

South Downs Local Plan
Progress from Issues and Options to Preferred Options

September 2015

Introduction

This evidence based document has been produced to support the publication of the South Downs Local Plan: Preferred Options for consultation. The purpose of the document is to provide a clear audit trail from the South Downs National Park – Local Plan Options Consultation Document to the Preferred Options. It should be read in conjunction with the Options Consultation Document and the Summary of Responses. It sets out all the issues and options consulted on and the main issues raised. It then explains and justifies these preferred options.

Issue Number	Issue	What we propose to do	% (no. of reps) support	Reasonable alternative options	% (no. of reps) support	Issues arising	Preferred option	Justification
1	How can the Local Plan best help conserve and enhance landscape character?	The Local Plan to include a criteria-based policy which ensures the conservation, management and enhancement of the National Park's landscape, supported by sector, issue and/or area specific policies.	94% (51)	1a .In addition to adopting the criteria-based policy above which seeks the conservation, management and enhancement of the landscape, the Local Plan could adopt a policy to restrict development in areas which are considered – through an objective assessment of landscape sensitivity – to be especially sensitive to change.	77% (36)	<p>Policy could be too general. Should be applied on a proportionate and case-by-case basis.</p> <p>NPPF requires Local Plans to identify land where development would be inappropriate. Approach in option 1a could devalue and put greater development pressure on those sites / areas not selected as being especially sensitive to change.</p> <p>Difficult to be objective on landscape sensitivity.</p>	<p>The Local Plan: Preferred Options include a strategic policy on landscape character as set out in policy SD5. In addition, the specific issues associated with safeguarding views and protecting tranquillity in the National Park, including Safeguarding Views, Relative Tranquillity and Dark Night Skies are dealt with in draft policies SD7, SD8 and SD9.</p> <p>Strategic Policy SD22: Development Strategy places restrictions on development outside the boundaries of an identified list of settlements.</p> <p>Strategic Policy SD10: The Open Coast restricts development still further in the Sussex Heritage Coast and a designated Undeveloped Coastal Zone.</p>	<p>The SDNPA has developed a strong evidence base on landscape issues which will be used to back up a small suite of criteria based landscape polices, in accordance with the proposed approach in Issue 1 which received overwhelming support at consultation.</p> <p>Option 1a has been taken forward through the retention of the principle of settlement boundaries and through the additional restrictions on development in the Heritage Coast and Undeveloped Coastal Zone.</p>
2	How can the Local Plan provide resilience for people, business and their environment?	The Local Plan to include a green infrastructure policy that encourages green infrastructure initiatives and will help underpin the commitment to conserving and enhancing the natural environment, cultural heritage and landscape character of the	93% (51)	2a. The Local Plan could take the approach of not pursuing an all-embracing GI strategy, but individual opportunities for GI are taken as they arise through development proposals.	47% (20)	<p>All-embracing GI strategy should be at the core of the Local Plan. Need for policy to protect existing GI. Amount of privately owned land may make a comprehensive GI strategy difficult to deliver. GI policy / strategy should take into account GI projects just</p>	<p>Strategic Policy SD14 will provide resilience to communities making sure that new development contributes to the provision of on and offsite GI, and the protection and enhancement of existing GI assets.</p>	<p>The preferred option combines the commitment to a GI Framework with a case by case approach to ensuring development proposals contribute to GI. Points raised at consultation on the protection of existing green infrastructure</p>

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		National Park in the face of both development pressure and climate change. Such a policy will be supported and informed by a GI Strategy setting out the approach to the provision of GI in and around the National Park.				<p>beyond the National Park boundary.</p> <p>Option 2(a): Provision of GI should not be at the expense of the viability of development proposals and should be sufficiently flexibility. Scale of most development in the National Park is not sufficient to provide significant GI improvements.</p> <p>Ad hoc approach is inconsistent with NPPF, particularly 165. A piecemeal approach will result in a disjointed GI network that is not fit for purpose.</p>	Proposals for the delivery of the pending GI Framework will be supported.	and the need for a GI Strategy have been incorporated. Tying in the GI Strategy with the Infrastructure Delivery Plan and CIL will avoid the risk of piecemeal GI delivery highlighted by some respondents, and ensure the contributions required from new development protect its viability.
3	How can the Local Plan best ensure designated and undesignated habitats and protected species are conserved and enhanced?	The Local Plan to incorporate a criteria-based policy ensuring the conservation and enhancement of protected habitats and species, with the level of protection being commensurate with their status, and is pro-active in seeking to significantly enhance biodiversity, for example through the expansion of the local ecological network and re-establishment of species. Encourage new development to contribute to the local ecological network by incorporating features to promote biodiversity and contribute to green infrastructure, supported by a Green Infrastructure Strategy, which informs development proposals, other spatial policies within the Local Plan and the identification and management of designated sites.	94% (48)	<p>3a. The Local Plan could develop specific policies to deal with potential impact of development on particular habitats, such as river corridors.</p> <p>3b. The Local Plan could specify the types of development appropriate within Nature Improvement Areas.</p>	76% (25)	<p>Policy advice on requirements for ecological assessments supporting planning applications.</p> <p>Not possible to provide compensatory habitat for certain habitats, such as ancient woodland. Should set out the priorities for both the quality and extent of habitats, including coastline, and species across the SDNP.</p> <p>Approach in line with the mitigation hierarchy advocated by the NPPF, but simple sequential approach for biodiversity is not appropriate for statutorily protected sites.</p> <p>Step 3 of guidance for Natura 2000 sites should only be applied in exceptional circumstances. Include a specific policy on development affecting heathland, such as a 400 metre exclusion zone around Special Protection Areas (SPAs) and SSSI (Sites of</p>	The preferred approach is to include a strategic policy on biodiversity and geodiversity, which will incorporate the proposed approach set out under Issue 3 in the Local Plan Options Document. In addition, it is proposed that the Local Plan includes further policies on international sites and on rivers.	The proposed approach in Issue 3 has been taken forward, as well as Option 3a with regard to a specific policy on rivers (there is also a specific policy on trees, woodland and hedgerows). The main policy on biodiversity and geodiversity is structured around a hierarchy with different criteria applying to the different levels of designated site. The irreplaceable nature of ancient woodland, as raised during the consultation, is incorporated into the policy. A separate policy on internationally designated sites has been created which deals with some of the issues raised by consultees, including on a 400m exclusion zone around the Wealden Heaths Phase II SPA.

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						<p>Special Scientific Interest) heathland and National Nature Reserves.</p> <p>Development within a wider zone for designated sites should contribute to access management measures and alternative greenspace.</p> <p>Option 3a: Could provide opportunities to minimise encroachment on river corridors and address flood risk and other issues.</p>		
4	How can the Local Plan best ensure that geodiversity is conserved?	The Local Plan to include a policy that seeks to conserve geological conservation interests and geodiversity.	96% (43)			Comments are outside the Local Plan remit.	The preferred approach is to include a strategic policy on biodiversity and geodiversity, which will incorporate the proposed approach set out under Issue 4 in the Local Plan Options Document	The proposed approach in Issue 4 has been taken forward. The main policy on biodiversity and geodiversity is structured around a hierarchy with different criteria applying to the different levels of designated site.
5	How can the Local Plan best address issues of water resources, water quality and flooding?	The Local Plan to consider the potential impact on the water environment of proposals for development on a case-by-case basis, in line with national policy and legislation and using other policies in the Local Plan and Neighbourhood Plans.	100% (43)	<p>5a. The Local Plan could include a policy focusing on demand management/water efficiency.</p> <p>5b. The Local Plan could include policies that address a 'twin-track approach' to water management, that is:</p> <p>(i) a policy on demand management/water efficiency, and</p> <p>(ii) a policy not permitting development proposals that would adversely affect the water environment in terms of the quality and yield of water bodies, and their location in the floodplain.</p> <p>5c. The Local Plan could include a policy of 'water neutrality', whereby there would be no net additional water resource required over</p>	18% (11)	<p>Local Plan needs to address water demand, water discharge, ground water recharge, and flooding, water at a catchment scale to ensure improvements in water management, not on a case-by-case basis. Recommend policies for protection and enhancement of surface and groundwater quality.</p> <p>Development needs to take into account climate change, increasing rainfall, use of grey water and similar technologies. New homes should achieve, as a minimum, internal water use of 105 litres / per head / per day. Commercial development should meet BREEAM excellent standards.</p> <p>Development in flood plains designed to minimise impact</p>	The Local Plan: Preferred Options includes a policy on the protection of aquifers from contamination; a policy on development affecting rivers and watercourses which covers a wide range of issues including pollution, biodiversity, recreational access and character; and a policy on flood risk management.	The Preferred Options carry forward part of Option 5b from the Options paper, with the protection of the water quality of aquifers and watercourses, and discouragement of floodplain development. Policy SD31 'Climate Change and Sustainable Construction', while it does not specifically refer to water efficiency, does contain a general requirement for new development to incorporate high standards of sustainable construction and requires non-residential development to meet BREEAM 'Very Good' or 'Excellent' standard. These go some way towards meeting the issues raised by

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				the course of the plan to meet the needs of new development.		and risk of flooding. Safeguard areas for flood storage or set back of coastal defences.		consultees at Options stage.
6	How can the Local Plan adequately protect, manage and enhance trees and woodland?	The Local Plan to specify clear criteria to ensure the protection and protective buffering of trees and woodland subject to Tree Preservation Orders and trees within Conservation Areas.	94% (49)	<p>6a. The Local Plan could, where appropriate, seek to retain existing trees, woodland and hedgerows, require adequate protection between existing trees and woodland and proposed development and, where appropriate, require the planting of appropriate new trees and other vegetation.</p> <p>6b. The Local Plan could specify clear criteria to ensure the adequate protection and protective buffering of ancient and veteran trees and ancient woodland, particularly referencing ancient woodland outside SSSIs.</p>	58% (18)	<p>Policy to outline the strongest possible level of protection for ancient woodland. Not possible to replace ancient or veteran trees. Proactive use of woodland for sustainable fuel and enhance biodiversity.</p> <p>Advocate creation of woods close to residential areas. Tree disease should be mentioned. Woodland creation would assist with a resilient woodscape. Important to encourage mixed woodland and should specify native trees.</p> <p>Discretion for development in the wider public interest which adversely impacts on woodland, subject to adequate mitigation.</p> <p>Nothing intrinsically different in trees and woodland from other vegetation types, question whether separate policies are required. Trees subject to TPOs or in conservation areas are protected by legislation so policy not required.</p> <p>Tree planting needs to be in appropriate locations and not in areas of heathland.</p>	<p>Strategic Policy SD12: Biodiversity and Geodiversity contains protection for ancient woodland, aged and veteran trees.</p> <p>Development Management Policy SD37: Trees, Woodland and Hedgerows requires that proposals conserve and enhance trees, woodland and hedgerows, and comply with other relevant policies and legislation.</p> <p>Development Management Policy SD46: Agriculture and Forestry facilitates appropriate development of buildings, tracks and structures for the purposes of forestry.</p>	<p>The Local Plan: Preferred Options carry forward the proposed approach in Issue 6 as well as elements of the previous options 6a and 6b.</p> <p>Strategic Policy SD12: Biodiversity and Geodiversity recognises the irreplaceable nature of ancient woodland, aged and veteran trees.</p> <p>Strategic Policy SD5: Landscape Character requires planting associated with new development to be consistent with landscape character and generally of native species, which addresses some of the concerns raised by consultees.</p> <p>As requested through the consultation, the policies do provide discretion allowing for the loss of trees subject to appropriate replacement or compensation, including in exceptional circumstances protected trees.</p>
7	What approach should the Local Plan adopt to heritage at risk?	The Local Plan to outline the approach of the National Park Authority and its partners in relation to heritage at risk, that is monitor the condition of designated heritage assets, identify those already at risk or vulnerable, exploit opportunities to secure their repair and enhancement,	94% (47)	7a. The Local Plan could include a policy which encourages the re-use of buildings at risk with a more flexible approach to new uses.	90% (37)	<p>Reference to SDNPA powers and their use as a last resort.</p> <p>Any development should meet Code for Sustainable Homes Level 6. CIL should not be used on privately owned buildings.</p> <p>Danger of setting precedents.</p>	There is no specific policy in the Local Plan: Preferred Options on heritage at risk. Strategic Policy SD11: Historic Environment, alongside other criteria, encourages the re-use of redundant or under-used heritage assets with an optimal	<p>The proposed approach in Issue 7 has been integrated into broader policies on the Historic Environment and on the conversion of redundant agricultural buildings.</p> <p>Reference to the use of CIL is not included, as per consultation response. The</p>

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		including the use of the community infrastructure levy, and take a proactive role in addressing heritage at risk, working with partners and communities and seeking external funding as necessary.				Each site be taken on its merits.	viable use which secures their long term conservation and enhancement, including setting. Development Management Policy SD49: Conversion of Redundant Agricultural Buildings contains more detail with regard to redundant agricultural buildings.	use of the Code for Sustainable Homes in new planning policies has been banned by the Government, but Policy SD31 'Climate Change and Sustainable Construction' contains a general requirement for new development to incorporate high standards of sustainable construction.
8	What approach should the Local Plan adopt in relation to adaptation and new uses of historic buildings and places which have lost their original purpose?	The Local Plan to seek to secure the optimum viable use for heritage assets, that is consistent with, or least harmful to, the character and appearance of the heritage assets affected and their wider setting.	96% (48)	8a. The Local Plan could adopt a generally restrictive policy approach to the conversion of historic assets to new uses. In conservation terms, the original use is usually the best one for the preservation of any particular historic asset. Alternatives should only be entertained if the original use is wholly and demonstrably defunct. 8b. The Local Plan could adopt a policy approach to conversion of historic buildings to other uses, on a case-by-case basis. Policy guidance may still be required regarding the neighbourliness of certain uses, the balance of uses in town centre locations, or the long-term preservation of certain architectural features, such as historic shop fronts.	35% (16)	Majority support for Option 8b but significant minority preferred more rigid approach of 8a. Option 8b: The word 'conservation' is preferable to 'preservation.' Consideration of the possibility that ancient buildings are left to decay where they have lost their original use and are beyond repair. Prefer a criteria-based approach.	Strategic Policy SD11: Historic Environment, alongside other criteria, encourages the re-use of redundant or under-used heritage assets with an optimal viable use which secures their long term conservation and enhancement, including setting. Development Management Policy SD49: Conversion of Redundant Agricultural Buildings contains more detail with regard to redundant agricultural buildings.	The preferred option follows the proposed approach in Issue 8, with some additional detail.
9	What approach should the Local Plan adopt to ensure the diversification of the agricultural economy conserves and enhances historic farm buildings and their setting?	The Local Plan to set out a policy seeking to secure the optimum viable use for historic/traditional farm buildings that is consistent with, or least harmful to, the character and appearance of the buildings affected and their wider setting.	100% (49)	9a. The Local Plan could adopt a policy approach to conversions where planning permission is required which favours business and community uses over residential, and only allows the latter where all other uses have been demonstrated to be unviable. 9b. The Local Plan could adopt	36% (15) 64% (27)	Preference for flexibility of Option 9b. Judgements should be made on a case-by-case basis. Significant minority support for 9a. Either option be caveated with "whilst carefully conserving their special interest." Possibility of agricultural buildings left to decay,	Strategic Policy SD11: Historic Environment, alongside other criteria, encourages the re-use of redundant or under-used heritage assets with an optimal viable use which secures their long term conservation and enhancement, including setting. Development	The preferred option follows the proposed approach in Issue 9, and implicitly also Option 9b (allowing for a greater variety of proposed uses rather than favouring business and community uses). One consultee suggested that the possibility could be retained for agricultural buildings to

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				a more permissive policy approach to new uses, including residential, which allows for greater variety of proposed uses.		particularly those with bats/owls nesting in them.	Management Policy SD49: Conversion of Redundant Agricultural Buildings contains more detail with regard to redundant agricultural buildings.	decay; this could happen if they are disused and do not meet the criteria in SD11 or national permitted development rights for change of use.
10	The Local Plan to include a policy to permit and encourage work to improve the energy performance of heritage assets consistent with their character and appearance and that of their wider setting.	The Local Plan to include a policy to permit and encourage work to improve the energy performance of heritage assets consistent with their character and appearance and that of their wider setting.	93% (42)	10a. Guidance could be developed, underpinned by a policy in the Local Plan, which attempts to provide clarity about the potential impacts of various forms of retrofitting and detailed guidance over which options are most suitable in different contexts.	92% (36)	N/A.	Development Management Policy SD38: Energy Performance and Historic Buildings permits work to improve the energy performance of heritage assets subject to certain criteria including that they be consistent with the heritage asset's character and appearance and that of their wider setting.	The preferred option follows the proposed approach in Issue 10.
11	How can the Local Plan best protect non-designated heritage from total loss or incremental change?	The Local Plan to encourage the consolidation of the existing local lists and add new entries within conservation areas identified according to established criteria as part of the Conservation Area Appraisal process. Heritage assets of strong merit will be afforded consideration under the determination process.	100% (51)	11a. The Local Plan could highlight that no further co-ordinated attempt to identify non-designated heritage assets will be made and provide no special policy for their preservation. 11b. As resources permit, survey probable non-designated heritage assets for the creation of a National Park-wide local list, selected against carefully considered, pre-established criteria. The Local Plan could provide a policy safeguard to ensure that their special interest is considered and given appropriate weight in the planning decision-making process.	7% (3) 93% (39)	Parish Councils to prepare local lists. There should be a reference to heritage assets identified in Neighbourhood Plans.	Strategic Policy SD11: Historic Environment gives a certain level of weight to the protection to non-designated heritage assets.	The preferred option follows the second point of option 11b. Rather than committing to the creation of a National Park wide local list, the supporting text makes clear that the National Park Authority will support the creation of local lists by community groups, as suggested by consultees.
12	Should the Local Plan include a policy on enabling development to address heritage at risk issues?	The Local Plan to use the guidance set out by English Heritage when assessing any proposals for enabling development. The use of enabling development should be exceptional in the National Park.	88% (43)	N/A	N/A	Little support for widening concept of enabling development to allow it to be used for more generic heritage costs (e.g. revenue costs of an estate as a whole) rather than a specific, capital cost to address a specific heritage asset.	Development Management Policy SD40: Enabling Development states that enabling development should only take place in wholly exceptional circumstances and meeting the tests and	The preferred option follows the proposed approach in Issue 12.

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							criteria set out by English Heritage.	
13	What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?	The Local Plan to adopt an approach that ensures that the impact of new infrastructure proposals on known heritage assets is fully considered in dealing with planning applications and that proper provision is made for dealing with the discovery of previously unknown heritage assets in the course of construction.	98% (45)	13.a The Local Plan could include planning policy guidance that ensures that infrastructure schemes deliver opportunities for community engagement and learning during the period of project work on site and that the information from the investigations of the cultural heritage is widely disseminated.	91% (31)	The term 'infrastructure project' should be clearly defined. Should consider historic churches and chapels, sunken Lanes, ancient boundaries, historic rights of way, historic landscape types, battlefields, historic cemeteries, ancient forests, mills and ponds, nesting sites for migrant birds affected by conversion of buildings, historic local landed families (extinct and surviving), historic trading or cattle routes, folklore, non-designated historic designated.	Strategic Policy SD30: Strategic Infrastructure Proposals states that, on any strategic infrastructure proposals that are otherwise considered suitable, 'the highest level of mitigation and improvements to the... cultural heritage of the National Park will be sought.' Development Management Policy SD41: Archaeology protects archaeological heritage assets, and the supporting text to the policy requires projects affecting significant archaeological remains to include a programme which promotes a wider understanding and appreciation of the site's archaeological heritage.	The approach in the Local Plan: Preferred Options will ensure that the impact of new infrastructure proposal on known heritage assets is fully considered in dealing with planning applications.
14	How can the Local Plan best ensure the design of new development supports the built environment character and conserves and enhances the National Park's natural beauty, wildlife and cultural heritage?	Develop and publish Design Guidance in consultation with local communities, building on Village Design Statements. The Local Plan to require all development to be of a high design quality that demonstrates how it responds to the local landscape and built environment character	100%(50)	The Local Plan could set out that development applications be supported by robust built environment characterisation studies and that designers integrate defining characteristics into development proposals.	85%(33)	More weight and consideration should be given to Village Design Statements. Some support for modern, good-quality design, provided it respects the setting. The need to recognise individuality and that each settlement has its own identity and there is diversity across the National Park which would need to be accommodated within any guidance. This should not prevent the development of energy efficient/eco-homes. The need to recognise the	Develop a strategic policy which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies.	The preferred option follows the proposed approach in Issue 14. Strategic Policy SD6: Design addresses several of the concerns raised at consultation by including requirements that development proposals must be informed by village and town design statements where available, and that design must be locally appropriate and take into account its location and context. Energy efficiency, extensions and farm buildings are covered by policies SD30, SD45 and SD46 respectively.

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						<p>cumulative effect of small scale development and extensions.</p> <p>This needs to be proportionate with detailed character studies considered too onerous (except for larger scale developments) and that this would need to be applied to acknowledge that each proposal should be assessed on its merits. Considered more appropriate to spend time on sense of place and local distinctiveness in relation to site context/characteristics rather than on characterisation studies. Important to use local materials (i.e. to reflect local geology) and that attention is paid to the local vernacular, not just traditional detailing.</p> <p>Support for preparing development briefs on allocated sites.</p> <p>Need to consider what is appropriate for agricultural and farm buildings (i.e. consideration of function/fit for purpose).</p>		
15	How can the Local Plan best ensure the use of appropriate materials?	The Local Plan to encourage the use of local building materials, particularly where their use will contribute to sustainable landscape management and local employment.	96%(48)	<p>15a. The Local Plan could encourage the use of the most sustainable, energy efficient materials regardless of source.</p> <p>15b. The Local Plan could encourage the use of materials which match locally distinctive appearances, regardless of source or energy performance.</p>	<p>38%(11)</p> <p>62%(18)</p>	<p>Important not to be too restrictive – potential impact on viability of development. Also is potential that contemporary design using high quality design solutions can be appropriate without harming the landscape.</p> <p>Need to include/address the presence and supply of local materials and their associated cost.</p> <p>Objection to „regardless of</p>	<p>Develop a strategic policy (SD6: Design) which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies.</p>	<p>Strategic Policy SD6: Design requires the use of locally appropriate materials in development proposals, where appropriate, and for proposals to be informed by a Strategic Stone Study, where available and relevant.</p>

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						<p>source" as an unsustainable option.</p> <p>Options considered to be at odds with the proposed approach.</p> <p>Some support where locally sourced materials are not available or where matching the locally distinctive appearance can only be achieved by sourcing from elsewhere.</p> <p>National Trust support a policy to encourage the use of local materials, but that priority should be given to the materials most appropriate for the historic character of the building, with a greater emphasis on more sustainable/energy efficient materials on new buildings.</p> <p>I 5a. Some commented that materials matching locally distinctive appearances could be used with energy efficient materials.</p> <p>I 5b. Question how achievable this would be and what „match locally distinctive approaches" means. Considered to be too variable for Option 15b to be meaningful.</p> <p><input type="checkbox"/> Option 15b as most appropriate within a Conservation Area.</p>		
16	How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?	The Local Plan to require development to demonstrate robustness to changing social, economic and environmental circumstances.	89%(34)	16a. The Local Plan could include a policy whereby buildings within major developments incorporating mixed-use and commercial activities will be required to	93%(28)	Support for flexibility and adaptability, with specific references made to buildings for life and lifetime homes.	Develop a strategic policy (SD6: Design) which includes a range of design considerations which the supporting text raises.	Strategic Policy SD6: Design requires that development proposals ensure buildings are durable and adaptable over time, where appropriate.

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		<p>The Local Plan to require public spaces to demonstrate viability for multiple uses, rather than specific or inflexible uses.</p> <p>The Local Plan to require buildings to be designed so that they can be adapted.</p>		<p>demonstrate a higher level of adaptability and robustness to change than those which are predominantly housing-led. This recognises that commercial and mixed-use environments are subjected to higher pressure to change than residential environments.</p>		<p>That any policy needs to be allied with a flexible approach to allowing new uses in buildings.</p> <p>Comments not in support:</p> <p>Potential impact on viability A one size fits all approach is not feasible for the whole national park</p> <p>That these standards are being brought in through building regulations which would make this policy redundant.</p> <p>Good design and architectural merit are important and good design dictates that buildings should be used for their intended purposes.</p>	<p>These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies.</p>	
17	Should the Local Plan include minimum space standards for new residential development?			<p>17a. The Local Plan could set local minimum space standards for new residential development.</p> <p>17b. The Local Plan could follow the Government's approach, adopting nationally set space standards, if introduced.</p> <p>17c. The Local Plan could avoid setting minimum space standards.</p>	<p>41%(24)</p> <p>27%(16)</p> <p>19%(11)</p>	<p>17a. Minimum standards should take into account different needs and preferences and should be informed by local needs and shortfalls in housing.</p> <p>Need to ensure affordability. Suggest minimum standards should be tiered for different house types.</p> <p>17b. Should wait for the outcome of the consultation on local space standards. Should be considered on a case by case basis and this would need to take into account site constraints. Not considered to be appropriate to apply a single standard across the National Park.</p> <p><input type="checkbox"/> Should be market led.</p> <p><input type="checkbox"/> Potential impact on viability and have a negative impact on affordability.</p>	<p>Develop a strategic policy (SD6: Design) which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies.</p>	<p>Restrictions on policies on this subject were introduced by the Government, which mean that a policy on minimum space standards cannot currently be introduced in the South Downs National Park.</p>

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						Local Plan Options Consultation (February – April 2014) - Summary of Responses 23 17c. Considered contrary to NPPF para 50 stating that local plans should deliver a wide choice of high quality homes. <input type="checkbox"/> This will be incorporated in building regulations which would make the policy redundant.		
18	How can the Local Plan best ensure that the design of streets and roads reduces vehicle dominance and speeds, enhances local distinctiveness and minimises signage clutter and light pollution?	<p>Develop Design Guidance and a Design Protocol for highways.</p> <p>The Local Plan to ensure that development is designed in accordance with the Guidance/Protocol to raise the quality of the public realm and, where appropriate, to engage with the quality of the characteristic built and natural environment of the area, rather than using standardised highway measures which can erode the distinctiveness and quality of places.</p> <p>The Local Plan to ensure that signs, road markings, barriers, street lighting and traffic signals will be kept to a minimum to reduce clutter and keep to a minimum the impact on dark-night skies from light pollution.</p> <p>The Local Plan to ensure that the shared function of roads, streets and spaces within settlements is recognised and priority given to non-motorised movement.</p> <p>The Local Plan to ensure that additional light spill is kept to</p>	96%(47)	18a. The Local Plan could set out that street lighting is desirable in certain circumstances, such as within village and town centres. Rather than limiting lighting in all circumstances a more graded approach will help limit lighting to where it is really necessary.	65%(22)	<p>Support for design guidance/design protocol for highways.</p> <p>NFU and the estates raise the need to consider the operational requirements of agricultural machinery. Concern raised regarding prioritising non-motorised movement.</p> <p>Potential impact of inappropriate signage, street furniture and highways surfaces on local character and distinctiveness.</p> <p>Local Plan should have regard of the County Strategic road network identified in the Transport Plans (County Councils).</p> <p>18a. Need to retain traditional appearance of village lighting. Any light pollution unacceptable in National Park.</p> <p>Lighting should be limited to safe minimum necessary and be</p>	Development Management Policy SD43: Public Realm and Highway Design links to and embeds the principles of Roads in the South Downs (2015) into the Local Plan, with policies on the layout of new development and on sensitivity to context in street design. It also contains a criterion on public art. The supporting text to the policy mentions street lighting, which will also come under the control of Strategic Policy SD9: Dark Night Skies.	The preferred option follows the proposed approach in Issue 18, linking to and embedding the principles of the joint highway design guide 'Roads in the South Downs' into the Local Plan. The needs of agricultural machinery, and the strategic road network, are considered through the supporting text of policy SD18: Transport and Accessibility. Strategic Policy SD9: Dark Night Skies covers street and other lighting with a policy that uses multiple means to reduce lighting and its impact, while taking into account instances where lighting may be necessary, as per some consultation responses.

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		the absolute minimum.				<p>more cost effective.</p> <p>Local communities should be involved – no one size fits all for the National Park</p> <p>Should use latest technology to minimise the impact on dark skies.</p> <p>CLA request that consideration is made for security and safety requirements of lighting, including on farms and commercial premises. Policy should not prevent lighting in these developments.</p>		
19	How can the Local Plan best provide for sustainable new development which minimises greenhouse gas emissions and reinforces the resilience to climate change impacts?	The Local Plan to ensure that the levels of carbon emissions and sustainable design standards from new development meet national targets and building regulation standards and that the location and design of new development give great weight to the National Park's landscape and natural beauty.	94%(49)	<p>19a. Using an existing assessment model, the Local Plan could set standards which are higher than national targets and cover a wider range of sustainability criteria (such as Bioregional's 'One-Planet Living')¹</p> <p>19b. The Local Plan could set sustainability standards, specifically tailored to the SDNPA.</p>	<p>21%(7)</p> <p>79%(26)</p>	<p>Portsmouth Water comment that it should not be necessary to set specific policies as this is covered by national targets.</p> <p>Support for tailored standards – reference made to South East as an area of water stress which could justify higher standards</p> <p>NFU comment that farming should be exempt from the policy and considered more appropriate to use industry led initiatives</p> <p>Policy could be more effective as an outline (e.g. as part of design guidance) rather than a specific approach.</p> <p>Portsmouth Water comment on the risk of unintended</p>	The preferred approach is to include a strategic policy in the Local Plan (SD31: Climate Change and Sustainable Construction) which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be used for Development Management Officers and could be cross referenced with other Local Plan policies. A specific development management policy on Energy Performance and Historic Buildings (Policy SD38) is also proposed.	For non-residential development, Strategic Policy SD31: Climate Change and Sustainable Construction carries forward Option 19a by requiring BREEAM Very Good or Excellent standards. For other development no specific standards are set, but a generally high level of sustainable design is required with suggestions in the supporting text as to how this could be achieved, which follows one of the approaches recommended through consultation.

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						<p>consequences (i.e. Code for Sustainable Homes</p> <p>Level 5/6 producing less water efficient homes).</p> <p>The Environment Agency recommends this policy is linked to a policy on water efficiency standards.</p> <p>Need to support retaining and upgrading of existing buildings in first instance.</p> <p>Potential impact on viability</p> <p>Consider the key elements of Code for Sustainable Homes – be prepared that this could be scrapped.</p> <p>Portsmouth Water comments that building regulations are the best means for delivering sustainable developments and refurbishments.</p> <p>Need for more clarity on what the standards would be and their impact. Option 19a considered to be potentially subjective and open to challenge.</p>		
20	How can the Local Plan address carbon reduction targets through energy-efficiency schemes?	The Local Plan to support energy-efficiency schemes on existing buildings where they do not impinge on the National Park's Purposes. For new build, exploit the Government's emerging zero-carbon policy to secure high standards of energy efficiency in new build and, where appropriate, target opportunities for 'allowable solutions' into local low-carbon	96%(46)	<p>20a. The Local Plan could include a 'consequential improvements' policy requiring property owners seeking planning permission to extend their property to make energy-efficiency improvements to the whole of their property.</p> <p>20b. For new buildings, the Local Plan could require a greater level of energy</p>	<p>23%(13)</p> <p>50%(28)</p>		The preferred approach is to include a strategic policy in the Local Plan (SD31: Climate Change and Sustainable Construction) which includes a range of design considerations which the supporting text raises. These criteria would be specific enough to be	For non-residential new-build development, Strategic Policy SD31: Climate Change and Sustainable Construction carries forward Option 19a by requiring BREEAM Very Good or Excellent standards. For other development no specific standards are set, but a generally high level of sustainable design is

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		schemes including energy-efficiency schemes.		reduction than currently required by National Building Regulations, that is, a policy of Code for Sustainable Homes Level 4 (which incorporates 44 per cent energy reduction on 2006 emission rates). 20c. The Local Plan could restrict new development if it cannot be connected to mains gas unless higher levels of sustainability are proposed (for example, low-carbon schemes or energy-efficiency schemes).	18%(10)		used for Development Management Officers and could be cross referenced with other Local Plan policies. A specific development management policy on Energy Performance and Historic Buildings (Policy SD38) is also proposed.	required with suggestions in the supporting text as to how this could be achieved.
21	What development should the Local Plan permit outside settlements?	<p>Within the countryside outside settlements, and where consistent with the National Park's first Purpose, the Local Plan to:</p> <p>Normally allow development on previously developed land (brownfield sites) in relation to agriculture and forestry (including related infrastructure), farm diversification, tourism, appropriate recreation² and the promotion of the understanding and enjoyment of the countryside but put in place strict controls on greenfield land.</p> <p>Not permit new residential development, except in special circumstances, for example where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset; or on a rural exception site (these are</p>	84%(47)	<p>21a. The Local Plan could apply the same policy across the whole National Park.</p> <p>21b. The Local Plan could identify specific locations that are of high landscape sensitivity in which an especially restrictive approach should apply.</p> <p>21c. The Local Plan could apply different policies for development in the countryside in each of the four main National Landscape Character Areas.</p>	<p>24%(12)</p> <p>53%(26)</p> <p>22%(11)</p>	<p>There should be an opportunity for smaller parish and settlements to extend their Settlement Policy Boundary to allow development which responds directly to local need.</p> <p>Too restrictive in terms of meeting housing need. Special circumstances should include where there is no 5 year housing land supply and high housing need (as long as it does not negatively impact Purposes). There may also be special circumstances where development outside settlement policy boundary could be appropriate, especially where it forms an extension to the settlement and has no negative landscape impact. Supports the criteria based approach with a general policy about Previously Developed Land (PDL) and focus on inside existing Settlement Policy Boundary Need to define the settlements before it is possible to comment on policy regarding</p>	<p>The preferred option on agricultural development is set out in Development Management Policies SD46: Agriculture and Forestry, SD47: Farm Diversification and SD48: Agriculture and Forestry Workers' Dwellings. This follows what was proposed regarding developments outside settlements that topic in the Options Consultation, which received overwhelming support, in limiting development in the countryside to agriculture, forestry and farm diversification (along with tourism, recreation and education), with farm diversification targeted towards the reuse of vacant farm buildings. New agricultural buildings will be on brownfield land in the first instance but</p>	<p>The proposed approach set out in issue 21 has been carried forward in the Local Plan: Preferred Options whilst expanding the range of development which will be allowed in the countryside to include the potential for greenfield development that meets the exception categories, employment development in accordance with Core Policy SD27 on Sustaining the Rural Economy, development that has an essential need for a countryside location but does not fall within any of the categories previously listed, and developments that form part of comprehensive estate or farm plans and meet certain criteria. The proposed approach set out in issue 21 has been carried forward in the Local Plan: Preferred</p>

² ' However, in light of research published in 2005, the Government recognises that not all forms of outdoor recreation are appropriate in each Park and that activities which would have an adverse impact on the Parks' special qualities and other people's enjoyment of them may need to be excluded (in order to meet the requirements of section 11A (2) of the 1949 Act)' *English National Parks and the Broads: UK Government Vision and Circular 2010*, para.26.

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		discussed in Chapter 7: Housing and Chapter 4: Historic Environment).				<p>development in different types of settlement.</p> <p>The plan should recognise that some limited Greenfield development may be required for tourism and visitor accommodation. Existing settlements may not be appropriate or have capacity for this type of development, and the nature of this accommodation may require alternative locations, which will require green field development.</p> <p>Need to be more explicit about the use of PDL first, with development outside the settlement on PDL in exceptional circumstances and very rarely development on greenfield outside the settlement (for appropriate uses – e.g. tourism, agriculture, forestry).</p> <p>As written, the Authority’s proposal could be seen as implying that agricultural and forestry development would only be allowed on PDL, which would be excessively restrictive. Preference should be given to the redevelopment of PDL, but this should not be an essential requirement: agricultural or forestry development will normally need to be within a specific location, which is unlikely to be brownfield (English Heritage).</p> <p>Strictly controlling development outside settlements is not appropriate and does not have due regard to the importance of towns and villages in the vitality and</p>	<p>this will not always be possible.</p> <p>Strategic Policy SD22(5) only allows development outside settlement boundaries in exceptional circumstances and requires development to comply with the specific policies relating to the five ‘Broad Spatial Areas’ identified in the Local Plan Preferred Options: Core Policies SD4/CP The Coastal Plain, SD4/DS The Dip Slope, SD4/WD The Western Downs, SD4/SS The Scarp Slope, and SD4/WW The Western Weald.</p> <p>Strategic policy SD22(6) sets out the exceptional circumstances under which development outside settlement boundaries may be allowed through comprehensive estate and large farm plans.</p>	<p>Options in Development Management Policies SD46: Agriculture and Forestry, SD47: Farm Diversification and SD48: Agriculture and Forestry Workers’ Dwellings, whilst allowing for greenfield development as a last resort.</p> <p>Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan Preferred Options, including recognition of the need for greenfield development in certain circumstances.</p>

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						<p>viability of the National Park.</p> <p>Need for robust evidence to support this proposal. The approach should be (i) identify need, (ii) assess capacity, (iii) identify environmental constraint and (iv) decide on level of development.</p> <p>This issue which restricts brownfield sites with the Park to certain uses, does not address the needs of some large previously developed sites such as the cement works in Shoreham and Halewick Lane ex-tip site in Sompting where value uses (such as employment) are required in order to help their restoration and improvement.</p> <p>Provision will be contained within this policy to permit new development of houses of an outstanding and innovative nature, particularly where they may form part of a wider scheme for landscape conservation and enhancement (in accordance with para 55 of NPPF).</p> <p>Comments on the proposal relating to rural workers included:</p> <p>Caution must be taken with the rural worker policy, applications must be scrutinised as the need for rural workers to be located on site isn't as essential as it was in the past.</p> <p>Support for allowing residential development for rural workers on PDL agricultural/forestry. This policy should also allow</p>		

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						for those retiring from the farming industry to allow them to remain in the community. Criteria and controls should be placed on this type of development to ensure it remains in its function in perpetuity.		
22	What approach should the Local Plan adopt to development in Tier 5 settlements?	<p>The Local Plan to include a policy whereby permission will be granted for housing development in Tier 5 settlements in special circumstances, such as where there is an essential need for a rural worker to live permanently at or near their place of work in the countryside; such development represents the optimal use of a heritage asset or; on a rural housing exception site, in accordance with the NPPF.</p> <p>The Local Plan will not define settlement policy boundaries for any Tier 5 settlements and existing settlement boundaries would not be carried forward into the Local Plan.</p>	73%(33)	22a. The Local Plan could allow small-scale development which does not significantly extend the built form of settlements and where the landscape will be conserved and enhanced	82%(28)	<p>Any allowance of small scale growth could lead to incremental growth of settlements without associated facilities and services.</p> <p>Development in Tier 5 settlements should be considered appropriate if it has support from the local community and there is a clear need demonstrated for that development.</p> <p>Extensions to Tier 5 settlements should only be considered in exceptional circumstances once PDL/brownfield sites have been explored or exhausted elsewhere.</p> <p>A restrictive policy in relation to Tier 5 settlements could lead to such settlements never becoming more sustainable. It should be recognised that small scale incremental development can lead to services and facilities being provided.</p> <p>Concern regarding removing all Tier 5 settlements SPB and not carrying forward existing SPB in the local plan, some Tier 5 settlements may be appropriate for small scale growth to meet local needs.</p> <p>The number of Tier 5</p>	<p>The settlement hierarchy with its categorisation of settlements by tiers has now been replaced by a Settlement Facilities assessment which does not categorise settlements in this way, but which has informed several policies in the Local Plan. Strategic Policy SD22: Development Strategy identifies which settlements are proposed to have settlement boundaries and what types of development would be allowed inside and outside settlement boundaries. Various other policies, for example Strategic Policy SD20 Sustainable Tourism and the Visitor Economy, SD21 Recreation and Development Management Policy SD44 Car and Cycle Parking, also make reference to the suitability of different types of development inside and outside settlement boundaries. Other policies in the Local Plan, including Strategic Policy SD18 Transport and Accessibility, Strategic Policy SD23 Housing and</p>	<p>Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan: Preferred Options, including: The great majority of settlements which currently have settlement boundaries, are proposed to continue to have settlement boundaries. Affordable housing exception sites can be delivered in settlements without settlement boundaries, provided that (among other criteria) the scale and location of the site relates well to the existing settlement.</p>

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						<p>settlements means a more flexible approach is required which allows communities to deliver small scale development which does not detract from landscape quality or natural beauty.</p> <p>If special circumstances allow for small scale development in very rural locations scrutiny and enforcement will be key. Need to ensure rural worker housing is retained and prevented from being extended and then made available on the open market, which then required further development of rural worker dwellings.</p> <p>Settlements should not be considered unsustainable just because people have to use private car to access services, people in larger settlements will use the private car to access local services so this is not an appropriate measure for 'sustainable'</p> <p>Some support for small scale development where there is a demonstrated need and local support for the development. Good design will be essential.</p>	Development Management Policy SD53 New and Existing Community Infrastructure, refer to the suitability of, criteria applying to, or requirement for development within, a shorter list of settlements.	
23	What approach should the Local Plan adopt to development in Tier 4 settlements?	<p>The Local Plan to:</p> <p>Include a policy whereby development on brownfield land and other sites within the existing built-up area /settlement boundary of Tier 4 settlements will normally be allowed.</p> <p>Ensure housing development will be for affordable and local housing needs only.</p>	88%(43)	<p>Option 23a – The Local Plan could allow a limited extension of the settlement to meet local needs for affordable housing, employment and community facilities, providing it conserves and enhances the landscape.</p> <p>23b. The Local Plan could allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other</p>	<p>47%(26)</p> <p>44%(24)</p>	<p>Extension of Tier 4 settlement boundaries should only be carried out in consultation with those settlements, where the SDNPA consider it necessary to extend the boundary.</p> <p>Many brownfield/PDL sites will fall outside settlement boundaries; these sites should still be considered for development, it may be appropriate to re-define</p>	The settlement hierarchy with its categorisation of settlements by tiers has now been replaced by a Settlement Facilities assessment which does not categorise settlements in this way, but which has informed several policies in the Local Plan. Strategic Policy SD22: Development Strategy identifies which	Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan: Preferred Options, including: The great majority of settlements which currently have settlement boundaries, are proposed to continue to have settlement boundaries. Brownfield sites and views into and out of settlements

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		<p>Ensure there would be a presumption in favour of community facilities, small-scale retail development and business units, including live-work housing, and against the loss of such facilities.</p> <p>Ensure that, unless reviewed through Neighbourhood Plans, current settlement boundaries in Tier 4 villages will be incorporated into the Local Plan unchanged.</p> <p>Ensure that where there is no existing settlement boundary, and a Neighbourhood Plan is not proposed, the Local Plan will propose a settlement boundary, in close consultation with the community.</p>		<p>development (for example, market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process.</p> <p>23c. The Local Plan could ensure collaboration between communities will be encouraged to allow economies of scale to support rural services. With community agreement, settlement would be grouped in clusters and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision).</p>	33(18%)	<p>settlement boundaries to recognise this.</p> <p>The statement for Issue 23 is perfectly adequate and there is no need to go beyond this approach for Tier 4 settlements.</p> <p>Views into and out of settlements should be considered when allowing development in any settlement.</p> <p>The focus should be on development in brownfield locations only in Tier 4 settlements. A general presumption in favour of development in Tier 4 settlements could lead to the loss of important historical centres of villages</p> <p>Development in Tier 4 settlements should not be limited to only affordable housing, often these communities will require affordable housing but small amount of market housing may be required to ensure development is viable.</p> <p>A cluster based approach could be difficult to implement as often Tier 4 settlements do not consider themselves to be part of a larger cluster.</p> <p>Define sustainability, it shouldn't be restricted to just transport and access, many more factors make a sustainable settlement.</p> <p>East Sussex County Council comments that Option 23a is the only one to mention conservation and enhancement</p>	<p>settlements are proposed to have settlement boundaries and what types of development would be allowed inside and outside settlement boundaries. Various other policies, for example Strategic Policy SD20 Sustainable Tourism and the Visitor Economy, SD21 Recreation and Development Management Policy SD44 Car and Cycle Parking, also make reference to the suitability of different types of development inside and outside settlement boundaries. Other policies in the Local Plan, including Strategic Policy SD18 Transport and Accessibility, Strategic Policy SD23 Housing and Development Management Policy SD53 New and Existing Community Infrastructure, refer to the suitability of, criteria applying to, or requirement for development within, a shorter list of settlements.</p>	<p>have been considered in the review of settlement boundaries. Some settlements that were previously in Tier 4 have been given requirements for numbers of houses to allocate- these could be market housing led schemes.</p>

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						<p>of the landscape. Options 23b and 23c raise concerns in this context. A collaborative approach between settlements is supported as it could reduce the pressure for new infrastructure development.</p> <p>English Heritage comment that Option 23a and 23b are potentially acceptable, but both would need to ensure that due regard is had to the historic environment (including historic landscapes) as well as the landscape.</p> <p>The policies for each settlement type state that loss of community facilities will be resisted. Hampshire County Council, as a service provider requests that clarification is made by cross-referencing to issue 48 (community infrastructure) in any subsequent draft criteria-based policy, in order to be consistent with paragraph 70 of the NPPF.</p> <p>Lewes District Council comment that the meaning of “local housing needs” and “small-scale retail and business” development will need to be very carefully defined in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency in accordance with NPPF Paragraph 17.</p> <p>The proposed approach is considered contrary to the approach which has been already found sound by Inspectors appointed to act on</p>		

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						behalf of the Secretary of State		
24	What approach should the Local Plan adopt to development in Tier 3 settlements?	<p>Within Tier 3 villages, development on brownfield land and other sites within the built-up area/ settlement boundary will normally be allowed.</p> <p>There would be a presumption in favour of community facilities, small-scale retail development and business units (including live-work housing) and against the loss of such facilities, to meet local needs.</p> <p>A limited allocation/settlement extension may be made to meet local development needs, including for affordable and local housing.</p> <p>Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale in keeping with the existing settlement, and do not have a potentially adverse landscape impact.</p> <p>Where Neighbourhood Plans are not proposed, site allocations required for housing, the review of existing settlement boundaries and the creation of new settlement policy boundaries will be proposed by the Local Plan, in close consultation with the community.</p>	95%(40)	<p>24a. Allow a limited extension of the settlement to meet a community need or realise local community aspirations, together with some other development (such as market housing) that is necessary to make this viable, that relates well to the form, scale and function of the settlement, that protects and enhances the landscape, and that has the support of the community through a Neighbourhood Plan or other agreed process.</p> <p>24b. Allow some land to be allocated to meet objectively assessed needs for the wider housing market area, as determined through the Strategic Housing Market Assessment (see Chapter 7: Housing).</p> <p>24c. Collaboration between communities would be encouraged to allow economies of scale to support rural services. With community agreement, Tier 3 villages would be grouped in clusters with other nearby settlements, and their needs planned for together; clusters could be based upon sustainable access to rural services (evaluated against an updated version of the old DEFRA rural standard and public transport provision). Collaboration between communities would be encouraged to allow economies of scale to support rural services.</p>	<p>49%(24)</p> <p>22%(11)</p> <p>43%(21)</p>	<p>Focusing development on a single site should be avoided unless there is community support for the proposal, the local plan should encourage developments of different tenure and type to ensure mixed sustainable communities</p> <p>Community support for changes to settlement policy boundary or allocation of sites for development is crucial to the success of the local plan</p> <p>A broad presumption in favour of development in Tier 3 settlement boundaries could lead to the loss of important green spaces or negative changes to the characteristics of settlements</p> <p>to meet objectively assessed need some extension to Tier 3 settlement boundary will be necessary, it is unlikely that Tier 1 & 2 settlements will deliver the required housing provision, therefore 24b is preferred option</p> <p>East Hampshire District Council commented that Option 24b is the most realistic in considering development in Tier 3 settlements which will allow some land to be allocated to meet objectively assessed needs for the wider housing market area.</p> <p>Sussex Wildlife Trust comments that it is unclear what “These villages are relatively sustainable” means. If sustainability is meant in terms</p>	<p>The settlement hierarchy with its categorisation of settlements by tiers has now been replaced by a Settlement Facilities assessment which does not categorise settlements in this way, but which has informed several policies in the Local Plan. Strategic Policy SD22: Development Strategy identifies which settlements are proposed to have settlement boundaries and what types of development would be allowed inside and outside settlement boundaries. Various other policies, for example Strategic Policy SD20 Sustainable Tourism and the Visitor Economy, SD21 Recreation and Development Management Policy SD44 Car and Cycle Parking, also make reference to the suitability of different types of development inside and outside settlement boundaries. Other policies in the Local Plan, including Strategic Policy SD18 Transport and Accessibility, Strategic Policy SD23 Housing and Development Management Policy SD53</p>	<p>Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan: Preferred Options, including that all the settlements that were previously in Tier 3 have been given requirements for numbers of houses to allocate- these could be market housing led schemes.</p>

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						of these settlements being big enough to maintain facilities then it is not consistent with rest of paragraph which implies that expansion is needed to be able to continue to provide the current level of services. This introduction to this settlement category does not justify the expansion indicated. If these settlements are sustainable then there is no need for expansion. If they are not sustainable then there is no indication that expansion will make them so.	New and Existing Community Infrastructure, refer to the suitability of, criteria applying to, or requirement for development within, a shorter list of settlements.	
25	What approach should the Local Plan adopt to development in Tier 2 settlements?	<p>Within Tier 2 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.</p> <p>Subject to landscape and other constraints, land will also be allocated to meet the settlement's objectively assessed local development needs, including for affordable and local housing. The location and quantity of development proposed will be informed primarily by a landscape assessment of each settlement to determine the direction of growth (if any).</p> <p>A presumption in favour of retail development within existing shopping centres and, if no suitable sites are available there, then on sites immediately adjoining centres.</p> <p>A presumption in favour of community, tourism, cultural and leisure facilities and other town centre uses (of an</p>	95%(35)	25a. To allocate sufficient sites in the Tier 2 settlements to make a contribution towards the development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints; these would be in excess of the town's local development needs, in recognition of the additional services and facilities available in those towns.	91%(29)	<p>A cautious approach should be taken in providing housing in Tier 2 settlements to provide for the wider housing market area. The provision of housing in a National Park must be predominantly for local people with housing need. Any market housing should also be provided for local people that will contribute to the local economy.</p> <p>Concerns mainly raised by developers relating to the statement 'given these constraints the objectively assessed need is likely to exceed the capacity of the National Park to accommodate it' Their concerns relate primarily to the fact that the strategy has started from a negative position and that the plan should in fact start from a positive position looking to accommodate the objectively assessed need.</p> <p>Tier 2 settlements are likely to have to provide some strategic allocations (to provide housing beyond the needs of the</p>	The settlement hierarchy with its categorisation of settlements by tiers has now been replaced by a Settlement Facilities assessment which does not categorise settlements in this way, but which has informed several policies in the Local Plan. Strategic Policy SD22: Development Strategy identifies which settlements are proposed to have settlement boundaries and what types of development would be allowed inside and outside settlement boundaries. Various other policies, for example Strategic Policy SD20 Sustainable Tourism and the Visitor Economy, SD21 Recreation and Development Management Policy SD44 Car and Cycle Parking,	Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan: Preferred Options, including that any housing allocations in these settlements will be subject to landscape constraints.

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		<p>appropriate scale and type) within centres and, if no suitable sites are available there, on sites immediately adjoining centres. Loss of community facilities will be resisted.</p> <p>Provision for an appropriate amount of employment uses (B1, B2 and B8 use classes) within, on the edge of and outside centres in accordance with the sequential approach which seeks to allocate the most central and sustainable site first before considering one further out from the centre. Support will be for the retention of existing employment where there is reasonable prospect of the site being used for this purpose.</p> <p>Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale and in keeping with the existing settlement, and do not have an adverse impact on the landscape. Where Neighbourhood Plans are not proposed, the Local Plan will review Tier 2 settlement boundaries and allocate required sites for housing, business and other uses, in close consultation with the community.</p>				<p>settlement alone) therefore allocations in these settlements beyond what is identified in neighbourhood plans could be appropriate.</p> <p>Although Tier 2 settlements may be appropriate for development should they be considered appropriate for major development, in exceptional circumstances (NPPF), the local plan should be looking to provide some of the objectively assessed housing need outside the designated area.</p> <p>The clustering of some Tier 3 settlements may allow for some objectively assessed need to be delivered in Tier 3 settlements where there is no capacity in Tier 2 settlements.</p> <p>Petworth Town Council state that it should be considered as a Tier 2 settlement.</p> <p>25a. Only if necessary to meet objectively assessed needs in the SHMA and always subject to landscape constraints (CPRE Hampshire).</p> <p>Chichester District Council state they would support this approach and consider that it may be appropriate for Tier 2 settlements to contribute to meeting housing, employment and other development needs within their wider local catchment area where this extends outside the National Park boundary.</p> <p>Sussex Wildlife Trust comments that no reference to an objectively assessed</p>	<p>also make reference to the suitability of different types of development inside and outside settlement boundaries.</p> <p>Other policies in the Local Plan, including Strategic Policy SD18 Transport and Accessibility, Strategic Policy SD23 Housing and Development Management Policy SD53 New and Existing Community Infrastructure, refer to the suitability of, criteria applying to or requirement for development within a shorter list of settlements.</p>	

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						environmental need whereby development is the constraint on the need for growth in natural capital. This issue also details policies for development in key settlements inside the National Park. However, the Plan will need to demonstrate how this is better than similar policies for settlements outside the Park. Option 25a is not supported.		
26	<p>Within Tier 1 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.</p> <p>Subject to landscape and other constraints, land will also be allocated to meet each settlement's objectively assessed local development needs, including for affordable and local housing. The location and quantity of development proposed will be informed primarily by a landscape assessment of each settlement to determine the direction of growth (if any).</p> <p>A presumption in favour of retail development within existing shopping centres and, if no suitable sites are available there, then on sites immediately adjoining centres.</p> <p>A presumption in favour of community, tourism,</p>		95%(36)	26a. To allocate sufficient sites in the Tier 1 settlements to make a contribution towards development needs of the wider (housing market or travel to work) area within the National Park, subject to landscape and other environmental constraints; these would be in excess of the town's local development needs, in recognition of the additional services and facilities available in those towns.	94%(33)	<p>Landscape capacity should be the primary factor considered in assessing whether these key settlements can accommodate further growth. It should be noted that if the larger settlements can not accommodate more growth provision will need to be found outside the NP.</p> <p>The Local Plan should take a positive approach to development, landscape constraints shouldn't be the starting point, meeting objectively assessed needs should be.</p> <p>Tier 1 settlements and their surroundings will be appropriate locations for development of tourism and visitor accommodation due to their enhanced transport links</p> <p>These sustainable settlements should accommodate housing need from a wider area, even areas outside the NP boundary</p> <p>There doesn't appear to be any differentiation between the type of development in Tier 2 and Tier 1. The Local Plan proposes the same approach</p>	The settlement hierarchy with its categorisation of settlements by tiers has now been replaced by a Settlement Facilities assessment which does not categorise settlements in this way, but which has informed several policies in the Local Plan. Strategic Policy SD22: Development Strategy identifies which settlements are proposed to have settlement boundaries and what types of development would be allowed inside and outside settlement boundaries. Various other policies, for example Strategic Policy SD20 Sustainable Tourism and the Visitor Economy, SD21 Recreation and Development Management Policy SD44 Car and Cycle Parking, also make reference to the suitability of different types of development inside and outside settlement boundaries. Other policies in the Local Plan, including	Some concerns raised against this issue in the Options Consultation have been addressed in the Local Plan: Preferred Options, including that any housing allocations in these settlements will be subject to landscape constraints.

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	<p>cultural and leisure facilities and other town centre uses (of an appropriate scale and type) within centres and, if no suitable sites are available there, on sites immediately adjoining centres. Loss of community facilities will be resisted.</p> <p>Provision for an appropriate amount of employment uses (B1, B2 and B8 use classes) within, on the edge of and outside centres in accordance with the sequential approach which seeks to allocate the most central and sustainable site first before considering one further out from the centre. Support will be for the retention of existing employment where there is reasonable prospect of the site being used for this purpose.</p> <p>Generally Neighbourhood Plans will determine new settlement boundaries and site allocations, provided these are of a modest scale and in keeping with the existing settlement, and do not have an adverse impact on the landscape. Where Neighbourhood Plans are not proposed, the Local Plan will review Tier I settlement boundaries and allocate required sites for</p>					<p>for both tiers.</p> <p>Support for the recognition that Tier I settlements are likely to pass the 'exceptional circumstances' test in NPPF</p> <p>CPRE Hampshire commented that it is essential that landscape constraints are given priority in the quantity of development allocated. The point may well be reached soon at both Petersfield and Lewes where no further development other than on brownfield land can be accommodated without unacceptable impact on the landscape.</p> <p>Lewes District Council agreed with proposed approach, but commented that the meaning of "local development needs", the "appropriate scale and type" of town centre uses and the appropriate amount" employment development will need to be very carefully defined in order to provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency in accordance with NPPF Paragraph 17.</p> <p>National Trust - We consider that there needs to be more explanation of (and indeed consultation on) the proposed settlement hierarchy. It is not clear from the document what type of settlements fall into what category and it is extremely hard to comment on the above without reference to examples of the types of settlements in each category –</p>	<p>Strategic Policy SD18 Transport and Accessibility, Strategic Policy SD23 Housing and Development Management Policy SD53 New and Existing Community Infrastructure, refer to the suitability of, criteria applying to or requirement for development within a shorter list of settlements.</p>	

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	housing, business and other uses, in close consultation with the community.					<p>only Tier 1 and 2 being named.</p> <p>Sussex Wildlife Trust commented that there is a strong presumption in favour of physical growth; not just redevelopment of existing sites but also “on adjacent sites”, a policy approach that could encourage sprawl. They would like to see stronger emphasis counter-balancing development need – such as with a Natural Capital Asset Plan.</p> <p>Natural England commented that it is not clear whether the plan is arguing that the ‘exceptional circumstances’ test has been met. The major development test requires the consideration of a number of factors, some of which have not been included in the reasoning in this section. They advise that, based on the reasoning provided in the plan, the ‘exceptional circumstances’ test has not been met. Both additional reasoning and robust evidence would be required to ascertain whether the ‘exceptional circumstances’ test has been met. In particular they advise that the Authority would need to demonstrate that the scope for developing elsewhere outside the designated area had been fully considered in the context of the duty to cooperate. In addition to be consistent with the NPPF aspiration to enhance the natural environment, they wish to see the cumulative impact of new housing on the landscape assessed and policy requirements put in place to ensure that housing, cumulatively, did not prejudice</p>		

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						the attainment of this aspiration.		
27	How can the Local Plan best take account of the adjoining settlements outside the National Park?	Through seeking to comply with the Duty to Co-operate, the SDNPA will meet with neighbouring authorities and other relevant public bodies to discuss cross-boundary strategic planning issues on an on-going basis.	96%(46)	<p>27a. To develop a strategy for development which assumes that many of the facilities to serve the National Park's population are provided in adjoining settlements outside its boundaries and to focus on developing sustainable transport links between the National Park and these neighbouring settlements and working with partners to enable this.</p> <p>27b. – To develop a strategy that seeks to encourage as many facilities as possible to be provided within the settlements within the National Park, especially Tiers 1, 2 and 3.</p>	<p>58%(22)</p> <p>42%(16)</p>	<p>The Duty to Cooperate should work in both directions and beyond the duty to provide housing. For example where there are pressures on land in areas outside the National Park, the National Park could provide community facilities etc., which contribute to need outside the National Park.</p> <p>Provision of services outside the National Park is appropriate to serve those settlements on the periphery of the National Park, but it is not sustainable to expect communities in the centre of the park to travel out to access essential services.</p> <p>Where possible facilities should be provided in the National Park. With an ageing population access to essential facilities becomes harder when you do not have access to a private car and there is a poor public transport</p> <p>The Duty to Cooperate should also relate to parishes that are split by the National Park boundary. Improving transport links to major settlements in the park for those settlements split on the edge is also important so this shouldn't be over looked</p> <p>Duty to Cooperate will be complicated as there are so many neighbouring authorities and all at different stages of planning, how can SDNPA expect cooperation in terms of exporting housing numbers if</p>	Consideration is made of adjoining settlements through the introductory and supporting text of several policies in the Preferred Options, including Strategic Policies SD9 Dark Night Skies; SD18 Transport and Accessibility; SD19 Walking, Cycling and Equestrian Routes; SD20 Sustainable Tourism and the Visitor Economy; SD29 Town and Village Centres; SD58 Air Quality, among others.	The preferred option takes forward the previous main proposed approach in that the SDNPA has fulfilled its duty to cooperate with neighbouring authorities and other relevant public bodies. Details of this are laid out in the Duty to Cooperate Statement (2015). This includes on the Employment Land Review and Strategic Housing Market Assessment, which consider relationships between the National Park and nearby settlements. This Duty to Cooperate work has informed the Local Plan: Preferred Options. Neither of the previously suggested options has been taken forward, since there is no specific criterion in Strategic Policy SD22: Development Strategy on relationships with settlements outside the National Park.

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						<p>the neighbouring authority has an up to date plan.</p> <p>There needs to be a mix of both options. Large scale facilities with large footprints will be suited to urban environments outside the National Park (hospital, sports facilities) smaller facilities (retail etc.) should be provided where possible in the National Park to ensure sustainability of settlements.</p> <p>The next iteration of the Local Plan should set out in more detail how it will deliver the Duty to Cooperate so this is clear for people to see how development is spread across the park and its neighbouring authorities.</p> <p>Placing development outside the National Park will still have an impact on National Park Special Qualities, for example on tranquillity.</p> <p>There is already significant pressure on ageing facilities both inside and outside the National Park, this should be taken into account when promoting further growth and development</p> <p>Eastbourne Borough Council stated that larger settlements in the National Park should provide as many facilities as possible to serve their surrounding population. This would compliment the facilities that are being provided outside of the National Park, and reduce the need for residents in central areas of the Park to travel to reach these facilities.</p>		

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						<p>Waverley Borough Council expressed concern if there was a demonstrated need for a facility, and that the presumption was that it could be provided in an adjoining authority. Waverley recognises that Haslemere is seen as a gateway to the National Park, but it does have constraints, such as the Green Belt, and AONB as well as being in close proximity to the SPA. There are also concerns about the pressures on infrastructure. There are long-standing local concerns about the issue surrounding Haslemere station arising from it being a well used fast connection to London and the local parking issues, and intensive use of the A286, particularly as designated HGV route.</p> <p>Adur and Worthing Councils commented that they are unable to contribute to shortfall in housing provision as they are unable to meet their own needs as identified in the coastal duty to cooperate study 2013.</p>		
28	What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?	<p>The Local Plan to include a policy that will only permit development on land within the National Park, on sites adjoining settlements situated just outside the boundary, following a comprehensive landscape assessment of the whole settlement.</p> <p>The Local Plan to include a policy that will only permit development on such sites where it can be demonstrated</p>	90%(36)	<p>28a. The Local Plan to include a policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that there is no other suitable, developable and deliverable site outside or within the National Park to meet the objectively assessed need for development in that settlement and that it does not have a detrimental impact on the landscape.</p> <p>28b. The Local Plan to include a</p>	<p>75%(18)</p> <p>25%(6)</p>	<p>Paragraph 115 & 116 of the NPPF means the SDNPA do not necessarily have to find the objectively assessed housing / development required. This may have to be found outside the National Park.</p> <p>Strong reservations about development on the periphery of the National Park as these areas are often extremely high biodiversity, open space value for more built up areas just outside the National Park.</p>	Strategic policy SD22: Development Strategy states that small sites with the potential for development that are located within the National Park, but on the edge of settlements which are outside of the National Park, will only be allocated for development where they comply with other	The preferred approach only allows development on these sites when the proposal complies with all relevant policies.

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		that it will not have an adverse landscape impact and conserves and enhances the natural beauty, wildlife and cultural heritage.		policy that in exceptional circumstances development on such sites will be allowed where it can be demonstrated that other suitable, developable and deliverable sites around the settlement have a greater impact on the National Park's landscape than the proposed site within the National Park.		<p>In these circumstances the National Park will work closely with the neighbouring authority to reach the best outcome for the given settlement, especially where Neighbourhood Plans are being developed.</p> <p>Further clarification is required regarding 'exceptional circumstances.'</p> <p>This situation should only be considered appropriate in exceptional circumstances, it should not be written as a permissive policy.</p> <p>Both options should relate to the size and type of development proposed, otherwise it risks being too restrictive to enable sustainable development in some settlements.</p> <p>More detailed information will be required in terms of the comprehensive landscape assessment, so those proposing development can understand what they are required to produce in these circumstances.</p> <p>An appropriate balance needs to be sought between the economic and social interests of local communities and the conservation and enhancement of the natural beauty of the National Park.</p> <p>Natural England commented that there should be caveats regarding conserving and enhancing natural beauty and the historic environment.</p>	relevant policies.	

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						Arun District Council commented that more information is required on: (i) what type of development triggers this small scale, medium scale, large scale, allocations, commercial? (ii) the extent of the required landscape assessment should be proportionate to the size of the development.		
29	What approach should the Local Plan adopt for the redevelopment of major brownfield sites?					<p>Strong support for development on brownfield sites, but the development must enhance the National Park through good landscaping and high quality materials and design</p> <p>Each site should be individually assessed incorporating local community engagement in any proposals, especially where neighbourhood plans are being developed</p> <p>Developments need to provide a mix of uses which responds to local needs, also large scale development like this should be carried out over an appropriate period of time to allow the existing settlements to adjust to the new development</p> <p>This type of redevelopment is supported as long as associated infrastructure is in place or will be provided</p> <p>Where these uses were predominantly employment some employment should remain, so mix use is appropriate</p> <p>Focus for some of these sites (Shoreham) should be Purpose</p>	The preferred approach is to allocate the three key sites of the former Shoreham Cement Works near Upper Beeding (Strategic Site Policy SD32), the former Syngenta site near Fernhurst (Strategic Site Policy SD33), and North Street Quarter in Lewes (Strategic Site Policy SD34) for strategic redevelopment opportunities, in a coordinated approach to deliver national park purposes.	<p>There was no main proposed approach in the Options consultation for this issue. However, the Preferred Options does carry forward some of the suggestions made at consultation, including the requirement for mixed use development, and a focus on National Park Purpose 2 at Shoreham Cement Works.</p> <p>In response to concerns raised at consultation about the Settlement Hierarchy Study, a replacement study has been carried out called the Settlement Facilities Assessment which informs the Local Plan Preferred Options.</p>

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						<p>2, using the features to encourage visitors and tourism</p> <p>The impact on neighbouring settlements and neighbouring authorities must be taken into account</p> <p>The following additional sites were suggested/mentioned:</p> <ul style="list-style-type: none"> ○ Butser Hill chalk quarries ○ Stedham Sawmills ○ Singleton Station ○ Duncton Quarry ○ Lancing College ○ Halewick Lane ex-tip <p>Detailed comment from Callstone Ltd on Shoreham Cement Works regarding the proposed uses for the site, and the benefits to be gained by all planning authorities in the surrounding area.</p> <p>Comer Homes made detailed comments on Syngenta including the history of the site and a wide range of potential uses and benefits which could result from the redevelopment of this site</p> <p>The Environment Agency made detailed comments on all three sites includes in the options paper regarding flood risk, possible contamination and general environmental impact</p> <p>Natural England commented that brownfield sites can be rich in wildlife. Appropriate survey work needs to be</p>		

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						<p>undertaken prior to any allocation, to establish whether any allocation is deliverable.</p> <p>Sussex Wildlife Trust commented that all of the brown field sites listed are key areas with major impacts on the National Park. So any development there should fundamentally be about delivering National Park Purposes. As a large site at the narrowest most sensitive part of the Park, Shoreham Cement Works is possibly the most significant. It is of a type and location where very significant environmental enhancement should be expected in any plan. Key issues here will be chalk and wetland habitat restoration alongside development that does not create infrastructure demands above the local area's ability to deliver (specifically the road).</p> <p>Comments on the Settlement Hierarchy Study 2013:</p> <p>In addition to general comments made on the Issues relating to the Tiers set out in the Settlement Hierarchy Study, a number of specific comments were made in relation to the methodology and the findings of the study. These included:</p> <p>The settlement hierarchy needs to be scrutinised thoroughly to ensure settlements are in the correct tier before proposing extensions to settlement boundaries</p>		

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						<p>The scoring system used to assess a settlements position on the hierarchy should not give an equal score to all types of facility, for example a sports pitch or play area should not carry the same weight as a primary school or local shop.</p> <p>The interconnectivity of settlements is not considered, groups of Tier 5 settlements may have a range of services which can contribute to a sustainable settlement, but considered separately each settlement would not be highlighted as a sustainable location for growth. Para 55 of NPPF states 'For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.' For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.</p> <p>Some settlements (Coldwaltham) are described as Tier 5 yet have a primary school, a review of the settlement hierarchy is required to ensure that the correct score and therefore position on the hierarchy is given for all settlements</p> <p>An additional tier should be created for settlements with no facilities, where development would be inappropriate a simple scoring methodology is not appropriate to score settlements sustainability, for example access to a main line train station should carry far</p>		

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						more weight than access to a village hall, shop or cafe		
30	How can the Local Plan best ensure a 'sufficient' supply of housing?	<p>The Local Plan will set out a level of new housing (combined affordable and market) provision for the National Park. The level of the new housing provision set out in the Local Plan will be determined from:</p> <p>the 'objectively assessed need' of the National Park as determined through the SHMA, and</p> <p>the constraints identified from the evidence base, particularly the landscape character assessments of the major settlements and how paragraphs 115 and 116 of the NPPF are met.</p>	88%(43)	<p>30a. The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set levels for areas of the National Park, which could be based on local authority boundaries.</p> <p>30b. The Local Plan will not set a specific overall level of new housing provision for the whole of the National Park but will set individual levels of new housing provision for the different housing market areas that overlay the National Park.</p> <p>30c. The Local Plan will not set a specific level of new housing provision for the whole of the National Park but will set individual housing targets for major settlements (that is, those in settlement Tiers 1, 2 and 3).</p>	<p>14%(9)</p> <p>9%(6)</p> <p>32%(21)</p>	<p>Should be assessed in zones.</p> <p>Should involve parish councils and communities and include local landscape assessment as part of evidence base. Reiterates role of neighbourhood plans.</p> <p>Windfalls should be factored into the land supply figures.</p> <p>Not convinced of need for a National Park-wide SHMA. Some parts have already been included in two previous SHMAs.</p> <p>Should be a brownfield-first policy, including intensification.</p> <p>Key worker priority in affordable homes. New homes should be affordable to locals and small.</p> <p>Houses should be added to small villages to keep them local and alive, but no second homes.</p> <p>Concerns over Settlement Hierarchy Tiers 3 and 4 as no control over loss of certain types of services.</p> <p>Tiers 4 and 5 should be considered for housing to ensure strategy is deliverable if Tiers 1-3 cannot provide the required level. Also, SHLAA should inform this consideration.</p> <p>Comments from developers generally comment that all objectively assessed need</p>	The Local Plan Preferred Option follows the previous main proposed approach and part of Option 30c (in that as well as a park wide housing target, individual housing targets are set for major and medium sized settlements).	In order to maintain the focus of the policy on the delivery of affordable housing, in accordance with the National Parks Vision and Circular (2010), Strategic Policy SD23: Housing sets a target for the provision of affordable homes. The policy then sets an overall level of provision of housing (affordable and market combined). The policy sets out how this will be delivered and specifies a number of settlements which will accommodate approximate levels of housing. Suggestions proposed through the Options Consultation have been taken forward, including the factoring in of a windfall supply figure, the allocation of housing targets to some villages that were previously in Tier 4, and through other policies which encourage development on brownfield land (SD22) and affordable housing (SD24).

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						<p>across National Park area should be met as a minimum and that social and economic needs outweigh landscape constraints.</p> <p>General criticism of 'objectively assessed need' in principle, and how to address it.</p> <p>Wealden District Council suggests setting a National Park-wide target and then sub-divide by settlement. This could be done later through allocating DPDs.</p> <p>General preference amongst adjoining local authorities to be able to delineate the need within their respective areas - particularly for affordable housing (which may lean towards Option 30a) although this could be achieved from a combination of all options.</p> <p>Eastbourne Borough Council suggests Option 30b would be most supportive of Duty to Cooperate and could make it easier to meet unmet need from adjoining local authorities. Does not support Option 30a as it does not provide the necessary flexibility across housing market areas.</p> <p>Winchester City Council suggests SDNP needs to work with local authorities to determine housing need.</p> <p>Waverley Borough Council expects pressure for housing to increase there if SDNPA cannot meet its own objectively assessed need.</p> <p>English Heritage suggests the</p>		

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						<p>constraints to meeting the objectively assessed needs should include the historic environment and refer explicitly to paragraph 14 and footnote 9 of the NPPF.</p> <p>Adur/Worthing Councils comments that SDNPA should consider accepting development within boundary along coastal urban fringe through the Duty to Cooperate to meet a need that relates to the urban areas adjacent to the National Park but within the Housing Authority areas.</p>		
31	How can the Local Plan best address housing mix in the National Park?	<p>The Local Plan to set out how, through meeting housing requirements and building sustainable communities, residential development will provide:</p> <p>a range of dwelling tenures, types and sizes based on identified local needs to meet a range of housing requirements of the local community, including the elderly and those with special or supported needs, and</p> <p>a range of affordable housing types and sizes, based on the local need.</p> <p>New housing development will be required to ensure that it contributes to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.</p>	100%(47)	<p>31a. Put an emphasis on the delivery of smaller properties for market tenures, and a mix of sizes for affordable tenures, unless indicated otherwise by local housing need information and whilst respecting the setting of the development site.</p> <p>31b. Existing properties should not be extended excessively, further diminishing the existing property stock of small and medium sized dwellings.</p> <p>31c. On larger sites the different types and tenures will be required to be spread across development sites, whilst recognising the management requirements of registered providers of affordable housing. Also, there should be no distinguishing in terms of design between market and affordable homes.</p> <p>31d. Existing properties should not be replaced (one for one) by significantly larger properties.</p>	<p>67%(40)</p> <p>48%(29)</p> <p>58%(35)</p> <p>47%(28)</p>	<p>Size restriction should apply to Tiers 3, 4 and 5 rather than settlement boundaries to ensure rural affordability.</p> <p>Specific protection for 'small dwellings' in their own right (with robust criteria for what constitutes a 'small dwelling') further than just any proportional enlargement limit for all housing. This would protect the affordability of small houses, protect rural character and protect the landscape.</p> <p>Tenure and size mix is essential to meeting housing need – simply building more housing to meet market appetite does not address local need.</p> <p>The widespread opposition to Option 31e and specific comments suggest any size restrictions should apply universally within settlements as well, not just in countryside.</p> <p>Several comments suggesting it</p>	The preferred approach is to require the size, type and, for affordable housing, tenure of homes for each proposal to be based on up-to-date evidence of local needs (Strategic Policies SD23: Housing and SD24: Affordable Housing); and to have a policy on the extension and replacement of dwellings which protects the stock of smaller dwellings in the National Park.	<p>The previous main proposed approach has been taken forward in Strategic Policies SD23: Housing and SD24: Affordable Housing. Options 31b, 31d and 31e from the Consultation Document, related to protecting small dwellings from excessive enlargement or replacement, will be taken forward through Development Management Policy SD45: Replacement Dwellings and Extensions.</p> <p>Suggestions proposed through the Options Consultation have been taken forward, including applying the restrictions on the expansion of house size, whether through extension or replacement, across the National Park (outside the market towns), and not just in the open countryside; specific protection for small</p>

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				3 l.e. Any proposed size restrictions to extensions and replacement dwellings should apply only to dwellings outside settlement policy boundaries.	5%(3)	<p>is not realistic to “conserve and enhance” National Park, should instead “not adversely affect”. Further, the level of enhancement should be proportional and rural workers and agricultural development should not be required to conserve and enhance. Estate housing should also be encouraged as far as possible. Limits on extensions to preserve affordability should not inhibit reasonable extensions which could accommodate growing families or elderly relatives and should be clear in its objectives and not overburdening.</p> <p>Replacement dwellings or extensions should not be allowed to incrementally increase indefinitely. Should be a policy tying enlargement to a proportion of the original size (perhaps 50%?)</p> <p>Local housing need is certainly a factor but the Authority should be realistic about the purchasers of market housing being in-migrants.</p> <p>Tenure and mix should be determined site-by-site to ensure appropriate for the settlement, not prescribed.</p> <p>Selborne Parish Council particularly noted opposition to size restrictions outside of policy boundaries but supported all other options.</p> <p>Expanding Option 3 l.d, allow one house on a large to be replaced by two small houses to cater for smaller sized</p>		dwellings; and tying enlargement to a proportion of the original size.

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						needs. Consider policy on second homes.		
32	What approach should the Local Plan adopt to best meet local need?	The Local Plan to set out a proportion for affordable housing provision of all residential development proposals, subject to confirmation that this level is achievable from the Viability Assessment. Affordable homes will normally be required to be built on-site, unless it can be demonstrated to be unsuitable, where a financial contribution would be required. Affordable housing will need to remain available as affordable housing for people with a local connection in perpetuity.	93%(50)	<p>32a. The Local Plan could include a 'local connections' policy for the provision of affordable housing within parishes and towns in the National Park, with local connection being defined as those households unable to access the open housing market and having a residential, employment, family or primary carer connection within first the local parish (whether wholly or only partly within the National Park) and second neighbouring parishes.</p> <p>32b. The Local Plan could include a policy that all residential development, that is one net additional dwelling, should contribute towards the provision of affordable housing.</p> <p>32c. The Local Plan could include a policy that there is a dwelling threshold, either by site area or number of dwellings, for the provision of affordable housing on market housing sites.</p> <p>32d – The Local Plan could set an affordable housing proportion of at least 40 per cent, subject to confirmation that this level is achievable from the updated Viability Assessment. This provision will normally be on-site, unless it can be demonstrated to be unsuitable where a financial contribution would be required.</p>	<p>58%(36)</p> <p>24%(15)</p> <p>35%(22)</p> <p>29%(18)</p>	<p>Locally set affordable housing targets should be based on locally set need and employment opportunities.</p> <p>Local connections policy should apply to market housing also.</p> <p>Risk of cliff-edge numbers just below any threshold set – so all sites should contribute.</p> <p>Use higher CIL charges if sites don't provide affordable housing.</p> <p>Gross affordable housing provision should be in proportion to existing settlement sizes to avoid overwhelming ghettoisation.</p> <p>Local connection criteria should include 8 years as resident. Should accidentally prevent people nearby but outside of parish boundaries from rightly benefiting and remaining equitable to users.</p> <p>Contributions from single dwellings (especially self build and agricultural workers accommodation) could be too onerous.</p> <p>Proportions should be viability-led rather than target-led.</p> <p>Comments on the compound cost of affordable housing, CIL, sustainability measures etc. impacting on the viability of</p>	The preferred option for affordable housing in Strategic Policy SD24: Affordable Housing reflects the main proposed approach in the Options Consultation Document, and also Option 32a.	A combination of options from Issues 31 and 32 in the Options Consultation Document were considered to deliver a range of complementary benefits and have been taken forward into one preferred options policy (Strategic Policy SD24: Affordable Housing). Changes by the Government relating to site-size threshold, similar to Option 32c, had to be taken into account in drafting this policy, although those changes were repealed after the Preferred Options draft was finalised. Suggestions proposed through the Options Consultation have been taken forward, including consideration of viability and a local connections criterion for affordable housing which is focussed on but not limited to the community where that housing is delivered.

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						<p>development.</p> <p>Wealden District Council recommended its own Affordable Housing Policy WCS8 which sets a site size threshold and proportional requirement.</p> <p>Eastbourne Borough Council supports the approach and recommends its own Affordable Housing Policy where AH proportions are varied by area – depending on value. (Similar to the CIL viability zones).</p>		
33	What approach should the Local Plan adopt for rural exception sites?	<p>The Local Plan to support and encourage rural exception schemes, provided they are led and supported by local communities, on sites either within the settlements or immediately adjacent to either:</p> <p>settlement policy boundaries, or</p> <p>the built form, where there is no settlement policy boundary defined, and</p> <p>where the National Park's first Purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage is supported.</p> <p>The scale of the development proposal will need to be modest in size and relate well, in terms of location and size, to the existing settlement. The focus of new housing on rural exception sites will need to be on affordable housing and the need for a small proportion of market housing must be demonstrated through a</p>	92%(45)	<p>33a. The Local Plan could set a site threshold for rural exception sites.</p> <p>33b. The Local Plan could extend the definition of housing permitted on rural exceptions sites to allow individual 'self-build' schemes to come forward where supported locally.</p>	<p>41%(14)</p> <p>59%(20)</p>	<p>Confusion over the meaning of "threshold" in this option.</p> <p>Exceptions Sites should not necessarily have to adjoin settlement boundaries if overriding preferences exist for an alternative site.</p> <p>Should consider agricultural land classification.</p> <p>Several comments in support of market housing on Exception Sites to support viability but others expressing this should be a last resort.</p> <p>Several parties concerned about the affordability credentials / relevance of self-build and management structures as these would differ from affordable housing providers or estate managers.</p> <p>Wealden District Council advises not to be too prescriptive as Exception Sites should be allowed maximum flexibility.</p>	The preferred option is for a policy (Strategic Policy SD25: Rural Exception Sites) allowing affordable housing exception sites outside settlement boundaries to meet local need, subject to various criteria.	There was strong support for a policy supporting rural exception sites and so the principal option in the <i>Local Plan Options Consultation Document</i> Issue 33 has been taken forward in Strategic Policy SD25. Option 33a (size threshold for rural exception sites), however, was not supported as it is considered that the policy should be as flexible as possible. Option 33b proposed that 'self-build' housing could be allowed on rural exception sites. However, there is concern that this type of housing product does not comply with the NPPF definition of affordable housing and would be unlikely to remain affordable to meet local needs in perpetuity. Self-build housing will therefore be supported under the

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		Viability Assessment.				<p>East Hants District Council / HARA provide useful comments about on-site market housing and needs surveys. Critical of self-build credentials as either affordable or cross-subsidising market housing. Suggests probably neither and so has no place on an NPPF compliant exception site.</p> <p>Chichester District Council recommends their limit of 15 units for Exception Sites and suggests market housing should be allowed as a last resort only.</p>		general housing policy, SD23, but will not be supported as part of a rural exception site.
34	How can the Local Plan best meet the housing needs of agricultural and forestry workers?	<p>The Local Plan to set a policy whereby tied affordable residential accommodation for local workers within close proximity³ to agricultural or forestry enterprises, including temporary workers, will be permitted in the countryside as an exception provided:</p> <p>it is essential for the workers to live permanently at or near their place of work in the countryside.</p> <p>it is in keeping with the local context, and does not adversely affect National Park Purposes.</p> <p>is retained in perpetuity as accommodation for local agricultural and forestry workers, and</p> <p>other residential properties on the farm or economic unit have not been sold or redeveloped for other uses within the recent past</p>	96%(43)	<p>34a. In addition to the approach described above, the Local Plan could limit the size of such accommodation for agricultural or forestry workers.</p> <p>34b. The allowance of additional affordable residential accommodation for local workers could be restricted by the Local Plan to instances where there has been no sale of another residential property on the estate.</p>	<p>61%(17)</p> <p>39%(11)</p>	<p>General concern about exploitation of this allowance.</p> <p>Support for limiting size to prevent value or size exceeding appropriate levels for agricultural workers as originally intended.</p> <p>Questioning need for on-site agricultural workers given the predominance of autonomous technology.</p> <p>Also support for permanent local workers rather than transient temporary workforce.</p> <p>The NPPF policy sets our sufficient guidance and additional restrictions are unnecessary except maybe good design.</p> <p>The sale of estate housing on the open market does not necessarily mean there is no future need for workers</p>	The preferred option is for a policy (Development Management Policy SD48: Agricultural and Forestry Workers' Dwellings) which allows for residential accommodation for essential agricultural and forestry workers, including on a temporary basis when essential to support a new farming activity.	In relation to Issue 34, the preferred option follows what was proposed in the Options Consultation, which received very strong support, as well as Option 34a for limiting the size of agricultural dwellings, which received strong support. There was less support for the more restrictive Option 34b, so this has not been taken forward.

³ The definition of 'close proximity' in this context will be provided through the Preferred Options Draft Local Plan.

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						<p>accommodation. Rural workers accommodation should also include retired farmers and should be defined flexibly to allow workers who indirectly contribute to the rural economy – not necessarily in farming and agriculture.</p> <p>Chichester District Council recommends a rural exception site size limit of 15 units. Expanding policy beyond agriculture and forestry workers to include key workers and those involved in cultural heritage.</p>		
35	How can the Local Plan best ensure the housing needs of older people are met?	The Local Plan to include a policy to encourage new residential development which aims at providing accommodation for the older people, both those in early retirement and those needing some form of care.	90%(43)	<p>35a. The Local Plan could set out that residential development for older people be provided through smaller properties and opportunities for flats and bungalows exclusively for those aged 55/60 years and over, and retirement accommodation and care homes in the more sustainable settlements (Tiers 1, 2 and in some cases 3), both with access to a good range of services and facilities, including public transport.</p> <p>35b. The Local Plan could identify specific appropriate sites in the larger and more sustainable settlements (Tiers 1 and 2) for special needs housing, including for the elderly.</p> <p>35c. The Local Plan could make no specific provision for elderly persons' housing but assumes that this will be delivered by the market as part of the overall housing provision within the National Park.</p>	<p>59%(35)</p> <p>42%(25)</p> <p>8%(5)</p>	<p>Should be focused in Tiers 1 and 2 where there is supporting infrastructure; others suggest it should relate to 'local' need irrespective of settlement tier. Many comments focusing on avoiding an over-concentration of elderly accommodation to ensure sustainable mixed communities. New development should focus on maintaining independence and links with the wider community.</p> <p>Consider age-threshold; 55 is often considered too young. Also, 'size' is less relevant than 'type'.</p> <p>Disabled-access accommodation should be given same support as elderly accommodation. Also that there is an over-focus on elderly accommodation but other sections of society's needs should also be met, including through life-time homes standards.</p>	The preferred option is to require through Strategic Policy SD23: Housing that the size and type of homes for each proposal will be based on up-to-date evidence of local needs. A suitable mix will be determined through liaison with parish or town councils, housing authorities and rural housing enablers where applicable. This would ensure the delivery of housing for the elderly when a specific need is identified by stakeholders.	The preferred option will deliver homes for older people where needed, on the basis of up to date evidence of local needs.

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				35d. The Local Plan could allow for appropriately sized annexes and free-standing accommodation to be built within the curtilage of existing properties where they do not detract from the existing built form.	36%(21)	<p>Any annexation must be tied to the principal dwelling to avoid exploitation. But annexes are preferable to bespoke, exclusive elderly accommodation. Other comments suggest targeting elderly accommodation frees up existing family housing.</p> <p>Estate landowners have offered to discuss how they might provide housing to the benefit of elderly/retired members of local communities.</p> <p>Hampshire County Council – as provider of adult services in its area – has requested specific targets for growth of accommodation for older and vulnerable people to ensure their needs are met as it does not believe that the market will provide this. Also requests specific reference to ‘extra-care’ to support the County Council’s Project Extra Care Programme.</p>		
36	How can the Local Plan best ensure that the housing needs of Gypsies, Travellers and Travelling Showpeople are met?	The Local Plan to identify sites to provide a 15-year supply to meet identified accommodation needs, working with our partners/adjoining authorities. A policy will be included within the Local Plan setting out the criteria for assessing sites and applications. This will follow the principles set out in Government policy.		<p>36a. The Local Plan could identify specific locations for temporary stopping places⁴ to provide alternatives to illegal encampment for those Gypsies and Travellers passing through.</p> <p>36b. The Local Plan could protect existing sites with permanent planning permission for Gypsy and Traveller accommodation from other uses. As there are existing sites with permanent permission one option is for the Local Plan to safeguard these existing sites against loss</p>	<p>57%(28)</p> <p>51%(25)</p>	<p>SDNPA must take into account concerns of local people both within and bordering the National Park.</p> <p>Option 36b should be related to a continued identified-need. Existing sites should only enjoy continued support where they are suitable in terms of wider local plan policies.</p> <p>Should not focus solely on rural sites as urban locations are nearer to amenities.</p> <p>Eastbourne Borough Council</p>	Strategic Policy SD26: Gypsies and Travellers and Travelling Showpeople recognises accommodation needs of both groups strategically, has a set of criteria for assessing planning applications on specific sites and safeguards existing lawful sites.	The Local Plan: Preferred Options take forward part of the previous main proposed approach, as well as the previous options 36b and 36c. A Call for Sites for Gypsies, Travellers and Travelling Showpeople is being carried out, which may lead to the allocation of sites (although not of temporary stopping places) in accordance with the remainder of the previous main proposed approach. Suggestions proposed through the Options

⁴ ‘Temporary stopping places’ are areas where gypsies or travellers can stop for up to 28 days.

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				<p>through the granting of subsequent planning permissions.</p> <p>36c. The Local Plan could protect any future site granted planning permission for Gypsy and Traveller accommodation and which has been implemented. These sites could be safeguarded as long as there is an identified need.</p>	45%(22)	<p>supports partnership working to identify a 15-year supply of sites and refers to its Local Plan Policy D6. East Sussex County Council, Chichester District Council, Brighton and Hove City Council and others support the options for identifying a supply of sites.</p> <p>Arun District Council promote joint working with Coastal West Sussex authorities to identify sites and advises that Travelling Show People have different needs which may need to be addressed in a different policy.</p> <p>Southern Water advise that sites considered adjacent to wastewater treatment works or major pumping stations should be far enough away to allow adequate odour and noise dispersion.</p>		<p>Consultation have been taken forward, including the inclusion of a criterion requiring new sites to be well related to settlements. Partnership working with adjoin local planning authorities, as requested by several consultees, is also being taken forward.</p>
37	How can the Local Plan best encourage Community Land Trusts?	The Local Plan to encourage the establishment of Community Land Trusts as a way of encouraging affordable housing for local people where the CLT proposals are consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage.	100%(39)			<p>Angmering Estate requested discussion with the NPA on how housing can be provided for its workers without ceding control to an independent and separate management organisation.</p> <p>Shorter time limits on implementation of planning permission.</p> <p>More provision of smaller accommodation for single-person households.</p> <p>“Major Development” should be defined.</p> <p>Second homes issues.</p> <p>House-building is partly consumed by</p>	The SDNPA is committed to encouraging community land trusts and this is made clear in the supporting text for Strategic Policy SD24 (Affordable Housing) and Development Management Policy SD53 (New and Existing Community Infrastructure). Policy SD24 includes a provision, where applicable, for ‘established community-led and legally constituted organisations’ to be involved in the management of selection for affordable housing in partnership with the local housing authority.	The preferred option reflects the proposed approach set out in Issue 37.

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						<p>reducing/dispersing household numbers/occupants rather than new needs from new people.</p> <p>Brownfield-first policies and promotion of SUDS systems in design.</p> <p>Housing Density: should match the surrounding character.</p>		
38	What strategic goals should the Local Plan set for the local economy?	The Local Plan will set clear strategic goals for the local economy, which will support the <i>Partnership Management Plan</i> .	98%(39)			<p>Milland Parish Council stated that priority economic issues are addressed and limited resources targeted</p> <p>Ensuring jobs for local people and fostering thriving and sustainable communities</p> <p>Support for small and medium sized enterprises, and new enterprises</p> <p>Supporting clusters of businesses</p> <p>Supporting infrastructure delivery, including transport</p> <p>Facilitating the knowledge economy, including home working</p> <p>Selborne Parish Council made reference to sustainable growth within the National Park constraints</p> <p>Hambledon Parish Council referred to the provision of broadband</p> <p>Businesses supporting the special qualities of the National Park, the Partnership Management Plan objectives and the National Park's purposes</p>	<p>Strategic Policy SD27: Sustaining the Rural Economy sets clear strategic goals for the local economy, namely:</p> <ul style="list-style-type: none"> • Key sectors which support the Partnership Management Plan: tourism and the visitor economy, forestry and wood-related activities, and local food and beverages; • Green businesses • Rural supply chains • Small businesses • Home working • Superfast broadband 	The strategic goals selected reflect the Partnership Management Plan and consultation responses received.

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						<p>Having a flexible approach Supporting local agricultural and forestry businesses and enabling diversification, where appropriate, and appropriate forms of tourism, including visitor accommodation</p> <p>Angmering Estate referred to the role farm estates and farms make and that they should be able to improve and adapt their business activities</p> <p>Ensure thriving town and village centres</p>		
39	Should the Local Plan safeguard existing employment sites?	<p>The Local Plan to:</p> <p>consider up-to-date evidence on the need for employment land and/or commercial floorspace and consider the suitability of existing land to meet the identified business needs. Where appropriate, the Local Plan will aim to safeguard employment land to ensure sites are available to meet the short- and long-term needs, and will have a presumption against the loss of employment land and set criteria within policy against which the loss of employment land/floorspace will be judged.</p> <p>avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. However, where appropriate, the Local Plan will encourage the redevelopment of such sites, retaining the employment use but providing improved facilities or making</p>	97%(38)	<p>39a. The Local Plan could adopt a sequential approach to the loss of employment land/floorspace as follows:</p> <p>(i) preference given to the redevelopment of the site whilst retaining the employment use on the whole site.</p> <p>(ii) if (i) is demonstrated as being unachievable, we will consider a mixed-use development on the site, which includes some employment land/floorspace.</p> <p>(iii) if both (i) and (ii) are demonstrated as being unachievable, we will then consider the loss of the employment land floorspace.</p> <p>39b. Where development is proposed which would result in loss of an existing active industrial or business use, the Local Plan could explore</p>	92%(23)	<p>Impact on the environment and the traffic levels, including vehicle movements and vehicles sizes, on rural roads</p> <p>If it is important to the local community then it should be retained, whether or not it has been 'run-down' prior to an application for change of use</p> <p>Determining factors should include: how long it has been vacant, how long it has been marketed for, its location and the local need for employment sites</p> <p>Avoidance of long-term protection of employment sites where there is no reasonable prospect of a site being used for that purpose</p> <p>Essential that current employment land is safeguarded.</p>	Strategic Policy SD28: Employment Land safeguards existing employment sites (subject to marketing which could demonstrate there is no market demand)	The preferred option reflects most of the proposed approach set out in Issue 39, since it follows the recommendations of up-to-date evidence in the 2015 South Downs Employment Land Review Update, including a presumption against the loss of employment land. Suggestions proposed through the Options Consultation have been taken forward, including the specification of traffic as a potential impact that change of use between employment land categories must avoid.

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		better use of the site.		options for mitigation.				
40	What approach should the Local Plan take to the allocation of additional employment land?	<p>The Local Plan to:</p> <p>identify if there is a need for new employment sites within the National Park through regular assessments and monitoring of take-up of different employment floorspace. Part of this consideration will include a review of existing employment sites.</p> <p>set criteria for the provision of new employment land/floorspace.</p>	93%(38)	<p>40a. Allocate new employment sites to accommodate the need for new or expanding businesses in appropriate locations.</p> <p>40b. Allocate mixed-use sites to accommodate the need for new or expanding businesses.</p>	<p>41%(9)</p> <p>59%(13)</p>	<p>What are the criteria for 'appropriate' locations?</p> <p>Broadband speeds and availability</p> <p>Where possible on brownfield sites</p> <p>Need to safeguard the character and environment of the National Park – no overall quantitative target should be set for additional employment land</p> <p>Criteria should be tailored to the settlement hierarchy, conserving the integrity of rural lanes</p> <p>Landscape constraints must be adequately factored into the proposed approach.</p> <p>What criteria do you think are important in determining the location of new employment sites?</p> <p>The responses to this question included:</p> <p>Local housing and infrastructure is available and affordable</p> <p>Transport access, local labour markets and the costs of site and buildings</p> <p>Must take account of landscape and environmental constraints and tranquillity</p> <p>Encourage the re-use of brownfield sites</p> <p>Good broadband connection</p>	<p>Strategic Policy SD28: Employment Land sets out amounts of new employment land to be accommodated, and allows for change of use from industrial to office and warehousing use. Strategic Policy SD27: Sustaining the Rural Economy states that business proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused. Strategic Sites Policies SD32, SD33 and SD34 allocate sites for mixed use development, including employment.</p>	<p>The preferred option reflects most of the proposed approach set out in Issue 40, since it follows the recommendations and need assessments of up-to-date evidence in the 2015 South Downs Employment Land Review (ELR) Update, which included a review of existing employment sites. The ELR Update found that the need for additional employment land in the National Park can mostly be met through the implementing of current planning permissions, and the remainder should be met by allocating employment sites in towns where Neighbourhood Plans are being carried out, and intensification of existing sites. Therefore the Local Plan does not allocate any new sites purely for employment use. This approach of focussing employment growth on existing and already permitted sites and in the National Park's market towns is consistent with the criteria suggested during the consultation.</p>

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						Location, geography and site layout.		
41	How can the Local Plan support new businesses, small local enterprises and the rural economy?	<p>The Local Plan to:</p> <p>support the sustainable growth and expansion of a range of businesses and enterprise in rural areas, both through appropriate conversion of existing buildings and well-designed new buildings, where consistent with National Park Purposes.</p> <p>support the delivery of small and flexible start-up business units, by encouraging the provision of small units as part of larger developments and/or encouraging the appropriate conversion or sub-division of industrial units into small units. Such units must be well designed and of sustainable construction and ensure that they meet National Park Purposes.</p>	95%(41)	41a. Allocate land for start-up enterprise centres ⁵ located where there is demonstrated to be a strong market demand.	75%(21)	<p>Much depends on the location and local impacts, particularly traffic.</p> <p>All development proposals must be in keeping with their surrounding and enhance them.</p> <p>Do not agree with growth and expansion in rural areas.</p> <p>Many start-ups will need to expand or move to larger premises to grow. Enterprise centres should include a mix of size units High-speed broadband provision is critical.</p> <p>Business development should be focussed in appropriate locations and the conversion of existing buildings.</p>	<p>Strategic Policy SD27: Sustaining the Rural Economy sets clear strategic goals for the local economy, namely:</p> <ul style="list-style-type: none"> • Key sectors which support the Partnership Management Plan: tourism and the visitor economy, forestry and wood-related activities, and local food and beverages; • Green businesses • Rural supply chains • Small businesses • Home working • Superfast broadband <p>The policy also states that states that business proposals that would have an unacceptable adverse impact on the special qualities of the National Park will be refused.</p>	The preferred option includes the proposed approach set out in Issue 41, with rural supply chains and small businesses being two of the main topics encouraged by Strategic Policy SD27. This takes into account some of the consultation responses.
42	What approach should the Local Plan take to the diversification of agricultural land and buildings?	The Local Plan to support appropriate development associated with the expansion of businesses and enterprise in rural areas, subject to the development being of a high quality, both through the well-designed conversion of existing buildings and high-quality new buildings, which reflects its	96%(45)	42a. The Local Plan could support a limited scale of farm diversification on the premise that the diversification supports the core agricultural use and development in accordance with the National Park's Purposes. This may also include the development of buildings to enable on-site processing and	54%(20)	<p>All impacts from the development proposals should be factored in, especially traffic along rural lanes.</p> <p>Where they are in appropriate locations and in keeping with the natural surroundings.</p> <p>Impact of lighting, noise ,</p>	Development Management Policy SD47: Farm Diversification sets out what uses and buildings will be suitable for farm diversification developments, and requires that diversified activities remain	A combination of Options 42a and 42b is preferred, with a wider range of diversification options allowed for which promote the National Park purposes, but also a strong requirement that diversification support the

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		landscape setting.		<p>sale of products grown on site.</p> <p>42b. The Local Plan could allow for more diverse economic use of agricultural buildings where it is considered to promote the National Park Purposes.</p>	46%(17)	<p>odours and discharges should be minimised.</p> <p>'limited' scale diversification would be sufficient supportive for farm and rural estate businesses. Diversification should only be refused where they are in conflict with the Purposes.</p> <p>English Heritage state that care should be taken to conserve and enhance the architectural and historic significance of traditional buildings.</p> <p>The NFU raises concerns about raising design quality to the extent that conversion schemes become uneconomic.</p> <p>The South Downs Land Managers' raise an issue about limiting the sale of products of farm shops to local products which they consider will make most operations uneconomic and recommend the use of the National Farmers' Retail and Marketing Association's guidelines.</p> <p>The Wiggonholt Association has reservations about diversification of existing farm buildings which then triggers requirements for the construction of new farm buildings.</p>	subsidiary to and do not undermine the farming operation.	<p>core agricultural use. A very wide range of new uses are now allowed under the permitted development rights for change of use of agricultural buildings.</p> <p>Suggestions proposed through the Options Consultation have been taken forward, including concerns about design cost which are addressed in the supporting text to the policy and concerns that the re-use of existing farm buildings for diversified activities will lead to the construction of additional farm buildings, as well as traffic concerns, which are addressed in policies SD46: Agriculture and Forestry and SD18: Transport and Accessibility respectively.</p>
43	What approach should the Local Plan take to equine-related development?	The Local Plan to: support appropriate development and diversification of agricultural and other land-based rural businesses where such development conserves and enhances the natural	98%(40)	43a. Alongside the Local Plan, the National Park Authority could develop guidance on the keeping of horses and equine development. Any policy and or guidance would need to acknowledge the different impacts associated with commercial and domestic	92%(34)	<p>Damage by heavy overgrazing should be a consideration</p> <p>Selborne Parish Council agreed that the keeping of horses should be required to comply with the agricultural practice set out with the requirements of the Single Farm Payment,</p>	Issues raised in responses included sites being well connected to the bridleway network, farm diversification, cumulative impacts, subdivision of fields and best practice	The preferred option takes forward the proposed approach in Issue 43. Through a commitment in the supporting text to produce an SPD on the issue, Option 43a is also taken forward. Suggestions proposed

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		<p>beauty, wildlife and cultural heritage (Purpose One) and the landscape character of the National Park.</p> <p>require planning applications for development associated with the keeping of horses to be accompanied by sufficient information to demonstrate that the associated impacts conserve and enhance the natural beauty and wildlife, for example by including details of fencing and landscaping.</p>		equine-related development.		<p>and traffic impact from horse-related movements should be a consideration.</p> <p>Hambledon Parish Council and Winchester City Council both referred to policies being required on the cumulative impact of equine development, and so-called mobile field shelters.</p> <p>Enforcement is a key issue associated with equine-related development</p> <p>CPRE raised the issue of subdivision of open fields by fencing can change the character of a rural area</p> <p>The CLA mention that the use of land for equestrian-related uses is an important diversification opportunity for farmers and an important sport and recreation activity and does not support guidance on the keeping of horses</p> <p>Hampshire County Council mentioned that the keeping of horses should be focused in locations that take into account the bridleway network.</p>	<p>for managing sites.</p> <p>Taking these into consideration, a single policy on equestrian development is proposed: SD. Its criteria cover a wide range of issues associated with equestrian development, which will link with other Local Plan policies. The policy supports the appropriate use of land for equine development provided its criteria are met.</p>	<p>through the Options Consultation have been taken forward including consideration of the effect of intensity of equestrian use and the subdivision of fields on the landscape, and the need for a satisfactory relationship with the bridleway network.</p>
44	How should the Local Plan consider visitor accommodation?	<p>To meet the second Purpose to promote opportunities for the understanding and enjoyment of the special qualities by the public, the Local Plan to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the National Park's first Purpose.</p> <p>The Local Plan to have a presumption against the loss of</p>		<p>44a.The Local Plan could encourage the development of visitor accommodation to certain parts or areas, such as the larger settlements and/or areas in close proximity to visitor attractions.</p> <p>44b.The Local Plan could encourage development associated with visitor accommodation away from certain parts or areas, such as the less accessible areas.</p>	<p>37%(16)</p> <p>28%(12)</p>	<p>Visitor accommodation must not be at the expense of affordable accommodation for local people.</p> <p>Sompting Estate consider that in pursuant of Purpose Two, and Purpose One, it is vital in planning for visitor accommodation should be permitted in rural areas</p> <p>Bignor Parish Council highlight the Houghton Forest holiday</p>	<p>The preferred approach in this Local Plan is for a strategic policy (SD20: Sustainable Tourism and the Visitor Economy) which takes a positive, flexible and enabling approach to tourism related development which applies to the whole National Park, provided that development is in accordance with national</p>	<p>The preferred option takes forward the proposed approach in Issue 44 in terms of protecting existing visitor accommodation, and also takes forward Option 44a by stating that visitor accommodation should be either within settlement boundaries or, provided various criteria are met, in the countryside but closely associated with attractions or established tourism</p>

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		<p>visitor accommodation and set criteria within policy, against which the loss of accommodation will be judged.</p> <p>What criteria do you think are important in determining if visitor accommodation should be retained?</p>		<p>44c. The Local Plan could take a more flexible approach to visitor accommodation, informed by landscape character assessments.</p>	<p>56%(24)</p>	<p>cabin proposal as one that is inappropriate in a precious landscape.</p> <p>The Alice Holt Community Forum state that it is strongly opposed to any form of built or tented development within Alice Holt Forest.</p> <p>Amberleigh House Limited considers that the Local Plan must support the delivery of a great range and diversity of visitor accommodation to support Purpose Two. Appropriate development proposals should be supported in locations where there is demand and the Plan should take a flexible approach, although hotel provision is often best located on the edge of settlements and where well served by public transport and the road network.</p> <p>Hampshire County Council point out that such development proposals must be informed by landscape character assessments and that small scale development and conversions of existing buildings will be generally less visually intrusive than larger proposals.</p> <p>Past use of premises and demand for accommodation</p> <p>Amberley Parish Council refer to the retention of existing visitor facilities</p> <p>Selborne Parish Council highlight that there should be a demonstrable need, and minimise the number of camping and caravan sites in</p>	<p>park purposes and other relevant policies in the Local Plan, and does not harm the special qualities.</p>	<p>related uses, including rights of way. This approach is consistent with most of the Options consultation responses on the subject.</p>

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						<p>the countryside and maximise the number of affordable permanent visitor accommodation in built-up areas</p> <p>The CLA states that tourism accommodation development is important in some place to support diversification but do not agree that there should be a presumption against the loss of visitor accommodation, particularly if there is support for development of new accommodation</p> <p>Midhurst Town Council consider that there is a need for camping, caravanning and motor home sites in the National Park as they will attract visitors who will stay in the Park.</p>		
45	How should the Local Plan consider types of tourism development and recreational activity?	<p>To meet the second Purpose to promote opportunities for the understanding and enjoyment of the special qualities by the public, the Local Plan to support sustainable tourism, recreation, environmental education and interpretation, subject to meeting the National Park's first Purpose.</p> <p>The Local Plan to support the development and maintenance of appropriate recreation and tourism facilities and visitor hubs including a mix of good-quality accommodation, which responds to market demands and supports a sustainable visitor economy.</p>		<p>45a. The Local Plan could encourage recreational activity in certain parts or areas of the National Park, such as the larger settlements and/or areas within close proximity of existing visitor attractions (including national trails and routes).</p> <p>45b. The Local Plan could encourage recreational activity away from certain parts or areas of the National Park, such as less accessible areas.</p> <p>45c. The Local Plan could take a more flexible approach to recreational development, which is informed by landscape character assessments.</p>	<p>35%(19)</p> <p>31%(17)</p> <p>52%(28)</p>	<p>Amberley Parish Council considers that there is no place for intrusive tourism development or activities along the South Downs Way or in historic settlements</p> <p>Hambledon Parish Council make the points that some of the national trail and other routes pass through some of the quietest and most tranquil countryside</p> <p>Eastbourne Borough Council believes that restricting tourism and recreational activities to only certain areas will limit the potential for meeting Purpose Two</p> <p>Sompting Estate makes the point that there are many different types and scales of recreational activity and this</p>	The preferred approach is for a strategic policy (SD21: Recreation) which takes a positive, flexible and enabling approach to tourism-related development which applies to the whole National Park, provided that development is in accordance with national park purposes and other relevant policies in the Local Plan, and does not harm the special qualities. The policy acknowledges that some recreational activities in some locations may be inappropriate in the National Park. Therefore, development must not, on its own or cumulatively with other development and uses,	The preferred option takes forward the proposed approach in Issue 45 in terms of supporting the development of appropriate recreation and tourism facilities, and also takes forward Option 45a by stating that such facilities should be either within settlement boundaries or, provided various criteria are met, in the countryside but closely associated with attractions or established tourism related uses. This approach carries forward some of the Options consultation responses on the subject.

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						<p>should be recognised</p> <p>Hampshire and IOW Wildlife Trust considers that this issue is one of the greatest challenges for the National Park, with too great a reliance on Natura 2000 sites, nature reserves and other vulnerable habitats. Look to the NPA to provide new open spaces as a means to promote Purposes</p> <p>National Trust support a policy to encourage development of tourism and recreation facilities in appropriate locations; do not believe that area-based policies are appropriate but would support criteria-based policies.</p>	prejudice or disadvantage peoples' enjoyment of other existing and appropriate recreation, environmental education or interpretation activities, including the informal quiet enjoyment of the National Park.	
46	What approach should the Local Plan take to static holiday caravan sites?			<p>46a. The Local Plan could have a presumption against the development of new static caravan parks across the National Park.</p> <p>46b. The Local Plan could restrict the development of new static caravan sites and support the appropriate redevelopment or relocation of existing sites only.</p> <p>46c. The Local Plan could allow the development of new static caravan parks that are appropriate in size and can be accommodated where they meet with the National Park Purposes, subject to the approach taken under Issue 42.</p>	<p>42%(21)</p> <p>22%(11)</p> <p>38%(19)</p>	<p>Any new developments should be small and in keeping with the local environment</p> <p>Static caravans are visually intrusive</p> <p>Winchester City Council states that such development should be close to amenities.</p> <p>NFU state that static caravans are often of vital importance in housing seasonal farm workers.</p> <p>Other Issues that the Local Plan should address?</p> <p>Amberley Parish Council say that non-fixed accommodation, such as 'glamping' are an option, and small purpose built holiday camps can be very good if well designed and in appropriate location</p> <p>Selborne Parish Council consider that there should be a</p>	The preferred approach in this Local Plan is to have a general policy by which proposals for any type of visitor accommodation be judged subject to the context of that site and other relevant policies.	The preferred option takes forward Option 46c by applying the same criteria to the assessment of static caravan sites as to other forms of visitor accommodation.

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						<p>presumption against new and extensions to existing golf courses</p> <p>Waitrose Ltd state that it is important to emphasize the important and necessary role of town centres</p> <p>CLA makes the point that the farming industry has changed significantly in recent years and viticulture has become an important part of the National Park and development associated with it should not be prevented by restrictive policies</p> <p>South Downs Land Managers says that the Local Plan should take a proactive approach to the provision of agricultural infrastructure and that it should do more to support the forestry industry by encouraging greater use of wood fuelled heating systems.</p>		
47	How can the Local Plan best ensure communities have access to local services?	<p>The Local Plan to:</p> <p>Take a flexible and positive approach to the delivery of new and expanded community facilities to address identified needs.</p> <p>Provide certainty of where the SDNPA wishes to encourage new facilities and the circumstances in which such development will be supported.</p> <p>In each of the following options, the acceptability of proposals will be tested against their ability to meet National Park Purposes. The National Park Authority would require evidence of a site-selection process to ensure new and expanded facilities take account</p>	97% (37)	<p>47a. The Local Plan could support new and expanded facilities and services, primarily in settlement Tiers 1, 2 and 3 where suitable sites can be found. The need for new facilities should be demonstrated through Parish Plans and Neighbourhood Plans or other forms of evidence agreed by the National Park Authority.</p> <p>47b. In addition to Option 47a, the enhancement and expansion of essential facilities and services could be supported by the Local Plan, as identified by the local community, in any settlement. Particular support will be given</p>	64% (29)	<p>Re-use and conversion of existing buildings should focus on meeting any identified community need first.</p> <p>Broadband policy should be included to enable introduction or enhancement of broadband with minimal bureaucracy. Should encourage new technology and techniques to enable high speed broadband across the SDNP.</p> <p>Clustering of parishes below Tier 3 is supported, if it enables the provision of important community facilities to serve more than one settlement.</p>	A combination of options from Issues 47 and 48 in the Options Consultation Document were considered to deliver a range of complementary benefits and have been taken forward into one policy (SD53: New and Existing Community Infrastructure) in this Preferred Options Local Plan.	The preferred option takes forward the proposed approach in Issue 47 and elements of options 47a, b and d, focussing the provision of new facilities in larger settlements but also encouraging the provision of appropriately scaled facilities to meet a proven local need in other settlements, including clusters of settlements where certain criteria can be met. This approach takes forward some of the suggestions made through consultation.

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		of the special qualities of the National Park and other Local Plan policies.		<p>for facilities and services which can demonstrate a benefit to a cluster of settlements.</p> <p>47c. Where necessary, to enable the delivery of Option 47a or 47b, small-scale mixed-use developments could be supported by the Local Plan, including through the use of Community Right to Build Orders. The amount of enabling development should be limited to that which allows the community facility to be provided.</p> <p>47d. The shared and flexible use of new and existing buildings to allow a range of community facilities and services could be supported by the Local Plan. Where this applies to an existing service the sharing of facilities should support the retention of the primary use.</p>		<p>Clustering of settlements should be clearly explained and these communities made aware of their status regarding provision of community facilities.</p> <p>Community Led Plans (CLP) should be used and supported to identify the type of facilities required. Identify where clusters of certain types of facilities are required (identify groups of parishes that need the same facility). Use CLP to evidence need and support the provision of appropriate services and facilities.</p> <p>Approach unduly complex.</p> <p>Proposals should be judged against normal planning criteria.</p> <p>Option 47c should be clear about the community deciding the level of enabling development.</p> <p>Questioned how the proposal could be flexible and provide certainty for where development will occur.</p> <p>More sensible to be flexible given the wide range of settlements across the SDNP.</p> <p>All four options were a suitable approach for the local plan. Suggest a policy which brings in elements of all four options and focus on top tiers of Settlement Hierarchy, but keep in mind essential facilities in some Tier 4/5 settlements, especially where they perform an important visitor function (such as museum, public toilets etc.).</p>		

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						One policy should encourage focus on top tier facilities but not eliminate other tiers protecting or enhancing important facilities.		
48	How can the Local Plan best resist the loss of community infrastructure?	The Local Plan to support the protection of existing local facilities and services in the areas where they are needed. Communities themselves can use Community Right to Bid powers, providing an opportunity to bid to take over a community asset for sale.	98% (39)	<p>48a. The Local Plan could include a policy resisting the loss of any community infrastructure except where there is no longer a demonstrable need, it is no longer viable or where a suitable alternative is provided. Where these tests are met, the preference for future use of the site will be an alternative community use.</p> <p>48b. The Local Plan could include a policy supporting communities designating Local Green Spaces. These will be mostly undesignated land which is in close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historical significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.</p>	55% (17)	<p>48a. must take into account accessibility to other existing infrastructure.</p> <p>May be appropriate not to maintain a facility if there is adequate sustainable transport links to another facility in close proximity.</p> <p>48a is restrictive to alternative uses, or partial alternative use of an existing facility to make the existing service viable.</p> <p>48a and b quite different and both should be supported in the Local Plan.</p> <p>Policy should enable local communities to defend the loss of important facilities. Community right to bid not enough.</p> <p>How do you test demonstrable need for a facility could be important to one part of community and not another (elderly or young).</p> <p>Need to clarify infrastructure. People may not describe open spaces as community infrastructure.</p> <p>Open space may require a separate option/policy. Policy about resisting loss of facilities is important, the tools or methods for doing that do not need to be included in policy (i.e. right to bid, right to build, green space etc.)</p>	<p>A combination of options from Issues 47 and 48 in the Options Consultation Document were considered to deliver a range of complementary benefits and have been taken forward into one policy (SD53: New and Existing Community Infrastructure) in this Preferred Options Local Plan.</p> <p>Local Green Spaces are now covered in a separate policy, Development Management Policy SD36: Local Green Spaces.</p>	The preferred option takes forward the proposed approach in Issue 48, and most of Option 48a (except the preference for change of use to an alternative community use). This is consistent with some of the suggestions made at consultation. Suggestions about Local Green Spaces and walking and cycling routes have been take forward through policies SD36 and SD19 respectively.

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						<p>Need to set out a range of options (similar to 47) that communities can use to protect existing facilities, including enabling development (alternative partial use) to make the existing use viable.</p> <p>General over-arching policy necessary together with local criteria. Local Green Space (LGS) can only be identified as part of preparation of this Local Plan or Neighbourhood Plans (para 76 NPPF).</p> <p>Process for putting forward LGS made available as soon as possible.</p> <p>Include a policy supporting enhancement of existing walking and cycling routes and where necessary creation of new ones that link to and between local green spaces, to establish a coherent and connected network of accessible green infrastructure.</p> <p>Protect important community assets (eg local green spaces). Should be qualified to ensure that private landowners are notified as part of the process of designation.</p> <p>LGS designation not used to resist development.</p>		
49	How can the Local Plan best ensure adequate infrastructure provision for new development?	New development in the National Park will be required by the Local Plan to provide new or improve existing infrastructure to mitigate its impact and support future residents or businesses. This infrastructure can be delivered on- or off-site and be secured	100% (40)	N/A	N/A	<p>Consider adequate private parking, waste water, sewerage and other essential infrastructure provision in all new development.</p> <p>Broadband funded through existing revenue streams, not CIL. Focus on 4G broadband.</p>	The preferred approach in Development Management Policy SD54: Supporting Infrastructure for New Development takes forward what we proposed to do in the <i>Local Plan Options</i>	The preferred option takes forward the proposed approach in Issue 49, and also incorporates some suggestions received through consultation, including setting out the mechanisms by which infrastructure contributions

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		<p>through section 106 legal obligations, CIL charges, other financial contributions or direct provision. Connectivity to broadband facilities, particularly in rural areas, will be a key requirement of the infrastructure package. The economic viability of development proposals will be considered when determining infrastructure contributions.</p>				<p>Encourage contributions in kind very close to the major development where ever possible, getting better value for money and improved access to inaccessible tracts of private (estate) land (deliver Purpose 2).</p> <p>Economic viability of infrastructure must be subservient to the purposes, and not conflict with purpose 1 (eg broadband). Must consider viability.</p> <p>Development should be phased to ensure supporting infrastructure is in place before or immediately after a development is completed.</p> <p>CIL charges set in advance of infrastructure need being formulated and led by Local Plan. Greater evidence base needed before policies can be developed. SDNPA has muddled proposals and the CIL consultation.</p> <p>Southern Water can provide strategic infrastructure through own budget systems. More local infrastructure requirements need to be negotiated through the planning process.</p> <p>Planning policies should explicitly encourage and support infrastructure being delivered by service providers.</p> <p>Planning policies should recognise that developer contributions required are agreed directly with service providers and the SDNPA</p>	<p><i>Consultation Document</i> and incorporates useful consultation responses.</p>	<p>will be secured.</p>

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						through conditions. Planning policies should allow any mismatch in timing of development to be managed to coordinate with provision of necessary infrastructure.		
50	How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/domestic-scale renewable-energy schemes?	In line with Government guidance, and with the aim of meeting Government climate change targets, the Local Plan will give positive consideration to renewable energy schemes of a size, scale and design and in a location that is appropriate, that is where consistent with conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.	100% (43)	<p>50a. The Local Plan could include a policy relating to schemes generating energy from renewable sources where these are of a location, scale and design appropriate to the locality and which contribute towards meeting domestic, community or business energy needs within the National Park.</p> <p>50b. The Local Plan could include a variation on Option 50a that gives overriding preference to community energy schemes.</p> <p>50c. The Local Plan could include the development of a sensitivity analysis of the National Park's landscape to identify areas that are more sensitive and where development may therefore need to be restricted.</p>	<p>53% (27)</p> <p>29% (15)</p> <p>51% (26)</p>	<p>Should be an overriding presumption in favour of renewable schemes, which are not found to be inappropriate.</p> <p>Need to be careful with community schemes as there will be a mismatch of different technologies and possibility for inappropriate technologies.</p> <p>Small scale renewables likely to be more appropriate. Policy should set out that micro generation will be supported and larger more strategic schemes will be subject to more rigorous testing.</p> <p>Must consider cumulative effect of numerous small schemes in the same area to resist harmful visual impact. Mitigation important.</p> <p>Need to focus on energy efficiency not just renewables. Priority given to wood fuel as this contributes to purpose 1.</p> <p>RSPB mapping exercise on the sensitivity of bird species to wind farms available and could inform Local Plan.</p> <p>Creation of a renewables options analysis for types of individual and community (Options a and b) renewable schemes.</p> <p>Development of an ambitious</p>	Development Management Policy SD56: Renewable Energy states that the Local Plan will give positive consideration to renewable energy schemes that will not have an adverse impact on landscape character, adjoining uses, residential amenity, relative tranquility, cause the loss of Grade 1 or 2 agricultural land, or impede public access.	Given the overwhelming support in favour of Option 50 the Preferred Option policy reflects the policy direction given through the options consultation.

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						<p>renewables policy (including targets) could contribute to meeting domestic, community or business energy needs and deliver national targets.</p> <p>Small scale proposals may be acceptable in exceptional cases depending on landscape impacts and remoteness / wildness of the area.</p> <p>Option 50a: Applications dealt with on a case by case basis, using option 50a as the basis for policy (criteria based approach to assessing each application).</p> <p>Option 50b: should be rejected as it would not be fair to estates seeking to diversify their businesses into renewable energy to refuse a scheme but approve a community scheme.</p> <p>Option 50c: Less sensitive areas more appropriate for large scale or visually intrusive development.</p> <p>Whole of SDNP landscape should be considered sensitive. Protect landscape areas especially sensitive to change. Risk of identifying areas as "less special" will open up argument by developers to allow larger schemes in these areas.</p>		
51	How can the Community Infrastructure Levy be best allocated?	As the CIL Charging Authority, the SDNPA to allocate and spend future Community Infrastructure Levy (CIL) funding in partnership with stakeholders on infrastructure projects to support the growth of communities and to deliver the National Park's statutory Purposes and Duty.	100% (39)	51a. The investment of CIL funds could be prioritised in areas within close proximity to the new development which generated the CIL. This would provide a significant source of additional funding which can then be directed to support community facilities and services in the immediate area.	67% (22)	CIL could be split between National Park scale projects and local projects depending on the need created through the development (fixed proportion which is contributed to a strategic pot for national park wide projects).	The introduction to the 'Community Infrastructure and Facilities' chapter states that a proportion of CIL funds will be passed directly to parish councils to spend on projects of	The system for the prioritisation of those CIL funds for which spending decisions are taken by the National Park Authority is separate from the Local Plan and is still undergoing development.

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				<p>51b. The investment of CIL funds could be prioritised on National Park-wide strategic projects, such as improvements to the South Downs Way. This could ensure the benefits of CIL are felt over a wide area and enhance the ability of the National Park Authority and its partners to deliver large-scale projects supporting National Park Purposes. This funding could also be used to lever investment from other parties.</p>	33% (11)	<p>Find balance between the two options with a small proportion going to park wide initiatives and majority for infrastructure relating directly to the development.</p> <p>CIL fund should be restricted to the area where development has occurred, and not spent on a more strategic scale across the SDNP.</p> <p>Need to consider down stream impacts of development.</p> <p>Development in one area could have impact on surrounding settlements, which should be considered in allocation of CIL.</p> <p>Consider cross boundary funding for strategic infrastructure. Funding should not be restricted to infrastructure needs just inside the National Park.</p> <p>Prioritise IDP and ensure CIL contributes to local needs and those directly created by development.</p> <p>Need to be specific about what will be funded to ensure no CIL projects damage special qualities.</p> <p>Test should be devised to ensure that any CIL spend will make a measurable difference to the community.</p> <p>The Regulation 123 list should allow GI enhancements for site specific aspects to be delivered by 106 still. CIL for wider National Park projects and use 106 and 278 for more local needs resulting from</p>	<p>their choosing. Innovative forms of funding and service delivery such as community land trusts, community-run buses, energy schemes and community broadband solutions will also be supported.</p>	

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						<p>development.</p> <p>CIL not to fund work which already has funding through other sources.</p> <p>Plan needs to address infrastructure needs of areas outside but abutting the Park linked to and benefit the Park. Eg. secure improvements to pedestrian/equestrian and cycle crossings on the A27 as well as to helping to secure green links from urban areas.</p> <p>The SDNPA should allocate and spend CIL revenue in association with its partners and stakeholders. Should be allocated in accordance with the agreed CIL schedule.</p> <p>Consider CIL be limited to specific areas where the funds were generated or to specific strategic projects.</p> <p>Spending should prioritise economic development and flood risk management to rural communities.</p> <p>Allocation of CIL to identified GI projects may highlight deficiencies in that network that are important to complete, but which are not near development.</p>		
52	How should the Local Plan deal with proposals for strategic infrastructure?	The Local Plan will assign great weight to conserving and enhancing the landscape, biodiversity or cultural heritage (first Purpose), and strategic infrastructure development proposals will need to meet the tests for major developments set out in	96% (47)	52a. In exceptional circumstances, and where the tests of NPPF, para.116 are met, the Local Plan could seek to enhance the landscape, biodiversity and cultural heritage by securing maximum benefits from any strategic infrastructure delivery. This	92% (35)	<p>Concern for allowing strategic infrastructure which may cause harm to enable improvements in other parts of the National Park.</p> <p>Whole SDNP is an important landscape, shouldn't be willing to accept inappropriate</p>	The preferred approach in Strategic Policy SD30: Strategic Infrastructure Provision combines the proposed approach and Option 52a in the <i>Options Consultation Document</i> . It is broad enough to be flexible and cover all	The preferred approach in Issue 52 has been carried forward, together with the main element of Option 52a. Given concerns raised at consultation, the preferred option does not include support for strategic

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		paragraph 116 of the NPPF, including demonstrating that it is in the public interest.		could include supporting a limited number of strategic infrastructure proposals to facilitate maximum landscape and community gain in the immediate area or improvements elsewhere in the National Park in pursuit of the National Park's Purposes.		<p>development in one area to improve another.</p> <p>Strategic infrastructure should include effective waste water management, bulk supply of water, broadband and extension of the gas mains.</p> <p>Difficult to imagine where a nationally significant infrastructure requirement would need to be developed in a national park.</p> <p>Assessments should be carried out very thoroughly to make sure significant development must not absolutely happen in a national park.</p> <p>Plan should set out future major infrastructure proposals. Wording opens up the Plan to facilitating damaging infrastructure to provide gains in other places.</p> <p>Will be a need for strategic infrastructure including energy, flood defences and transport to support growth in the urban areas outside of, but abutting, the SDNP. A reference which provides appropriate support for this needs to be included.</p> <p>The Plan should set out a clear policy in relation to the future of the A27 and any other potential major infrastructure.</p> <p>Strategic infrastructure projects must give consideration to farming as the keystone to the rural economy. Proposals must fully mitigate effects.</p> <p>Need to have ongoing dialogue</p>	possibilities.	<p>infrastructure proposals, although it allows the possibility for them to come forward in exceptional circumstances and subject to certain criteria.</p> <p>A policy for non-strategic telecommunication and utilities infrastructure, as requested by some consultees, is included in Development Management Policy SD57: Telecommunications, Services and Utilities.</p> <p>Strategic Policies SD18: Transport and Accessibility and SD19: Walking, Cycling and Equestrian Routes encourage connectivity by sustainable transport between settlements within the National Park and those outside.</p>

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						<p>with water companies to ensure that we input into their 5 year Asset Management Plans if development comes earlier than anticipated. Planning policies needed to address this (e.g. putting the onus on developers, again ensuring that infrastructure is provided ahead of development).</p> <p>Developers to fund required infrastructure improvements where none are programmed.</p> <p>Encouraged infrastructure projects: flood defences, broadband, power distribution, gas mains, transport infrastructure.</p> <p>SDNPA should provide a method for the sharing of best practice to enable communities to protect, enhance or even provide new community facilities and infrastructure.</p> <p>Policies needed for telecommunications infrastructure, particularly the removal of obsolete structures.</p> <p>Policy for water and waste water management be included.</p> <p>Include policy for links between the larger settlements just outside the SDNP and their associated community facilities which people who live in the park rely upon.</p> <p>Should recognise expansion of settlements outside the park may support the SDNP vision.</p>		
53	How can the Local Plan best protect existing	The Local Plan to identify and protect disused railway line	100%(51)	Option 53a – Safeguard the following routes:	100%(42)	<ul style="list-style-type: none"> Suggestions for other routes that should be 	Strategic Policies SD18: Transport and	The Lewes-Uckfield disused railway line route is

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	routes for use as sustainable transport routes?	routes which could be critical in efforts to widen sustainable transport choice.		<p>Lewes–Uckfield disused railway line route that lies within the National Park.</p> <p>Disused Bordon–Bentley light railway line route that lies within the National Park</p> <p>Petersfield–Pulborough (via Midhurst) disused railway line route</p> <p>Chichester–Midhurst (Centurion Way) disused railway line route</p> <p>Wickham–Alton (Meon Valley Line) disused railway line route, and</p> <p>Guildford–Shoreham-by-Sea (Downs Link) disused railway line route.</p>		<p>safeguarded: Midhurst - Haslemere, Berwick Station – South Downs, Alresford – Kingsworthy, Hove – Devil’s Dyke, Monarch’s Way and other PROWs and cycle infrastructure.</p> <ul style="list-style-type: none"> • Specific support from Brighton and Hove City Council, Lewes District Council, Eastbourne Borough Council, East Sussex County Council and others for safeguarding and in future reinstating the Lewes-Uckfield line. Some variations on this route were proposed. • Much of the land is likely to be in agricultural or other use and any specific safeguarding proposals will require consultation/negotiation/flexibility/debate. • More reference sought to link the proposed routes to the wider cycle network; considerations of traffic on A roads inside and outside the park; extending sustainable transport routes; the importance of multi-user routes, not just for cyclists; and connections between the cycling network and trains/buses. • Eastbourne Borough Council would like land to be safeguarded for widening the A27 east of Lewes. 	Accessibility and SD19: Walking, Cycling and Equestrian Routes incorporate the proposed routes under Issue 53a as well as some further routes and points proposed by respondents to the consultation.	safeguarded for potential future railway use in Strategic Policy SD18: Transport and Accessibility. The other routes proposed through Option 53a, as well as the Alresford-Kingsworthy line proposed through the consultation, have mainly been taken forward into Strategic Policy SD19: Walking, Cycling and Equestrian Routes, to be safeguarded for potential future conversion to non-motorised routes. Other suggestions made through consultation have been taken forward, including that the routes should be for multiple non-motorised users, not just for cyclists; and, in Strategic Policy SD18, support for extending sustainable transport routes and improving connections between the cycling and railway networks.

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54	What should be the Local Plan's approach to car parking?	<p>The Local Plan to set out a policy identifying what is required for new parking facilities for cars, motorcycles and bicycles in town and village centres and visitor attractions and for new development. New parking provision needs to be convenient, safe and secure. Sufficient provision will need to be made for the amount of parking that is likely to be needed by residents of new residential developments and for commercial developments, with the emphasis on promoting good design. The policy will require Green Travel Plans for all new major development. In line with the NPPF local parking standards for residential and non-residential development will take into account:</p> <p>the accessibility of the development the type, mix and use of development the availability of and opportunities for public transport local car ownership levels, and an overall need to reduce the use of high-emission vehicles.</p>	97%(35)	54a. The Local Plan could permit new public parking provision outside local centres only if it is a proven component of a strategic traffic management scheme or extended visitor attraction which gives precedence to sustainable transport.	87%(27)	<ul style="list-style-type: none"> Support for the option conditional on it being accompanied by improvements to public transport, or on demand reduction measures having been attempted before new parking is permitted. Several recommendations for more flexibility on allowing new small public car parks in the countryside, including from some parish councils, although more parish councils supported the option put forward. Requests for a policy on coach/cycle/motorcycle parking. Interest in the design, materials and screening of new car parks. <p>Several respondents were in principle opposed to attempts to discourage car use.</p>	Development Management Policy SD44: Car and Cycle Parking Provision incorporates elements on car parking proposed in the Issues and Options document and through consultation.	The preferred option carries forward part of the proposed approach in Issue 54 (although National Park specific parking standards will be provided through an SPD to be produced following the adoption of the Local Plan). It also carries forward Option 54a, which received significant support at consultation, and the suggestion received through consultation for greater emphasis on the design, materials and screening of car parks.
55	How can the Local Plan best ensure that new developments are accessible?	The Local Plan to assess the suitability of sites for housing and businesses (including tourist facilities) using the Settlement Hierarchy Study and accessibility mapping for the National Park to ensure that, wherever feasible, new housing and businesses are located at sites with good public transport services and require a travel plan for all major development.	98%(44)	<p>55a. The Local Plan could define maximum travel times via public transport to/from service centres and use them to guide decisions on whether or not new development should be permitted.</p> <p>55b. The Local Plan could require all major development proposals to ensure that sustainable transport and accessibility are key components of sustainability</p>	<p>33%(15)</p> <p>64%(29)</p>	<p>55a. One third (33%) of respondents supported this option of deciding planning applications on the basis of maximum public transport travel times to/from service centres. Some respondents said that it was overly restrictive; others that it would require an improved public transport network, or that the journey times used would need regular reviewing to take account of changes in the</p>	The sustainable location of new development, and the assessment of sustainable transport and accessibility for major developments, is required by a general statement in Strategic Policy SD18: Transport and Accessibility, and through the Strategic Policy SD22: Spatial Strategy.	The Local Plan: Preferred Options document as a whole carries forward the proposed approach in Issue 55. The replacement for the Settlement Hierarchy Study, known as the Settlement Facilities Assessment, incorporated the National Park accessibility mapping and in its turn informed the identification of housing requirements for settlements in Strategic

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				<p>assessments.</p> <p>55c. The Local Plan could encourage consideration of locally funded community transport provision via the neighbourhood planning process.</p>	49%(22)	<p>public transport network.</p> <p>55b. Just under two thirds (64%) of respondents supported this option of requiring major developments to ensure that sustainable transport and accessibility are key components of sustainability assessments. There was very little comment on this option. CPRE Hampshire suggested this option be reinforced to ensure developer's public transport commitments are long-term and ring-fenced.</p> <p>55c. Just under half (49%) of respondents supported this option of encouraging the consideration of locally funded community transport provision through the neighbourhood planning process. Suggestions included:</p> <p>Broaden the policy from neighbourhood planning to community planning more generally.</p> <p>Look into the concept of community transport to take commuters to nearby railway stations.</p> <p>Emphasise funding capital infrastructure projects instead, or consider such community transport directly through the local plan.</p> <p>Encourage large businesses to fund bus services e.g. Sainsbury's bus from Midhurst.</p>		<p>Policy SD23: Housing. Accessibility was also taken into account in the Employment Land Review which informed the identification of where employment land should be delivered.</p> <p>Strategic Policy SD18: Transport and Accessibility includes a requirement for development to be located and designed to reduce the need to travel. Suggestions made through consultation have been taken forward, including the protection of rural lanes through Strategic Policy SD18; protection of the amenity and recreational experience of the rights of way network; encouraging increased non-motorised access to the National Park from nearby settlements; and working with highways authorities to reduce the impacts of signage, in so far as this can be done through the planning system.</p>

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						<p>Other Transport and Accessibility issues the Local Plan should address:</p> <p>Major concerns were rat running, protecting rural lanes, increased detail and emphasis on walking and cycling/PROW, and more on the strategic road network.</p> <p>Particular requests included:</p> <p>More linkages between the LSTF objectives and the proposed LP options</p> <p>Work with neighbouring authorities under the Duty to Cooperate to secure better and sustainable access across the downs between areas to the south with unmet housing need and areas to the north where that need may be met. (Adur & Horsham DCs)</p> <p>Managing local transport demands through the settlement hierarchy.</p> <p>More consideration of the strategic road network and potential future improvements to it, especially the A27.</p> <p>Consider the impact of through traffic on the Park, both in terms of level of traffic and inappropriate vehicles.</p> <p>Consider the impact of future developments within the Park on the road system beyond it.</p> <p>Introduce a presumption against development that would deter from or diminish the recreational experience of using the rights of way</p>		

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						<p>network.</p> <p>More emphasis on the needs of local and nearby residents, as well as visitors, and recognition that many visitors live nearby.</p> <p>Protect and enhance the character of rural lanes, from signage, speeding, HGVs and damage to verges.</p> <p>Address the potential of canals for transport.</p> <p>Place limits on HGVs.</p> <p>Influence the work of highway authorities to avoid detrimental impacts from signage etc.</p> <p>Take a holistic approach to limit the cumulative impact of many small developments on the highway network.</p> <p>Reduce emphasis on bus services which may be vulnerable to future cuts.</p>		