

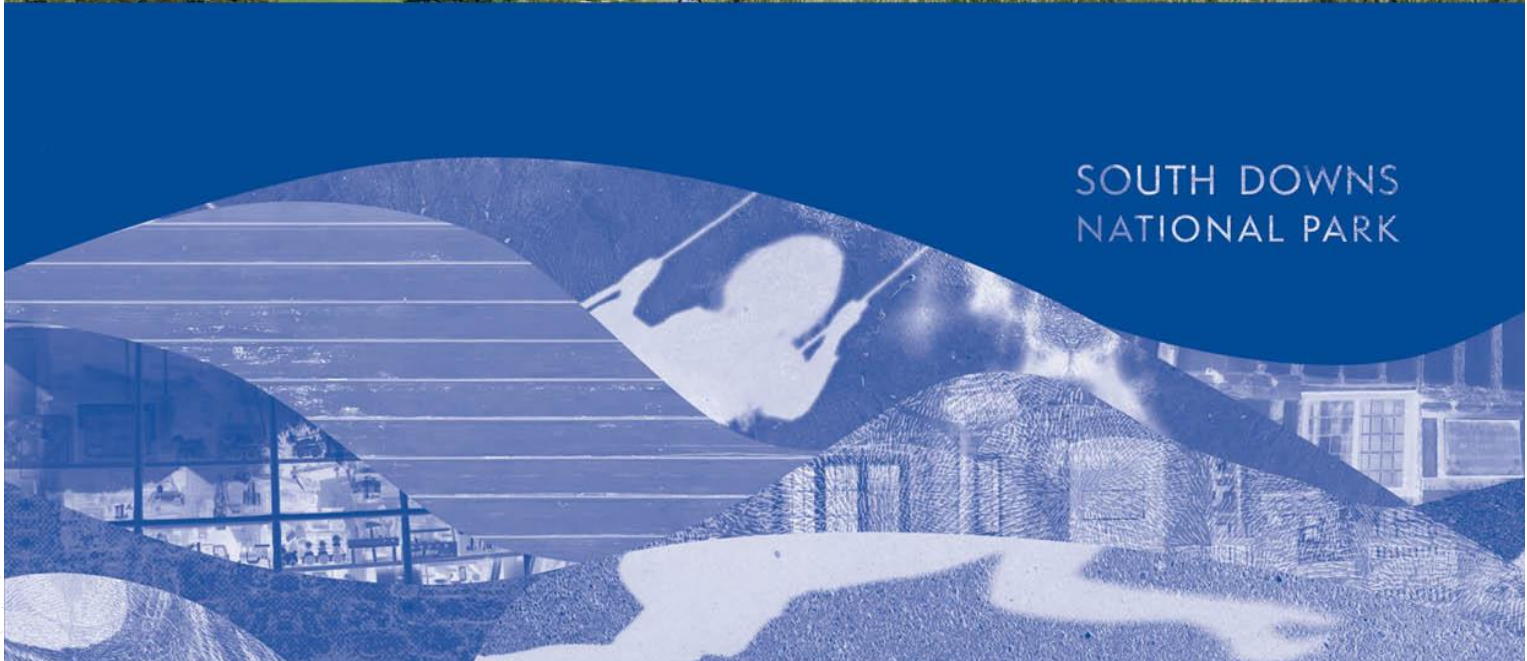
LANDSCAPES | VIEWS | DARK NIGHT SKIES | LOCAL ECONOMY
RECREATION | AFFORDABLE LOCAL HOUSING | GREEN SPACES

SOUTH DOWNS LOCAL PLAN PRE-SUBMISSION

September 2017



SOUTH DOWNS
NATIONAL PARK



FOREWORD

Welcome to the pre-submission version of the South Downs Local Plan.

This is the first Local Plan ever produced for the National Park: a landmark for this very special place. It looks rather different from most other local plans because it must recognize the national importance of the landscapes and our duty to conserve and enhance them.

But this Plan is not just about these precious, nationally important, landscapes, their wildlife and cultural heritage. It is about the wide range of benefits they provide for us all that must be nurtured and protected for future generations. It is about our communities that live and work in the National Park and their social and economic needs.

I thank everyone who has helped us create this Plan: those of you who have guided us with your comments during the Options consultation in 2014 and the Preferred Options consultation in 2015. This version, which precedes submission to the Secretary of State for public examination, takes into account your previously expressed views as well as extensive backing evidence.

I am conscious that this is a large and complex document but urge you to provide your comments on it so we can produce a Plan worthy of the South Downs National Park.



MARGARET PAREN

CHAIR OF SOUTH DOWNS NATIONAL PARK AUTHORITY

KEY MESSAGES

This is a landscape led Local Plan, looking at the South Downs as a whole for the first time with National Park purposes and duty to the fore, to conserve and enhance the landscapes, the special qualities of the National Park and communities small and large within it. The Plan introduces a new spatial portrait for the South Downs, which is set out overleaf.

The Local Plan considers the geology, geography and river catchments that have shaped the landscapes of the National Park and their influence on the evolution of settlement patterns. We attempt to capture principles of 'ecosystem services' into the making and delivery of the Local Plan. This approach seeks to ensure the services nature provides us (such as woodfuel, clean water, health and well-being) from nature's own 'capital' (timber, water, fresh air) is factored into decision making and allocations. This thinking results in an emphasis on landscape and the nature of the areas as mapped out in the South Downs Integrated Landscape Character Areas (SDILCA). This has informed the evidence base, which is wide and varied and deliberately includes elements important to the National Park's special qualities.

Development allocations and policies are therefore landscape capacity led, not target driven. This complies with the National Planning Policy Framework and the DEFRA Vision and Circular 2010 on National Parks. These documents, as Margaret Paren advises in the Foreword, do support our need to produce a plan fit for the conservation and enhancement of the landscape and, in relation to housing, local affordable homes provision. Therefore whilst we end up with site allocations, these are driven by landscape focussed assessments and the Local Plan approach as a whole, rather than by any individual piece of evidence.

Nevertheless we are subject to scrutiny and the plan has to be found 'sound' if it is to conserve the wider landscape to which the highest degree of protection has been afforded by planning system. We have searched thoroughly and rigorously for suitable development sites; it is just that in carrying out this work landscape conservation takes the primary role.

We have a clear spatial strategy, one of dispersing a 'medium' level of growth throughout communities within the National Park, rather than allowing growth just around the largest settlements. This has come from, and is broadly supported by, local communities, evidence of local need and a recognition that even the smallest communities need to live, breath and prosper over the next 15 years if landscape capacity allows.

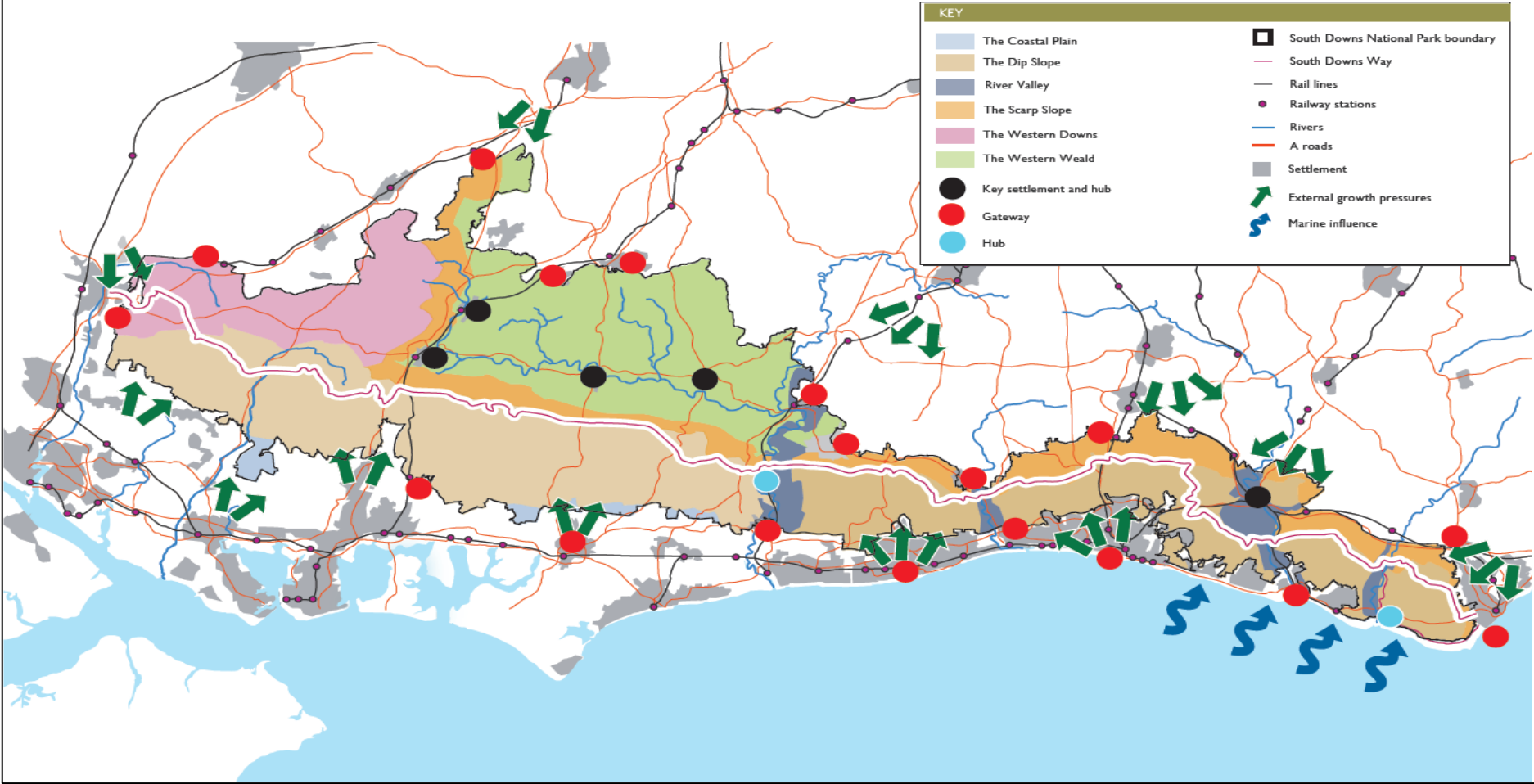
A strategic approach of dispersed growth combined with a landscape capacity analysis within the Local Plan, to formulate policies and allocate sites is driven by a number of key factors:

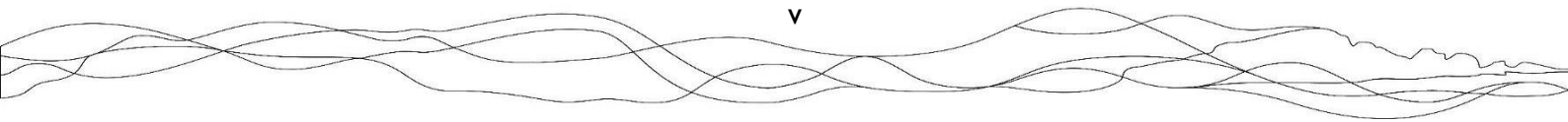
- Evidence Base – Studies / information such as Tranquillity mapping, Dark Night Skies, Transport Assessments, Ecoserve mapping to know what ecosystem services are available or in deficit
- Evidence Base – The Strategic Housing Land Availability Assessment where many parameters relate to landscape matters such as views, impact upon the special qualities of the National Park and other statutory assessments such as Habitat Regulation Assessments and Sustainability Appraisals
- Community Engagement and Feedback– particularly Neighbourhood Plans but also individual and collective Parish Meetings, use of a Landowners network, the South Downs Partnership and discussions with statutory agencies
- Officer and Member knowledge and professional insight as to what may be possible and what may be available. Given the range of officers involved in the Local Plan, the extensive knowledge of the National Park and the experience of Members in so many areas relevant to plan making, this is key to sound plan making

We have, in advance of the Local Plan, but using the same approach and where possible evidence base, actively promoted and assisted in 50 Neighbourhood Plans, all incorporated into the Local Plan. This ensures local knowledge and experience is used to fullest effect in creating a single Local Plan over such a large area.

CONCEPTUAL SPATIAL DIAGRAM

SOUTH DOWNS NATIONAL PARK





HAVE YOUR SAY

The consultation on the *Pre-Submission South Downs Local Plan* will run from 26 September to 21 November 2017.

The quickest and easiest way to input into the consultation is to access the consultation website: <https://www.southdowns.gov.uk/planning/planning-policy/national-park-local-plan/>

Alternatively you can fill in an electronic comment form and email it to planningpolicy@southdowns.gov.uk or fill out a paper copy comment form and write to the South Downs National Park Authority (SDNPA) at the following address:

Planning Policy
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex GU29 9DH

Everyone is welcome to comment on the Local Plan. All comments received in writing by the SDNPA will be passed in their entirety to the Local Plan Inspector on submission of the plan. This means that any comments you make will be considered by both the Authority and the Inspector. Whilst you may comment on any aspect of the Local Plan, your comments should ideally focus on these questions¹:

- Has the Plan been positively prepared? (Based on a strategy that provides for the development and infrastructure needs)
- Is the Plan justified? (Founded on proportionate evidence and is the most appropriate strategy against all reasonable alternatives)
- Is the Plan effective? (Deliverable and based on effective joint working on cross-boundary strategic priorities)
- Is the Plan consistent with national policy? (Enable the delivery of sustainable development in accordance with the *National Planning Policy Framework* and consistent with the *DEFRA Vision & Circular on English National Parks and the Broads*)
- Has the plan met legal and procedural requirements?

So that your response can be accurately recorded, please let us know which chapter and / or policy you are commenting on. Please note that all representations will be published on the National Park Authority website and anonymous comments cannot be accepted.

Please do not hesitate to contact the Planning Policy team by email at planningpolicy@southdowns.gov.uk or telephone on 01730 814810 if you have any queries about this consultation.

¹ Tests of soundness

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I. INTRODUCTION

It is important that the plan is read as a whole. All Local Plan policies should be viewed together and not in isolation in the preparation and consideration of planning applications. All development plan policies will be taken into account in determining planning applications, along with other material considerations. The policies in this Local Plan do not list or cross-reference to all other policies that may be relevant. The Core Policies set out the overarching principles of development for the National Park.

What is the Local Plan?

- 1.1** The South Downs was established as a National Park in 2010. The South Downs National Park Authority (National Park Authority) became the local planning authority for the National Park in 2011. The National Park contains over 1,600km² of England's most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east. The *South Downs Local Plan* is the first Local Plan to plan for the National Park as a single entity.
- 1.2** On adoption, this Local Plan will become the statutory development plan for the whole National Park, along with the minerals and waste plans and 'made' (adopted) Neighbourhood Development Plans. The planning system in this country is plan-led and statute states that decisions on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise. Accordingly this Local Plan will be used in the determination of planning applications.
- 1.3** This *Pre-Submission Plan* will accordingly be given some weight in the determination of planning applications by the National Park Authority and on its behalf. This weight will increase according to the stage of preparation of the Local Plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency with the relevant policies with the NPPF.
- 1.4** This is the *Pre-Submission version* of the *Local Plan* (subsequently referred to as the Local Plan) and is being published for public consultation under *Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012*. This version of the plan follows on from the *Options* and the *Preferred Options* documents that were published for public consultation in 2014 and 2015 respectively.
- 1.5** This Local Plan does not deal with minerals and waste. Instead, policies on this subject are developed through joint minerals and waste plans with the adjoining relevant authorities covering the National Park.
- 1.6** All planning applications should make reference to all relevant policies in minerals and waste plans, this Local Plan and Neighbourhood Development Plans. All parts of the development plan are complementary, and aim to fulfil the statutory purposes and duty of the National Park Authority.
- 1.7** The Local Plan covers the time period 2014 to 2033. This means that it will cover a 15-year time period from its projected time of adoption in 2018.

What is the Policies Map?

- 1.8** The *South Downs Policies Map* illustrates how the policies in the adopted development plan will apply. The Policies Map consists of three overview maps covering all of the National Park and about 50 inset maps. Together, these show all site allocations and designations that are most relevant to the determination of planning applications, including all those contained in made NDPs. It also shows, where practicable, planning constraints, for example environmental designations and conservation areas. The published paper and PDF (portable document format) versions of the Policies Map show some but not all planning constraints. The National Park Authority will also maintain an interactive version of the Policies Map, which will include more features than the paper and PDF versions, and allow a more detailed look at specific localities.
- 1.9** The adopted Policies Map is not itself part of the statutory development plan. It will therefore be updated as required to reflect updated information, for example the making of further NDPs.

What does the Local Plan seek to achieve?

- 1.10** The Local Plan sets out how the National Park Authority will manage development over the next 15 years. This is based on the statutory purposes and duty for national parks as specified in the *Environment Act 1995*:

FIGURE 1.1: THE PURPOSES AND DUTY

The National Park purposes are:

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

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

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

In addition, Section 62 of the *Environment Act 1995* also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires the Sandford Principle to be applied and the first purpose of the National Park will be given priority.

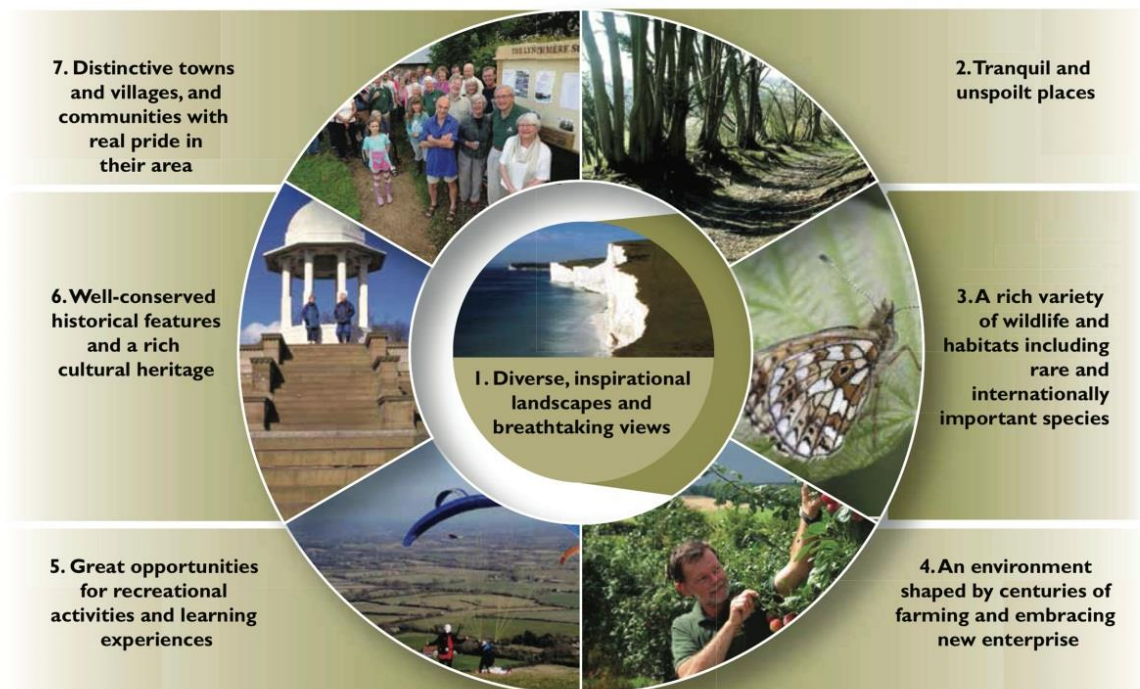
- 1.11** The *DEFRA Vision and Circular on English National Parks and the Broads*² provides guidance to national park authorities on how to achieve their purposes and duty. The Local Plan builds on the framework of the *South Downs National Park Partnership Management Plan*³ (PMP), which was adopted by the National Park Authority in 2013 following extensive consultation and dialogue with many interested parties and groups. The PMP sets out an overarching strategy for the management of the National Park. Local Plan policies deliver many of the outcomes and policies of the PMP; this was set out in greater detail in tables throughout the *Preferred Options* document.
- 1.12** The PMP's starting point was the *State of the South Downs National Park Report*⁴, 2012, which provided baseline information against which the success of future action arising from the PMP could be measured. The facts set out in the report form a fundamental part of the Local Plan evidence base. The seven special qualities of the South Downs National Park formed the basis for the *State of the South Downs National Park Report*. The special qualities do not sit in isolation, but are interconnected and mutually reinforcing. The special qualities are illustrated in Figure 1.2.

² *Vision and Circular on English National Parks and the Broads* (DEFRA, 2010)

³ *Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019* (South Downs National Park Authority, 2013)

⁴ *State of the South Downs National Park Report* (South Downs National Park Authority, 2012)

FIGURE 1.2: THE SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK



1.13 Landscape is the key to all of the special qualities. The South Downs was designated as a National Park in recognition of its exceptional natural beauty, for the opportunities to learn about and appreciate its special qualities, and as a landscape of national importance. Therefore it is entirely appropriate to take a landscape-led approach to the formulation of its Local Plan. The *National Planning Policy Framework*⁵ (NPPF) states that great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to landscape and scenic beauty along with the Broads and Areas of Outstanding Natural Beauty (AONB).

What are ecosystem services?

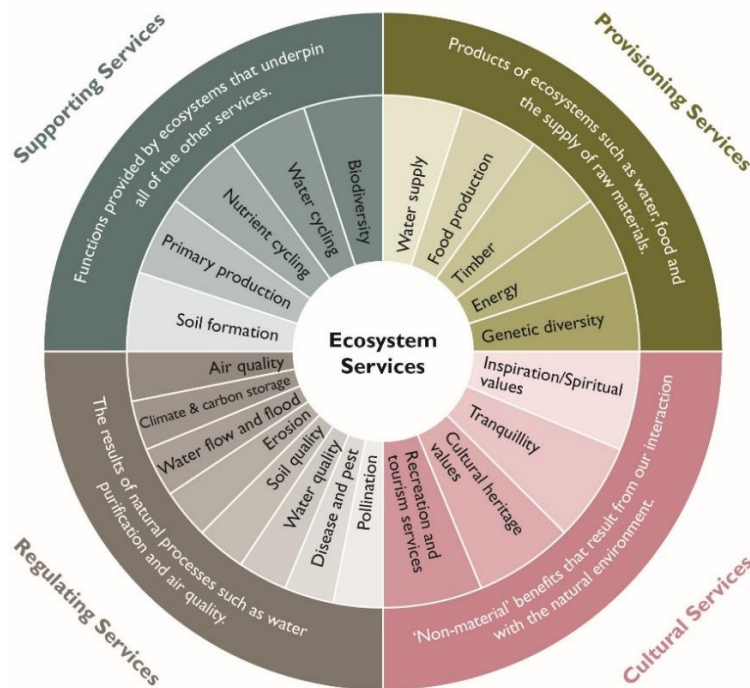
1.14 Ecosystem services come from our natural capital – our natural assets which provide valuable resources to people in a range of different ways. Some examples of natural capital are:

- Animal and plant species and their habitats;
- Soils;
- Freshwater rivers, streams, lakes and ponds;
- Aquifers storing water below the ground;
- Minerals resources; and
- Coasts and sea.

⁵ National Planning Policy Framework (2012)

I.15 People are able to enjoy a huge variety of benefits from these natural assets, ranging from the food they eat and water they consume, to outdoor experiences and improved health. These benefits to society can be seen as services, all of which are interlinked. These benefits are called ecosystem services. More and better quality natural capital should lead to more and better benefits for people and society –in other words, enhanced ecosystem services. The landscapes of the South Downs provide a multitude of ecosystem services. This is illustrated in Figure I.3.

FIGURE I.3: THE FOUR ASPECTS OF ECOSYSTEM SERVICES



I.16 Our natural capital is extremely vulnerable to impacts from human activities, as it cannot be readily substituted. It is therefore important that it is conserved and enhanced in good condition. The concept of ecosystem services allows the environment to be seen as a valuable asset to society, in a way which can in turn be used to steer growth to the right places, and ensure that growth incorporates features that support these benefits. In addition, our natural capital needs careful management and stewardship to ensure that the multiple benefits it gives to society are supported and protected.

What is the Structure of the Local Plan?

I.17 The Local Plan includes a vision, objectives and sets of policies which together provide a policy framework for assessing planning applications and guiding development in the National Park as follows:

- The *2050 Vision* looks ahead to a future National Park. A set of objectives act as stepping stones between the *Vision*, the spatial strategy and the Local Plan’s policies

- **The Spatial Portrait** provides a pen portrait of the National Park today. This includes a snapshot of the National Park in key facts and figures, and a description of the broad areas of the National Park, which represent the strategic landscape-defined areas upon which the Local Plan approach is built. The **Spatial Strategy** captures the high-level plan for managing growth and change across the National Park
- **Core Policies** deal with the overarching principles of development for the National Park. These core policies relate to the purposes and duty, the ecosystem services approach and major development
- The National Park-wide policies of the Local Plan are set out in three main chapters, which follow the headings of the PMP:
 - **A thriving living landscape**
 - **People connected to places**
 - **Towards a sustainable future**

1.18 The policies in these sections have been defined as:

- **Strategic Policies**, which are considered fundamental to achieving the overall Vision for the National Park and are linked to its special qualities
- **Development Management Policies**, which are listed alongside the relevant strategic policies. They provide more detail on specific issues such as shopfronts and advertisements
- **Strategic site allocations** relate to Shoreham Cement Works in Upper Beeding and the North Street Quarter and Eastergate Area of Lewes
- **Allocation Policies** allocate sites for development across the National Park
- **The Implementation and Monitoring chapter** explains the mechanisms for delivering the Local Plan objectives, and how the policies will be monitored. In addition, the Local Plan includes:
 - **Appendices** to set out further technical details and guidance to support policy implementation
 - A **Glossary** explains technical terms used in the Local Plan
 - The **Policies Map** is a spatial interpretation of the development plan policies covering the National Park

How have the Local Plan Policies been prepared?

Landscape and ecosystem services

1.19 All the Local Plan policies have been formulated putting landscape first and then peoples' interaction with it. This is in line with the purposes of national parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and promote opportunities for the understanding and enjoyment of the special qualities. The Local Plan and its policies seek to ensure that the benefits and services people and wider society get from the natural environment are recognised and enhanced. Many Local Plan policies require development proposals to conserve and enhance various aspects of natural beauty, wildlife and cultural heritage. The extent to which development proposals will be expected to both conserve and enhance is proportionate to the scale and impact of the development.

Evidence

1.20 All of the Local Plan policies are supported by adequate, up-to-date, relevant and proportionate evidence. A *Whole Plan Viability Assessment*⁶ has been carried out, which tests the ability of a range of types of development to viably meet the emerging Local Plan requirements and adopted Community Infrastructure Levy (CIL). All the supporting documents that the Authority consider to be relevant to the preparation of this Local Plan form the Core Document Library. These documents will be submitted for examination alongside the Local Plan.

1.21 Figure 1.4 illustrates the statutory framework, planning policy documents and evidence based studies that are linked to the Local Plan.

Public consultation and engagement with parishes

1.22 Local Plan policies have been formulated in consultation with local communities, building on extensive engagement on the PMP and the *State of the Park Report*. The views and input of the local community are vital to us and we have undertaken a considerable amount of public engagement, particularly with the town and parish councils. The Authority also benefits from active engagement with a number of groups including the South Downs Partnership and the South Downs Land Managers' Group, who give us a wide range of expert views from people who work and invest in the National Park.

1.23 The first formal round of public consultation on the Local Plan was on the *Options Consultation Document* in spring 2014. The *Progress from Options to Preferred Options*⁷ report sets out all the issues and options consulted on, the main issues raised and how these main issues were addressed in the formulation of the preferred options. The second public consultation was on the *Preferred Options Local Plan*⁸ in autumn 2015. Approximately 400 individuals and organisations made approximately 2,640 individual representations on the Local Plan. 77% of people who expressed an opinion supported or, supported with changes, Local Plan policies and/or chapters.

⁶ Whole Plan Viability Assessment and Affordable Housing Update (BNP Paribas, 2017)

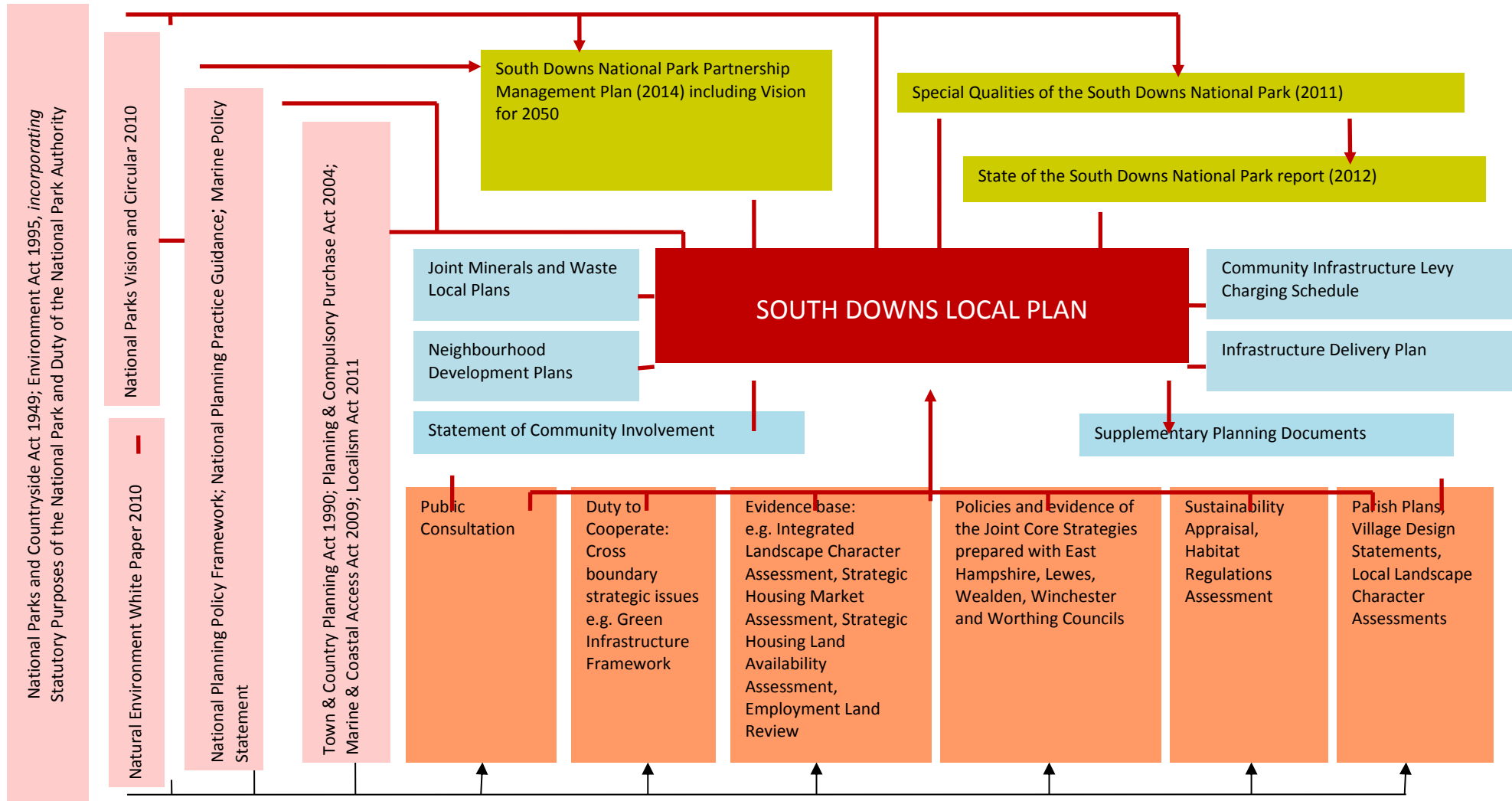
⁷ South Downs Local Plan – Progress from Issues and Options to Preferred Options (South Downs National Park Authority, 2015)

⁸ South Downs Local Plan: Preferred Options (South Downs National Park Authority, 2015)

A *Consultation Statement*⁹ has been produced to support this *Pre-Submission Local Plan*, which summarises the main issues raised by these representations and how they have been taken into account in this iteration of the Local Plan. An informal round of consultation took place in autumn 2016 with all the town and parish councils of the National Park. This focused on Sites & Settlements and asked for the expert opinions of the town and parish councils on emerging Local Plan allocations and designations.

⁹ Statement in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (Consultation Statement) (South Downs National Park Authority, 2017)

FIGURE I.4: POLICIES AND PLANS LINKED TO THE SOUTH DOWNS LOCAL PLAN



Sustainability Appraisal

1.24 The purpose of a Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Local Plan. Both the Local Plan and its accompanying SA meet the requirements of the Strategic Environmental Assessment (SEA) Directive. The Authority considers that this plan sets out the most appropriate strategy for development in the National Park when considered against the reasonable alternatives. The policies and sites identified in the Local Plan have been appraised against sustainability objectives on an iterative basis. These iterations identify how emerging policies help to achieve the relevant social, environmental and economic objectives, and recommend how sustainability could be improved. These recommendations have been taken into account in the drafting of this Local Plan.

Duty to Cooperate

1.25 The National Park Authority has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in this Local Plan. The key cross-boundary strategic issues identified by the Authority for the purpose of fulfilling the duty to cooperate are:

- Conserving and enhancing the **natural beauty** of the area
- Conserving and enhancing the region's **biodiversity** including green infrastructure issues
- The delivery of new **homes**, including affordable homes and pitches for Gypsies and Travellers and Travelling Showpeople
- The promotion of sustainable **tourism**
- Development of the local **economy**
- Improving the efficiency of **transport** networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel

1.26 The size of the National Park, and the numerous local authority and other boundaries, has made the duty to cooperate vital to the formulation of this Local Plan. Evidence of this is provided in the National Park Authority *Duty to Cooperate Statement*¹⁰ published at the same time as this plan.

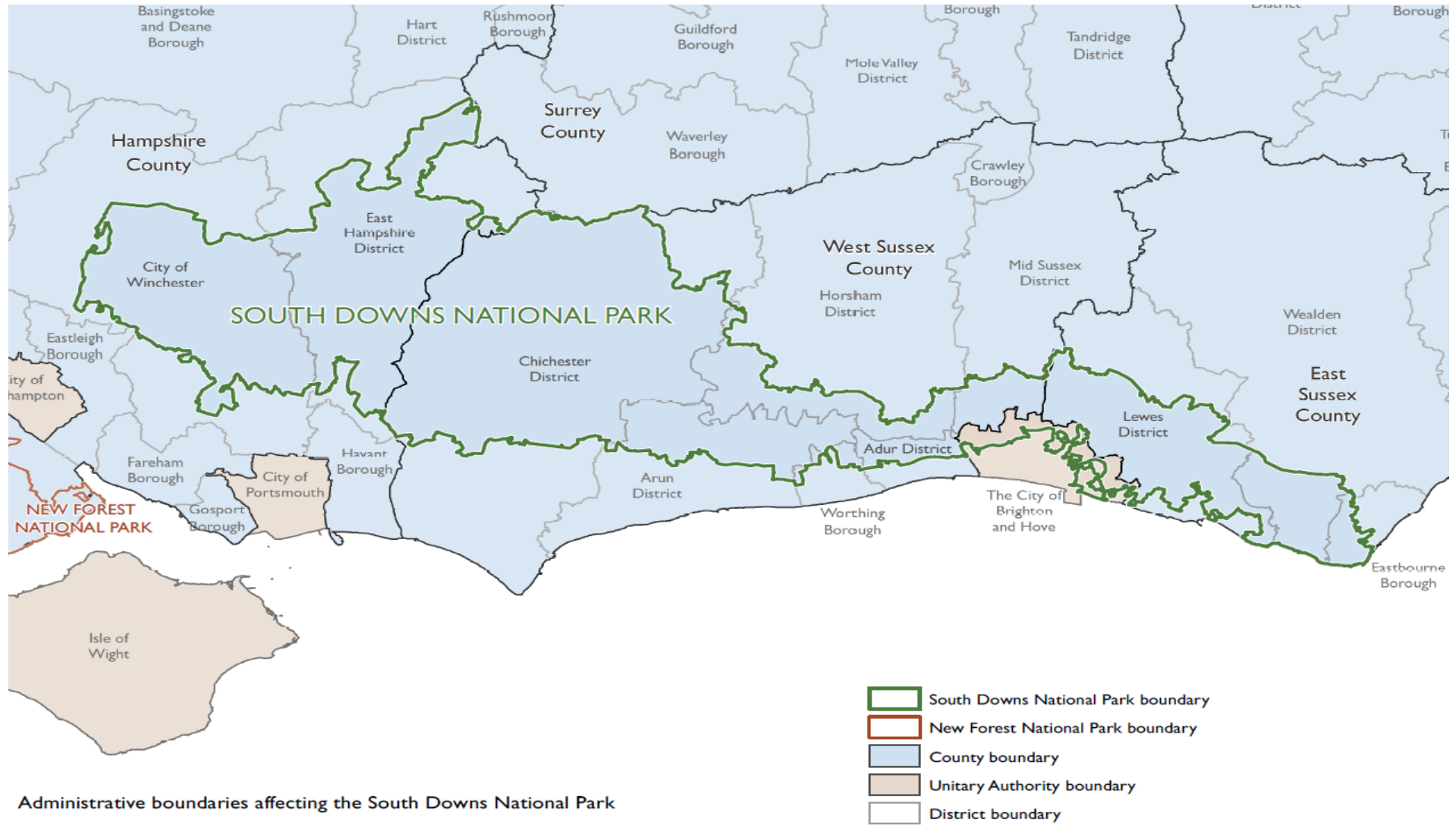
1.27 The positive engagement on cross-boundary issues has involved all the districts, boroughs, city and one unitary authority that fall partly within the National Park. The National Park Authority has engaged positively with all the strategic planning groupings both at an officer and member level that work across administrative boundaries. Figure 1.5 shows all of the local authorities within and adjoining the National Park.

1.28 The South Downs National Park Authority has also engaged constructively with all the relevant 'specific' bodies, who are responsible for advising on statutory and key infrastructure requirements. They include Natural England, Historic England, the Environment Agency, Highways England and the Marine Management Organisation.

¹⁰ Duty to Cooperate Statement (South Downs National Park Authority, 2017)

- I.29** There has been collaborative working with the three Local Enterprise Partnerships (LEPs) covered by the National Park – Coast to Capital (C2C), Enterprise M3 (EM3) and South East (SELEP). The National Park Authority is more involved with C2C than the other LEPs as it covers around two thirds of the National Park's area.
- I.30** The National Park incorporates 17.5km of open coastline; as such, it has a duty under the *Marine and Coastal Access Act (MACAA) Section 58 (3)* to consider relevant marine planning documents for any decision that might affect the marine area. Preparation of the Local Plan has been integrated with the preparation of the *South Marine Plan* insofar as it affects the marine environment.

FIGURE I.5: ADMINISTRATIVE BOUNDARIES AND THE SOUTH DOWNS NATIONAL PARK



What are the statutory requirements of the Local Plan?

I.31 The statutory requirements for preparation of local plans are set out in the *Planning and Compulsory Purchase Act 2004*¹¹, and guidance is contained in the NPPF and the *National Planning Practice Guidance* (NPPG). The submission version of the Local Plan will be examined by an independent inspector whose role is to assess whether it has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether it is sound. The tests of soundness are that it is positively prepared, justified, effective and consistent with national policy. The *Soundness Self-Assessment Checklist*¹² and the *Legal Compliance Checklist*¹³ published at the same time as this *Pre-Submission Local Plan* demonstrate how the tests of soundness have been met and proof that all legal requirements have been met.

How will this Local Plan be implemented?

I.32 The National Park Authority delivers its planning function uniquely through a partnership with Local Authorities with land inside the National Park boundary. In 2016-17, some 87% of the 4,953 planning and related applications that were determined were dealt with by host authorities acting on behalf of the National Park Authority.

I.33 Any reference in this Plan to ‘the Authority’ relates to the South Downs National Park Authority or the host Authority determining applications on its behalf. Where the National Park Authority is specifically referred to, this means the South Downs National Park Authority itself and not any host authority.

What does this Local Plan replace?

I.34 At present, planning decisions are made in accordance with national policy and with the policies contained within the adopted local plans of host authorities or, where applicable, joint core strategies adopted by the host authority and the National Park Authority.

I.35 On adoption, the policies of this Local Plan will replace all the saved local plan and core strategy policies inherited by the South Downs National Park Authority when it became the local planning authority for the National Park in April 2011 other than those policies relating to minerals and waste. It will also replace all joint core strategies relating to the National Park adopted since April 2011 other than those plans relating to minerals and waste. The policies to be replaced are listed in Appendix 2 along with the specific policies they will be replaced by.

¹¹ Planning and Compulsory Purchase Act (2004)

¹² Soundness Self-Assessment Checklist for South Downs Local Plan (South Downs National Park Authority, 2017)

¹³ Legal Compliance Checklist for South Downs Local Plan (South Downs National Park Authority, 2017)

What is the relationship between the Local Plan and neighbourhood development plans?

- I.36** The Local Plan establishes the strategic planning policy framework. However at a local level, neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. When a Neighbourhood Development Plan (NDP) is ‘made’ (adopted), it becomes part of the development plan for the National Park, and its policies will be used to determine planning applications within the relevant parish alongside the Local Plan and mineral and waste plans.
- I.37** NDPs are being prepared by many communities across the National Park. The National Park Authority is fully supportive of all parish and town councils that have expressed an interest in preparing an NDP for their community. The National Park Authority’s website lists all made and emerging NDPs.
- I.38** All NDPs, both partly and wholly within the National Park, need to be in general conformity with the strategic policies contained in the final adopted version of this Local Plan. NDPs can allocate land for development in line with the strategic policies and targets set out in this Local Plan. They can also formulate development management policies specific to their parish or town. It is important to note that the focus of NDPs is on guiding development rather than stopping it. The Authority is working proactively with all neighbourhood planning groups to ensure that emerging NDPs are consistent with the Local Plan. Any ‘made’ NDP that deviates significantly from this Local Plan when it is adopted will require a review.
- I.39** It is important that all of the National Park is planned for. This Local Plan does not generally allocate any development in parishes with an NDP. Exceptions to this are strategic sites / strategic allocations, or where a NDP itself does not allocate sites to meet Local Plan provisions. It does allocate sites in areas without an NDP. It is necessary for NDPs to proceed in a timely fashion in order to avoid there being any policy gaps. Nearly all NDPs that are allocating development sites have progressed to a pre-submission stage. This is a significant and important achievement for all the volunteers who have contributed to these plans.
- I.40** In order to provide some flexibility should unexpected delays occur to NDPs, further Development Plan Documents (DPD) may be programmed. These will allocate sites as necessary to accommodate the levels of growth set out in this plan. Additional DPDs may be taken forward if NDPs have not progressed in a timely fashion. This will be monitored and reported in the yearly *Authority Monitoring Report*.
- I.41** Other forms of community-led plans, such as parish plans and village design statements may be more appropriate for some towns and villages than NDPs. Although these other plans would not be made part of the development plan for the National Park, they may form material considerations in the determination of planning applications. These types of community plans can become Supplementary Planning Documents (SPD), thereby assuming greater weight in the decision-making process, if they undergo the statutory periods of consultation set out in the regulations.

What are the next stages of the Local Plan?

- I.42** Having undergone public scrutiny, this *Pre-Submission* version of the *Local Plan* will be submitted to the Secretary of State, via the Planning Inspectorate, for independent examination as soon as practicably possible after the close of this consultation. The sustainability appraisal, Policies Map, Core Document Library and all the representations made on this version of the Local Plan will also be submitted. The examination lasts from the date of Submission to the date on which the Inspector's final report is dispatched. The National Park Authority aims to adopt a sound Local Plan in 2018.
- I.43** Figure 1.6 sets out the main stages in the preparation of the Local Plan along with key dates and references to the *Town and Country Planning (Local Planning) (England) Regulations 2012*.

FIGURE 1.6: TIMELINE FOR LOCAL PLAN PREPARATION

Local Plan stage	Regulation	Date
Options Consultation	18	February-April 2014
Preferred Options Consultation	18	September-October 2015
Pre-Submission Consultation	19	September-November 2017
Submission to Secretary of State	22	March 2018
Examination	24	March - July 2018
Adoption	26	September 2018

2. VISION AND OBJECTIVES

- 2.1 The Vision for the South Downs National Park (the National Park) is set out in the *Partnership Management Plan*¹⁴ (PMP). This Vision describes where we want to be in 2050 and it is the overarching vision for the South Downs Local Plan. It applies across the whole National Park, but the ways in which it could be achieved will vary from area to area based on the characteristics and opportunities in that area.

FIGURE 2.1: A VISION FOR THE NATIONAL PARK

By 2050 in the South Downs National Park:

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

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

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

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

Successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.

Achieving the Vision for the National Park

- 2.2 A number of strategic objectives, based on the National Park purposes and duty (Figure 1.1), outline the direction that the Local Plan will take in order to achieve the vision. These objectives deliver the vision within the remit of the Local Plan and consideration of planning applications. The core, strategic, development management and allocation policies will deliver these objectives.

¹⁴ Partnership Management Plan: Shaping the future of your South Downs National Park 2014-2019 (South Downs National Park Authority, 2013)

FIGURE 2.2: LOCAL PLAN OBJECTIVES

1. To conserve and enhance the landscapes of the National Park.
2. To conserve and enhance the cultural heritage¹⁵ of the National Park.
3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape.
4. To achieve a sustainable use of ecosystem services¹⁶ thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing.
5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.
6. To adapt well to and mitigate against the impacts of climate change and other pressures.
7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses.
8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities.
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.

¹⁵ The reference to 'cultural heritage' encompasses the historic environment.

¹⁶ 'Ecosystem services' are the benefits people and society get from the natural environment.

3. SPATIAL PORTRAIT AND SPATIAL STRATEGY

Introduction

- 3.1** This chapter of the Local Plan introduces the spatial portrait, which is a new way of looking at the South Downs National Park (the National Park) as a single entity, arising from its geology, geography and settlement pattern. This is illustrated by the spatial diagram set out in Figure 3.4. The spatial strategy is also explained in this chapter and is summarised in Figure 3.1.

FIGURE 3.1: SUMMARY OF SPATIAL STRATEGY

Having regard to the landscape and five broad areas and river corridors, the spatial strategy for the *South Downs Local Plan* is for a medium level of growth dispersed across the towns and villages of the National Park.

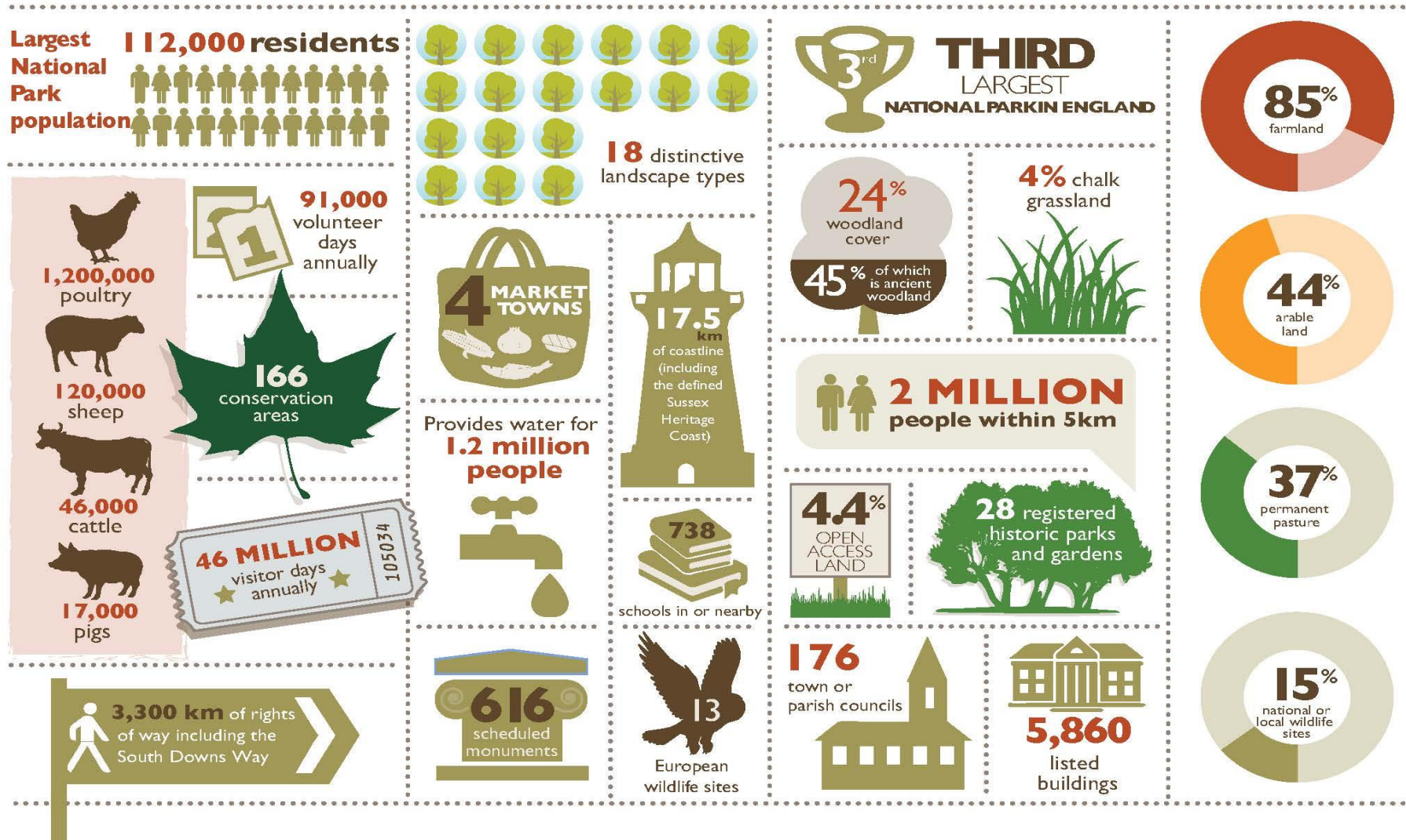
The National Park Today

- 3.2** Figure 3.2 is a map showing key features of the National Park. The National Park has a population of about 112,000, and approximately 2 million people live within 5 kilometres of its boundary. Figure 3.3 is a snapshot of the South Downs National Park today.

FIGURE 3.2: THE SOUTH DOWNS NATIONAL PARK



FIGURE 3.3: A SNAPSHOT OF THE SOUTH DOWNS NATIONAL PARK



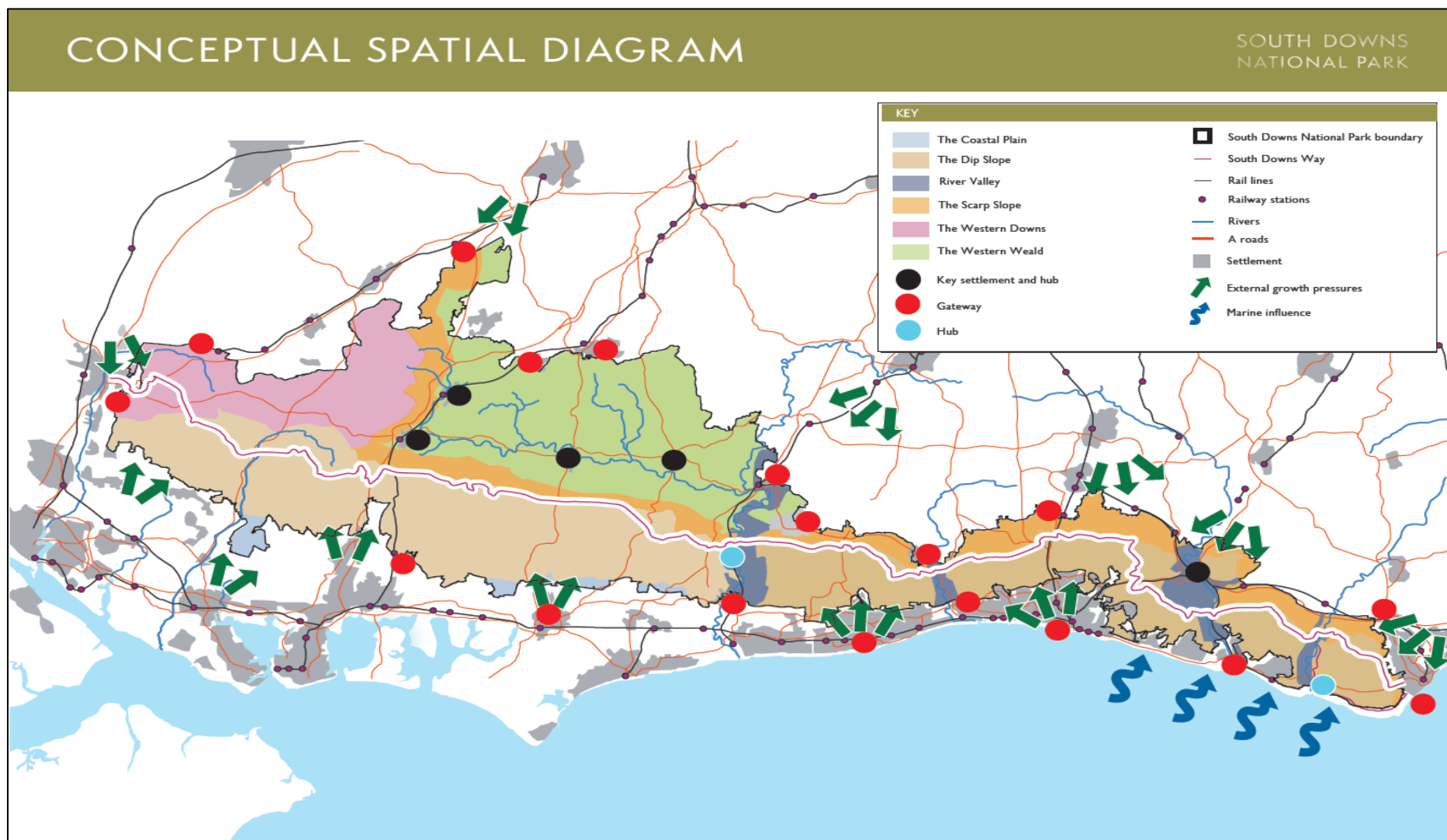
The Spatial Portrait

3.3 This Local Plan introduces a new way of looking at the South Downs National Park as a single entity, arising from its geology, geography, and hydrology and settlement pattern. This is illustrated in the spatial diagram set out in Figure 3.4. The spatial portrait is based on five broad areas and four river corridors. These are the Western Downs, the Western Weald, the Scarp Slope, the Dip Slope and the Coastal Plain broad areas and the Arun, Adur, Ouse and Cuckmere river corridors. The four river corridors highlighted all flow north to south bisecting the National Park; there are several other important rivers in the National Park such as the Itchen, Meon and Rother whose whole catchment area lies within the National Park. The spatial portrait:

- Is informed by the characteristics of the different landscapes, as defined in the SDILCA and the historic patterns of development. For example, the springline villages that run along the Scarp Slope from east to west face common challenges and opportunities, which are different to those faced by communities in the Western Weald
- Seeks to recognise the ecosystem services and special qualities that exist in different 'amounts' and provide opportunities for multiple benefits stemming from development, as well as constraints to growth
- Combines this with the reality of a long, relatively thin protected landscape which is strongly influenced by the areas around it

3.4 The spatial portrait stretches beyond the National Park's boundary, and acknowledges the many interdependencies and connections that exist across the boundary. For example, the Coastal Plain only covers the southern fringes of the National Park but extends southwards down to the coast. The spatial portrait and strategy have informed the National Park Authority's approach to the Duty to Cooperate.

FIGURE 3.4: CONCEPTUAL SPATIAL DIAGRAM OF THE SOUTH DOWNS NATIONAL PARK AND SURROUNDING ARE



3.5 Each of the broad areas and river corridors are now discussed in greater detail under the following sub-headings:

- Special qualities: describes how the special qualities are expressed within that area (**SQ references in bold**).
- Towns and villages
- Gateways: settlements outside the South Downs with good bus, ferry or rail links to the wider region and beyond, and bus and cycle links into the National Park
- Hubs: settlements in the National Park that have public transport links, accommodation and hospitality businesses and tourist information points
- Ecosystem services: benefits people and society get from the natural environment. Most ecosystem services are provided Park-wide, but the stock of natural capital from which these services flow does vary spatially between the different areas. This differentiation is particularly clear with 'provisioning services,' which are the goods or products obtained from ecosystems such as food crops and timber. Ecoserv¹⁶ maps have been produced for the whole National Park and its different areas, and are explained in more detail in the next chapter. They have been compiled into the document *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*¹⁷, which is part of the core document library and will be updated as new data becomes available (**main type of ecosystem service in bold**)
- Challenges and issues: identifies distinctive challenges and opportunities for individual broad areas

3.6 The settlements, strategic sites, gateways and hubs for the broad areas and river corridors are listed in Appendix I. The *Settlement Context Study*¹⁸ provides a strategic overview of the landscape context of the settlements in the National Park.

THE WESTERN DOWNS

3.7 This broad area is located in the north west of the National Park and is close to the historic city of Winchester where the South Downs Way starts.

Special Qualities

3.8 The Western Downs are characterised by large-scale open farmland dotted with the remnants of ancient woodland. In terms of **landscapes (SQ1)** there is Open Downland to the west. Downland Mosaic covers the central and eastern part of this area, which is intersected by Clay Plateau in places. The Western Downs contain some of the most **tranquil (SQ2)** areas and darkest night skies in the National Park. However, it also contains some areas of relatively low tranquillity, for example, the area surrounding the city of Winchester.

¹⁶ EcoServ-GIS Toolkit V2

¹⁷ Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

¹⁸ Settlement Context Study: Report and User Guide (South Downs National Park Authority, 2017)

- 3.9** In terms of its **wildlife (SQ3)**, this area has a rich variety of habitats, which support a variety of rare and internationally important species. These include ancient woodland, chalk grassland fragments, and the river Itchen, within the north-western boundary of the National Park. This is a chalk stream which is designated both as a Special Area of Conservation (SAC) and a site of Special Scientific Interest (SSSI) due to its high-quality habitats, which support a range of protected species including the water vole and otter.
- 3.10** In this area, **farming and new enterprise (SQ4)** takes the form of larger, diversified holdings such as the Rotherfield, Estate which include arable, managed woodland, shoots and fisheries. Nationally important watercress production occurs in the Itchen Valley.
- 3.11** Opportunities **for access (SQ5)** are more dispersed than in some of the other areas where the National Park is narrower with a larger population close at hand. Winchester is linked to its adjacent downland by the South Downs Way, and there are other hotspots, such as Cheesefoot Head.
- 3.12** This broad area also has a rich **cultural heritage and historical features (SQ6)**, including the site of the Battle of Cheriton (English Civil War battle of 1644) and the National Trust house and garden at Hinton Ampner.
- 3.13** Picturesque villages, many with literary links, are situated in the Western Downs, such as Chawton, which was home to Jane Austen. These **distinctive settlements (SQ7)** are more scattered than in other areas of the National Park as they are less strongly influenced by the drainage pattern and the proximity of rivers or springlines.

Towns and villages

- 3.14** There are no market towns in this area of the National Park. Villages in the Western Downs are clustered along the northern boundary of the National Park and relate most closely to the gateway towns, along the A31 corridor.

Gateways

- 3.15** The city of Winchester is the main western gateway to the National Park and is the county town of Hampshire. Alton and Alresford are smaller gateways to the north.

Hubs

- 3.16** There are no hubs within this sparsely populated area of the National Park.

Ecosystem services

- 3.17** Food provision in the Western Downs is of national importance with extensive areas of arable production including fodder crops for livestock. The chalk rivers and streams in this area are among the finest in the world, providing high-quality water for domestic, agricultural and commercial uses including paper mills, fish farms and water cress beds (**provisioning services**). The high relative tranquility and sense of isolation in this area provides a **cultural service** to visitors and locals.

Challenges and Opportunities for the Western Downs

- 3.18** Parts of the Western Downs are easily accessible from more densely populated areas around the National Park, such as Winchester and Alton, and there are opportunities to create better multi-user routes and circular itineraries based on railway stations.

- 3.19** A specific challenge in this area lies with the need to safeguard the important habitats and species of the Itchen and to reconcile these with the commercial imperatives of watercress production by finding more sustainable methods of cultivation and processing.

THE WESTERN WEALD

- 3.20** The Western Weald runs from the northernmost point of the National Park at Alice Holt Forest down to the market town of Petersfield, and east along to Petworth and Pulborough.

Special Qualities

- 3.21** The Western Weald is made up of wooded hills, deep valleys and open heaths linked by sandy sunken lanes. It includes Black Down, which is the highest point in the National Park.
- 3.22** This area is made up of a diverse range of types of **landscapes (SQ1)**, including the following SDILCA areas –Scarp Footslopes, Greensand Terrace, Mixed Farmland and Woodland Vale, Wealden Farmland and Heath Mosaic, Sandy Arable Farmland, Greensand Hills, Low Weald and Major Scarp. It has some of the most **tranquil (SQ2)** areas and darkest night skies in the National Park, such as Ambersham Common. However, it also contains some areas of relatively low tranquillity, for example, along the northern boundary and around the towns of Petersfield, Midhurst and Petworth.
- 3.23** The area has a rich variety of **wildlife (SQ3)**. This includes the river Rother, which is unusual in that it flows through chalk and greensand, large areas of ancient semi-natural woodland and a chain of lowland heathland sites. Internationally important woodland sites include Ebernoe Common NNR / SAC and The Mens SAC. Heathlands are of considerable international biodiversity importance and home to a large number of rare plants, insects, birds, amphibians and reptiles. Designated sites and priority sites include Woolmer Forest SAC and the Wealden Heaths (Phase II) SPA.
- 3.24** The thin sandy soils in the majority of the Western Weald provide very poor agricultural land for **farming and new enterprise (SQ4)** and instead there is a large amount of heathland and woodland. However, there are areas of Grade 3 and Grade 2 agricultural land; the most fertile soils being found in the north and alongside the river Rother in Hampshire. Ancient, species-rich and ecologically important coppice woodlands, traditionally intensively managed for fuel and timber, are a feature, and the area is home to a number of wineries.
- 3.25** There are particular opportunities for **access (SQ5)** to activities based on the special qualities of the National Park. These include large areas of open access land and accessible woodland. Examples include Alice Holt Forest, Black Down, Iping Common, Woolbeding Common and the Serpent Trail.
- 3.26** There are **rich cultural heritage and historical features (SQ6)** in the area, including Cowdray Park and Petworth Park, and the historic market towns of Petersfield, Midhurst and Petworth. There are a number of large ponds, representing hammerponds associated with the Wealden iron industry or later mill ponds, and the most significant Bronze Age barrow cemetery in the National Park is on Petersfield Heath.

Towns and Villages

3.27 Four of the National Park's five main settlements are located in the Western Weald, namely Petersfield, Liss, Midhurst and Petworth. These settlements serve a wide rural hinterland. Petersfield lies well-hidden from longer views in the valley of the Rother, with a historic core and medieval market square. It is well connected, situated on the A3 and a mainline railway line between London and Portsmouth. Liss is sometimes known as the 'hidden village' located in the wooded valley of the River Rother. It is also well connected by road and rail to London and the south coast. Midhurst and Petworth are smaller market towns than Petersfield located in the heart of the National Park. The historic town of Midhurst is located on a key junction of the A272 and A286 and on the river Rother; it is located close to Cowdray House and Park and the home to the ruin of the Tudor Cowdray House. Petworth is the centre of a nationally significant antiques trade. It is home to the 17th century Petworth House situated on the edge of town, with high walls surrounding the house and Capability Brown designed gardens.

Gateways

3.28 Liphook, Haslemere and Pulborough all provide easy access to the National Park from their train stations and have direct services to London.

Hubs

3.29 Petersfield, Liss, Midhurst and Petworth all provide a variety of services for visitors to the National Park.

Ecosystem services

3.30 The heavily wooded Western Weald has one of the highest densities of ancient woodlands in England and provides a number of **provisioning services** particularly timber from commercial plantations on the larger estates. It is a mixed farming area producing significant amounts of cereals and arable crops and is important for livestock including sheep, pigs and cattle. Vineyards are increasingly a feature on the south facing slopes. This broad area forms part of a sandstone aquifer, which has an important role in maintaining springs and base flows into rivers. The woodlands and heaths of the Western Weald provide **regulatory services**, for example, through carbon sequestration and storage. The woods at Alice Holt provide **cultural services** to children and young people with school field trips and forest schools.

Challenges and Opportunities for the Western Weald

3.31 There are opportunities to improve facilities in the three market towns.

3.32 The redevelopment of the former Syngenta site in Fernhurst provides an opportunity for an exemplar sustainable development of a strategic scale.

3.33 Heathlands are very vulnerable to rapid loss and degradation, for example, through neglect, and require careful management.

3.34 There is a risk of creeping urbanisation encroaching on the hills, which would dilute the hidden character of most of the larger settlements.

THE SCARP SLOPE

3.35 The Scarp Slope runs from Butser Hill in the west to Eastbourne in the east and is the steep, largely north facing aspect of the South Downs. It also runs north from Petersfield to mark the edge of the Western Downs. There are many picturesque springline settlements at the foot of the chalk Scarp Slope.

Special Qualities

3.36 The escarpment provides sweeping views north across the Weald. Distinctive sunken lanes link the Western Weald with the scarp slopes emerging on open commons such as Noar Hill, known for its wild flowers and rare butterflies like the brown hairstreak.

3.37 This area is made up of a diverse range of inspirational **landscapes (SQ1)** as defined in the SDILCA. The Major Scarp, Greensand Terraces and Scarp Footslopes run from Petersfield in the west to Eastbourne in the east and north towards Alton.

3.38 This broad area has a rich variety of **wildlife (SQ3)**. Designated sites and priority habitats include Old Winchester Hill NNR, Butser Hill SAC / NNR, Ashford Hangers SAC / NNR, East Hampshire Hangers SAC, Rook Clift SAC, Duncton and Bignor Escarpment SAC, Lewes Downs (Mount Caburn) NNR and SAC, together with many other fragments of chalk grassland and deciduous woodland.

3.39 In terms of **farming and new enterprise (SQ4)**, the steep topography in much of this area has meant that conversion of grassland to arable has been less prevalent as has wholesale intensive forestry despite the heavily wooded nature of the central downs. However, less livestock has meant many important habitats have been under grazed. More intensive arable cultivation is the norm on the clay soils below.

3.40 There are particular opportunities for **access (SQ5)** and overnight stays linked to the South Downs Way. Along the route there are a number of landmarks and key visitor attractions, including Butser Hill, Chanctonbury Ring, Devil's Dyke and Ditchling Beacon. This broad area also has a rich **cultural heritage and historical features (SQ6)**, including Charleston Farmhouse, Roman villas such as at Bignor, Iron Age hill forts and Parham House and Gardens.

3.41 At the foot of the chalk slopes and hangers are a number of springline villages including the village of Selborne, which was the home to the 18th century 'father of ecology' Gilbert White.

Towns and villages

3.42 Villages are distributed along this broad area as far east as Ditchling. The strongest relationships are mainly with towns outside the broad area such as Midhurst and Petersfield in the Western Weald.

Gateways

3.43 There are a number of gateways that lie just outside the National Park and cover both the scarp and dip slopes such as Worthing, Brighton & Hove, Eastbourne, Polegate, Storrington, Steyning and Hassocks.

Hubs

3.44 There are no notable hubs on the scarp slope.

Ecosystem services

3.45 The lowland calcareous grassland that covers the Scarp Slope has been called the European equivalent of tropical rainforest as up to 45 species of flowering plants can be found within one square metre of this habitat. This is part of a **supporting service** that helps to maintain the other ecosystem services. The breath-taking views from the top of the Scarp Slope from, for example, Butser Hill and Ditchling Beacon are a form of **cultural service** from which people derive happiness and inspiration. The sheep that graze the steep Scarp Slope are an important source of local and regional food and provide a **provisioning service**. The underlying chalk aquifers act as a storage reservoir forming the principle source of water for all of the settlements in and around the South Downs ridge. This in turn provides **regulatory services** with the chalk geology acting as a natural filtering system, which helps to maintain the chemical and ecological status of water bodies in and around the Dip Slope.

Challenges and Opportunities for the Scarp Slope

3.46 Flooding is the major challenge for the springline villages that run along the bottom of the scarp slope. There is great potential for these communities to benefit from being access points and gateways for visitors coming to the National Park. There is also a need for more good-quality, low-cost accommodation for users of the South Downs Way. The challenge, given the small size of most settlements, the narrow roads and the scarcity of parking, is to provide facilities and routes which encourage more walkers and cyclists and fewer cars. There is also a need to spread visits across a wider area to reduce pressure on hotspots such as Devil's Dyke.

3.47 The views out from the Scarp Slope are one of the reasons so many people visit this area. These views of the surrounding landscapes are vulnerable to development, such as creeping urbanisation on the lower scarp slope, which has the potential to create intrusion and alter the scale of views due to urbanising and incongruous elements.

THE DIP SLOPE

3.48 The Dip Slope extends along the entire length of the South Downs ending in the east at the spectacular sheer white cliffs of the Sussex Heritage Coast. This broad area includes villages such as Twyford, Singleton and Findon, and parts of country estates such as Uppark and Goodwood. Along with the Scarp Slope, it includes the downland part of the Brighton and Lewes Downs Biosphere Reserve, one of five areas in the United Kingdom recognised by UNESCO.

Special Qualities

3.49 In terms of **landscapes (SQI)**, the south-facing chalk Dip Slopes are intersected by river valleys, until the eastern end where the Dip Slope ends dramatically at the white cliffs of the Seven Sisters and Beachy Head.

3.50 The Dip Slope includes parts of the following landscape types defined in the SDILCA – Chalk Valley Systems (associated with the rivers Itchen, Meon and Lavant), Downland Mosaic, Wooded Estate Downland, Upper Coastal Plain and Open Downland.

- 3.51** The area has a rich variety of **wildlife (SQ3)**. There are extensive areas of deciduous and coniferous woodland, such as Queen Elizabeth Country Park, Houghton and Friston Forests. Other designated sites and priority habitats include Kingley Vale National Nature Reserve (NNR) and Special Area of Conservation (SAC), one of Europe's finest yew forests, areas of outstanding south facing Dip Slope chalk grassland such as at Castle Hill NNR / SAC near Brighton and Lullington Heath NNR.
- 3.52** To the west, the river Meon is a high quality chalk stream which supports a range of protected species including the water vole and otter. To the east there are important coastal, marine and estuarine habitats, including the chalk sea cliffs which are home to breeding colonies of seabirds such as kittiwakes and fulmars. A Marine Conservation Zone (designated in 2013) protects the chalk reef offshore and runs from Brighton Marina to Beachy Head, providing a valuable habitat supporting species such as the Short-snouted Seahorse.
- 3.53** The majority of the Dip Slope is Grade 3 agricultural land (**farming and new enterprise (SQ4)**). However, there are pockets of Grade 2, some of the most fertile soils in the National Park. The farmed south-facing slopes provide for a range of food and drink production, including arable, grazing, vineyards such as those at Hambledon and Alfriston, and breweries such as those at Dundridge and Lewes.
- 3.54** The Dip Slope has many **access (SQ5) opportunities with** Rights of Way (RoW) linking the coast to the crest of the South Downs, long-distance footpaths such as the Monarch's Way and large areas of accessible woodland and estates open to the public. This broad area also has a rich **cultural heritage and historical features (SQ6)**, including West Dean Estate, Weald and Downland Open Air Museum and Goodwood.

Towns and villages

- 3.55** The villages on the Dip Slope are nearly all situated in southern-oriented valleys and have relationships of varying strength with towns beyond the southern boundary of the National Park. The exceptions are Twyford in Hampshire and East Dean in East Sussex, at either end of the National Park, which look across the chalk ridge towards Winchester and Eastbourne respectively.

Gateways

- 3.56** There are a number of gateways that lie just outside the National Park and cover both the scarp and dip slopes such as Worthing, Brighton & Hove, Eastbourne, Polegate, Storrington, Steyning and Hassocks.

Hubs

- 3.57** There are no notable hubs on the Dip Slope.

Ecosystem services

- 3.58** The gently sloping, south facing Dip Slope provide many of the **Provisioning Services** within the National Park. This includes viticulture, cereal production, sheep grazing and both beef and dairy cattle. The underlying chalk aquifers provide the same **Regulatory and Provisioning Services** described for the Scarp Slope. There are a number of notable attractions on the Dip Slope that provide world famous **cultural services** such as Glyndebourne, home to the world famous opera festival.

Challenges and Opportunities for the Dip Slope

- 3.59** The Dip Slope is easily accessible from the densely populated Coastal Plain and so similar challenges and opportunities arise in ensuring that extra visitor pressure does not damage the special qualities. Improving the RoW network as a whole and providing new off-road multi-user routes can also relieve the pressure on very sensitive sites such as Kingley Vale.
- 3.60** Areas of more fertile soil on these warm south-facing slopes, coupled with the effects of climate change, mean there are particular opportunities for viticulture and wine production. As this is one of the most productive areas agriculturally, the incentive for more intensive production and related agricultural developments is higher than in other areas, and over time more sustainable ways to farm on the thin chalk soils may be found which provide benefits in terms of carbon sequestration and reducing soil erosion alongside crop production. The potential fragmentation of the remaining Dip Slope chalk grassland habitats is a key challenge for the National Park.
- 3.61** The undeveloped coast is an important aspect of the National Park landscape. The boundary of the National Park was intentionally drawn to include several narrow locations in addition to the Heritage Coast where settlements do not extend across the coastline. These areas are subject to particular developmental and recreational pressures from surrounding urban settlements.

THE COASTAL PLAIN

- 3.62** The northernmost part of the Coastal Plain is located within the National Park. The entire Coastal Plain extends southwards from the South Downs to the Solent and the English Channel and includes large towns and cities such as Southampton, Portsmouth and Chichester.

Special Qualities

- 3.63** The fragments of this broad area that lie within the National Park include Wooded Claylands, Upper Coastal Plain and Shoreline **landscapes (SQ1)**.
- 3.64** Due to the proximity of large urban areas to the south, much of this area is relatively less **tranquil (SQ2)** than others in the National Park, and light pollution is more prevalent; this makes the parts that are quieter and have darker skies particularly special.
- 3.65** In terms of **farming & new enterprise (SQ4)**, this broad area and the adjacent Dip Slope to the north, include some of the most fertile soils in the National Park, which has led to a larger proportion than elsewhere of intensively farmed Grade 2 agricultural land.
- 3.66** The proximity of the coastal towns and the largely gentle topography means there are particular opportunities to provide **access (SQ5)**, for example, to areas of accessible woodland such as West Walk in the Forest of Bere.
- 3.67** There are rich **cultural heritage and historical features (SQ6)** in the Coastal Plain area, which has been settled from prehistoric times forward.
- 3.68** The part of the Coastal Plain located within the National Park is sparsely populated with small hamlets and valley villages (**distinctive towns and villages (SQ7)**), such as Lavant. Many of these are relatively well connected to settlements beyond the southern boundary, on which they rely for many essential services.

Towns and Villages

3.69 The villages within the fragment of the Coastal Plain within the National Park are all closely related to the city of Chichester.

Gateways

3.70 Chichester is the main gateway into the Coastal Plain within the National Park.

Hubs

3.71 There are no notable hubs on the Coastal Plain within the National Park.

Ecosystem Services

3.72 It is mainly provisioning services that are provided here, with highly fertile soils covering the river flood plains; this broad area also overlies chalk aquifers.

Challenges and Opportunities for the Coastal Plain

3.73 There is very significant development pressure on this southernmost broad area because of the growth of housing to the north of the coastal towns and along the A27. The A27 itself forms a noisy and congested barrier to people from the south accessing the National Park. As the population of the wider Coastal Plain grows, the thin strip within the National Park provides opportunities for family days out, hiking, cycling, dog walking and other leisure activities. Managing this increased pressure so that visitors can discover, enjoy, understand and value the National Park without damaging its special qualities is a challenge, and as the first point of entry from the south, this area can play a part by providing good facilities at gateway points which orientate visitors, raise awareness of the importance of the landscapes and encourage more sustainable travel choices and behaviour.

3.74 Significant parts of this broad area are at a relatively higher risk from coastal, groundwater and / or fluvial flooding. To ensure these areas are adapting well to the impacts of climate change will involve using natural processes such as changes in cultivation and land-use in flood sensitive zones rather than major engineering solutions more suited to urban areas.

RIVER ARUN CORRIDOR

3.75 The source of the River Arun lies outside the National Park to the east of Horsham. It flows northsouth across the National Park from Pulborough to Arundel and enters the English Channel at Littlehampton. Its main tributary is the River Rother.

Special Qualities

3.76 In terms of **landscapes (SQ1)**, the River Arun flows through Major River Floodplains and Major Valley Sides.

3.77 The Arun Valley area has a rich variety of **wildlife (SQ3)** and is designated partly as an SAC, SPA and Ramsar site and partly as a Local Wildlife Site. Pulborough Brooks is an RSPB reserve that can be accessed from the gateway village of Pulborough. The Wildfowl and Wetlands Trust reserve at Arundel is also at a gateway location. Both sites are important in providing managed **access (SQ5)** to the sensitive wildlife of the valley.

3.78 The Arun Valley has many rich **cultural heritage and historical features (SQ6)** including the Castle Park of Arundel, which forms a southern gateway, the industrial museum at Amberley, the painted church at Hardham, and the route of the Wey and Arun Canal north of Pulborough. The villages of Bury and Burpham have literary connections.

Towns and Villages

3.79 The villages of Bury, Amberley, Coldwaltham and Watersfield are located in the Arun Valley.

Gateways

3.80 Arundel and Pulborough are important gateways into the National Park.

Hubs

3.81 Amberley Station forms a small hub in this river corridor.

Ecosystem Services

3.82 The principal ecosystem services provided by all the river corridors are **Regulating Services** particularly the regulation of water timing and flows. However, the River Arun has lost much of its flood storage capacity through land drainage and conversion for agriculture. In terms of **Provisioning Services** highly fertile soils cover the river flood plains and significant areas have been drained and converted to intensive agriculture. There are extensive areas of brooks and flood plain grazing marshes on the lower stretches of the River Arun at Amberley. There are also **Cultural Services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

Challenges and Opportunities for the River Arun Corridor

3.83 The principal challenge for all the river corridors relate to flooding. The principal opportunities relate to recreational opportunities along the river.

RIVER ADUR CORRIDOR

3.84 The River Adur is formed at the confluence of the western Adur and eastern Adur just west of Henfield. It flows north to south across the National Park from Coombes Farm and through a gap in the South Downs near Lancing College where it is fed by the Ladywell Stream. It travels past the strategic site of Shoreham Cement Works and leaves the National Park just north of Shoreham-by-Sea. It enters the English Channel at Shoreham-by-Sea.

Special Qualities

3.85 In terms of **landscapes (SQ1)**, the River Adur flows through Major River Floodplains and Major Valley Sides.

3.86 Coombes Farm gives visitors an insight into the **farming way of life (SQ4)** of the South Downs.

3.87 The **historic buildings (SQ6)** of Bramber village and Lancing College mark the northern and southern entrances to the section of valley in the National Park.

3.88 The Downs Link cycle route runs along the Adur Valley, providing opportunities for **access (SQ5)**.

Towns and Villages

3.89 There are no notable settlements in that part of the National Park within the Adur Valley.

Gateways

3.90 Shoreham-by-Sea is an important gateway to the south of the National Park.

Hubs

3.91 There are no notable hubs in this river corridor although Shoreham Cement Works does offer opportunities to become an important hub for the National Park.

Ecosystem Services

3.92 The main ecosystem services provided by all the river corridors are **Regulating Services** particularly the regulation of water timing and flows. The Adur's floodplain and wetlands retain water, which can decrease flooding and reduce the need for engineered flood control infrastructure. There are also **Cultural Services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

Challenges and Opportunities for the River Adur Corridor

3.93 The principal challenge for all the river corridors relates to flooding. The principal opportunities relate to recreational opportunities along the river and in the case of the River Adur these principally lie at Shoreham Cement Works. They are all substantially tidal, which limits their recreational use.

RIVER OUSE CORRIDOR

3.94 The River Ouse rises near Lower Beeding and then travels eastwards into East Sussex. It flows into the National Park near Hamsey and through the town of Lewes where it is crossed by Willey's Bridge, the Phoenix Causeway next to North Street Quarter, and Cliffe Bridge. It flows on past the villages of Glyde, Rodmell and Southease and leaves the National Park just south of Piddinghoe. It enters the English Channel at Newhaven.

Special Qualities

3.95 In terms of **landscapes (SQ1)**, the River Ouse flows through Major River Floodplains and Major Valley Sides.

3.96 In terms of its **distinctive towns and villages (SQ7)**, Lewes is considered to be one of the best preserved small market towns in England, with significant artistic and **cultural heritage (SQ6)** making it a popular tourist destination. Springline settlements lie at the foot of the chalk scarp, including the village of Rodmell, which has literary connections with Virginia Woolf.

3.97 A large part of the floodplain is designated as Lewes Brooks SSSI for its nationally important **wildlife and habitats (SQ3)**, notably in the ditches that criss-cross the area.

3.98 The South Downs Way crosses the River Ouse at the small hamlet of Southease, which has a railway station served by trains direct from Brighton, and from London via Lewes. The construction of the Egrets Way multi-user route along the river provides an opportunity to improve **access (SQ5)** to the valley for walkers, cyclists, mobility scooters and, in places, horse-riders.

Towns and Villages

3.99 The historic market town of Lewes is located in the River Ouse corridor and is the county town of East Sussex. The villages of Kingston-near-Lewes and Rodmell also lie on the valley sides.

Gateways

3.100 Newhaven, with its ferry service, is a gateway into the National Park from the continent.

Hubs

3.101 Lewes is also an important hub within the National Park providing a full and varied range of services and attractions to visitors.

Ecosystem Services

3.102 The principal ecosystem services provided by all the river corridors are **Regulating Services** particularly the regulation of water timing and flows. The Ouse's floodplain and wetlands retain water, which can decrease flooding and reduce the need for engineered flood control infrastructure. In terms of provisioning services highly fertile soils cover the river flood plains and significant areas have been drained and converted to intensive agriculture. There are extensive areas of brooks and flood plain grazing marshes at Lewes Wild Brooks. There are also **Cultural Services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

Challenges and Opportunities for the River Ouse Corridor

3.103 A key challenge for the town of Lewes is flooding as it is located on a stretch of the River Ouse where it flows southwards through a narrow gap in the South Downs. Restoring the natural capacity of the floodplain to the north of the town to absorb floodwater also brings opportunities in terms of wildlife and access. The redevelopment of the North Street Quarter of Lewes offers major regeneration opportunities for the town and the wider area.

RIVER CUCKMERE CORRIDOR

3.104 The River Cuckmere rises near Heathfield, flows across the Weald and enters the National Park just north of Alfriston. The Cuckmere Valley Nature Reserve is located on the lower estuary stretch of the river and it flows into the English Channel on the Sussex Heritage Coast at Cuckmere Haven.

Special Qualities

3.105 In terms of landscapes (SQ1), the River Cuckmere flows through Major River Floodplains and Major Valley Sides. The meanders of the River Cuckmere are an iconic feature of the National Park.

3.106 Multiple opportunities exist for **access (SQ5)**, with Berwick station nearby, the Seven Sisters Country Park and footpaths along the river.

3.107 Alfriston is a **distinctive, historic settlement (SQ6, SQ7)** that is a magnet for visitors to the area.

3.108 The southern part of the valley is designated as an SSSI for its **wildlife (SQ3)**, in particular for its plants and birds. The Cuckmere is one of few undeveloped estuaries along this stretch of coastline.

Towns and Villages

3.109 The picturesque and historic village of Alfriston is located on the River Cuckmere.

Gateways

3.110 There are no notable gateways into the River Cuckmere Corridor.

Hubs

3.111 The Seven Sisters Country Park at Exceat forms a small hub next to the river.

Ecosystem Services

3.112 The principal ecosystem services provided by all the river corridors are **Regulating Services**, particularly the regulation of water timing and flows. The Cuckmere Valley provides **Supporting Services** in terms of biodiversity and **Regulating Services** in relation to water flow. In terms of **Cultural Services** there is a sense of relative remoteness and wildness associated with the undeveloped heritage coast and Cuckmere Haven.

Challenges and Opportunities for the River Cuckmere Corridor

3.113 The principal challenge for all the river corridors relate to flooding. The principal opportunities relate to recreational opportunities along the river and in the case of the River Cuckmere these opportunities can be accessed at the Seven Sisters Country Park hub at Exceat.

The Spatial Strategy

3.114 The spatial strategy seeks to deliver the vision and objectives of the Local Plan. It guides how the National Park will evolve and develop over the plan period (2014-2033). **Having regard to the landscape and five broad areas and river corridors, the spatial strategy for the South Downs Local Plan is for a medium level of growth dispersed across the towns and villages of the National Park.** This starts from the following key principles:

- The Local Plan must first and foremost reflect the purposes of the National Park, and is therefore based on the capacity of the landscape to accommodate growth (landscape-led); and
- Pursuant to this, the Local Plan must reflect the duty of the National Park, and should therefore seek to foster the economic and social wellbeing of local communities, across the breadth of the National Park.

3.115 The spatial strategy therefore seeks to ensure that our towns and villages remain vibrant centres, whilst conserving and enhancing the special qualities.

3.116 There are several hundred settlements in the National Park, ranging from a collection of a few buildings, to large market towns. However, the spatial strategy of dispersed growth is limited to the 53 settlements listed in Policy SD25: Development Strategy of this plan. These are the settlements for which there are defined boundaries, and where the principle of growth is accepted.

Level and distribution of housing growth

3.117 The level and distribution of growth is informed by a robust evidence base and engagement exercise that incorporates the results of informal and formal consultations on the Local Plan. The proposed **level** of housing growth is a matter that has been carefully considered through a wide ranging evidence base including the *Housing and Economic Development Needs Assessment* (HEDNA)¹⁹, (which builds on the *Strategic Housing Market Assessment* (SHMA)²⁰), the *Strategic Housing Land Availability Assessment* (SHLAA)²¹, and the *Sustainability Appraisal*²² (SA). The scenarios considered in the context of a landscape-led approach were:

1. Low growth: the minimum number of homes needed to maintain the size of the current population;
2. Medium growth: the number of homes to reflect the historic delivery rate in the area now covered by the South Downs National Park, for the period 2004-2014;
3. Medium growth + 60%: the number of homes to reflect the Winchester, East Hampshire and Lewes Joint Core Strategies, **and** a 60% uplift on historic delivery for settlements outside the Joint Core Strategy areas; and
4. High growth: projects forward population growth for the period 2013-20133 based on five year trends, as set out in the SHMA – this scenario fully meets the objectively assessed housing need (OAN) identified in the SHMA.

3.118 For each of these scenarios, two high-level development strategies were initially considered: dispersed development, where development would be spread across a wide range of settlements, and a concentrated strategy, where housing growth would be restricted to the five key settlements of Petersfield, Lewes, Midhurst, Liss and Petworth.

3.119 Some scenarios were, at an early stage, considered not to be reasonable alternatives. Low growth would have resulted in little growth occurring anywhere but the five large settlements, which would fail to meet social and economic sustainability objectives. For higher growth scenarios, a concentrated strategy would lead to such high levels of development in the larger settlements that negative landscape impacts would be inevitable.

3.120 Of the remaining options tested through the SA, it was determined that a ‘dispersed **medium**’ development strategy would do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park. The SA also identified the sustainability benefits of encouraging development in a range of small settlements to support local services, rather than limiting growth only to locations with public transport opportunities.

¹⁹ Housing and Economic Development Needs Assessment (G.L. Hearne, 2017)

²⁰ Strategic Housing Market Assessment (G.L. Hearn, 2015)

²¹ South Downs Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

²² South Downs Local Plan Sustainability Appraisal (AECOM, 2014, 2015 and 2017)

3.121 A dispersed **medium** development strategy also reflects the outcome of public consultation. There has been strong community support for addressing local housing need within many settlements across the National Park. Equally, there was little appetite within the large settlements for high levels of growth over the period of the Local Plan, given their landscape setting.

Objectively assessed housing need and the Duty to Cooperate

3.122 The ‘objectively assessed need’ for housing (OAN) is the forecast amount of housing needed for an area to fully meet the needs of its population. Footnote 9 of the *National Planning Policy Framework* (NPPF) identifies national parks as an area where development should be restricted and OAN does not need to be met, notwithstanding the more generally applied national policy requiring local plans to meet the full OAN for housing in the housing market area. For the South Downs National Park, the HEDNA has set out a housing need of 447 new dwellings per year. The SA has confirmed that the National Park Authority would not be meeting its statutory purpose if it were to seek to fully meet the OAN within the National Park boundaries. Figure 3.5 sets out the overall picture of housing provision in the South Downs Local Plan, compared with the OAN range as advised in the HEDNA.

FIGURE 3.5 HOUSING PROVISION COMPARED WITH OAN

Annualised OAN in the National Park <i>(over whole Plan period)</i>	447 (8,493)
South Downs Local Plan housing provision <i>(over the whole Plan period)</i>	250 (4,750)
Annual shortfall in the National Park <i>(over the whole Plan period)</i>	197 (3,743)

3.123 The National Park Authority has tested all known possible housing sites for development potential through the SHLAA, and made provision for housing within a limited landscape capacity. The National Park Authority is also working with partner authorities to fully test all reasonable options for meeting unmet housing need in suitable locations outside the National Park boundaries. Chapter 1 of this Local Plan explains what the National Park Authority has done to engage positively with its neighbouring local authorities and others on cross-boundary issues, including housing. The *Duty to Cooperate Statement*²³ sets out further details of how the unmet need relates to specific district, borough and city areas, and also sets out in detail the processes by which partners are seeking to address the need.

Level and distribution of employment and retail growth

3.124 This Local Plan seeks to provide local employment and facilities primarily to address the social and economic wellbeing of local communities, and to provide for local businesses that contribute to the special qualities of the National Park. Chapter 7 sets out relevant strategic policies.

²³ Duty to Cooperate Statement (South Downs National Park Authority, 2017)

3.125 The HEDNA indicates a modest need for new employment land supply, and much of the requirement is met by extant planning permissions. Opportunities for new sites, as well as extant permissions, are focused on larger settlements. The SA recognised that the National Park's business base is based on small businesses that do not require large scale allocations. The spatial strategy for employment is therefore to focus on safeguarding local employment sites, and modest employment growth in the main towns.

3.126 The spatial strategy for retail is focused on supporting and sustaining local settlements and the rural economy. The market town centres within the National Park are Petersfield, Midhurst, Petworth and Lewes. Liss forms a larger village centre and smaller village centres are identified at Alfriston, Ditchling, Fernhurst and Findon.

3.127 There is no provision in the spatial strategy for strategic or large scale retail development, as this would not be appropriate for a National Park.

Broad areas

3.128 The spatial strategy applies across all the broad areas and river corridors and will be delivered through the policies of this Local Plan. It follows that the Local Plan policies will need to be interpreted in slightly different ways in the different areas if they are to operate effectively. For example, opportunities for agricultural diversification exist throughout, but we are likely to see more applications for development related to vineyards across the Dip Slope, and more for woodfuel supply chains in the Western Weald. The spatial portrait and spatial strategy will help to inform the preparation of further Neighbourhood Development Plans (NDP). Planning applications should reference it as appropriate.