieved through the requirements of Policy SD50: Sustainable Drainage. Particular attention will be paid to proposals for waste disposal, on-site sewage disposal, agriculture, and industrial and chemical processes. Advice should be sought at the earliest opportunity from the Authority on the sensitivity of a location in regard to aquifers.

Water quality and pollution

5.157 Pollution pressures arise in part from urban and rural surface water run-off that represent key challenges in meeting the WFD. Therefore, the Authority expects that pollution prevention measures, water efficiency measures to reduce surface water run-off, and sustainable drainage measures are incorporated into new development, in accordance with Policies SD48: Climate Change and the Sustainable Use of Resources and SD50: Sustainable Drainage. Site investigation and remediation of contaminated land is required in accordance with Policy SD55: Contaminated Land. An adequate buffer zone should be provided between the development and surface water features.

5.158 The preferred method of foul drainage is to connect to the mains system at the nearest point of adequate capacity.

Agricultural reservoirs

5.159 In general, reservoirs are not supported within the National Park due to their impact on the landscape. The role of small scale, agricultural reservoirs in certain circumstances is understood for sustainable water management. The design of any agricultural reservoirs will be carefully considered in relation to a range of considerations including reservoir safety, flood attenuation and risk landscape character and biodiversity. Reference should also be made to Policy SD4: Landscape, and Policy SD39: Agriculture and Forestry.

★ Strategic Policy SD18: The Open Coast

- I. Development proposals within the Sussex Heritage Coast area and the undeveloped coastal zone of the National Park, as defined on the Policies Map, will not be permitted unless they:
 - a) Meet one of the following two criteria:
 - i. Are appropriate to the coastal location and conserve and enhance the character of the Heritage Coast / undeveloped National Park coastline; or
 - ii. Are necessary for the operational needs of activities in support of the Heritage Coast.
 - and
 - b) Are consistent with the Beachy Head to Selsey Bill Shoreline Management Plan, or its replacement;
 - c) Conserve and enhance coastal access to / from the coast and along the coastline; and

d) Cause no adverse impact on any designated Marine Conservation Zone and should ensure their conservation and, where possible, enhancement.

5.160 Policy SD18 seeks to protect the undeveloped nature of the National Park coastline both within and outside the Sussex Heritage Coast, and ensure that vulnerability to any new development is minimised. It ensures a level of protection consistent with the *Marine Policy Statement*, emerging *South Marine Plan*, the *Heritage Coast Definition* applying to the Sussex Heritage Coast, and the *Beachy Head to Selsey Bill Shoreline Management Plan*.

5.161 The policy applies to both the undeveloped coastal zone and the Sussex Heritage Coast shown in Figure 5.6 and the Policies Map. The undeveloped coastal zone outside the Heritage Coast, is a zone defined as 1km inland from the National Park coastal boundary extending east and west as far as the National Park's boundary for each section of coastline.

Character of the undeveloped coast

5.162 The character of the undeveloped coast has been, and continues to be, heavily influenced by natural and human pressures. Sensitive design that relates to the relevant seascape and landscape character analysis is required for this iconic location. In particular, reference should be made to both the SDILCA and *South Coast Seascape Character Analysis*⁵¹ when assessing the impact of potential development on landscape character. A coordinated approach to development is required which takes into account the various pressures outside / adjacent to this vulnerable area including coastal port infrastructure, offshore development and recreational pressures, which have the potential to impact on the coastal area and the seascape. In this respect their landscape sensitivity demands equal protection to the Heritage Coast area.

Operational needs of certain activities

5.163 Purpose 4 of Heritage Coasts provides the basis for criteria (b) of policy SD18. Improvements to existing sea defence works are not usually subject to planning control although the National Park Authority would expect to be consulted on any proposed changes. Planning permission is, however, required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area as well as coastal access, good design will be essential to ensure proposals conserve their surroundings visually and enhance coastal access, where possible.

Beachy Head Marine Conservation Zone

5.164 There is one Marine Conservation Zone situated off the National Park coastline, the intertidal section of which intersects with the Local Plan area, namely Beachy Head West. The purpose of these zones is to protect the biodiversity of our marine environment.

⁵¹ <https://www.gov.uk/government/publications/seascape-assessment-for-the-south-marine-plan-areas-mmo-1037>

FIGURE 5.6: MAP OF THE SUSSEX HERITAGE COAST AND THE ‘UNDEVELOPED COASTAL ZONE’



6. PEOPLE CONNECTED TO PLACES

Introduction

- 6.1** The theme for this chapter, People Connected to Places, is taken from the *Partnership Management Plan*⁵² (PMP). It is primarily based on the second purpose of the National Park, namely, to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. It is also relevant to the National Park duty. The policies in this chapter are divided into two sub-sections: sustainable transport and the understanding and enjoyment of the National Park.
- 6.2** Improving the efficiency of transport networks and the promotion of sustainable tourism are both key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the Duty to Cooperate.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 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.

Objective 5: To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.

⁵² Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019 (South Downs National Park Authority, 2013)

6a. SUSTAINABLE TRANSPORT

Introduction

- 6.3** This section of the Local Plan contains two strategic policies and two development management policies. The first strategic policy, SD19: Transport and Accessibility, seeks to minimise the traffic impacts of new development and facilitate improvements to public transport. The second strategic policy, SD20: Walking Cycling and Equestrian Routes, is focussed on the protection and enhancement of the public rights of way network and the safeguarding of land for new routes. The first development management policy, SD21: Public Realm, Highway Design and Public Art, is about the protection of the existing public realm especially historic rural roads and ensuring that new developments provide good quality public spaces. Finally, Policy SD22: Parking Provision, covers new public vehicle parks and parking on private developments.
- 6.4** Effective planning policies on transport routes and the public realm are essential to fulfilling the National Park purposes and duty. Firstly, our transport policies will facilitate developments that make it easier for people to travel to and around the National Park by sustainable means. Secondly, transport policies can help support the National Park Authority's duty to communities, by focussing growth in the most sustainable locations, so it best meets the needs of residents and businesses while protecting the special qualities. Thirdly, most visitors experience the National Park's special qualities mainly whilst travelling. Therefore the public realm (such as roads, pavements, public rights of way and open access land) needs to be conserved and enhanced, to improve people's experience of it.
- 6.5** There are a number of studies supporting the transport policies in the Local Plan. The *Transport Study Phase 1*⁵³ provides an inventory of existing available data in relation to transport issues and an overview of the issues affecting the National Park. The *Local Plan Transport Assessment*⁵⁴ looks at the impact of the Local Plan's proposed development in Petersfield, Liss, Midhurst and Petworth, and at the former Syngenta site, on traffic flows through key junctions in the National Park. The *Site Allocations Highways Assessment* looks at all the housing allocations set out in chapter 9⁵⁵. Finally, *Roads in the South Downs*⁵⁶ provides a resource and reference point for emerging best practice in rural and urban highway design, drawing on experience gained in other UK National Parks.

⁵³ SDNPA Transport Study – Phase I Report (MTRU, 2013)

⁵⁴ Transport Assessment of the South Downs Local Plan (Hampshire Services, 2017)

⁵⁵ Site Allocations Highways Assessment (Hampshire Services, 2017)

⁵⁶ Roads in the South Downs (Hamilton-Baillie Associates Ltd, 2015)

Strategic Policy SD19: Transport and Accessibility

1. Development proposals will be permitted provided that they are located and designed to minimise the need to travel or promote the use of sustainable modes of transport.
2. Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres, public transport routes, main roads and, where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.
3. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.
4. The following improvements to transport infrastructure will be supported:
 - a) Public transport waiting facilities, particularly those with reliable and accessible information;
 - b) Infrastructure supporting the transfer of freight from road to rail and water;
 - c) Improvements to walking, cycling and bus connectivity at all transport interchanges;
 - d) Improvements to the quality and provision of cycle parking at railway stations and key bus stops.
5. In town and village centres, development will be permitted which appropriately provides for improved footways and cycle routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic on historic streets.

6.6 The purpose of Policy SD19 is to encourage development towards the most sustainable locations in transport terms. All new development will be expected to be located and designed so as to minimise the need to travel, and to maximise the availability of relevant sustainable transport options, so that growth in private vehicle use is kept to a minimum.

6.7 Information to support a planning application will include a design and access statement stating the likely vehicle movements to be generated by the development, and, for some developments, transport assessments.

Transport Assessments and Travel Plans

6.8 A Transport Assessment (TA), Transport Statement (TS), Transport Report (TR) and / or Travel Plan (TP) will be required on development that generates significant amounts of traffic movement. This requirement will be determined in accordance with the relevant guidance and thresholds produced by the local highway authority for the area where the development takes place, whilst having strong regard to the environmental sensitivity of the National Park. The TA, TS and / or TP must set out mitigation measures that are necessary to ensure that development is sustainable and deliverable, and to prevent harm to the special qualities. They must also demonstrate the continued safe and efficient operation of the relevant strategic and local road networks.

- 6.9** TAs, TSs and TPs will be secured by condition or legal agreement. They must be agreed with the Authority at the earliest opportunity, with appropriate input from the local highway authority and Highways England if required. The impact of traffic generated from a development should be considered cumulatively by taking into account all committed development in the area.
- 6.10** The HRA identified that some traffic movements may have the potential to impact on internationally designated nature conservation sites. This should be duly taken into when considering the transport impact of new development. Further information is set out in Policy SD9: Biodiversity and Geodiversity and its supporting text.

Provision of Public Transport

- 6.11** There is potential to improve the role of railway and bus stations as hubs by improving bus interchanges, cycle parking and other infrastructure. The provision of more sympathetically designed and located bus shelters can make public transport a more attractive proposition. Connectivity and signage to walking routes into the countryside will also be supported and facilitated where possible through the planning process. Freight transport by railway and water will also be encouraged, since any reduction in the movement of freight via the road network would be beneficial to the environment.

Town and Village Centres

- 6.12** The centres of the National Park's towns and villages provide opportunities for developments to take advantage of better public transport connectivity and encourage walking and cycling. However, vehicle traffic has been identified as having a major negative impact on the environment in some settlements. The Authority will seek opportunities to reduce negative impacts from traffic, and to give priority to the safe movement of walkers and cyclists, including through planning decisions.

Strategic Roads

- 6.13** Policy SD42: Infrastructure deals with projects relating to strategic roads.

Strategic Policy SD20: Walking, Cycling and Equestrian Routes

1. Development proposals will be permitted provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the National Park.
2. The following disused railway line routes within the National Park, as shown on the Policies Map, are safeguarded for existing, and potential future use as non-motorised travel routes. Development proposals that facilitate such use will be permitted. Development proposals that adversely affect their future potential as non-motorised transport routes will be refused:
 - a) Bordon to Bentley;
 - b) Petersfield to Pulborough (via Midhurst);
 - c) Chichester to Midhurst (Centurion Way);
 - d) Wickham to Alton (Meon Valley Trail);
 - e) Guildford to Shoreham-by-Sea (Downs Link);
 - f) Liss to Longmoor;
 - g) Devil's Dyke Route; and
 - h) New Alresford to Kingsworthy.
3. The following corridors, as shown on the Policies Map, are safeguarded for future restoration to their respective historic uses. Development proposals will not be permitted where they would adversely affect their future potential for such restoration. Proposals for restoration to their historic uses will be supported:
 - a) The original course of the former Lewes-Uckfield railway line; and
 - b) The Wey and Arun Canal.
4. Development proposals will be permitted provided they protect and enhance existing crossings provided for non-motorised travel routes across major roads, railways and watercourses. Proposals for sensitively designed new crossings, and proposals to upgrade the safety of existing crossings, will be supported.
5. Development proposals will be permitted provided they incorporate attractive, accessible public links through the site, which are suitable for pedestrians, cyclists, mobility scooters and equestrians as appropriate, which connect to the nearest convenient point on the public rights of way network and / or local footway network.
6. Development proposals will be permitted provided that they:
 - a) Maintain existing public rights of way; and
 - b) Conserve and enhance the amenity value and tranquillity of, and views from, non-motorised travel routes and access land.

- 6.14** The purpose of Policy SD20 is to safeguard and enhance the extensive network of routes across the National Park, which provide motor traffic-free travel and recreational opportunities. These non-motorised travel routes include public rights of way, for example footpaths, bridleways and restricted byways, as well as permissive rights of way, designated cycle routes and quiet, very lightly-trafficked lanes.
- 6.15** These routes are a valued asset to many types of user, including cyclists, walkers, horse riders and users of mobility aids. They are a fundamental element of Purpose 2, and greatly valued by local communities and visitors to the National Park alike. Being so close to many urban areas, the National Park should also be easily accessible from those areas by non-motorised transport routes. The National Park Authority will work to increase accessibility by public rights of way and other non-motorised routes, and also take opportunities to increase connectivity between the rights of way network and public transport, whilst avoiding harm to the special qualities.

Disused railway lines

- 6.16** There are a number of former railway lines running through the National Park which present outstanding opportunities for new non-motorised user paths. These are defined as routes for pedestrians, cyclists and horse-riders for leisure and / or commuting. The use of electric powered vehicles may be permissible in some circumstances, for example pedelecs (low-powered electric bicycles) and Class 2 mobility scooters or any updated equivalent. Some of these routes are already partly converted to non-motorised user paths, and development to extend the network is underway. The safeguarding of these routes will protect them from any development that would prevent future proposals to convert them to non-motorised user paths.
- 6.17** In many cases, the exact route of development for these schemes is not yet established; some diversions from the original railway line route may well ultimately be necessary. If a site along one of the safeguarded routes is proposed for redevelopment or conversion then the route of the former railway must be protected within the proposed development.
- 6.18** In instances where the line passes in or close to designated wildlife sites or where a survey reveals protected species, regard must be had to relevant policies in the development plan particularly Policy SD12: Biodiversity and Geodiversity. A diversionary route may prove to be more appropriate.
- 6.19** Development of a recreational transport route within the Singleton and Cocking Tunnels SAC will not be permitted and this section is left out of the safeguarding of the Chichester to Midhurst railway line route. Likewise, the section of the Liss-Bordon Railway which runs through Longmoor and Woolmer Forest is not suitable for development; the only safeguarded section of this route is that between Liss and Longmoor, which already operates as a non-motorised transport route.
- 6.20** Wherever possible, development proposals on disused railway lines should retain existing structures and features connected with railway use.

Restoration of abandoned routes

6.21 The National Park Authority supports restoration of the short sections of the Lewes-Uckfield railway (near Hamsey) and the Wey and Arun Canal to railway and canal use respectively, and will safeguard these routes. Proposals for such restoration should provide suitable routes for non-motorised travel alongside the new railway or canal, wherever feasible. Should proposals for a non-motorised transport route (as described in criterion 2) come forward on the route of the Lewes-Uckfield railway, before it is restored to railway use, these will also be supported

Crossing major roads and railways

6.22 Major roads and railways can often create breaks and safety hazards in the network of public rights of way and non-motorised routes. The result is that some leisure users may be discouraged from accessing the National Park. Proposals for developments to reduce the severance effect of major roads and railways will generally be supported. Policies SD4: Landscape Character, SD5: Design and SD9: Biodiversity and Geodiversity will be of particular relevance in considering such applications. Existing crossing points, including existing bridges across watercourses, will be protected, and their safety conserved and enhanced where possible, including through Section 106 contributions. Enhancement may include the introduction of speed limits, signage or a change of surface or levels. Wherever new crossing places are installed, they should be well- signed, of a high quality and locally distinctive design, respecting their setting and convenient and safe for all non-motorised users who may legitimately wish to use them.

Connections from new development

6.23 Where new development takes place, it should provide opportunities for new or enhanced connections for pedestrians, cyclists and horse riders. This should be achieved on- site, and where appropriate off-site. Wherever possible, development proposals with potential to generate footfall, for example residential development, employment uses, and development open to the public, should provide the appropriate infrastructure to link routes on site to the nearby public rights of way network, footways and, where relevant, the routes listed in criterion 2 of Policy SD20.

Protecting the amenity of public rights of way, other non-motorised routes and access land

6.24 The rights of way network, together with access land, non-motorised user paths and permissive paths, are some of the National Park's most important assets in attracting visitors, and the Authority will protect the quality of experience enjoyed by users. Development which harms views from, or is otherwise detrimental to the amenity value and tranquillity of public rights of way and other non-motorised user routes, will not be permitted. This includes development that would increase vehicular traffic on the network, for example, on a public footpath that follows the line of a private driveway, to the detriment of its enjoyment by walkers, cyclists and horse riders. Developments that are likely to generate significant additional pressure on the surrounding rights of way network may be required to provide a mitigation contribution to the Local Transport Authority towards enhancing the local network.

6.25 Developments affecting public rights of way must refer to the *Rights of Way Improvement Plan* for the local area, and any relevant LTA design standards applicable to rights of way. A commuted sum may be required to cover future maintenance. The historic alignment of rights of way should be safeguarded. In exceptional circumstances it may be appropriate to make minor diversions to rights of way, providing the amenity value and convenience for their users is not harmed; such changes will also be subject to application for a *Public Path Order* to the relevant local transport authority for the area.

Development Management Policy SD21: Public Realm, Highway Design and Public Art

1. Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, *Roads in the South Downs*, or any future replacement.
2. Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.
3. Site layout must be designed to protect the safety and amenity of all road users. The design and layout of new development must give priority to the needs of pedestrians, users of mobility aids, cyclists and equestrians. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.
4. Street design and management proposals must be context-sensitive, responding to the specific character, activities, heritage, built form and layout, materials and street furniture of the location. Highway design must pay particular attention to the role and location of buildings, doors and entry points.
5. Appropriately designed and located new public art will be supported, in particular within settlements. New public art should be site specific, reflecting and respecting the site and its context.

6.26 The purpose of Policy SD21 is to protect and enhance the public realm and street scene in the National Park, for the benefit of all users and in support of purpose 2 of the National Park in particular.

Roads in the South Downs

6.27 The guidance document *Roads in the South Downs* developed by the local highways authorities and the National Park Authority, sets out broad principles and procedures which should be followed by all developments involving changes to the public realm and the creation of new public spaces and highways. Development proposals will not be permitted where they do not protect highway safety whilst following the principles of context-specific design set out in *Roads in the South Downs*. Development will be expected to contribute to the adaptation of existing highways so that standardised road infrastructure can be minimised in a way consistent with highway safety.

Historic Rural Roads

- 6.28** Historic rural roads are defined as those roads outside towns shown on the *second edition of the Ordnance Survey*⁵⁷, which have not undergone significant widening or straightening in the intervening period. 'Roads' in this context refer to the highway itself as well as any associated pavements or cycle paths, verges, banks, ditches and boundary features.
- 6.29** Both development proposals themselves, and their off-site traffic impacts, may impact on historic rural roads. Physical impacts may include the removal of portions of hedgerows and banks for new access points, or the construction of new kerbs and signage. Development proposals involving physical alterations to roads and their immediate setting should identify whether the roads in question are historic rural roads and if so, demonstrate that the historical significance, ecological, landscape and recreational value and character of those roads are conserved and enhanced. The integrity of banks, hedges, walls and roadside trees must be maintained.
- 6.30** A Design and Access Statement should demonstrate that Policy SD21 is complied with, covering both physical changes arising from the development and impacts on traffic levels. The level of detail required in the statement should be proportional to the expected impact. As a guideline, any development proposal outside Lewes, Petersfield, Midhurst, Petworth and Liss which comprises at least one net additional dwelling, or the addition or change of use of 100m² or more of floorspace, will generally be required to specifically address the matters set out in Policy SD21.
- 6.31** Firstly, the statement must detail the expected traffic flows arising from the development and whether any routes leading to or from the site are likely to experience a traffic increase of approximately 10% or more on existing hourly vehicular traffic as a result. Where this applies, the assessment should check whether these routes meet the definition of historic rural roads given above. If that is the case it must be demonstrated that the changes to traffic levels and patterns arising from the development would conserve or enhance the ecological, landscape and recreational value of those roads. Cumulative impact must be taken into account.
- 6.32** Current levels of agriculture and forestry related traffic are part of the rural character of the National Park. Whilst this policy applies equally to agricultural and forestry developments where planning permission is required, there may be circumstances where benefits to the purposes of the National Park from specific agricultural or forestry operations outweigh a negative impact of traffic increases arising from those operations that would otherwise be unacceptable.

Street layout

- 6.33** This policy, specifically covering areas within the public realm, must be read in close conjunction with Policy SD5: Design, which discusses the design of new development more broadly.

⁵⁷ Ordnance Survey 2nd edition, Six-inch to the mile, England and Wales, 1891-1914: accessible online through various providers

- 6.34** Roads in the South Downs and the national guidance documents *Manual for Streets*⁵⁸, *Manual for Streets 2*⁵⁹ and the *Design Manual for Roads and Bridges*⁶⁰ provide useful guidance in relation to site layout, design and the safety of all users. Street clutter should be minimised and removed where safe to do so. Formal traffic calming measures can be inappropriate; good design at the outset should limit the need for further physical measures. New and amended road layout and design in rural areas should take account of the movement of large vehicles and machinery associated with agriculture and forestry.
- 6.35** Given the ageing population of the local area and the importance of visitors from this demographic group to the National Park's economy, it is especially important that the needs of disabled users of the public realm be factored into the design of new development at an early stage. A locally distinctive and easily legible and navigable environment is particularly important for people with visual impairments and those with dementia.

Sensitivity to context

- 6.36** Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of towns and villages. *Roads in the South Downs* and the Historic England document, *Streets for All: South East*⁶¹ provide guidance on this.
- 6.37** New street lighting may be considered inappropriate in areas of the National Park due to the need to protect dark night skies. Detail on street lighting is contained in Policy SD9 (Dark Night Skies).

Public Art

- 6.38** Public art is generally more characteristic of towns, villages and designed landscapes than of the broader countryside. The principle of new public art will be supported within settlement boundaries, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. Proposals for new public art outside settlement boundaries, where it is subject to the planning process, will be assessed on a case by case basis according to the policies contained in this Local Plan.

⁵⁸ Manual for Streets (Department for Transport, 2007)

⁵⁹ Manual for Streets 2: Wider Application of the Principles, (Chartered Institution of Highways and Transportation, 2010)

⁶⁰ Design Manual for Roads and Bridges (Highways England, last updated 2017)

⁶¹ Citation for Streets for All: South East

Development Management Policy SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:
 - a) There is evidence that overriding traffic management or recreation management benefits can be achieved; and
 - b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
 - c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the Public Rights of Way network.
2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.
3. All new private and public parking provision will:
 - a) Be of a location, scale and design that reflects its context;
 - b) Incorporate appropriate sustainable drainage systems.
4. All new public parking provision will comply with the following:
 - a) Wherever feasible, electric vehicle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters;
 - b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

6.39 New parking areas will be expected to contribute to a range of ecosystem services while protecting the landscape, and their distribution will contribute to the spatial strategy for the National Park.

New public car parks

6.40 Roadside car parking is a problem at various locations, causing damage to verges and reducing road capacity. However, the ability of the National Park's road network and car parks to accommodate an increasing number of visitors' cars is limited. It is not practicable, nor would it be desirable in landscape terms, to cater for peak demand. The Authority will direct new public car parking provision to locations in or adjacent to the settlements listed in policy SD25 (Development Strategy), where it will maximise benefits to the local economy and minimise harm to the landscape.

- 6.41** The construction of new public car parks should always be justified as part of an overall traffic management scheme whose primary focus is increasing access to the site by public and non-motorised transport. Large scale car parks with supporting infrastructure such as lighting can be particularly obtrusive in the landscape. Development proposals for significant new car parks may be classed as major development within the meaning set out in Policy SD3.
- 6.42** Traffic Regulation Orders (TROs) can be a means of improving access and preventing inconsiderate parking in towns and villages, and may be necessary in some cases to mitigate the impact of development. Associated street clutter should be avoided and additional signage kept to a minimum.
- 6.43** There are many existing visitor attractions in the countryside away from settlements related to the National Park purposes, which may wish to expand or relocate their parking facilities. Policy SD22 criterion 1 only applies to parking areas whose primary purpose is to serve the visitor attraction in question.

Parking standards for residential and non-residential developments

- 6.44** The provision of vehicle and cycle parking for new development should be in accordance with the local parking guidance applicable to that area.

Design, location and layout of new vehicle parking

- 6.45** New vehicle parking areas, whether public or private, can negatively impact on landscape, the local environment, biodiversity and drainage when inappropriately sited and designed. The cumulative impact of changes on biodiversity and surface water run-off will be given particular consideration when deciding applications for the loss of existing garden space to car parking.
- 6.46** Permeable parking surfaces should be used in preference to impermeable surfaces unless there are overriding reasons that render their use unsuitable. Materials should be selected which are appropriate to the site context and predicted levels of use. Usage should be made of existing and proposed buildings, landscape features and planting to successfully integrate the parking area within its surrounding landscape context and avoid negative impacts on local character. Changes to existing parking areas to bring them into line with the principles of Roads in the South Downs will be supported.
- 6.47** The type of parking provided must be accessible to all and resilient to future changes. All new public car parks should therefore deliver a proportion of parking spaces for disabled people / blue badge holders, cyclists and motorcyclists which are compliant with the relevant national and local guidelines for the area. Public parking should address the needs of mobility scooter users, and accommodate horse boxes, in line with the National Park's Purpose 2 and duty. Electric vehicle charging facilities must be provided for in all new parking areas, including residential developments and public car and cycle parks, unless it can be demonstrated that this is not viable or that adequate connections to the electricity grid are not available.

6b. UNDERSTANDING AND ENJOYMENT OF THE NATIONAL PARK

Introduction

- 6.48** This section of the Local Plan includes Strategic Policy SD23: Sustainable Tourism, relating to sustainable delivery of development proposals for visitor accommodation, attractions and recreation facilities, supporting the *Sustainable Tourism Strategy*⁶². It also includes Development Management Policy SD24: Equestrian Uses, relating to the planning, design and management of land on which horses are kept.
- 6.49** The National Park is a major resource for recreation and tourism, which play a significant role in the local economy. The *South Downs Visitor and Tourism Economic Impact Study*⁶³ report noted that, in 2011 / 12, 46 million visitor days were spent in the National Park, generating over £464m of expenditure and supporting over 8,000 jobs. By supporting and promoting sustainable tourism and recreation there is an opportunity to contribute to sustainable economic growth and contribute to meeting Purpose 2. Where development proposals appear to conflict with Purpose 1, then the *Sandford Principle* will be applied and greater weight will be given to Purpose 1.
- 6.50** The *South Downs Visitor and Tourism Economic Impact Study* and the *South Downs Visitor Accommodation Review*⁶⁴ found that the tourism sector is largely leisure driven, and there are frequent shortages of all types of accommodation at weekends throughout the year and during the week in summer. There is strong demand for high-quality accommodation and clear prospects for future growth in the demand for all types of visitor accommodation. There are some gaps in accommodation provision, particularly hotel accommodation in Petersfield and accommodation supply along the South Downs Way. A significant proportion of visits are day trips from those living in the National Park or in the villages, towns and cities surrounding the National Park
- 6.51** Enabling the provision of appropriate, properly scaled accommodation will help to manage the number of visitors who stay within the National Park for overnight / multi-night stays.
- 6.52** The National Park has sensitive habitats and landscapes, and a rich and varied historic environment. The National Park Authority's *Sustainable Tourism Strategy*⁶⁵ has been developed in association with many partner organisations to guide tourism activities and our work with partners, so that visitors enjoy the National Park without compromising its special qualities. The strategy establishes four themes or 'lands' which seek to engage the public, building knowledge and patronage of the National Park. They are Adventure, Cultural, Natural and Working Lands.

⁶² South Downs National Park Sustainable Tourism Strategy 2015-20, (South Downs National Park Authority, 2016)

⁶³ South Downs Visitor & Tourism Economic Impact Study: Technical Report on the Research Findings (TSE Research, 2013)

⁶⁴ South Downs National Park Visitor Accommodation Review: Report of Key Findings (Hotel Solutions, 2014)

⁶⁵ South Downs National Park Sustainable Tourism Strategy 2015-20 (South Downs National Park Authority, 2017)

6.53 Equestrian activities are strongly linked with the understanding and enjoyment of the National Park through their significant role in shaping the National Park's landscape, agriculture and industry, and their role in recreation and sport. The race meetings at Goodwood and polo fixtures in Midhurst are important national sporting events. The keeping of horses has the potential to make a positive contribution to the local landscape and offers opportunities to diversify the rural economy. While the grazing of horses does not require planning permission, the keeping of horses and related development does. This type of development includes small-scale private domestic stables, riding schools, commercial livery yards of various scales and polo related activity.

Strategic Policy SD23: Sustainable Tourism

1. Development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where it is demonstrated that:
 - a) The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;
 - b) The design and location of the development minimises the need for travel by private car and encourages access and / or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;
 - c) Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area;
 - d) Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;
 - e) Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities;
 - f) Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value; and
 - g) Where proposals are located outside settlement policy boundaries as defined on the Policies Map, they:
 - i. Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and
 - ii. Are closely associated with other attractions / established tourism uses, including the public rights of way network; or
 - iii. Are part of farm diversification schemes or endorsed Whole Estate Plans.
2. Development proposals that would result in the loss of visitor accommodation, visitor attractions and recreation facilities will not be permitted unless :
 - a) Evidence is provided that the current use is financially unviable and a robust marketing campaign of at least 12 months has been carried out that clearly demonstrates there is no market demand for the existing use or an equivalent tourism use; or
 - b) The current use or related development harms the special qualities.
3. The Authority will support a year-round visitor economy, while ensuring the facility remains for visitor use only.
4. Development proposals, on their own or cumulatively with other development uses, must not prejudice or disadvantage people's enjoyment of other existing and appropriate tourism and recreation activities. Development proposals that generate significant additional pressure upon the surrounding rights of way network will be required to mitigate these impacts.

Details of the marketing requirements are set out in Appendix 3.

- 6.54** The purpose of this policy is to foster the responsible and sustainable delivery of tourism and recreation development in accordance with the *Sustainable Tourism Strategy*. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of the National Park. They should also foster guardianship of the special qualities, for example, by promoting and incorporating the National Park's natural beauty, wildlife, cultural heritage, and the ecosystem services the National Park provides. Proposals will be supported which reflect the four themes as set out in the SDNPA's *Sustainable Tourism Strategy* and future updates. There are many diverse and creative ways in which development proposals could address this, which should be tailored to the context of the proposals.
- 6.55** This policy applies to recreation facilities which will attract visitors both from within and outside the National Park and contribute to the visitor economy. Requirements and guidance for proposals for recreation facilities to meet local needs within the National Park such as sports pitches and local parks are set out in Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries.

Sustainable tourism

- 6.56** While the National Park Authority will support growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or and causing physical erosion. The Authority will support proposals for sustainable attractions and recreational activities, which, by reducing or mitigating against any undesirable impacts, will appropriately balance the needs of users, provide benefits to the economy and will not adversely impact the environment.

Proposals outside of settlement boundaries

- 6.57** Development proposals for visitor accommodation, attractions and recreation facilities should be located sustainably. Locating such tourism development within existing settlements, particularly those identified as hubs in Chapter 3: Spatial Portrait and Strategy give most opportunity for access to sustainable transport and other facilities, helping to minimise use of the private car.
- 6.58** Given the nature of some tourism-related and recreational activities, a more rural location or proximity to a geographically specific feature, such as the coast or a river, may be required. Criterion 1(g) of Policy SD23 seeks to ensure that these are planned for appropriately. An example of how a proposal might contribute to Purpose 1 and to ecosystem services, is habitat restoration of a degraded site.
- 6.59** Every opportunity for sustainable travel should be utilised including access to the site and / or subsequent travel, for example bicycle hire provision, as part of visitor accommodation. This is to ensure that the proposals are in accordance with National Park purposes and do not harm the special qualities.

Retention and reuse of existing buildings

- 6.60** Landscape character and built form are central to the attractiveness of the National Park as a destination for visitors and therefore, in the first instance, proposals should retain and utilise existing buildings. If existing buildings are not available, or are causing harm to the special

qualities, then proposals for any new buildings should be accompanied by justification and evidence that the proposals are sensitive to the site and its wider context. Favourable consideration will be given to the removal of existing buildings which produce net gains for landscape.

Retention of visitor accommodation, visitor attraction, recreation facilities and associated development

- 6.61** The Authority will seek to retain visitor accommodation. This is supported by existing evidence in the *Visitor Accommodation Review Study*, which indicates a need to increase capacity and potential for growth in demand for visitor accommodation. This study also identifies that due to the availability of sites for new development, any loss of visitor accommodation can be difficult to replace. Proposals that would result in the loss of visitor accommodation will be required to demonstrate that it is financially unviable, by providing evidence in accordance with part 2(a) of Policy SD23, and in accordance with Appendix 3: Marketing Requirements for Change of Use Applications.
- 6.62** The minimum marketing period required by Policy SD23 is 12 months. A longer marketing period may be required to cover more than one season or where the existing use is located in close proximity to established tourist attractions or the rights of way network.
- 6.63** Redevelopment of visitor accommodation, visitor attraction, recreation facilities or associated development which is currently resulting in harm to the special qualities of the National Park should, in the first instance, be redeveloped for other more suitable tourist or community uses.

Year-round visitor economy

- 6.64** In order to support a year-round visitor economy, the Authority may support proposals for the relaxation or removal of seasonal planning restrictions, where appropriate. Instead, conditions will be used to prevent the occupation of accommodation as a permanent residential dwelling and restrict continuous periods of stays by occupiers, ensuring the facility remains for visitor use.

Development Management Policy SD24: Equestrian Uses

- I. Development proposals for equestrian development will be permitted where they:
 - a) Are of a scale and / or an intensity of equestrian use compatible with the landscape and the special qualities;
 - b) Demonstrate good design which is well located and responds to local character and distinctiveness;
 - c) Re-use existing buildings wherever feasible and viable;
 - d) Locate new buildings, stables, yard areas and facilities adjacent to existing buildings provided they respect the amenities and activities of surrounding properties and uses;
 - e) Are well located to existing utilities and transport infrastructure, including vehicular and field accesses, tracks and bridleways;
 - f) Provide new or supplementary landscape features including hard and soft treatments and planting, consistent with local character; and
 - g) Demonstrate a conservation based land management approach.

6.65 The purpose of this policy is to ensure the careful planning, design and management of land on which horses are kept. It is important that equestrian activities have a positive impact and protect natural beauty. Good design should be informed by local character and distinctiveness, with particular reference to farm buildings, layout and materials. Further criteria on landscape and design is set out in policies SD4 and SD5 respectively

Fencing and subdivision

6.66 The subdivision of fields into small turnout paddocks can affect landscape character and relates to many of the criteria of this policy. Fencing which subdivides large fields into individual paddocks can have a significant visual impact on the landscape. Sensitive and well thought out fencing which respects the existing field pattern and contours, together with appropriate levels of grazing, can enhance a site leading also to improvements in biodiversity and the quality of grazing. The removal of hedgerows from existing field boundaries will be strongly resisted.

Stables, field shelters and new buildings

6.67 The location of new buildings like stables, field shelters, and tack storage can change the character of the land and views, particularly when poorly sited substantial and intrusive earthworks take place including maneges. Equine buildings on sites which are open, exposed, elevated or sloped are likely to have particular landscape impacts that may make it difficult to achieve sensitive design solutions. Wherever viable, existing buildings should be re-used to avoid additional buildings in the countryside.

6.68 New buildings should be sited next to existing buildings and new structures should be kept to a minimum. The layout of buildings should seek to contain and enclose yard areas for storage, parking and other activities. Equestrian development such as new barns and maneges should be sensitively lit in accordance with Policy SD8: Dark Night Skies. Examples of equestrian development that can impact on dark night skies include barns with extensive glazing and roof lights, floodlit maneges and other intrusive lighting may not be permitted.

Jumps, feed bins, general storage

6.69 Equestrian equipment like jumps and open storage can harm views. Careful design and layout should mitigate against these impacts through the siting of buildings and permanent structures to screen and protect them from the elements. Management of manure and waste should take account of the amenities of local residents and other uses as well as environmental protection requirements.

Utilities and transport infrastructure

6.70 Development proposals should be well located to existing transport infrastructure and utilities infrastructure, including water, electricity, and gas. Access for cars and larger vehicles is often required as part of an application. Car parking, trailer storage and manure arrangements can create clutter and have urbanising influences in the landscape. This should be addressed through good design and the careful location of these areas in relation to existing landscape features and boundaries. Sites that are well located adjacent to the bridleway network can reduce pressures on the land and provide good recreational opportunities.

Landscape features and treatments

6.71 Where new or supplementary landscape features such as planting or hard landscape features and boundary treatments are required, these should reflect the local character of the site and wider area and planting should consist of a locally appropriate native species mix. Further requirements on this matter can be found in Policy SD4: Landscape Character and SD5: Design.

Conservation based land management

6.72 The National Park Authority seeks to encourage owners to adopt a best practice approach towards managing the land, depending on the breed, size and purpose of keeping horses, which supports horse welfare as well. A conservation based land management approach is strongly encouraged. This could include a range of measures such as: species rich grazing with a locally native seeding mix, incorporation of headlands around paddocks (ungrazed areas along hedgerows), grazing rotation programme, on site hay production, native tree planting in groups and restoration hedgerows as a framework for paddock subdivision and track grazing systems. This approach may also be influenced by soil type and natural drainage patterns where the support of natural drainage processes through management of ditches and water courses can contribute to the resilience of the soil to wear, and increase biodiversity habitats.

6.73 It will be appropriate in some cases for management plans to be devised and submitted to support planning applications to demonstrate how this approach will be delivered. Advice should be sought from the Authority at the earliest opportunity and prior to submitting an application on whether a management plan would be needed.

7. TOWARDS A SUSTAINABLE FUTURE

Introduction

- 7.1** The theme for this chapter, Towards a Sustainable Future, is taken from the *Partnership Management Plan*⁶⁶ (PMP). It is primarily based on the duty of the National Park Authority, namely, to seek to foster the economic and social well-being of the local communities within the National Park. The chapter begins with the development strategy for the National Park and is followed by the strategic and development management policies relating to homes, employment, town centres and retail, agriculture and forestry, infrastructure, green infrastructure, climate change, advertisements and pollution.
- 7.2** The delivery of new homes, including affordable homes and pitches for Gypsies and Travellers and Travelling Showpeople, the development of the local economy and green infrastructure are all key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the Duty to Cooperate.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 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.

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

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

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

Objective 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.

⁶⁶ Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019 (South Downs National Park Authority, 2013)

7a. DEVELOPMENT

Introduction

- 7.3** This sub-section of the Local Plan contains strategic Policy SD25: Development Strategy. This responds to the spatial strategy, set out in Chapter 3, to plan for a medium level of growth dispersed across the towns and villages of the National Park. The development strategy 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 Western Downs, the Western Weald, the Scarp Slope, the Dip Slope, the Coastal Plain, and the four river corridors formed by the Rivers Arun, Adur, Ouse and Cuckmere.
- 7.4** There are 53 settlements that are well-placed to accommodate some level of growth as set out in Policy SD25. This sets a clear framework for accommodating the local housing, employment and other development needs of communities. In particular, it provides a starting point for positively identifying settlements that can help meet the Plan objectives, as set out in Policy SD26: Supply of Homes, Policy SD35: Employment Land and Policy SD36: Town and Village Centres. Figure 7.1 is a map of the 53 settlements distributed across the broad areas and river corridors.
- 7.5** The development strategy recognises that Neighbourhood Development Plans (NDPs) constitute an important element of the statutory development plan. A number of settlements listed in Policy SD25 are within parishes or town council areas that are developing or have made NDPs. These reflect the vision and objectives of the local community, and should help to deliver the objectives and strategy of this Local Plan by making positive provision for development in line with Policy SD25. It is important that NDPs meet Local Plan as well as local objectives, as they provide the principal framework for determining planning applications within the parish.
- 7.6** As shown in Figure 7.2, the Local Plan only seeks to allocate sites where an NDP has not done so. This is usually because there is no made NDP, nor one being developed. An important exception to this is that the Local Plan allocates strategic sites and strategic housing allocations across the National Park.

FIGURE 7.1: SETTLEMENTS IDENTIFIED IN POLICY SD25: SPATIAL STRATEGY

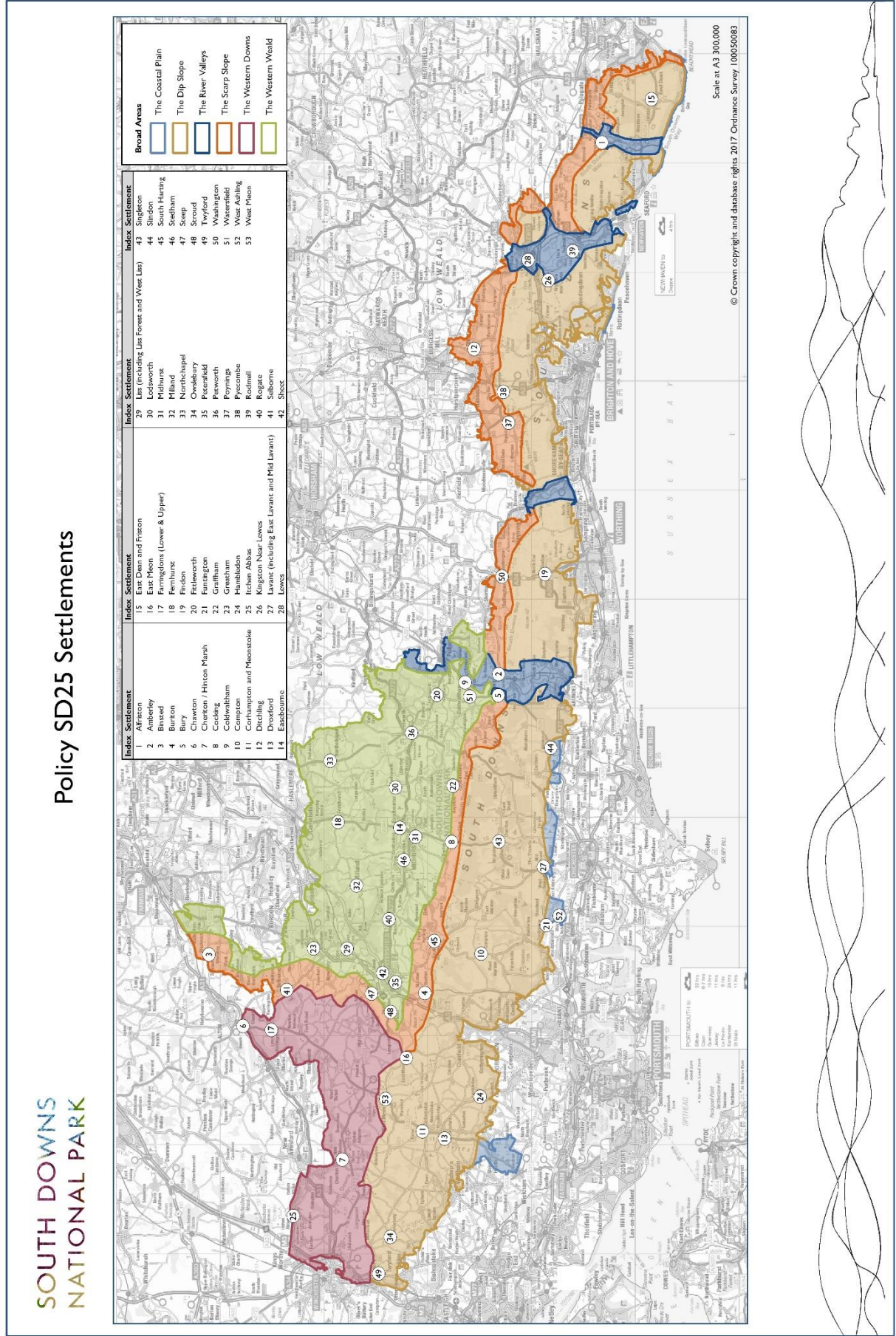
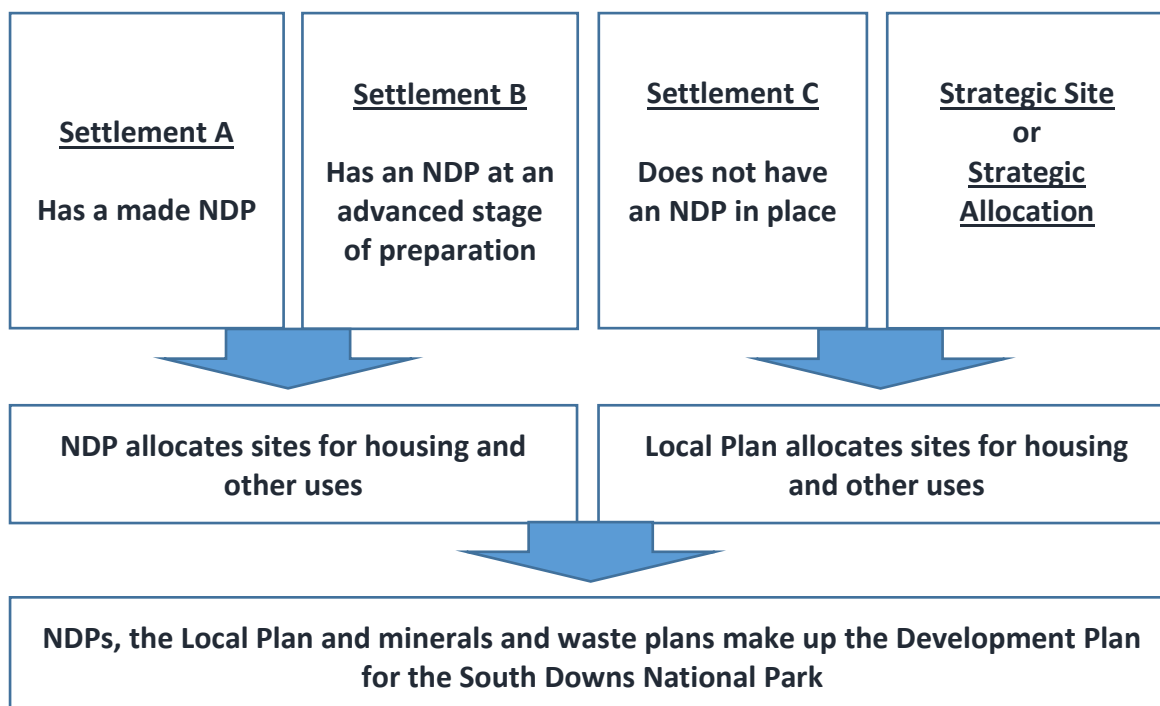


FIGURE 7.2: NEIGHBOURHOOD DEVELOPMENT PLANS AS PART OF THE DEVELOPMENT PLAN



Strategic Policy SD25: Development Strategy

- I. 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 in its landscape context;
 - b) Makes best use of suitable and available previously developed land in the settlement; and
 - c) Makes efficient and appropriate use of land.

Western Downs

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

Western Weald

- Binsted
- Easebourne
- Fernhurst
- Fittleworth
- Greatham
- Milland
- Northchapel
- Petersfield
- Petworth
- Rogate

<ul style="list-style-type: none"> • Liss (including Liss Forest and West Liss) • Lodsworth • Midhurst 	<ul style="list-style-type: none"> • Sheet • South Harting • Stedham
<p>Scarp Slope</p>	
<ul style="list-style-type: none"> • Buriton • Bury • Cocking • Ditchling • East Meon • Graffham 	<ul style="list-style-type: none"> • Poynings • Selborne • Steep • Washington • West Meon
<p>Dip Slope</p>	
<ul style="list-style-type: none"> • Compton • Corhampton and Meonstoke • Droxford • East Dean and Friston • Findon • Hambledon 	<ul style="list-style-type: none"> • Owslebury • Pyecombe • Singleton • Slindon • Twyford
<p>Coastal Plain</p>	
<ul style="list-style-type: none"> • Funtington • Lavant (including Mid Lavant and East Lavant) 	<ul style="list-style-type: none"> • West Ashling
<p>River Arun Corridor</p>	
<ul style="list-style-type: none"> • Amberley • Coldwaltham 	<ul style="list-style-type: none"> • Watersfield
<p>River Ouse Corridor</p>	
<ul style="list-style-type: none"> • Kingston near Lewes • Rodmell 	<ul style="list-style-type: none"> • Lewes
<p>River Cuckmere Corridor</p>	
<ul style="list-style-type: none"> • Alfriston 	

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, excepting residential gardens, and conserves and 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 National Park 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.

*Additionally, a portion of the Arundel settlement boundary is shown on the Policies Map. Other settlements not listed in Policy SD25 may also be shown on the Policies Map if an NDP has allocated, designated or safeguarded sites or areas within the National Park.

Principles of development

7.7 The purpose of Policy SD25 is to identify 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 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.

7.8 Evidence to support the inclusion of these settlements includes the *South Downs Integrated Landscape Character Assessment*⁶⁷, and the *Settlement Facilities Study*⁶⁸, which form part of the Local Plan evidence base.

⁶⁷ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

⁶⁸ Settlement Facilities Assessment (South Downs National Park Authority, 2015)

Settlement Boundaries

7.9 Settlement boundaries are defined on the Policies Map. They have all been comprehensively reviewed as part of the Local Plan process unless this was done through an NDP. The methodology for determining the boundaries is set out in the *Settlement Boundary Methodology Paper*⁶⁹, which forms part of the Local Plan evidence base. Policy SD25 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 boundaries, and will be treated as open countryside for the purposes of Policy SD25.

Exceptional development outside settlements

7.10 Policy SD25 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 Policies SD23: Sustainable Tourism and SD29: Rural Exception sites. 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

7.11 In order to conserve wider landscape character and minimise the footprint of development, it is important to focus development on previously developed land (PDL), which is often referred to as ‘brownfield’ land. Therefore the Authority will expect developers to make best use of PDL within settlement boundaries, subject to other locational and physical constraints. Policy SD25 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.

7.12 However all development on PDL 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 PDL outside settlement boundaries must have full regard to Purpose 1 and the special quality of an environment shaped by centuries of farming. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.

⁶⁹ Settlement Boundary Review: Methodology Paper (South Downs National Park Authority, 2015 and updated 2017)

Efficient use of land

- 7.13** Throughout the National Park, development pressures are great, whilst availability of land suitable for development is scarce. Furthermore, many of its villages and towns 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 a design of new development that respects traditional patterns of built form, whilst reducing demand for additional land supply to meet local communities' needs.
- 7.14** 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

- 7.15** 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 SD25 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*⁷⁰.
- 7.16** 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 SD32 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.

⁷⁰ Whole Estate Plans Preparation Guidelines (South Downs National Park Authority, 2015 and updated 2016)

7b. HOMES (STRATEGIC POLICIES)

Introduction

- 7.17** This sub-section of the Local Plan includes two strategic policies namely SD26: Supply of Homes and SD27: Mix of Homes.
- 7.18** 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 conserve and enhance the villages and market towns 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. However, the provision of housing should not be at the expense of a nationally protected landscape. The NPPF cites national parks as areas where development should be restricted and objectively assessed need not met.
- 7.19** The Local Plan determines the level of housing provision and types of homes to be delivered. To inform this, the National Park Authority commissioned a Housing and Economic Development Needs Assessment (HEDNA)⁷¹ which forms part of the evidence base for this Local Plan. This updated the *Strategic Housing Market Assessment (SHMA)* to incorporate new national population projections and new household projections. Over the 19 year period 2014-2033, the HEDNA identifies an objectively assessed need of 447 homes per year and separately identifies a need for 293 affordable homes per year. Policy SD25: Development Strategy provides the starting point with regards to settlements considered. Policy SD26 sets out the overall housing provision for the National Park along with specific figures for the market towns and a number of villages.
- 7.20** The Local Plan incorporates the overall levels of housing proposed within the adopted Joint Core Strategies, updated where relevant by made NDPs. For example, the housing figure for Petersfield is based on the *East Hampshire Joint Core Strategy* and the *Petersfield Plan*. This Local Plan meets the commitment in the *East Hampshire Joint Core Strategy* to deliver a total of 1,694 dwellings in that part of East Hampshire within the National Park. This equates to approximately 100 dwellings per annum until the *East Hampshire Joint Core Strategy* end date of 2028.
- 7.21** 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 HEDNA and SHMA identify 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.

⁷¹ Housing and Economic Development Needs Assessment (G.L. Hearne, 2017)

Strategic Policy SD26: Supply of Homes

1. The National Park Authority 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 provision
Alfriston	15
Amberley	6
Binsted	11
Buriton	10
Bury	6
Cheriton / Hinton Marsh	14
Coldwaltham	38
Corhampton and Meonstoke	18
Ditchling	15
Droxford	30
Easebourne	50
East Dean and Friston (East Sussex)	11
East Meon	17
Fernhurst (including Syngenta)	220
Findon	30
Fittleworth	6
Greatham (Hampshire)	38
Itchen Abbas	9

Kingston near Lewes	11
Lavant (including Mid Lavant and East Lavant)	20
Lewes (including North Street Quarter)	875
Liss (including West Liss and Liss Forest)	150
Midhurst	175
Petersfield	805
Petworth	150
Pyecombe	8
Rogate	11
Selborne	6
Sheet	31
South Harting	13
Stedham	18
Steep	10
Stroud	28
Twyford	20
West Ashling	19
West Meon	11

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 are in general conformity with the strategic policies of the development plan.

The Amount of Housing

7.22 The purpose of this policy is to set out figures for how many new homes will be provided in town and villages across the National Park in line with the spatial strategy for the Local Plan.

7.23 The process for determining the amount of housing to be delivered 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 Authority, and therefore should seek to foster the economic and social wellbeing of local communities.

7.24 Policy SD26 sets a level of new housing provision which totals 4,750 over the Plan period, representing a net increase of 250 homes per year. This is informed by the evidence from the HEDNA⁷², 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*⁷³ (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 target set in Policy SD26 are set out in Figure 7.3.

7.25 There are particular challenges posed by the National Park’s protected status and uncertainties on NDP progress. It is therefore appropriate that the supply of homes set out in Figure 7.3 is slightly more than the Local Plan housing provision figure set in Policy SD26. An up-to-date housing trajectory is published each year in the *Authority Monitoring Report*.

FIGURE 7.3: 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	2,787
b	Implementation of extant planning permissions granted before 1 st April 2015 on sites that have not been allocated	965
c	Anticipated windfall development	714
d	Completions in monitoring years 2014 / 15 and 2015 / 16	511
	Total	4,977

⁷² Housing and Economic Development Needs Assessment (G.L. Hearne, 2017)

⁷³ Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

The Location of Housing

- 7.26** Policy SD26 sets out set out figures for how many new homes will be provided in individual settlements. This approach provides clarity to local communities on the amount of development to be provided, which will be of particular importance in designated neighbourhood plan areas. The starting point for the housing provision figures is the spatial strategy 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 I. Key evidence includes the *Strategic Housing Land Availability Assessment*⁷⁴ 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.
- 7.27** The housing provision figures 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 figures are approximate, and actual delivery in individual settlements may vary should the land supply position change. Nevertheless, it is expected that the National Park Authority, parish and town councils and other partners will work together to deliver at least these numbers.

Allocation of strategic sites and housing sites

- 7.28** 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.
- 7.29** There are two previously developed strategic sites allocated in chapter 8 of this Local Plan: North Street Quarter in Lewes, and the former Shoreham Cement Works in Upper Beeding. The former Syngenta site is allocated as a strategic site in the *Fernhurst NDP*. North Street Quarter and Syngenta will deliver a considerable number of homes as part of mixed use development schemes. There are two strategic housing allocations in Chapter 9 namely Old Malling Farm, Lewes and the former Brickworks and West Sussex County Council Depot in Midhurst.
- 7.30** Non-strategic Local Plan housing site allocations are being made in areas of the National Park where there is currently no emerging NDP, or where the NDP does not allocate land for housing in line with Policy SD26. In areas where NDPs are emerging or have been made, these are expected to allocate sites sufficient to meet the settlement level housing provision figures set out in Policy SD26.
- 7.31** The allocation of land in an NDP which will deliver a greater number of homes than is specified in Policy SD26 will be supported, where it meets an identified local housing need in that settlement or locality and is supported locally.
- 7.32** A list of made and emerging NDPs can be viewed on the National Park Authority's website.

⁷⁴ Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

Windfall allowance

7.33 The development of previously unallocated or unidentified land, known as ‘windfall sites’, will count towards the Local Plan housing provision figure. This is known as a ‘windfall allowance’, and is not attributable to particular settlements. Therefore windfall sites will not count towards settlement-specific housing provision figures. 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.

Strategic Policy SD27: Mix of homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.
 - a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:
 - 1 bedroom dwellings: 35%*
 - 2 bedroom dwellings: 35%
 - 3 bedroom dwellings: 25%
 - 4 bedroom dwellings: 5%
 - b) Proposals for market housing should 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 needs; or
 - b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.
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.

*1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

Meeting the needs of local households

- 7.34** The purpose of this policy is to ensure that development proposals provide a mix of homes that reflects the need and community aspiration for small and medium-sized homes.
- 7.35** The precise mix of homes within each proposal should be informed by the latest evidence of strategic and local needs, including the currently published HEDNA or future reviews as relevant. However, given clear evidence in the HEDNA 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.
- 7.36** The mix of dwellings set out in Policy SD27 is in line with the recommendations of the SHMA (and confirmed by the HEDNA), which is based on detailed modelling of housing market trends up until 2033. The SHMA and HEDNA recommends that market housing, in particular, should be explicitly focused on delivering smaller family housing for younger households. This approach also complements Policies SD30: Replacement Dwellings and SD31: Extensions to existing dwellings, annexes and outbuildings, which similarly seek to retain smaller dwellings.
- 7.37** It is recognised that many housing sites are small and in such instances it may not be possible to achieve the exact proportions set out in Policy SD27. 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.
- 7.38** Affordable 1 bedroom dwellings may be substituted with 2 bedroom dwellings, in recognition that 2 bedroom dwellings are more adaptable to changing needs, for example, where a couple have children whilst living there.
- 7.39** For avoidance of doubt, any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or W/C, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

Alternative mix of homes

- 7.40** The Authority recognises that future development will need to respond appropriately to local needs. Policy SD27 therefore allows for regard to be had to bespoke local housing need evidence relating to the parish. This would normally be in the form of a housing need survey. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development. Where a made NDP proposes an alternative housing mix based on robust local evidence, this should be used in place of the mix proposed in Policy SD27.
- 7.41** Exceptionally, the effect of unit types and sizes on a scheme's financial viability may be a material consideration, where this has been clearly evidenced through independent viability appraisal. For avoidance of doubt, the overall proportion of affordable housing with tenure mix to reflect Policy SD28: Affordable Housing will be prioritised, if exceptionally necessary, over the normal mix of market housing.
- 7.42** The delivery of each element of supply will be subject to ongoing monitoring.

Older people's housing

7.43 The evidence from the SHMA, and confirmed by the HEDNA, 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.

7.44 The 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.

7.45 The HEDNA identifies an indicative demand for some 90 homes per annum suitable to meet the needs of older people. This represents some 20% of the total objectively assessed housing need. Figure 7.4 indicates the different types of older people's housing need. There is a particular need for more sheltered housing in future.

FIGURE 7.4: ESTIMATED NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE, 2014-33

	Affordable		Market		Total	
	2014-33	Per Annum	2014-33	Per Annum	2014-33	Per Annum*
Sheltered	506	27	758	40	1,264	67
Enhanced sheltered	81	4	121	6	202	11
Extra-Care	101	5	152	8	253	13
Total	688	36	1,031	54	1,719	90

*Note total differs from sum of rows due to rounding

Source: *South Downs Housing & Economic Development Needs Assessment (GL Hearne, Sep 2017)*

7.46 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

7.47 The National Park 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'.

7.48 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.

7c. AFFORDABLE HOMES

Introduction

- 7.49** This sub-section of the Local Plan includes two strategic policies namely SD28: Affordable Homes and SD29: Rural Exception Sites.
- 7.50** Policy SD28: Affordable Homes, relates to the proportion of affordable housing to be delivered from development schemes. Provision should be on-site as required by the NPPF unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.
- 7.51** The National Park Authority supports the principle of rural exception sites, which provide 100 per cent affordable housing delivery on sites which may not be suitable for market housing. Policy SD29 sets out the basis for this type of development which is particularly relevant to a national park.
- 7.52** The affordability of housing is a major barrier to sustainable communities in the National Park. In 2016, the average house price was 13.6 times average earnings, making it the second least affordable National Park in the UK. House prices in the National Park increased by 45% from 2006 to 2016. With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of affordable homes, it can be difficult for people working in the National Park to afford to live within it. Young people and young families, in particular, struggle to find low-cost housing which creates a significant local housing need. The HEDNA concluded that there is strong justification for policies seeking to maximise delivery of affordable housing, given that 294 affordable homes per year are needed to meet the full need for affordable housing.
- 7.53** The Local Plan must balance meeting these local housing needs with upholding the purposes of the National Park. It responds to the challenge posed by a large proportion of housing in the National Park being delivered on small sites of 10 or fewer homes – especially in the National Park’s smaller settlements, where the long-term impacts of housing unaffordability are most keenly felt. The National Park Authority has prepared a robust evidence base to demonstrate the deliverability of the Local Plan, including those policies that seek to deliver affordable housing on the majority of housing sites. This evidence also takes into account the adoption of CIL which came into force on 1st April 2017.
- 7.54** Community Land Trusts (CLT) are supported as one mechanism for delivering affordable housing. They facilitate community ownership of land, homes and other assets to deliver long-term community benefits such as affordable housing, low cost workspace and local services. Partnership working between Housing Authorities, CLTs and other community-led and legally constituted organisations is essential to maximise the delivery of affordable homes.
- 7.55** It is crucial for the Local Plan to deliver affordable housing that truly meets the needs of those on low incomes, such as affordable rented tenures. The National Park Authority also recognises the complementary role of housing provided for rural workers by large-scale landowners, as part of their historic stewardship role and commitment to local communities. Opportunities for these less formal types of arrangement will be encouraged through Whole Estate Plans.

Strategic Policy SD28: Affordable Homes

1. Development proposals for new residential development will be permitted that maximise the delivery of affordable housing to meet local need, and provided that, as a minimum, the following are met:
 - a) On sites with gross capacity to provide 11 or more homes, a minimum of 50% of new homes created will be provided as affordable homes on-site, of which a minimum 75% will provide a rented affordable tenure
 - b) On sites with gross capacity to provide between 3 and 10 homes, a proportion of affordable homes will be provided in accordance with the following sliding scale, applied to new homes created:

3 homes	Meaningful financial contribution, to be negotiated case-by-case
4-5 homes	1 affordable home
6-7 homes	2 affordable homes, at least 1 of which is a rented affordable tenure
8homes	3 affordable homes, at least 1 of which is a rented affordable tenure
9 homes	3 affordable homes, at least 2 of which is a rented affordable tenure
10 homes	4 affordable homes, at least 2 of which is a rented affordable tenure

Development proposals of 3 to 10 net dwellings will provide affordable housing on-site. Exceptionally, at the discretion of the Authority, financial contributions in lieu will be accepted.

2. Where, exceptionally, provision of affordable housing which complies with the above is robustly shown to be financially unviable, priority will be given to achieving the target number of on-site affordable homes over other requirements set out in this policy.
3. Development proposals will be permitted provided that affordable housing units are integrated throughout the development, are indistinguishable in design and materials from the market housing on the site, and, where feasible, will remain affordable in perpetuity.
4. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.
5. Developers may not circumvent this policy by artificially subdividing sites.

Applying Policy SD28 to residential development

- 7.56** The purpose of policy SD28 is to maximise the delivery of affordable homes across the National Park as part of market-led housing schemes.
- 7.57** All development falling within Use Class C3 is subject to Policy SD28, including any retirement or assisted living accommodation within this use class. The policy applies to all developments of 3 or more new homes, and applies to all residential units on the site that have been created by building new structures or converting existing structures.

Amount of affordable housing

- 7.58** Policy SD28 sets out a sliding scale of requirement for developments to provide affordable housing. This recognises the greater challenges that exist for small site developers in making such provision. These requirements have been tested for viability, taking account of the different market circumstances across the National Park. Where the calculation of the on-site affordable housing requirement results in a fraction of a unit, the requirement will be rounded up to the nearest whole number. Applications proposing a lower proportion of affordable home provision should present robust evidence to demonstrate constrained viability or other exceptional circumstances.

Mix of affordable housing tenures

- 7.59** The SHMA, as confirmed by the HEDNA recommends that 75% of new affordable homes should be either Social Rented or affordable rented tenure to reflect evidence of need, with the remaining 25% being provided as intermediate forms of housing, such as shared or low-cost ownership. However the SHMA also recognises that different communities within the National Park have different needs and aspirations.
- 7.60** Policy SD28 reflects the SHMA strategic tenure mix (as confirmed by the HEDNA) as a requirement for new housing development, whilst allowing flexibility to reflect local need. Evidence of local need can include, but is not limited to: local housing needs survey, relevant housing market assessment published by a local authority, and housing registers (waiting lists). If a tenure mix is proposed which departs from the strategic tenure mix set out in Policy SD28, robust evidence must be provided, which is supported by the relevant housing enabler.
- 7.61** The National Park Authority considers that social rent tenures are the most affordable to those in greatest need, and should be prioritised over other forms of rented tenure. Levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.

Local connections

- 7.62** Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. Rural local connection criteria, which is linked to parishes, will take precedent over other needs.

7.63 Local connections will be determined by the Authority, parish council and relevant housing authority, having primary regard to the relevant housing register allocations policy. Where a Community Land Trust (CLT) is to be the managing body for the homes provided, regard will be given to the CLT's objectives and strategy. The Authority will also have regard to evidence of local need which is specific to a rural estate or large farm, particularly where this is set out in a Whole Estate Plan that has been endorsed by the National Park Authority.

Viability

7.64 The *South Downs Whole Plan and Affordable Housing Viability Study*⁷⁵ demonstrates that for the great majority of sites, the requirements of Policy SD28 can be achieved. The *Vision and Circular on English National Parks and the Broads*⁷⁶ states that new housing should be focused on affordable housing requirements, and support local employment opportunities and key services. Insufficient affordable housing provision which runs contrary to Policy SD28 will be a significant factor weighing against approval, irrespective of any viability barriers.

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

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

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

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

⁷⁵ South Downs Whole Plan and Affordable Housing Viability Study (BNP Paribas, 2017)

⁷⁶ Vision and Circular on English National Parks and the Broads (DEFRA, 2010)

7.68 Where a lower proportion of affordable housing is accepted by the Authority as an exception, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions, up to the requirement in Policy SD28, if market conditions improve before the completion of development.

7.69 The National Park Authority will publish guidance on viability matters in due course.

Providing for affordable housing on-site

7.70 Affordable homes should be provided on-site. The options for achieving this should be discussed in full with both the Authority and the relevant housing enabler.

7.71 Exceptionally, off-site provision or a financial contribution of broadly equivalent value to the normal on-site provision may be justified. Only when all options for on-site provision are shown to have been reasonably explored, without success, will a financial contribution to provide affordable housing off-site be accepted. On larger sites of 11 or more homes, this will usually be due to a lack of financial viability, ascertained by working through the cascade set out under Viability above. On smaller sites of 10 or fewer homes, there may on occasion be other site-specific practical constraints that make on-site provision of a policy-compliant mix of housing tenures unfeasible.

7.72 Financial contributions secured in lieu of affordable housing must directly address local needs within the National Park, and support achievement of mixed and balanced communities. In such cases, a legal agreement will be required that sets out the terms of payment, and that limits its spending to relate only to schemes that address local needs. The calculation of financial contributions will be based on the most up-to-date policy or guidance published or used by the local housing authority within which the site is located. The National Park Authority will publish its own guidance on this matter in due course, which will supersede other guidance.

7.73 In some cases, the Authority may be willing to accept serviced plots as payment-in-kind, either on the application site, or on an equivalent site that equally addresses local need and is in other respects suitable and deliverable. This, together with any additional payment necessary, should represent a value equivalent to the financial contribution which would otherwise be calculated and paid to the Authority in the absence of acceptance of the serviced plot.

Design and mix

7.74 Affordable homes must be integrated throughout the development and be of visually indistinguishable design. They should be located throughout the site in a manner that supports integration but can also be managed efficiently by the relevant housing association. The mix of dwelling types and standards of design for affordable housing are considered under other development management policies alongside all other types of housing.

Artificial subdivision of sites

7.75 The Authority will not accept the artificial subdivision of sites where an obvious consequence of doing so would be to fall under the relevant policy threshold requiring either on-site provision of affordable housing, or a financial contribution proportionate to the total sum of development. For the purposes of housing provision, the Authority will consider a site to be a single site if the current arrangements, in either functional and / or legal land ownership terms, can be considered part of a wider whole.

Affordable housing delivery

- 7.76** Affordable housing provision will be secured at the granting of planning permission by a Section 106 legal agreement. The National Park Authority will work in close partnership with the relevant Local Housing Authority to ensure that affordable housing is delivered effectively. Affordable housing should remain as such in perpetuity.
- 7.77** Community Land Trusts (CLTs) provide an opportunity for local community ownership of land for long-term affordable housing provision. Affordable housing provided by CLTs and most housing associations are exempt from the “Right to Buy”, allowing affordable housing to remain affordable in perpetuity.

Strategic Policy SD29: Rural Exception Sites

1. Proposals for new residential development of 100 per cent affordable housing outside of settlement boundaries as shown on the Policies Map will be permitted, provided that the following are met:
 - a) Affordable housing is provided in perpetuity;
 - b) The site selection process has considered all reasonable options, and the most suitable available site in terms of landscape, ecosystem services and overall sustainability has been chosen;
 - c) The scale and location relates well to the existing settlement and landscape character; and
 - d) It is shown that effective community engagement has fed into the design, layout and types of dwellings proposed.
2. The size (number of bedrooms), type and tenure, (for example, social and affordable rented, intermediate, shared ownership or older people’s housing) of affordable homes for each proposal will be based on robust and up-to-date evidence of local community need.
3. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.

- 7.78** The purpose of Policy SD29 is to encourage the delivery of rural exception sites. These sites provide a critical source of affordable housing in perpetuity to meet local needs, which are not served by the market, on land that would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Mix of tenures

7.79 The National Park Authority believes that a policy of allowing market housing would reduce the number of affordable homes coming forward and may reduce the willingness of communities to support the principle of rural exception sites. The emphasis on rural exception sites in national parks should be on 100 per cent affordable housing. If a viability appraisal has robustly demonstrated that viability genuinely risks preventing a rural exception site from coming forward, and there are no alternative, more viable, sites, the Authority will work with the landowner, community and other stakeholders to establish the optimum alternative option which best meets the local need.

Site selection, scale and location

7.80 Policy SD29 (1) (b) requires the most sustainable, available site to be chosen. It is important to ensure that locations, which have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, work best within the landscape and settlement form, allow better access to local services, and are most suitable in other respects, are preferred.

Community and stakeholder engagement

7.81 “Effective community engagement” should be demonstrated by the applicant in both the site selection and application design processes. This can include liaison with the relevant parish council(s), community groups and neighbours. It is also essential that the advice of the relevant Rural Housing Enabler feeds into these processes, so that any practical difficulties regarding management issues are identified and overcome at an early stage of design.

Local need and local connection

7.82 Occupation of affordable housing brought forward on both rural exception sites and market-led sites is subject to conditions to ensure the needs of local people are being met. The meanings of “local need” and “local connection” are set out in the supporting text to Policy SD28: Affordable Housing. Rural exception sites should also take into account the aspirations of the local community, for example, as expressed in the relevant NDP or Parish Plan Village Statement. The type and tenure of dwellings on rural exception sites will need to balance the provision of local needs with the character of the existing settlement and the landscape within which it is located.

Delivery of rural exception sites

7.83 The Authority will expect all rural exception sites to reflect local needs and aspirations. An effective way to achieve this is through establishing CLTs to drive the delivery of sites. Local partnership arrangements will generally be appropriate for delivering on sites, for example, between CLTs, Parish or Town Councils, Specialist Housing Associations and / or Rural Housing Enablers (RHEs). Whichever delivery model is used, the Authority will seek to ensure that affordable housing remains affordable in perpetuity.

7d. HOMES (DEVELOPMENT MANAGEMENT POLICIES)

7.84 This sub-section of the Local Plan includes three development management policies relating to housing namely: SD30: Replacement Dwellings, SD31: Extensions to existing dwellings, and provision of annexes and outbuildings and SD32: New Agricultural and Forestry Workers' Dwellings.

Development Management Policy SD30: Replacement Dwellings

1. Development proposals for replacement residential dwellings outside settlement boundaries, as defined on the Policies Map, will be permitted where:
 - a) The structure, constituting all new and existing development, does not result in a net increase of more than 30% compared with the gross internal area of the existing dwelling; and
 - b) The replacement dwelling is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and / or privacy.
2. Development proposals for the replacement of one residential dwelling with two or more separate residential dwellings will be permitted where:
 - a) Criteria 1(a) and (b) are satisfied;
 - b) The replacement dwellings are 'small' and designed with appropriate layouts and internal arrangements; and
 - c) There is sufficient scope within the existing dwelling and its curtilage to provide satisfactory private amenity space, landscaping, boundary treatments, external storage and vehicular parking for each dwelling.
3. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.85 The purpose of this policy is to reduce the loss of small homes in the National Park through replacement by substantially larger homes. A key consideration is demonstrating that there is no increase in the overall visual impact of the replacement dwelling(s) on the landscape of the National Park.

Applying Policy SD30 to development proposals for replacement dwellings

7.86 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 01 April 2011. This is the date that the National Park Authority became the local planning authority for the National Park.

7.87 Where outbuildings were utilised for ancillary domestic purposes on 01 April 2011, and where the number of outbuildings would be rationalised to improve the appearance of the site, the GIA of the outbuildings may be considered in the assessment of whether the proposed extension is materially larger than the existing dwelling.

7.88 It is expected that the residential curtilage (domestic garden area) of a replacement dwelling would be no larger than that of the existing dwelling. The Authority will need to be satisfied that the dwelling to be replaced has a lawful use for residential purposes. The policy relates to a

dwelling as it existed on 01 April 2011, or as the dwelling was originally built or legally established, if the residential use post-dates 01 April 2011. Where residential use may have been abandoned, used for some other purpose or is in an uninhabitable condition, the advice of the Authority should be sought at an early stage.

7.89 Within the broad principles set out in criteria 1c above, proposals for replacement dwellings will be expected to be of a high standard of design in accordance with Policy SD5: Design. Proposals should take account of local and traditional elements of design and should not introduce discordant or intrusive features in the landscape. It will be appropriate to maintain existing gaps between dwellings to ensure that the existing rural character is not prejudiced. Any replacement dwelling will normally be expected to be located on the site of the existing dwelling it is to replace. However, where a re-siting within the residential unit is proposed it must be demonstrated that there would be no harmful impact on the landscape of the National Park.

Increase in number of dwellings

7.90 Where proposals include a net increase in the number of dwellings on the site, a 'small' dwelling is defined as having a total Gross Internal Area (GIA) of 120m² or less. Proposals must not result in cramped, impractical and / or contrived layouts and internal arrangements. Such proposals must ensure that each dwelling has suitable vehicular parking, bin and cycle storage and private amenity space. Features such as fencing, entrance gates, lighting, new driveways and additional hardstanding can have a considerable urbanising effect on rural areas and as such proposals which do not respect, or are not in keeping with, the rural character of the area will not be permitted.

Permitted development rights

7.91 In determining planning applications for replacement dwellings, consideration will be given to the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD31: Extensions to existing dwellings, and provision of annexes and outbuildings

1. Development proposals for extensions to existing dwellings, and the provision of annexes and outbuildings will be permitted where:
 - a) The proposal does not increase the floorspace of the existing dwelling by more than 30% unless there are exceptional circumstances;
 - b) The proposal respects the established character of the local area; and
 - c) The proposal is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and / or privacy.
2. Proposals for annexes should demonstrate the functional and physical dependency on the host dwelling.
3. Proposals for outbuildings should demonstrate that they are required for purposes incidental to the use of the host dwelling.
4. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.92 The purpose of this policy is to avoid the over-extension of existing dwellings and the adverse impact that this has on the character and appearance of both settlements and the countryside. This policy relates to the extension of existing houses and the provision of new annexes and outbuildings across the National Park. Within the broad principles set out in Policy SD31, proposals will be expected to be of a high standard of design and compliance with any size limits will not alone be sufficient in itself to secure planning permission. Proposals should respect local character and complement the scale, height, massing, appearance and character of the existing dwelling.

Applying Policy SD31 to development proposals for extensions

7.93 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 01 April 2011.

7.94 With respect to the size of extensions and annexes the Authority will generally seek modest proposals which increase the Gross Internal Area (GIA) of the existing dwelling by no more than 30%. A larger proposal may be permitted where it can be clearly demonstrated that there will be no harmful intrusive impact in the landscape and that there is an enhancement in the appearance of the host dwelling.

7.95 Proposals for outbuildings should be sensitively sited to the side or rear of the host dwelling. Single or double detached garages of appropriate dimensions and design may be permitted if they are not intrusive upon the local area, remain subordinate to and do not detract from the character and appearance of the main dwelling.

7.96 Proposals for annexes to provide additional ancillary accommodation must demonstrate a functional link between it and the host dwelling. The annexe must be in the same ownership as the main dwelling and share utility services, access, vehicular parking and private amenity space. An annexe should usually be incorporated within or physically attached to the host dwelling. Where an extension to provide an annexe is not practical, consideration will also be given to the size of the detached annexe and sub-ordinance to the host dwelling.

7.97 For the purposes of applying this policy, the use of outbuildings to support home working and home-based businesses will generally be supported where this does not involve a change of use of the main dwelling or have an adverse impact on the residential amenities of adjoining residents or the landscape of the National Park.

Permitted development rights

7.98 In determining planning applications for extensions, annexes and outbuildings, the impact of cumulative additions will be taken into consideration as well as the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD32: New Agricultural and Forestry Workers' Dwellings

1. Development proposals for agricultural and forestry workers' dwellings will be permitted where it has been demonstrated that the nature and demand of the work concerned make it essential for one or more people engaged in agricultural and forestry enterprises to live at, or very close to, the site of their work.
2. Applications for new agricultural and forestry workers' dwellings will need to demonstrate that:
 - a) The agricultural or forestry enterprise is established, extensive, viable and contributes to the special qualities of the National Park;
 - b) There is an essential functional need for the agricultural and forestry dwelling that could not be fulfilled either by another residential dwelling on the enterprise or existing residential accommodation in the local area which is suitable and available for occupation by the workers concerned;
 - c) No other residential dwellings either on or closely connected to the enterprise have been sold off separately or alienated from it in the past five years unless the reason for separation is justified through robust evidence;
 - d) Full consideration has first been given to the conversion of an existing building within the enterprise; and
 - e) The proposed agricultural or forestry dwelling should be well-related in terms of siting to existing buildings or dwellings within the enterprise, result in and remain as a total habitable floor space not exceeding 120m² (gross internal area) and be sensitively designed.
3. Applications for the removal of occupancy conditions will not be permitted unless it can be demonstrated through robust evidence that there is no longer a current or possible renewed need for the dwelling for the authorised use for the foreseeable future, and will only be made available on the open market when it has been robustly demonstrated that its use as an affordable dwelling would be unviable or unsuitable or unnecessary.
4. Temporary dwellings for agricultural and forestry workers will be permitted where they are essential to support the agricultural or forestry enterprise, whether new or established, provided that it is demonstrated that:

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

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

7.99 The purpose of this policy is to address an essential need for agricultural or forestry workers to live either permanently or temporarily at, or closely sited to, their place of work. The Authority wishes to ensure that any proposal for a dwelling is not an abuse of the concession that the planning system makes for such dwellings and as such will be subject to strict criteria and conditions to ensure that they are only used for the purpose intended.

Demonstration of need

7.100 Permanent dwellings will only be permitted to house full-time, rural workers and their immediate family on established (at least 3 years old) and extensive (at least 5 hectares) agricultural or forestry enterprises in line with the criteria set out in the policy. The functional test is necessary to establish whether it is essential for proper functioning of the enterprise for one or workers to be readily available at most times. Occupiers will need to be engaged in actual operational work, actively contributing to the management of the land. This is because non-operational work, although it may be associated with the business, can be achieved away from the enterprise and as such these cases will not meet the exception test needed to justify new dwellings in the open countryside.

7.101 Applicants should provide suitable information which clearly sets out the economic viability of the enterprise.

7.102 Applicants should also provide an independently corroborated statement from an appropriately qualified individual which suitably demonstrates that the functional requirement cannot be accommodated by either another dwelling on the enterprise or other available and suitable accommodation in the local area, and that no dwellings on or closely connected with the enterprise have recently (at least the last five years) been disposed of, for example, by sale or by removal of restrictive conditions so that the dwelling can be let out on the open rental market.

7.103 Where there is an essential need for accommodation, and a new dwelling is proposed, the applicant should first demonstrate through structural surveys undertaken by a suitably qualified individual that redundant buildings, both agricultural and non-agricultural, within the enterprise are not capable of, or suitable for, being converted to residential use under Policy SD49: Conversion of Redundant Agricultural Buildings.

7.104 The Authority will seek appropriately sited dwellings to avoid isolated dwellings in remote locations. Proposals should respect the local vernacular and provide appropriate boundary treatments to reduce the potential impact on the rural landscape. Proposals which include disproportionately large private amenity spaces will not be permitted.

Occupancy conditions

7.105 The use of agricultural and forestry workers' dwellings will be secured through occupancy conditions, which will not be removed while there is a need for such dwellings in the local area. The implementation of new agricultural or forestry workers dwellings submitted as part of a larger development proposal shall be controlled through suitable planning obligations and conditions to ensure appropriate phasing of development. If the need on a given enterprise disappears, there may still be a need for agricultural and forestry workers to live close to other holdings in the local area and as such their continued use for such purposes would contribute towards maintaining a sustainable rural economy.

7.106 Applications seeking the removal of occupancy conditions will only be permitted where the enterprise has been marketed unsuccessfully for a minimum of 12 months. The scope of the marketing exercise required to demonstrate the lack of need for agricultural and forestry worker housing will comprise an independently corroborated statement from a suitably qualified individual demonstrating that there is no longer the immediate requirement for a unit of this type within a suitable catchment, and the marketing of the property at no more than 70% of deemed open market value, through advertisements in the local press, internet and other publications including at least one agricultural publication, for at least 12 months. The unit will then be made available as an affordable dwelling in the first instance. Only if it can be robustly demonstrated that such use would be unviable, unsuitable or unnecessary at the location, will release on to the open market be deemed acceptable.

Temporary dwellings

7.107 The need for a temporary dwelling for an agricultural or forestry worker to live on or in close proximity to the enterprise in order to be readily available at most times, will also be subject to a functional test demonstrated by robust evidence. The Authority will specify the period for which the temporary permission is granted and the date by which the temporary dwelling will have to be removed or reverted to agricultural use. Successive extensions to a temporary permission will not normally be granted unless material considerations indicate otherwise.

7e. GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

Introduction

- 7.108** This sub-section contains Policy SD33: 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 allocations for Gypsies, Travellers and Travelling Showpeople are set out in Chapter 9.
- 7.109** 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 small resident and transient communities of each group. There are currently around 45 permanent pitches for gypsies and travellers, 30 transit pitches and 4 permanent plots for travelling showpeople.
- 7.110** The need for all types of sites is identified through Gypsy and Traveller Accommodation Assessments (GTAA). Recognising the cross boundary nature of these assessments, the National Park Authority 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*⁷⁷.
- 7.111** A summary of the need for permanent and transit pitches within the National Park as of the 1st December 2016 is presented in Figure 7.5. 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.

⁷⁷ Gypsy, Traveller and Travelling Showpeople Background Paper (South Downs National Park Authority, 2016)

FIGURE 7.5: PERMANENT PITCH NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Area (Within National Park)	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
Total	32	4

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

7.113 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*. The results of this work are:

- The allocation of a small number of sites within the National Park for permanent pitches in chapter 9 of this Local Plan;
- The intensification of the usage of some sites; and
- The safeguarding of existing authorised sites from other uses under policy SD33.

7.114 The outcome of this work is that the National Park Authority is not able to identify sufficient sites to meet the entire identified need for Gypsies, Travellers and Travelling Showpeople within. Very limited opportunities have been put forward by land owners or other interested parties for consideration and the National Park Authority does not own any land on which sites might be provided. All Local Authorities with land within the National Park have reviewed their land holdings as part of these studies.

7.115 As Local Authorities review their Gypsy & Traveller Needs Assessments the outcomes will be shared with the National Park Authority and will also be a consideration in determining planning applications.

7.116 Considerable joint working with neighbouring Local Authorities has taken place to come to this current position. The provision of sites for Gypsies and Travellers is rarely a static matter that can be concluded in its entirety through a Local Plan, therefore this joint working will continue through the plan period. In response to the limited allocations that have been possible, the policy includes criteria that will be used to determine applications on unallocated sites.

Strategic Policy SD33: 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 National Park Authority will seek to meet the need of Gypsies, Travellers and Travelling Showpeople up to 2027 / 28, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately:
 - a) 13 pitches in that part of the National Park located in Brighton & Hove;
 - b) 8 pitches in that part of the National Park located in Lewes District;
 - c) 11 pitches in that part of the National Park located in East Hampshire and Winchester Districts.
3. Development proposals to meet the needs of the Gypsy, 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 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, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers;
 - g) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
 - h) Restrict any permanent built structures in rural locations to essential facilities.
4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.

7.117 The purpose of this policy is to safeguard permanent lawful sites, establish the need for new sites and set the criteria against which applications will be considered.

Safeguarding

7.118 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*. 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 GTAA and any

subsequent update or assessment. Alternative sites should not be any less suitable than the existing pitch or plot proposed to be lost.

Meeting the Need for sites

7.119 The Local Plan allocates 13 pitches within the National Park for Gypsies & Travellers. A summary of the allocations and remaining need is presented in Figure 7.6.

FIGURE 7.6: SUMMARY OF LOCAL PLAN ALLOCATIONS AND PERMANENT PITCH NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

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

7.120 Within the Coastal West Sussex area a need for 6 Gypsy & Traveller and 10 transit pitches was identified. Since the completion of the study 16 pitches have been supplied within the South Downs National Park. In addition it is expected that 2 pitches will become available through the movement of people to bricks and mortar accommodation. This results in the provision of 18 pitches which is 12 above the identified need of 6 in the period to 2027. A transit site containing 9 pitches has also been completed just outside the National Park in Chichester.

New Sites for Gypsies & Travellers

- 7.121** 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, the availability of alternative sites in the area and the most up to date need assessment
- 7.122** 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 well related to settlements with services and facilities, but it is recognised that throughout the National Park sites are often in very rural locations.
- 7.123** 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.

7f. EMPLOYMENT

Introduction

7.124 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.

7.125 Within the National Park the challenge is to encourage sustainable development within the limits of the environment and to ensure Purpose 1 and 2 are not compromised by meeting the socio-economic duty, given 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.

7.126 The National Park is home to about 10,000 businesses and generates £19,450 GVA per head. The 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 economy is mainly rural.

7.127 The *Employment Land Review (ELR)*⁷⁸ is the main evidence based study supporting the Local Plan policies on employment. A site focused update of the ELR was published in 2017 (*ELR Update*)⁷⁹ to support the allocation and safeguarding of employment sites in the Local plan. An updated calculation of employment land need is set out in the *South Downs National Park Housing and Economic Development Needs Assessment (HEDNA)*⁸⁰ published in 2017.

⁷⁸ South Downs National Park Employment Land Review 2015 (G.L. Hearne, 2015)

⁷⁹ South Downs National Park Authority Employment Land Review 2017 Update (South Downs National Park Authority, 2017)

⁸⁰ South Downs National Park Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Strategic Policy SD34: Sustaining the Local Economy

- I. 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 flexibility 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;
 - g) Promote smart economic growth and advances in information and communications technologies, particularly superfast broadband.

7.128 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 SD25, which identifies settlements where the principle of development is accepted.

Key sectors

7.129 Following on from the *State of the Park Report*, the Local Plan identifies three key sectors or clusters of economic activity, 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.

7.130 Food and beverages form an important economic sector. 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 should 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.

7.131 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 SD39: Agriculture and Forestry.

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

Green businesses

7.133 The National Park Authority will encourage green business proposals particularly when they are linked to the special qualities. 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

7.134 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 have both a traditional and future role as hubs for rural supply chains including traditional markets, networking, training and services.

Small and micro businesses

7.135 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 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.

7.136 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.

7.137 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

7.138 Provision of workspace is only one part of encouraging new business start-ups and developing existing businesses. It is also important that businesses are resilient to changes in the local and international economy, for example having the ability to adapt or expand premises to respond to a changing market. The planning process also has a role in supporting the availability of advice and training, and on-going business support. These types of services help to ensure the survival and development of small businesses and thus improve their resilience.

Intensification

7.139 The development strategy set out in Policy SD25 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, provided that this does not compromise the special qualities of the National Park.

Smart economic growth

7.140 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. Policy SD44 deals with telecommunications and other utilities.

Strategic Policy SD35: 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 5.3 hectares
 - Industrial (B1c/B2): 1.8 hectares
 - Small-scale warehousing (B8): 3.2 hectares
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 provided 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 provided 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, to which further protection applies as follows:
 - a) On principal employment sites: B class employment uses will be safeguarded from development proposals for non-B class uses and evidence of a robust marketing campaign of at least 18 months will be required
 - b) On local employment sites: commercial uses will be safeguarded from development proposals for non-commercial uses and evidence of a robust marketing campaign of at least 18 months will be required

Details of marketing requirements are set out in Appendix 3.

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

Employment land requirements

7.142 Policy SD35 sets out the employment land provision figures, which meet the objectively assessed need for employment land identified in the ELR and HEDNA. Evidence indicates that this amount of development is deliverable on sites across the National Park, particularly in the market towns, without harming the special qualities.

7.143 The methodologies for calculating the employment land provision figures are explained in full in the ELR and HEDNA. The provision figures 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 employment need figures should be treated with 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 purposes are not compromised in order to meet its socioeconomic duty.

7.144 A sufficient supply of employment sites is available to meet the provision figures set out in Policy SD35 whilst taking into account that there will be some losses of existing employment land. 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 Figure 7.7. 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 significantly the *Petersfield Plan*, which allocates approximately 3 hectares of land for employment, and the *Petworth NDP* which allocates about a hectare of land as an extension to an existing employment site. There is one Local Plan allocation in Lewes, which is set out in Chapter 9 of this Plan.

7.145 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 SD56 and detailed policies will be contained in the *Area Action Plan*. Policy SD57 forms the detailed policy for North Street Quarter.

FIGURE 7.7: 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)	5.35
NDP allocations	4.69
Local Plan allocations	1.72
Total	11.76

Flexible approach to change-of-use applications

7.146 The ELR forecasts a growth in demand for both office (use class B1⁸¹) 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.

⁸¹ The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories known as 'Use Classes'.

7.147 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.

7.148 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.

7.149 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

7.150 It is important to safeguard premises for local businesses that are fit for purpose both within 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, by providing local employment opportunities for local residents, and by reducing out commuting to employment centres outside the National Park. The ELR and ELR Update provide robust information on existing employment sites across the National Park.

7.151 Change of use applications that would result in the loss of employment land need to be supported by robust evidence. Guidance on the evidence required to prove that a robust marketing exercise has been carried out to support relevant applications is set out in Appendix 3. Advice should be sought from the local planning authority at the earliest opportunity to agree the details of the exercise.

7.152 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 National Park Authority supports the continued use of these sites for B class employment and will resist development proposals for alternative commercial uses and housing. The following principal employment sites are identified on the Policies Map and safeguarded for employment uses:

- Bedford Road, Petersfield
- Holmbush Industrial Estate, Midhurst
- Central Lewes
- Cliffe Industrial Estate, Lewes

7.153 There are a number of local employment sites located in towns and villages identified in policy SD25. 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 NDPs. The Local Plan will safeguard those local employment sites outside designated neighbourhood planning areas that are identified on the Policies Map:

- Abbas Business Centre, Itchen Abbas
- Farringdon Business Park, Lower Farringdon
- Farringdon Industrial Estate, Lower Farringdon
- The Old Piggery, South Harting
- The Wharf, Midhurst
- Midhurst Business Centre, Midhurst
- Hampers Common Industrial Estate, Petworth

7.154 The Authority 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 SD37 on town and village centres.

7.155 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 important to protect all existing small business premises, extending beyond identified principal and local employment sites, 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 3.

7g. TOWN CENTRES AND RETAIL

Introduction

7.156 This sub-section contains the strategic policy on town and village centres. It also includes 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.

7.157 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. The main findings of the recent retail evidence study for Liss, Midhurst and Petworth is also set out.

Lewes

7.158 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, and two supermarkets. 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, Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes allocates land for this use. The strategic site, 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

7.159 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. Liss has a small number of national multiples, and the centre provides adequately for the day-to-day retail needs of the community. However it lacks a bank, and residents depend heavily on Petersfield for most retail need. The village 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.

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

Midhurst

7.161 Midhurst has a very traditional, attractive, linear shopping street, with the addition of a beautiful market square, which is somewhat separate from the main shopping area. The town has low vacancy rates overall.

7.162 The shopping offer includes ladies outfitters, equestrian goods and clothing, several coffee shops and eateries, both multiples and individual. There are also two pharmacies, and a florist. There is some provision for everyday small electrical items and hardware, and this is complemented by independent retailers including a delicatessen, book shop, and jewellers. The town has a number of banks, and there are a number of well-presented charity shops.

7.163 The convenience goods sector is dominated by two supermarkets (one medium and one small), with a range of supporting smaller independent stores. The centre performs a healthy top-up function for local residents.

7.164 A town centre boundary for Midhurst is shown on the Policies Map. It incorporates land at the Grange, adjacent to the public car park, in order to encourage a new medium sized supermarket. Should permission be sought, the National Park Authority 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 there is no increase in pollution of the pond) and amenity. Primary and secondary frontages for Midhurst are also shown on the Policies Map.

Petersfield

7.165 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. 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. At the same time it has retained 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

7.166 Petworth is an attractive, historic market town, which is heavily oriented towards the antique sector. This appeals to visitors to Petworth House and is a draw for visitors to the town centre itself. The centre contains a small convenience store, DIY store, pharmacy, bank and a range of restaurants, pubs and community buildings. There are also a large number of independent shops including delicatessens, florist, top of the range ladies and clothing and homeware retailers and a fine wine shop. 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 one convenience store providing only for top-up shopping. Petworth also benefits from a successful and popular monthly farmers market, held in the town square.

7.167 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

7.168 The *2016 Retail Study* considered the Midhurst, Petworth and Liss centres. It concluded that there was capacity for up to 1,200 sqm 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*.

7.169 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 inappropriate within a National Park.

7.170 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. Suitable edge-of-centre or out-of-centre opportunities are not currently available. Proposals for large-scale out of centre retail parks / supermarkets would not be appropriate in the context of a National Park.

Strategic Policy SD36: Town and Village Centres

1. Development proposals for town centre development will be permitted where they promote or protect the following hierarchy of identified centres as defined on the Policies Map:
 - a) Market Town Centres: Petersfield, Midhurst, Petworth and Lewes
 - b) Larger Village Centre: Liss
 - c) Smaller Village Centres: Alfriston, Ditchling, Fernhurst and Findon
2. Within the smaller village centres, development proposals for retail purposes will be permitted where they are compatible with its historic nature and of a scale appropriate to the community they sit within. Such development should be well related to any existing shops and services within the village unless it can be demonstrated that this is not feasible or practicable.
3. The loss of units in Use Class A that are fit for purpose will not be permitted within smaller village centres unless evidence of a marketing campaign of at least 24 months demonstrates that there is no market demand for the premises, and that its continued use for retail purposes is not viable. Details of marketing requirements are set out in Appendix 6.

7.171 The purpose of this strategic policy is to identify a hierarchy of existing town and village centres across the National Park. This is based on evidence of the current state of the market town centres and village centres, their realistic role and function, and how they relate to those centres outside of the National Park. The establishment of a hierarchy of centres allows their relative positions to be monitored, and if a centre is in decline it enables strategies to put in place to either rejuvenate or manage that decline positively. Policy SD37 sets the more detailed criteria against which development in these centres will be judged.

Development Management Policy SD37: Development in Town and Village Centres

1. Within the town and larger village centres as shown on the Policies Map, development proposals for main town centre uses, in particular those that promote or protect local markets and retailers linked to supply chains across the National Park will be permitted providing they do not harm the retail function of the centre, and are compatible with its scale and historic nature.
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. Planning permission will be granted for retail uses and for non-retail main town centre uses within the secondary shopping frontage as shown on the Policies Map.
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.
5. Within the smaller village centres, development proposals for retail purposes will be permitted where they are compatible with its historic nature and of a scale appropriate to the community they sit within. Such development should be well related to any existing shops and services within the village unless it can be demonstrated that this is not feasible or practicable.
6. The loss of units in Use Class A that are fit for purpose will not be permitted within smaller village centres unless evidence of a marketing campaign of at least 24 months demonstrates that there is no market demand for the premises, and that its continued use for retail purposes is not viable. Details of marketing requirements are set out in Appendix 3.

7.172 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 3.

Towns and larger village centres

7.173 The town centres of Lewes, Petersfield, Midhurst and Petworth, and the large village centre of Liss, provide a range of comparison and convenience goods, and community services and facilities, as described in the introduction to this chapter. These centres are therefore crucially important to meet the needs of communities across the National Park.

7.174 Non-retail town centre uses relate to a range of leisure, entertainment and sports uses as defined in the Glossary. Uses relating to the evening economy include pubs, bars, restaurants and late-opening cafes; where such uses are proposed, regard should be had to the amenity of existing neighbouring uses, including residents.

Smaller Village Centres

7.175 There are a number of smaller village centres. These centres offer vital rural services and contain small collections of shops, but are not generally sufficient to meet the day-to-day needs of the community.

7.176 Communities preparing Neighbourhood Development Plans with small centres not identified in policy SD36 are able to define boundaries and prepare policies for these areas in order to seek to meet the future needs if supported by evidence.

Development Management Policy SD38: 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 18 months demonstrates that there is no market demand for the premises, and that its continued use for retail purposes is not viable. Details of marketing requirements are set out in Appendix 3.
3. Development proposals for new farm shops or extensions to existing farm shops will be permitted provided that:
 - a) The scale and scope would not harm the retail offer in the immediate area. Such shops should aim to sell:
 - i. At least 40 per cent of goods that are own produce plus local foods;
 - ii. 40 per cent of goods that are regional; and
 - iii. 20 per cent are from elsewhere.
 - b) The proposal has re-used or replaced existing buildings, unless it is demonstrated that this is not feasible.
4. Development proposals for new garden centres, or extensions to existing garden centres, will be permitted where:
 - a) It is demonstrated that the primary use of the centre is, and will remain, the sale of plants and horticultural products;
 - b) The scale of operations is appropriate to the location;
 - c) It is demonstrated that the use proposed is directly related to the supply chain of local horticultural businesses; and
 - d) The proposal has re-used or replaced existing buildings, unless it is demonstrated that this is not feasible, in which case it should be related physically and functionally to existing buildings associated with the business.
5. 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 m²
 - b) Larger Village: 500 m²
6. A retail impact assessment will be required for retail development outside of Market Town and Larger Village settlement policy boundaries where the proposal exceeds 150m².
7. All retail development outside centres should consider and take opportunities to increase people's awareness, understanding and enjoyment of the special qualities of the National Park.

7.177 The purpose of this policy is to support the development and expansion of small-scale shops that meet day-to-day shopping needs. The National Park is home to many individual shops, which are sometimes run by the local community. Their development for alternative uses 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.

Farm shops

7.178 Farm shops can support farm diversification, which in turn supports farm incomes. 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 away⁸² and regional is considered to be that which has come from Hampshire, Surrey, West Sussex and East Sussex i.e. counties with land within or that abuts the National Park.

7.179 Wherever possible, development proposals for farm shops should utilise disused or obsolete agricultural buildings in accordance with Policy SD40 on Farm Diversification.

Garden centres

7.180 Diversification in relation to garden centres can help to even out the seasonal fluctuations and meet customer expectations. These types of retail 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.

7.181 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 and local horticultural suppliers, complies with the relevant parts of SD38 and justifies development outside of the settlement boundary will assist in the consideration of an application.

Retail Impact Assessments

7.182 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, and the limited opportunities for retail development in these locations, any significant retail development outside of these centres is likely to divert trade from them. As a result, it is appropriate to set lower thresholds than the NPPF default position, as developments considerably smaller than those defined in the NPPF 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.

⁸² CPRE definition of local food.

Understanding and enjoyment of the National Park

7.183 In all retail development outside centres the 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.

7h. AGRICULTURE AND FORESTRY

Introduction

7.184 This section of the Local Plan includes three development management policies on agriculture and forestry. Firstly, there is a policy on the construction of new agricultural and forestry buildings. The second policy is on farm diversification, which is intended to increase the long-term viability of farming in the National Park by enabling farmers to set up additional income streams to their core business. The third policy is on the conversion of redundant agricultural buildings, which seeks to ensure that farmers can re-use redundant assets in a way that safeguards their agricultural character and contributes to the economic and social wellbeing of the National Park's communities.

7.185 Land used for farming and forestry covers most of the National Park, and is the most important provider of its ecosystem services. These range from the provisioning of food, biomass and other materials such as timber to the regulation of water and soil quality. Farming and forestry include the provision of habitats to many of the National Park's most distinctive species, and the cultural benefits arising from the protection of beautiful and centuries old landscapes that attract visitors. This Local Plan aims to protect and enhance the delivery of multiple ecosystem services which arise from farmland and woodland, and the buildings associated with them, in line with Core Policy SD2: Ecosystem Services.

7.186 Farming and forestry are also a crucial part of the National Park's economy. The fourth special quality is an environment shaped by centuries of farming and embracing new enterprise. The existing agricultural buildings make an important contribution to this special quality, and any new development or conversion should conserve and where possible enhance the agricultural character of such buildings and their setting.

7.187 There are a wide range of permitted development rights available to farms, both for agricultural development and for the change of use of agricultural buildings, without the need for planning permission. There are several differences between the permitted development rights in National Parks and those elsewhere. The following policies apply to developments which do not come under the category of permitted development.

★ Development Management Policy SD39: Agriculture and Forestry

1. Development proposals for new buildings or structures for the purposes of agriculture or forestry will be permitted where:
 - a) There is an agricultural or forestry need for the development within the National Park and its scale is commensurate with that need;
 - b) It has been demonstrated that available alternative sites, including where feasible sites outside the National Park, which might better protect and enhance the special qualities have been considered, and are unsuitable to meet the need;
 - c) The buildings are in keeping with local character, and of a design that reflects the proposed agricultural or forestry use;
 - d) The proposals include structure planting to integrate the development into the existing local landscape framework;
 - e) The development re-uses or replaces existing buildings where feasible. Where this is not feasible, the development should be related physically and functionally to existing buildings associated with the enterprise, unless there are exceptional circumstances relating to agricultural or forestry necessity for a more isolated location;
 - f) A building has not been disposed of or converted to an alternative use at the holding in the past three years, which could have met the need of the development proposed; and
 - g) Existing buildings which have a negative landscape impact are removed.
2. Development proposals for new or improved access tracks for forestry or agriculture will be permitted where:
 - a) The proposal is essential for the sustainable management of the land;
 - b) It has been demonstrated that it is not feasible to accommodate the proposed traffic using existing accesses;
 - c) The layout and design is located to minimise impacts on the special qualities; and
 - d) Where appropriate, the track is opened as a path for permissive public usage.

7.188 The purpose of this policy is to enable farm and forestry enterprises to grow in a way that conserves and enhances the special qualities of the National Park.

Agricultural or forestry need

7.189 It is important that the construction of new or extended buildings for agricultural and forestry must meet an identified operational need within the context of the National Park purposes and duty. As they will normally be outside settlement boundaries, they should be built at the minimum scale required to meet that need. An analysis of reasonable alternative sites should demonstrate that the chosen site is optimal in respect of the special qualities. This analysis should include sites outside the National Park boundary where this is a feasible option for the applicant.

Design and landscape

- 7.190** Appropriately sized and located agricultural and forestry buildings are part of the rural character of the National Park, and their generally functional and minimal design is related to their integral relationship with the management of the surrounding land. New agricultural and forestry development should follow the same principle, and not be disguised as any other type of development.
- 7.191** The landscape impact of new development should be minimised. Often this can be achieved by location close to existing buildings. The scale, massing and colour of agricultural buildings is particularly important. Different parts of the National Park also have different traditions in the design and layout of agricultural buildings. Advice should be sought from the Authority on these matters at an early stage in the design process.

Replacement buildings

- 7.192** Unnecessary proliferation of buildings in rural locations will be resisted. The loss of existing fit-for-purpose buildings that may be needed for future operations is discouraged, therefore new buildings to replace those recently disposed of will not normally be permitted. Exceptions may be made to this where the applicant can provide strong evidence that a need could not previously have been anticipated or planned for. Where the opportunity arises to enhance the landscape through appropriate replacement of a building, this must be taken.

Forestry development

- 7.193** Any forestry related development of buildings or structures within woodland should have particular reference to policies SD9: Biodiversity and Geodiversity and SD11: Trees, Hedgerows and Woodland. Consideration should also be given to the protection of the mycology and health of forest soils, mitigating the negative effects of development, where possible.

Tracks and Infrastructure

- 7.194** Proposals for new, or alterations to, agricultural and forest tracks and roads should be in keeping with the local geology and landscape character. Proposals should consider all relevant agricultural or forestry activity including turning circles at track junctions, timber stacking and loading areas and access to trunk roads. The design and layout of tracks should fit in with the pattern of existing contours and vegetation, and should deliver ecosystem services by protecting and enhancing drainage patterns, protecting heritage assets (including archaeology) and incorporating features of biodiversity value wherever possible.
- 7.195** New access tracks that relate to existing Public Rights of Way and public roads used by non-motorised users should, wherever feasible and compatible with the needs of agriculture, forestry, landscape and biodiversity, provide a meaningful connection with the road and public right of way network. These should be designated as permitted paths or public rights of way. Such designation may be secured through a planning condition or legal agreement.

Exceptional use of removal condition

- 7.196** In exceptional circumstances, it may be considered appropriate for reasons of supporting the National Park purposes to grant permission for an agricultural or forestry building which does not comply with one or more of the criteria in Policy SD39. In such circumstances a condition will be attached to the planning permission requiring the demolition of the relevant building should it fall out of use and remain so for a period of ten years or more.

Development Management Policy SD40: Farm and Forestry Diversification

- I. Development proposals relating to farm and forestry diversification will be permitted where:
 - a) A diversification plan is submitted, which demonstrates that:
 - i. The proposed development(s) would contribute to the first purpose of the National Park by providing long-term benefit to the farming or forestry business as an agricultural / forestry operation;
 - ii. Diversification activities remain subsidiary to the farming or forestry operation, in terms of physical scale and income stream; and
 - iii. The proposed development does not cause severance or disruption to the agricultural holding.
 - and
 - b) The development re-uses or replaces existing buildings where feasible. Where this is not feasible, the development should be related physically and functionally to existing buildings, be of an appropriate scale, and retain agricultural character; and
 - c) Any outdoor storage is provided as a minor ancillary element of other uses.

7.197 The purpose of this policy is to support the long term viability of the National Park's farm and forestry enterprises, which contribute to the first purpose of the National Park by their land management activities. This will be achieved by facilitating farm diversification projects, which will also deliver multiple benefits for the National Park purposes and duty. The Partnership Management Plan states that farm diversification that supports the appropriate re-use of redundant or neglected traditional buildings presents a particular opportunity for delivering multiple benefits.

Subsidiary nature

7.198 The principle aim of a farm diversification proposal should be to supplement the core farm enterprise and not to replace it. This need not mean that income from the diversified business be less than from the farm, but the diversified elements of the business should contribute a long-term sustainable income stream to the farm which allows the main business to withstand periods of sustained low returns. The Authority will therefore resist proposals which could harm the long-term viability of farm holdings, i.e. those proposals that lead to the piecemeal loss of assets from farms.

7.199 A diversification plan will show how the development proposal(s) will contribute to the viability of the farming business over the long term. The preparation of this Plan should be proportionate to the scale of the diversification project.

7.200 The Authority may use a planning condition or legal agreement to ensure that the ownership and control of new development is retained, and ensure that income will be used to support appropriate management of the landscape. In addition, the physical scale of the diversified business uses should not overwhelm that of the farming activities on the site or disrupt them. No diversification activities should preclude the future return of the land to agricultural use. The cumulative impacts of diversification developments, including on traffic generation, will be taken into account in assessing applications against this criterion.

Existing and new buildings

7.201 Farm diversification should make the best possible use of existing, appropriate buildings. In instances where the reuse of existing buildings would cause harm to a heritage asset, a new building may be preferable.

7.202 Where new buildings are deemed necessary, they should generally be in close proximity to existing buildings and respond to the context of an agricultural farmstead. A functional design may be appropriate, provided that the buildings are modest in scale.

Specific uses

7.203 Examples of possible farm diversification may include:

- Farm shops selling local produce;
- Educational facilities directly related to the farm / countryside location;
- Leisure facilities promoting the quiet enjoyment and understanding of the special qualities, including increased access to the countryside;
- Tourist accommodation;
- Small-scale generation of electricity or heat from local renewable sources of energy, primarily for use on site or in the local area;
- Appropriately scaled processing facilities for the outputs of the unit or of other agriculture / forestry businesses in the local area; or
- Services to the agriculture or forestry sectors that contribute to the sustainable maintenance of the landscape of the National Park.

Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings

1. The conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries to an alternative use will be permitted where:
 - a) The location is sufficiently well related to existing infrastructure, amenities and services;
 - b) The existing vehicular access is suitable in landscape terms for the use proposed;
 - c) The original building is structurally sound, is not derelict and of an appropriate design and scale for conversion to the proposed new use, without the need for substantial reconstruction, significant extensions or ancillary buildings;
 - d) Conversion will not result in the need for another agricultural or forestry building on the holding;
 - e) If the building proposed for conversion is not a traditional one, there are no redundant traditional buildings within the holding capable of being re-used in the first instance; and
 - f) There is no adverse impact on the character of the building and its setting, in particular its agricultural / forestry character, and
 - g) For residential uses, the proposed development is restricted to occupation by local workers who need to be accommodated outside of defined settlement boundaries.
2. The conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries identified as heritage assets will be permitted where:
 - a) Part I of this policy is complied with;
 - b) The optimal viable use is proposed to conserve and enhance its architectural and historic significance and setting;
 - c) Wherever possible, essential utilities and other functional requirements do not harm significant internal or external fabric; and
 - d) Existing historic fabric and features of architectural or historic significance are retained.

7.204 The purpose of the policy is to enable the conservation of agricultural or forestry buildings which are heritage assets, and allow for the beneficial re-use of other rural buildings to support the rural economy, tourism and local communities whilst protecting and enhancing the character of the countryside.

Suitability of agricultural or forestry buildings for conversion

7.205 Many but not all agricultural or forestry buildings will be suitable for conversion. Buildings which are generally not suitable for conversion include those in isolated locations, or with poor access arrangements; buildings which would require substantial reconstruction or structural works to accommodate the new use; buildings which are subject to a planning condition or condition of prior approval which requires their removal on cessation of agricultural use; or buildings which have a negative landscape impact only justified in a National Park setting by their agricultural or forestry usage.

Future needs

7.206 Conversion of agricultural or forestry buildings should not result in the need for another building on the holding. An assessment will be made as to what extent the building has been designed and used for agricultural purposes, its age, how long it has been unused and the potential for it to be used for agriculture again in future.

Non-traditional farm buildings

7.207 The use of non-traditional farm buildings for alternative uses should only be considered after considering the conversion of traditional buildings on the holding, as these are likely to be more worthy of being retained. The removal of disused buildings that have a negative landscape impact will be encouraged.

Design considerations

7.208 Conversion should be achieved through minimal changes and retention of the existing structure and its characteristics. Small-scale localised rebuilding may be acceptable, but any significant rebuilding would be considered new-build rather than a conversion, which would instead be subject to Policy SD25 and other relevant Local Plan policies as applicable. It will be necessary to assess which features are original, and which are newer alterations, and which of these is worthy of being retained.

Extensions and Ancillary Buildings

7.209 Minor extensions as part of conversion may be acceptable only where they can safeguard the character of the main buildings and farmstead. Where unavoidable, they should be subordinate in scale and should not compromise the setting of the building or farmstead.

7.210 New ancillary buildings can detract from the agricultural character of farm buildings and adversely impact on surrounding views. Re-using existing ancillary structures is encouraged, and any new structures will be carefully scrutinised.

Setting

7.211 A sensitive conversion respects the relationship the building has with the surrounding landscape. It is the buildings in their setting and not just the buildings themselves which are important to the special qualities of the National Park. The relationship of each building to others in the group should be considered. Existing boundaries around and within a farmstead are likely to be of value and should be respected from the start of the design process.

7.212 Where a farmstead is proposed for conversion into multiple units, care must be taken in the subdivision of surrounding land, as, for example, new separate gardens can greatly affect setting of the group by eroding the scale and proportion of the existing building. There is a risk that the subdivision of shared spaces can also create problems between the new use and any continuing agricultural use.

Use

7.213 The priority use for redundant agricultural or forestry buildings will be for farm diversification projects, in line with policy SD47.

7.214 If it can be robustly demonstrated that this cannot be delivered in line with the relevant policy, examples of potentially acceptable conversion to other uses include:

- Employment uses in line with policy SD34: Sustaining the Local Economy
- Local community uses in line with Policy SD43: New and Existing Community Facilities
- Visitor accommodation in line with policy Policy SD23: Sustainable Tourism
- Housing for local workers who need to be accommodated outside settlement boundaries

7.215 Residential conversion is more likely than other uses to require a high degree of change and intervention. There are often conflicts with the potential desire for a more domestic character by occupiers, and the likelihood of outdoor domestic paraphernalia. Housing development is therefore unlikely to meet the criteria in Policy SD41 and elsewhere in this Local Plan, except where less harmful uses have been demonstrated not to be viable. Agricultural and forestry workers housing will be an exception to this since it has to be located on or adjacent to the farm or forestry unit in any event, and the alternative to conversion may be a new build dwelling. Conversion to housing for other local workers may be acceptable where a similar level of need can be demonstrated for a location outside settlement boundaries; for example, where a worker on a farm diversification project or tourist accommodation needs to be on site at all times,

Heritage assets

7.216 Where a traditional agricultural or forestry building is considered a heritage asset, the optimal viable use should be sought to secure its future. This may include a mix of uses which are sympathetic to the historic fabric. Further information on optimal viable use is set out under Policy SD12: Historic Environment.

7i. INFRASTRUCTURE

Introduction

7.217 This section of the Local Plan includes three policies relating to infrastructure development. The first, a strategic policy, sets out an overarching approach for infrastructure development in the National Park. This is followed by two development management policies relating to new and existing community facilities, and telecommunications & utilities. Many types of infrastructure are also addressed by other Local Plan policies such as Policy SD19: Transport and Accessibility and Policy SD45: Green Infrastructure.

7.218 Infrastructure is the services and systems that communities need to function. It includes both 'grey' and 'green' infrastructure and is interlinked with multiple ecosystem services such as water flow and flood. The impact of new infrastructure and the expansion of existing infrastructure on the special qualities are a particular concern for the National Park Authority. 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. 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.

7.219 Some infrastructure development proposals will be deemed to constitute major development by the National Park Authority. 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.

7.220 All proposals relating to strategic roads will be dealt with in accordance with the National Park Authority's *Position Statement*⁸³ on the A27, or any successor guidance. This also applies to other major infrastructure proposals.

Strategic Policy SD42: Infrastructure

1. Development proposals for new, improved or supporting infrastructure will only be permitted where:
 - a) It represents the least environmentally harmful option reasonably available, also having regard to the operational requirements and technical limitations of the proposed infrastructure; and
 - b) The design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park and the general amenity of local communities.
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. Financial contributions towards future infrastructure maintenance will, where necessary, be secured by means of a legal agreement.

⁸³ Position Statement on A27 route corridor (South Downs National Park Authority, 2014)

7.221 The purpose of this policy is to support the development of appropriate new infrastructure, while seeking to conserve and enhance the National Park. It relates to all applications for infrastructure development within the National Park.

Impact on the National Park

7.222 All planning applications for new or improved infrastructure will need to provide evidence that the works proposed are the least environmentally harmful option. The preparation of this evidence should be proportionate to the impact of the development on the special qualities.

Infrastructure investment

7.223 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 Authority 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.

7.224 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 National Park Authority will publish an up-to-date list to clearly define what infrastructure is to be provided through either planning obligations or CIL (known as the 'regulation 123 list').

Phasing

7.225 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 coordinated and delivered in partnership with site promoters, public agencies, the relevant county council and other relevant authorities.

7.226 Infrastructure is often considered to be essential, and necessary to be delivered within the early phase of a development or prior to occupation. In these instances, the Authority will work closely with site promoters to source early funding or innovative means to enable delivery. In such circumstances, the Authority will require a proactive approach from site promoters and land owners.

7.227 Financial contributions 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.

Development Management Policy SD43: New and Existing Community Facilities

1. Development proposals for new and/or expanded community facility infrastructure will be permitted where:
 - a) They 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) They 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:
 - a) For commercially run community facilities, evidence is provided of a robust marketing campaign of at least 12 months that clearly demonstrates there is no market demand for the existing use or an equivalent community use; or
 - b) For community- or publicly-owned or managed facilities, it can be robustly demonstrated that there is a lack of need for the existing facility, or an equivalent community use, or
 - c) Alternative community facilities are provided that are 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 3.

7.228 The purpose of this policy is to provide new and protect existing community facilities that serve the local communities of the National Park.

7.229 There is a wide range of community infrastructure facilities 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.

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

- Cultural facilities
- Education
- Healthcare
- Libraries
- Public Houses
- Recreational open space
- Sports pitches, pavilions and leisure centres

- Town and village halls

New community facilities

7.231 It is important that local people are involved in decisions about their community facilities. All planning applications for new community facilities will need to provide evidence of a community engagement exercise to gauge the need for the current and proposed community uses. The preparation of this evidence should be proportionate to the scale of the development.

7.232 The Authority will not look favourably at development proposals for new community facilities located outside settlement boundaries that would replace more sustainably located community facilities within settlement boundaries.

Existing community Facilities

7.233 The Authority will safeguard all existing community facilities that are fit for purpose from development proposals for non-community uses. Where a development proposal could lead to the loss of a community facility or reduce its scope and/or viability, the Authority 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.

7.234 Proposals for losing a community facility must not be based solely on the needs of the current owner / tenant or their chosen business model. Where the loss of a commercially run facility, such as a pub or village shop, is proposed, robust 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 use. The loss of a community facility owned or managed by the community, or run as a non-commercial public service, should be supported by an assessment of local need. This should show that there is no longer a need for the facility, or that there is no opportunity for an equivalent use to move into the premises. Proposals to provide an alternative facility in line with part 2(c) of the policy will also be considered.

Assets of Community Value

7.235 The National Park Authority 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 Authority will consider whether an immediate *Article 4 Direction* should be made to protect the sustainability of local communities.

Development Management Policy SD44: Telecommunications and Utilities Infrastructure

1. Development proposals for new telecommunications and/or utilities infrastructure will be permitted where:
 - a) The identified need cannot be met using existing infrastructure or other appropriate structures;
 - b) They are of an appropriate design that would not have an adverse impact on the special qualities;
 - c) They make use of all available technologies and suitable mitigation designed to minimise the impact on the landscape and general amenity;
 - d) They minimise other relevant environmental impacts; and
 - e) They remove, reduce in prominence, or move underground related existing infrastructure, where feasible.
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 must also be provided with this standard of connection when available, unless it can be demonstrated through consultation with relevant service providers that this would not be deliverable.

7.236 The purpose of Policy SD44 is to provide appropriate new telecommunications and utilities infrastructure without harm to the special qualities. Telecommunications and other utilities infrastructure often constitutes development in its own right, and Policy SD44 relates to such development. 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.

7.237 Telecommunications infrastructure includes development proposals related to the supply and management of broadband, mobile services and telephone land lines. Utility infrastructure includes development proposals related to the supply and management of water, waste water, gas and electricity.

Siting, mitigation and design

7.238 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. New development proposals should make maximum possible use of technologies with lower landscape impact, before technologies with greater landscape impact are considered.

7.239 Proponents of new telecommunications masts must demonstrate that they have exhausted all the opportunities for use of existing masts and other structures. This should include, where appropriate, siting apparatus on buildings, where this means that 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.

7.240 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.

Mitigating impacts of existing infrastructure

7.241 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. Opportunities will sometimes arise from proposals for new telecommunications or utilities development to mitigate these impacts. Examples of how new development may achieve this include removal or undergrounding of such facilities, screening with appropriate landscaping in compliance with Policy SD5 (Landscape Character), or replacing them with facilities that are less prominent or otherwise have a less negative impact. Policy SD44 requires that such opportunities should be taken. Undergrounding and/or landscape screening will be supported provided that this is compatible with relevant policies, for example biodiversity and archaeology.

Improving telecommunications through new development

7.242 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.

7j. GREEN INFRASTRUCTURE

Introduction

7.243 This sub-section includes policies related to green infrastructure provision. It includes one strategic policy providing the overarching requirements for green infrastructure (Policy SD45). It also includes two development management policies on specific requirements for open space, sports and recreation facilities or other amenity space and burial grounds (Policy SD46) and on Local Green Space designation (Policy SD47).

7.244 Green infrastructure is the multifunctional network of natural and semi natural features, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. Green infrastructure is a vital tool for the delivery of ecosystem services benefits, for resilience to climate change, and for health and wellbeing. The National Park as a whole is a nationally significant green infrastructure asset through its role as the green heart of the South East, and its green infrastructure network is recognised to extend beyond its boundaries. Accordingly, green infrastructure is identified as one of the six key strategic cross boundary issues (see Chapter 4 of the Local Plan).

7.245 The emerging *South Downs Green Infrastructure Framework* sets out a roadmap for green infrastructure planning for the National Park and the wider sub-region. It aims to ‘*create, protect and enhance a connected network of multifunctional assets; which sustainably meet the needs of local communities and supports the special qualities of the South Downs; by achieving a consensus about the strategic principles for planning, delivery and management of green infrastructure*’.

7.246 National Parks have traditionally been places for informal recreation and this is widely recognised in the *National Parks Vision and Circular*. As the local planning authority, the National Park Authority has an additional responsibility to plan for the provision of formal sports and recreational facilities for the health and wellbeing of its population. Such provision needs to be based on robust and up-to-date assessments of the needs for facilities and opportunities for new provision.

7.247 The *National Planning Policy Framework* introduces the concept of Local Green Space designation as a way to provide special protection for green areas that are demonstrably special and holds a particular local significance for local communities. The designation would rule out development other than in very special circumstances. The Local Plan designates and protects Local Green Spaces which were nominated by local communities.

Strategic Policy SD45: Green Infrastructure

1. Development proposals will be permitted where they demonstrate that they:
 - a) Maintain or enhance green infrastructure assets, green infrastructure links and the overall green infrastructure network; and
 - b) Provide new green infrastructure, or improvements to existing green assets and green linkages, which are integrated into the development design, that meets the needs of communities both within and beyond the site's boundaries.
2. Green Infrastructure proposals must contribute to multifunctional landscapes which:
 - a) Strengthen connectivity and resilience of ecological networks;
 - b) Incorporate green infrastructure measures that are appropriate to the type and context of the development proposal as part of an overall landscape design;
 - c) Maximise opportunities to mitigate, adapt and improve resilience to climate change;
 - d) Maximise opportunities for cycling and walking, including multi user routes and, where possible, facilitate circular routes; and
 - e) Support health and wellbeing and improve opportunities for understanding and enjoyment of the National Park and its special qualities.
3. Development proposals that will harm the green infrastructure network must incorporate measures that sufficiently mitigate or offset their effects.
4. Where appropriate, the Authority will seek to secure via planning condition or legal agreement provision for the future management and/or maintenance of green infrastructure.

7.248 The purpose of this policy is to promote the provision of new green infrastructure whilst protecting existing assets and the integrity of the green infrastructure network as a whole. This network extends well beyond the boundaries of the National Park.

Enhancing existing and provision of new green infrastructure

7.249 Both green infrastructure assets and the green infrastructure network as a whole are important considerations in determining planning applications. Green infrastructure assets in this context may relate to a wide range of natural or semi-natural features. For example, a development may undermine the viability of a larger habitat through fragmentation.

7.250 New development should be designed in a way that enhances green infrastructure and avoids harm. The National Park Authority will seek contributions as appropriate for the future management and maintenance of the new infrastructure.

7.251 Improvements to existing or provision of new infrastructure should be an integral part of the design of development proposals, and should be landscape led, planned around existing green infrastructure assets, and should be multifunctional. Opportunities should be identified and taken for improving and creating new connections between habitats,

7.252 It is acknowledged that green infrastructure assets serve not only residents within the immediate locale, but also the wider community both locally and further afield. Wherever possible both

new and enhanced green infrastructure will be planned to deliver benefits to as wide a cross-section of National Park users as possible.

Multifunctional and connected green infrastructure

7.253 Green Infrastructure that is multifunctional and connected provides multiple benefits for people and wildlife. There are many ways in which green infrastructure can be multifunctional. In order to maximise opportunities for multifunctional green infrastructure, proposals must be informed by the context and address potential conflicts between users, for example between recreational uses and also between people and wildlife.

7.254 The multifunctional role of green infrastructure can strengthen climate change resilience through sustainable drainage and flood storage provision, and mitigate against climate change through carbon storage and providing sustainable transport options. Where appropriate, green infrastructure should be integrated into the built form of development proposals, for example, through green roofs and swales.

7.255 Green linkages can include green areas of land which connect habitat, green corridors which support movement of wildlife (for example, hedgerows), and public rights of way, Public rights of way provide linkages between GI assets and also between villages and towns and can be multifunctional for the movement of both people and wildlife. Where appropriate, proposals for public rights of way should take opportunities for multi user and inclusive access.

Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries

1. Residential development will be required to provide open space on site or within proximity to the site, in line with the National Park Authority's adopted standards as set out in Figure 7.8, or their replacements. Development proposals for open space should demonstrate how they:
 - a) Are of a type determined by the scale and type of development and the needs of the area;
 - b) Are of high quality design which reflects the landscape character and setting;
 - c) Are safe and accessible for all members of the community; and
 - d) Include provision for the long-term management and maintenance of any recreation or open space facilities provided.
2. Development proposals for new buildings that provide local sport and recreational facilities should be located within settlement boundaries as defined on the Policies Map. Outside of settlement boundaries new buildings for local sport and recreational facilities will be limited to those ancillary to and essential for the use of the land for outdoor sport and recreation. Robust evidence of a sequential search for sites and the ancillary nature of the building will need to be provided and agreed with the Authority. Development proposals for new or improved playing surfaces should be located within or close to settlement boundaries as defined on the Policies Map.
3. Development proposals will be refused where they would result in the loss of open space unless provision of equal or better quantity, quality and accessibility is made in close proximity to the existing open space. Robust evidence must be provided to demonstrate the following:
 - a) Alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need;
 - b) It has been demonstrated that the land cannot reasonably be converted to another form of open space provision for which there is an identified deficit; and
 - c) The development will provide alternative, sports, recreation or open space facilities, the need for which clearly outweighs the loss of the open space.
4. Development proposals for new cemeteries and burial grounds will be permitted where they are:
 - a) Appropriately sited with regard to impact on local amenity;
 - b) Designed to make the most of opportunities to improve and/or create new biodiversity, habitats and green infrastructure; and
 - c) Will have no adverse impact on groundwater and surface water.

7.256 The purpose of Policy SD46 is to ensure provision is made for open space, sports and recreational facilities commensurate with assessed need and protects existing facilities that are valued by the communities they serve.

Adopted open space standards

7.257 The National Park Authority, as the local planning authority, works with the twelve local authorities that are responsible for the delivery of sports and recreation facilities within their district, borough or city both in and outside of the National Park. The *South Downs National Park Open Space, Sports and Recreation Evidence Study*⁸⁴ reviewed the open space standards in operation throughout the National Park. The standards set out in Figure 7.8 are taken from this report and represents the standards that the National Park Authority will adopt. These are based on standards set out in adopted Local Plans or in local needs-based evidence. Residential development proposals will be required to provide open space on site or within a set proximity in accordance with the appropriate standard in Figure 7.8 or any updated standards adopted in the course of the plan period.

FIGURE 7.8: STANDARDS FOR OPEN SPACE, SPORTS AND RECREATIONAL FACILITIES FOR THE NATIONAL PARK BY LOCAL AUTHORITY AREA

Local Authority	Amenity Greenspace		Parks and Gardens		Outdoor Sports		Children / Teen Play	
	ha per 1000† ⁸⁵	Prox. within* ⁸⁶	ha per 1000 †	Prox. within*	ha per 1000†	Prox. within*	ha per 1000†	Prox. within*
Adur	0.72	400m	0.22	1200m	-	-	0.04	1200m
Worthing	0.78	400m	0.20	1200m	-	-	0.05	1200m
Arun	0.82	400m	0.02	1200m	-	-	0.06	1200m
Brighton & Hove	0.582	480m	0.92	720m	0.47	960m	0.055	720m
Chichester	0.50	480m	1.60	600m	1.60	600m	0.15	480m / 600m
East Hants	1.0	700m	1.0	650m	0.5	650m	0.25	480m / 650m
Lewes	-	-	-	-	1.7	-	0.7	-
Horsham	1.7	-	-	-	-	-	0.5	-

⁸⁴ South Downs National Park Open Space, Sports and Recreation – Evidence Study (South Downs National Park Authority, 2014)

⁸⁵ † hectares per 1,000 of population.

⁸⁶ * The accessibility standards provide the maximum distance a person would normally walk from their home and/or work to get to the respective type of open space. They help to show open space catchment areas and thus help in the assessment of locational deficiencies. They also help in the assessment of open space priorities when considering development proposals.

Eastbourne	0.6	1200m	0.75	1000m	1.5	1200m	0.1	800m
Mid Sussex	-	-	-	-	1.6-1.8	-	0.6-0.8	400m – 1000m
Wealden	1.0	600m	1.4	600m	-	-	0.03 / 0.02	480m / 600m
Winchester	0.8	700m	0.75	650m	0.75	650m	0.5	480 / 650m

7.258 The requirements set out in Figure 7.8 will apply to all qualifying developments that meet the threshold set for respective district areas. The Authority will be alert to proposals that seek to artificially subdivide sites, in which cases the threshold will be applied to the combined sites' gross areas.

7.259 Provision should be calculated on a pro-rata basis proportionate to the gross site area, using a guideline population density of 60 people per hectare. All types of public open space should be provided on-site where reasonable and proportionate to do so. Open space may form part of the requirement to deliver sustainable drainage, if the space is useable and fit-for-purpose. Where insufficient space exists on site to meet local needs then off-site provision in the locality may be sought in line with strategic policy SD45: Green Infrastructure.

7.260 Private open space that is not available for public use will not be accepted in lieu of requirements for public open space provisions or contributions.

New buildings providing local sport and recreational facilities

7.261 Pavilions and other buildings provide facilities for changing and taking refreshment at cricket and other sports grounds. These buildings should if possible be located within settlement boundaries as defined on the Policies Map. Development proposals to locate such buildings outwith settlement boundaries need to provide evidence of a sequential approach to site selection. The search should focus first on sites within a settlement boundary. If buildings are to be located outwith a settlement boundary evidence is also required that the building is both ancillary to and essential for the use of the land for outdoor sport and recreation. New or improved playing surfaces should also be located within or close to settlements. It is important that the impact of the new surface on the landscape is fully considered in line with policy SD4: Landscape Character. Applications also need to comply with policy SD43: New and Existing Community Facilities.

Safeguarding

7.262 Criterion 3 of Policy SD46 safeguards against the loss of existing open space and associated sports and recreational facilities. This policy will apply not only to public facilities but also privately owned facilities such as school playing fields and sports clubs. The latter are equally important to national park purposes in terms of shaping the form, character, and appearance of settlements and their place in the wider landscape.

Cemeteries and burial grounds

7.263 Cemeteries and burial grounds are a much valued and sensitive type of green infrastructure asset. The development proposals should have due regard to the character of the surrounding area especially those relating to the special qualities and retain any existing landscape features such as hedges and trees. Any opportunities to improve and/ or create new biodiversity, habitats and green infrastructure should also be taken. It will be necessary to demonstrate that the proposed cemetery will not have an adverse impact on ground or surface water.

Development Management Policy SD47: Local Green Spaces

The following green areas, as defined on the Policies Map, are designated and protected as Local Green Spaces, in line with the National Planning Policy Framework:

Brighton & Hove

- Green Ridge

Buriton

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

Cheriton

- Open space at Top of Freemands Yard Lane

Corhampton and Meonstoke

- Church Green, Meonstoke

Droxford

- Droxford Parish Green

East Chiltington

- **Hollycroft Field**

East Dean, East Sussex

- The Horsefield
- Went Way Allotments

East Worldham

- East Worldham Playground

Fulking

- North Town Field

Hambledon

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

Midhurst

- South Pond and associated green space
- Half Moon Covert
- Carron Lane Recreation Area
- Holmbush Recreation Area
- St Margaret's development community garden
- Jubilee Path and associated green space

Poynings

- Poynings Playing Field
- Poynings Allotments

Seaford

- The Village Green, Bishopstone
- Tide Mills, Mill Drove

Selborne

- Burlands Field or Culverscroft
- Dowlings Little Mead and Church Meadow
- Selborne Recreation ground

Slindon

- Slindon Common Recreation Ground
- Top Playing Field
- Meadsway
- The Forge Field
- Jubilee Orchard
- The Allotments
- The Copse

Stedham

- Stedham Sports Ground
- Stedham Recreation Ground (Village Green)

- Land at Common View (Allotment Gardens)
- Playing Field – land at Common View

Wannock, Polegate

- Wannock Coppice

7.264 The purpose of Policy SD47 is to designate Local Green Spaces, which have been promoted to the National Park Authority as demonstrably special to the local community. The methodology and the results of the Local Green Space assessment is set out in an evidence based study *Local Green Spaces in the South Downs National Park*⁸⁷. Many other Local Green Spaces have been designated in Neighbourhood Development Plans.

7.265 National policy sets out how Local Green Spaces are protected. Development proposals should not conflict with the reasons that the local green space has been demonstrated to be special to the local community, or prejudice its role as a Local Green Space.

⁸⁷ Local Green Spaces in the South Downs National Park, (South Downs National Park Authority, 2017)

7k. CLIMATE CHANGE

Introduction

7.266 This section of the Local Plan includes two strategic and two development management policies linked to the subject of climate change. These policies are SD48: Climate Change and the Sustainable Use of Resources, SD49: Flood Risk Management, SD50: Sustainable Drainage and SD51: Renewable Energy.

7.267 Mitigating against and adapting to climate change is an international and national priority. In response to anticipated long-term changes in our planet's average temperatures, weather and seasonal patterns and sea level rises, the UK has committed to reducing carbon dioxide emissions by 80 per cent of 1990 levels by 2050⁸⁸. Currently, the built environment nationally is responsible for approximately 50 per cent of carbon dioxide emissions.

7.268 The *Vision and Circular for English National Parks* states that national parks should lead the way in adapting to and mitigating climate change. Development should therefore minimise the National Park's vulnerability to climate change through reducing and mitigating the factors which are causing it, and become more resilient by being able to adapt to its effects. The *South Downs National Park Climate Change Adaptation Plan*⁸⁹ (CCAP) is the main evidence based study on climate change and states that the South Downs is particularly vulnerable to the impacts of present and future climate change. It sets out a range of responses to the risks and opportunities from climate change, including flood and coastal erosion management, building ecological resilience to the impacts of climate change and effective water management.

7.269 Our use of resources is not sustainable, and the design and construction of new development with improved environmental performance is a critical part of delivering sustainable development. Even without climate change, there is still an imperative to promote development which meets the highest possible environmental design standards which minimises the use of finite resources.

7.270 The likelihood of flooding is predicted to increase as a result of climate change causing more extreme weather events, such as prolonged periods of intense rainfall. Reducing the National Park's vulnerability to the impacts of climate change, and particularly flooding to residential properties, is therefore a key objective of the Local Plan. The National Park's extensive chalk geology makes groundwater flooding a key issue with a number of areas at risk. A *Strategic Flood Risk Assessment (SFRA)*⁹⁰ has been undertaken for the National Park. Areas at risk of surface

⁸⁸ The Climate Change Act 2008 commits the UK to set a long-term binding framework to cut our emissions by at least 80 per cent by 2050 and by at least 35 per cent by 2020 against 1990 levels. It also places a duty on authorities to report to Government on the current and future predicted impacts of climate change on their organisation; proposals and policies for adapting to climate change; and an assessment of progress towards implementing the policies and proposals set out in previous reports. This is in the context of the national climate change risk assessment and adaptation programme that has been devised to address the Act's requirements.

⁸⁹ South Downs National Park Climate Change Adaptation Plan (South Downs National Park Authority, 2016)

⁹⁰ South Downs National Park Authority Water Cycle Study and SFRA Level I Scoping and Outline Report (Amec, 2015)

water flooding typically follow the main water courses and dry valleys in chalk downland areas. The SFRA also identifies that groundwater influence on fluvial flooding is a problem along the Findon Valley and Rivers Itchen, Meon, Lavant, as well as some of the smaller tributaries. A Level 1 Update and a Level 2 SFRA has also been produced which assesses all allocated sites that are at risk from fluvial and tidal flooding; surface water flooding and groundwater flooding in both the Local Plan and the *Lewes NDP*⁹¹. This study has helped to facilitate the application of the Sequential and Exception Test, where necessary, the formulation of site specific flood risk management policies and recommendations on the suitability and design of SuDS for allocated sites.

7.271 Sustainable drainage systems (SuDS) can help to mitigate the risk of flooding. Development can lead to increased surface water run-off and as such all proposals should ensure that as a minimum there is no net increase in surface water run-off taking account of climate change. SuDS are designed to replicate, as closely as possible, the natural drainage from a site before development and treat run off to remove pollutants, reducing the impact on groundwater and receiving water courses. Therefore, development should incorporate mitigation techniques in its design such as permeable surfaces and SuDS. However, there are locations in which elements of SuDS are either unfeasible or inappropriate; for example, infiltration mechanisms may not be appropriate on floodplains, areas of high groundwater or in areas with known soil contamination. Similarly they will not be a feasible option in areas with impermeable soils.

7.272 The use of renewable energy rather than fossil fuels will help to reduce carbon emissions and thus reduce climate change. Renewable energy offers a more sustainable use of natural capital and therefore is an important ecosystem service. However, the landscape character of the National Park is a finite and precious resource that the National Park Authority is charged with conserving and enhancing. Development of renewable energy, therefore needs to be suitably constrained so as not to compromise the special qualities.

7.273 It should be noted that there are restrictions on designated landscapes including National Parks, which mean that permitted development rights do not apply to solar photo voltaics and solar thermal technologies in the same way as non-designated areas⁹². Similarly there are more specific restrictions that apply to the installation of renewable technologies in listed buildings or conservation areas. Potential applicants should seek guidance from the Authority on the nature of these restrictions.

⁹¹ South Downs National Park Authority Level 1 Update and Level 2 SFRA Report (Amec, 2017)

⁹² Part 40 of The Town and Country Planning (General Permitted Development) (Amendment) (England) order 2008

Strategic Policy SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.
2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy: 19% carbon reduction improvement against Part L (2013)⁹³ and;
- ii. Water: Consumption of no more than 110 litres per person per day⁹⁴.

Non-Residential:

- i. Major: BREEAM Very Good⁹⁵
3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.
4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

7.274 The purpose of this policy is to encourage high standards of sustainable building design and construction in new and existing buildings, as an essential part of the National Park's response to the challenges of climate change.

7.275 The way in which buildings are designed, constructed, operated and decommissioned have significant impacts on the built and natural environment and require major resource inputs such as energy, water and materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce resource inputs and the National Park's carbon footprint, and also costs for developers and occupants. These aspects should be integral to development from the start, rather than improvements 'bolted on' at the end of this process, and should work alongside relevant elements of the Local Plan design policies. This applies equally to development which is allowed under Permitted Development Rights. Developers, other businesses and homeowners are encouraged to consider these aspects to achieve the highest possible environmental standards in their proposals.

⁹³ This standard is equivalent to former Code for Sustainable Homes Level 4 in energy use

⁹⁴ The optional enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency', March 2015, pp.15 G2(3)

⁹⁵ Major non-residential development is defined as Development over 1,000 sq/m; or development on a site of 0.5ha or more.

Sustainable construction and technologies

7.276 Applicants are strongly encouraged to consider what measures could be incorporated into their proposals. For example, it can be the case that the most sustainable building materials to use are those sourced locally.

7.277 The Authority will consider site constraints, technical restrictions, financial viability and the delivery of additional benefits to the National Park where requirements of the policy cannot be met. However, all development proposals should minimise the impact on landscape character, features of natural beauty, wildlife, cultural heritage and the general amenity of communities.

On-site Energy

7.278 A *Renewable and Low Carbon Energy Study (RLCES)* was prepared as part of the evidence for the Local Plan⁹⁶. This has fed into the requirements set out in Policy SD48.

7.279 The *Building Research Establishment Environmental Assessment Method (BREEAM)* is a widely recognised, accredited, independent method for assessing environmental performance of non-residential buildings. Until superseded by nationally prescribed standards, the BREEAM standards for non-residential buildings by nationally recognised certification bodies may also be accepted.

Retrofitting

7.280 The existing building stock also makes a large contribution to carbon emissions. Measures should be implemented which lower the environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.

Major Development⁹⁷

7.281 A detailed assessment of the energy demand and carbon dioxide emissions will be expected from all proposed major developments in order to ensure that climate change is fully addressed.

On-site Water Use

7.282 The Environment Agency (EA) has identified that all of South East England, including the National Park, as an area of serious water stress. It is therefore imperative that water resources are managed efficiently. Accordingly, all new homes in the National Park will be required to achieve water consumption of no more than 110 litres per person per day. This target is equivalent to that proposed as an optional requirement of the *Housing Standards Review* which corresponds with *Code Level 4* in relation to water efficiency. The *Whole Plan and Affordable Housing Viability Assessment*⁹⁸ sets out that viability analysis factored in *Code 4* as a minimum and as such this requirement will not impact residential development viability in the National Park.

⁹⁶ South Downs National Park Renewable and Low Carbon Energy Study – Main Report (AECOM, 2013)

⁹⁷ As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015

⁹⁸ South Downs Local Plan and Affordable Housing Viability Assessment (BNP Paribas, 2017)

Strategic Policy SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:
 - a) Steering development away from areas of flood risk as identified by the Environment Agency and the Strategic Flood Risk Assessment. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception tests;
 - b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;
 - c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and
 - d) Ensuring that the integrity of coastal and river flood defences are not undermined.
2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).
3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.

7.283 The purpose of Policy SD49 is to reduce the National Park's vulnerability to flood risk and the impacts of flooding associated with climate change. The Authority will seek to manage flood risk through avoidance of risk wherever possible. The National Park Authority will work with others to implement relevant flood and coastal protection strategies and plans.

Sequential and Exception Tests

7.284 Proposed development within a flood zone will be assessed using the sequential and exception tests in national policy. The sequential test aims to steer different types of new development away from areas with the highest risks of flooding, which includes considering reasonably available alternative sites where it is proposed in areas at highest risk of flooding.

7.285 The exception test is used to demonstrate whether flood risk to people and property will be managed satisfactorily, while allowing necessary development to be permitted in circumstances where suitable sites in areas with a lower risk of flooding are not available. It must be demonstrated that there are wider sustainability benefits which outweigh the flood risk, it will be safe for its lifetime, does not increase flood risk elsewhere and that any residual risk can be safely managed.

Risk of Flooding

7.286 Development proposals should not increase the risk of flooding elsewhere. Site specific Flood Risk Assessments (FRA) should be provided in conjunction with planning applications in line with national planning guidance. An FRA will be needed for development (except minor development) within Flood Zones 2 or 3. For sites within Flood Zone 1 and larger than 1 hectare, an FRA is likely to be required where there are known flood risks and critical drainage problems. The Environment Agency (EA) further advises that FRAs should be undertaken if the site is in an area known to have flooding problems from any particular source, or is within 20m

of a watercourse irrespective of the land's Flood Zone classification. If there is any potential for flood risk issues, advice from the EA should be sought before submitting an application.

Flood Protection, Mitigation and Adaptation

7.287 Flood risk management opportunities should be sought to reduce the overall level of flood risk in the application site and beyond. This can be achieved through suitable design, appropriate green infrastructure, the application of sustainable drainage systems (SuDs), off-site works and through safeguarding land for flood risk management.

7.288 The Authority, as appropriate, will secure ongoing maintenance and operation of approved flood mitigation and adaptation systems through planning obligations or suitable conditions.

7.289 Where surface water flooding is identified as a relevant issue for a development, a detailed assessment will need to be made on a site-by-site basis. The assessment should identify the suitable management and mitigation necessary to ensure that there is no increase in surface water run-off from the proposal on both the development site and elsewhere. Proposals incorporating SuDS should address Local Plan policy SD50: (Sustainable Drainage).

7.290 Where development is proposed in areas of groundwater flooding risk, proposals must take account of any relevant existing plans or strategies, including those produced by the Lead Local Flood Authorities (LLFAs)⁹⁹. For example, Hampshire County Council has prepared a Groundwater Management Plan, which includes specific flood risk management plans for the Finchdean, Hambledon, West Meon and Rowlands Castle areas.

7.291 Where coastal and/or tidal flood protection, mitigation and adaptation is proposed, proposals must take account of any relevant existing plans or strategies, including the SFRA, and engage constructively with relevant authorities at the pre-application stage.

Working with Others

7.292 There are a number of organisations involved in flooding matters, including the Environment Agency (EA) and the LLFAs, which the National Park will work with closely to reduce the risk of flooding through relevant strategies and plans. This includes Shoreline Management Plans¹⁰⁰, Flood Risk Management Plans¹⁰¹, River Basin Management Plans¹⁰², Surface Water Management Plans and Local Flood Risk Management Strategies.

⁹⁹ In the National Park there are four (4) Lead Local Flood Authorities (LLFA) – Hampshire County Council, West Sussex County Council, Brighton and Hove City Council and East Sussex County Council

¹⁰⁰ Shoreline Management Plans (SMP) are developed by Coastal Groups with members mainly from local councils and the EA. They identify the most sustainable approach to managing the flood and coastal erosion risks to the coastline in the short (0-20 years), medium (20 to 50) and long (50-100 years) terms.

¹⁰¹ Flood Risk Management Plans (FRMPs) have been published by the Environment Agency for all River Basin Districts in England to provide an overview of the risk of flooding from rivers, the sea, surface water groundwater and reservoirs, as well as measures and objectives for managing flood risk for the period 2015-2021. There are five catchments across the SDNP study area (Test and Itchen, East Hampshire, Arun and Western streams, Adur and Ouse and the Cuckmere and Pevensy Levels).

¹⁰² The River Basin Management Plans (RBMP) describe the river basin district, and the pressures that the water environment faces. It shows what this means for the current state of the water environment in the river

Development Management Policy SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.
2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must provide suitable sustainable drainage systems where required by the Lead Local Flood Authority (LLFA).
3. Sustainable drainage systems, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.
4. Where sustainable drainage systems are provided, arrangements must be put in place for their whole life management and maintenance.

* major development as defined in the *Town and Country Planning (Development Procedure) (England) Order 2015*.

7.293 The purpose of Policy SD50 is to reduce the National Park's vulnerability to surface water flooding through appropriate management and ensuring there is no net increase in surface water run-off from new development.

7.294 In considering a development that includes SuDS, the Authority will need to be satisfied that the proposed standards of operation are appropriate, taking into account the specific site and local area characteristics, and relevant national guidance such as the *Technical Standards and Supporting Practice Guidance*¹⁰³. Where infiltration is proposed, this should be supported by suitable evidence which demonstrates that annual high groundwater levels are below the base of infiltration. Further guidance on the appropriate design of SuDS can also be found in the SDNPA's Level 1 Update and Level 2 SFRA¹⁰⁴.

7.295 When considering major development, as defined in the *Town and Country Planning (Development Procedure) (England) Order 2015*, the LPA will consult the Lead Local Flood Authority (LLFA). For other developments the LPA will seek advice from the LLFA on a site-by-site basis taking into account the site characteristics and type of development proposal. The LPA will also consult other relevant bodies, such as the Environment Agency, as appropriate.

Provision of open space

7.296 Where appropriate, SuDS should be used as part of the linked green infrastructure network to provide multiple functions and benefits to landscape quality, recreation and biodiversity. This can be achieved through habitat creation, new open spaces and good design. SuDS should be

basin district, and what actions will be taken to address the pressures in line with the requirements of the Water Framework Directive.

¹⁰³ Sustainable Drainage Systems: non-statutory technical standards (DEFRA, 2015)

¹⁰⁴ South Downs National Park Authority Level 1 Update and Level 2 SFRA Report (Amec, 2017)

designed to help cope with intense rainfall events and to overcome any deterioration in water quality status. In determining the suitability of SuDS for individual development sites, developers should seek advice from the Environment Agency and the relevant LLFA.

Whole Life Management and Maintenance

7.297 Site promoters need to ensure that their design takes account of the construction, operation and maintenance requirements of both surface and sub-surface components. Suitable whole life management and maintenance will be secured through planning obligations and/or conditions

Development Management Policy SD51: Renewable Energy

1. Development proposals for renewable energy schemes, except those specifically addressed in criterion 2, that contribute towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be permitted where it is demonstrated through suitable site specific analysis that the proposal:
 - a) Makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
 - b) Ensures existing public access is not impeded; and
 - c) Does not result in the loss in use of Grades 1, 2 or 3a agricultural land.
2. Development proposals for small-scale individual wind turbines and freestanding solar arrays serving individual properties or small groups of properties will be permitted where:
 - a) They are suitably sited and screened and clearly associated with the buildings or properties that they are intended to serve;
 - b) They are appropriate in scale to the property being served; and
 - c) There is no unacceptable adverse impact on local amenity or conflict with public safety.

7.298 The purpose of Policy SD51 is to support the development of appropriate new renewable energy that will improve the quality of life for those living in, working in or visiting the National Park, while seeking to conserve and enhance the special qualities.

7.299 All renewable energy development proposals should address the criteria of Policy SD42: Infrastructure. Applicants should also note that major development is subject to Policy SD3: Major Development. Impacts on landscape, cultural heritage, wildlife habitats, tranquillity, access and recreation, air and water quality and highways should be considered against the relevant policies in this Local Plan.

7.300 In addition, when considering the appropriateness of local schemes potential applicants are referred to the *Integrated Landscape Character Assessment*¹⁰⁵ (SDILCA) and to the *Viewshed Characterisation Study*¹⁰⁶. In view of the sensitivity of the landscape to renewable energy schemes, potential applicants are advised to consult the Authority at the earliest opportunity when considering schemes.

¹⁰⁵ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

¹⁰⁶ South Downs National Park: View Characterisation and Analysis (LUC, 2015)

7.301 A *Renewable Energy & Low Carbon Study*¹⁰⁷ was prepared as part of the evidence for the Local Plan. The Study sets out some of the key issues in assessing the appropriateness of the following different technologies within the National Park, which are reflected in Policy SD51.

Wind Energy

7.302 The majority of the South Downs National Park has sufficient average annual wind speed for commercial scale wind energy generation. Large scale wind presents by far the greatest opportunity for renewable energy generation in the Local Plan area. However, such schemes are unlikely to be granted planning permission in this nationally protected landscape as this would be contrary to the first purpose of the National Park and numerous Local Plan policies. There are likely to be additional ecological and historic constraints, such as bat fly-lines and the setting of conservation areas, which may also exclude deployment of wind energy technologies.

7.303 Small scale wind turbines are defined as having capacity of less than 100 kW and typically comprise single turbines. It may be appropriate in some areas of the National Park for individual small scale wind turbines to come forward. These should be similar in scale to existing buildings and trees, set against a backdrop or suitably screened, in an appropriate colour, and be assimilated into the landscape.

7.304 The potential for exploiting the wind resource in the National Park from small scale wind turbines is limited by the need to ensure that small-scale wind turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes, such as heath and downland, including in coastal locations, are particularly sensitive to intrusive development from vertical structures due to their open vistas and wild character.

7.305 In order to judge whether the potential impacts of a small scale wind turbine proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage and other resources.

Solar Energy

7.306 Proposals for multiple ground-mounted solar arrays – or ‘solar farms’ that are sited in isolation away from existing built forms are likely to have significant impacts on landscape character and visual amenity, and are unlikely to be appropriate within the National Park.

7.307 Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be acceptable. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings, such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest.

¹⁰⁷ South Downs National Park Renewable and Low Carbon Energy Study (AECOM, 2013)

Hydropower

7.308 *The Renewable Energy & Low Carbon Study* confirms that significant hydropower development is not envisaged for the National Park. Notwithstanding this, advice on environmental protection for new hydropower schemes has been published by the Environment Agency¹⁰⁸.

Biomass

7.309 *The Study* highlights the opportunities from biomass due to the availability of woodfuel and other crops within the National Park. The Study recommends that the development of the biomass / woodfuel market should be supported in principle. Forestry is one of the key sectors of the National Park's economy.

Heat Networks & Combined Heat and Power

7.310 *The Study* identifies that only larger settlements such as Lewes and Petersfield are suitable propositions for combined heat and power schemes.

Geothermal

7.311 Outside *the Study*, the former Department for Energy and Climate Change (DECC) assessed the potential for deep geothermal power generation in the UK. The South Downs National Park was not identified in the *DECC assessment* as having potential for geothermal energy use.

¹⁰⁸ <https://www.gov.uk/guidance/new-hydropower-scheme-apply-to-build-one>

7I. ADVERTISEMENTS & SIGNAGE

Introduction

7.312 This section includes two policies. The first relates to shop fronts both within and outside identified town and village centres. The second policy relates to adverts.

7.313 Shop fronts can make a significant contribution to the character of town and village centres particularly where they incorporate traditional features.

7.314 Adverts like shop fronts have an important role to play in making people aware of a business. By their very nature, permanent and temporary adverts are conspicuous and prominently displayed. Individually and cumulatively, they can affect the character and appearance of buildings, settlements, the landscape and views. Illuminated advertisements can also affect the tranquillity of an area at night. Because of the volume of traffic, the most prevalent areas for adverts are on the A roads, such as the A27 and A272, and the main roads which link them. Temporary adverts for events are also a regular occurrence throughout the National Park.

Development Management Policy SD52: Shop Fronts

1. Development proposals for new, or changes to, existing shop fronts will be permitted where they:
 - a) Relate well to the building in which they are situated, giving regard to upper floors, in terms of scale, proportion, vertical alignment, architectural style and materials;
 - b) Retain and restore where possible significant historic features of any original shop front;
 - c) Are based upon a traditional approach to shop front design;
 - d) Take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a listed building; and
 - e) Use materials which respect the street scene.
2. If a single shop front is to be created by joining two or more units, it should reflect and show the original divisions that existed, particularly in the case of historic properties.
3. There will be a presumption against internally illuminated signage / logos as well as solid shutters or any other feature which obscures window displays, unless this is a traditional feature of a historic premises.
4. External lighting is only normally appropriate for businesses operating in the evening. If required, it should be kept to a minimum, be discreetly positioned and incorporated into the design.

7.315 The purpose of this policy is to ensure that shop fronts contribute to the generally traditional character of the town and village centres, are considered as part of the whole building, and are sympathetic with neighbouring buildings. Particular attention should be paid to materials, style, proportion and size of windows and fascias. Traditional shop fronts incorporate a number of components including vertical glazing bars, recessed entrance doors, stall risers, fascias and pilasters topped with sometimes decorative corbels. Colours, too, are important both for the

shop front itself and for any lettering. In many situations, a corporate company style may have to be modified, especially if a brightly coloured and / or internally illuminated signage / logos are proposed.

7.316 Traditional blinds / canopies will normally be canvas or other natural material, of retractable roller or fan type. The use of solid shutters, which can create unattractive street frontages, will not be supported unless it is a traditional feature of the property or in exceptional circumstances where evidence supported by the police has shown that security poses a particular problem.

Development Management Policy SD53: Adverts

1. Advertisement consent will be granted where:
 - a) The location, size, scale, proportions, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and area;
 - b) The number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and
 - c) There is no harmful impact to public safety.
2. There will be a presumption against internally illuminated advertisements.
3. Externally lit adverts are normally only appropriate for businesses operating in the evening. If required, they should be kept to a minimum, be discreetly positioned and incorporated into the design of the building.

7.317 The purpose of this policy is to ensure that adverts do not adversely detract from the location in which they are placed. This policy relates to outdoor adverts and excludes road traffic signage, which is covered by separate legislation. Depending on a number of factors including location, overall size, height, content and lettering, some advertisements do not require the submission of an application. This is subject to criteria within the *Advertisement Regulations* and is referred to as a deemed consent.

7.318 Some areas within the National Park are identified as areas of special advertisement control, where stricter limitations are applicable. It is therefore recommended that advice is sought from the Authority before erecting an advertisement.

7.319 'A' boards may require advertisement consent. When business are not open to the public, 'A' boards should be stored away to prevent clutter.

7.320 Relevant conditions will be applied to consents, to ensure that the advertisement does not endanger the public or harm the character or appearance of the area.

7m. POLLUTION AND CONTAMINATION

Introduction

7.321 This section of the Local Plan includes two development management policies. The first policy on pollution and air quality deals with a wide range of pollutants. The second policy focuses on contaminated land.

7.322 The natural environment of the National Park provides many regulating ecosystem services, for example, vegetation cover helps to remove vehicle emissions from the air. In general, air quality in the National Park is good. However, there are concerns about the levels of nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes Town Centre for nitrogen dioxide¹⁰⁹, mainly due to traffic emissions. Ground level concentrations of ozone have also frequently exceeded the UK air quality standards at Lodsworth where Chichester District Council measure this pollutant.

7.323 Contaminated land exists in pockets throughout the National Park, the sources of which include old petrol filling stations, land used for industrial processes involving hazardous substances, landfill sites and sewage works.

Development Management Policy SD54: Pollution and Air Quality

1. Development proposals will be permitted provided that levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation.
2. Development proposals that by virtue of their location, nature or scale could impact on an existing AQMA, as shown on the Policies Map, will be required to:
 - a) Have regard to any relevant Air Quality Action Plan (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP; and
 - b) Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.
3. Development proposals will be required to provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.
4. Development proposals will be permitted where they follow best practice methods to reduce levels of dust and other pollutants arising during a development from demolition through to completion.

7.324 The purpose of the policy is to ensure that the National Park Authority, working with local authority partners and other relevant agencies, manages the impact of pollutants and in particular improves air quality throughout the National Park. In line with other policies in the Local Plan development proposals should promote opportunities for walking, cycling, public transport and congestion management to reduce traffic levels in areas of reduced air quality.

¹⁰⁹ Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached.

7.325 The effects of air pollution can be felt far beyond the original source of the pollution and impact other areas. Therefore all proposals, not just those for development within or adjacent to AQMAs, need to consider the potential impact on air quality. This includes not just those matters covered by statutory legislation but also more general amenity issues such as dust and odour. For example, developments adjacent to existing wastewater treatment works or smaller wastewater facilities, such as pumping stations will only be permitted if the proposal demonstrates that there is adequate mitigation. Pollution takes many forms and the impact of litter resulting from a development such as a takeaway will be considered and management will be required.

7.326 Development proposals that may lead to a deterioration in air quality resulting in unacceptable effects on human health, the natural environment or local amenity, will require the submission of an air quality assessment. Where this effects internationally designated nature conservation sites an HRA will be required in line with Policy SD9: Biodiversity and Geodiversity. Should an air quality assessment or HRA be required it should address but is not restricted to:

- The existing background levels of air quality;
- The cumulative impact of development levels of air quality; and
- The feasibility of any measures of mitigation.

7.327 An Air Quality Action Plan (AQAP) has been produced for the Lewes Town Centre AQMA and includes a number of measures that aim to improve air quality. It is expected that developments within the vicinity will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development's potential negative impacts.

7.328 Applicants for development within or adjacent to an AQMA, be it inside or outside of the National Park, should discuss any requirements with the Authority at the earliest opportunity and certainly before a planning application is submitted. This will help to determine whether a proposed development could impact upon the AQMA and therefore require mitigation measures.

Development Management Policy SD55: Contaminated Land

- I. Development proposals for sites with either known or suspected contamination or the potential to contaminate land either on site or in the vicinity, will require the submission of robust evidence regarding investigations and remedial measures sufficient to ensure that any unacceptable risk to health or environmental health is removed prior to development proceeding.

7.329 The purpose of the policy is to ensure that when considering the development of land known or suspected of being contaminated, the principle is one of ensuring the land is "suitable for use". This requires that the owner, occupier or developer of a site should undertake those measures necessary to deal with any unacceptable risks to health or the environment, taking into account the intended use of the land. Consideration must be given to the potential impact on neighbouring developments, residents and the road network of any decontamination process.

7.330 It is for the owner or developer to determine the existence and extent of any contamination. The Authority will follow national guidance in regard to the need for pre-application

investigation into contamination issues but such an assessment may include some or all of the following;

- A desk top study;
- Site investigation;
- Risk assessment,
- Remediation; and
- Post remediation certification of the work completed.

7.331 Where there is no evidence to the contrary, the possibility of contamination will be assumed when concerning applications in relation to land on or adjacent to previous industrial use or where proposed uses are considered that are particularly sensitive to contamination for example housing, schools, allotments, children's playing areas.

7.332 If there is only a suspicion of contamination or the contamination is slight, planning permission may be granted subject to conditions requiring site investigation and any necessary remedial measures.