



South Downs National Park – Local Plan Options Consultation Document

February 2014

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I. Introduction

What is the Local Plan?

- I.1 When adopted the Local Plan will set out the planning policies for the South Downs National Park. This will be the first time that the South Downs National Park will be planned for as a single entity. The Local Plan policies will cover a wide range of topics setting out the approach to different types of development from the very detailed issues, such as the size of extensions to houses, to National Park-wide issues, such as levels of affordable housing over a 15-year period from adoption. It will also include site allocations (for example, identifying a site for housing, or a site for employment use). Once the Local Plan has been adopted, all planning applications for development within the National Park will be judged against these adopted policies.
- I.2 The Local Plan is being developed in the context of the *South Downs Partnership Management Plan (PMP)* which sets out the long-term Vision for the National Park. The policies in the Local Plan will contribute to the achievement of the Vision and help deliver many of the objectives of the PMP. Once adopted, the Local Plan policies will replace all the 'saved' Local Plan and Core Strategy policies inherited¹ by the South Downs National Park Authority (SDNPA) when it became the local planning authority for the National Park in April 2011, and also Joint Core Strategies adopted since April 2011 (see para. I.24).

¹ On 1 April 2011 the South Downs National Park Authority inherited all the existing policies from the 15 previous planning authorities (Adur District, Arun District, Brighton & Hove City, Chichester District, Eastbourne Borough, East Hampshire District, East Sussex County, Hampshire County, Horsham District, Lewes District, Mid Sussex District, Wealden District, West Sussex County, Winchester City and Worthing Borough Councils).

- I.3 Minerals and waste policies are being developed through Joint Minerals and Waste Plans, working with the adjoining Minerals and Waste Authorities across the three counties covering the National Park. Consequently minerals and waste will not be part of the Local Plan and are, therefore, not discussed in this *Options Consultation Document*. The relevant Minerals and Waste Plans are:

- *East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)*
- *Hampshire (Portsmouth, Southampton, New Forest National Park and South Downs National Park) Minerals and Waste Plan (2013)*
- *West Sussex Waste Local Plan* (submitted to Secretary of State for Examination, 2013)
- *Draft West Sussex Minerals Local Plan*.

What is this Options Consultation about?

- I.4 This *Options Consultation Document* represents the first stage in developing the Local Plan. It will represent the formal Regulation 18 stage (of the *Town and Country Planning (England) Regulations 2012*), whereby the local planning authority notifies stakeholders of its intention to produce a local plan. The aim of the Options Consultation is to ask for your views on what approach the Local Plan policies should take on various key planning issues. At this early stage in the development of the Local Plan the discussions will be broad and at a high level.
- I.5 This *Options Consultation Document* consists of 10 chapters:
 1. Introduction
 2. A Portrait of the South Downs National Park
 3. Landscape and Natural Resources

4. Historic Environment
5. Design
6. Settlement Strategy
7. Housing
8. Economy and Tourism
9. Community Facilities and Infrastructure
10. Transport and Accessibility.

- 1.6** The development of the Local Plan and the choice of issues that this consultation focuses on builds on the conversations and engagement which have been on-going through the development of the South Downs National Park Vision, the Special Qualities, the *State of the National Park Report* and, most recently, for the development of the *South Downs Partnership Management Plan*. Each chapter covers a different topic, but there is considerable cross-over and important links between the chapters and issues. Links between chapters and also to other reference material are highlighted in the side bars throughout the document.
- 1.7** For each of the issues realistic, broad approaches have been given for consideration and discussion. For most of the issues the document sets out ‘*what we propose to do*’ statements, which give the suggested approach for the Local Plan to follow taking into account the National Park’s Purposes and Duty, the requirements of national planning policy and guidance from documents such as the *English National Parks and the Broads: UK Government Vision and Circular 2010*, the *National Planning Policy Framework 2012* and the *Localism Act 2011*, and the evidence collected so far. This *Options Consultation Document* then sets out other realistic options and seeks feedback on these.
- 1.8** At the same time as the *Options Consultation Document* is being consulted upon, the SDNPA is consulting on a *Preliminary Draft Community Infrastructure Levy (CIL) Charging Schedule*. This represents the first formal

consultations stage in implementing a CIL for the National Park and comments are sought on the document.

What are the next stages?

- 1.9** Following the Options Consultation all of the responses received during this consultation will be collated and analysed against the options outlined. The responses will be taken into account alongside the evidence base and other considerations, such as national policy and guidance, to produce the Preferred Options Document. This will be the first draft of the Local Plan, including draft policies and proposed site allocations.

Key dates for the development of the Local Plan

Local Plan Stage	Date
Options Consultation	February 2014
Preferred Options Consultation	January 2015
Publication and Pre-Submission	November 2015
Submission to Secretary of State	June 2016
Examination	to be confirmed
Adoption	Spring 2017

- 1.10** Once the SDNPA has considered the comments received on the Preferred Options outlined with the first draft of the Local Plan, a final draft Local Plan will be prepared. This will be published as a ‘Pre-Submission’ version, where representations can be made on the soundness and legal compliance of the plan. All representations made at this stage, along with the Pre-Submission version of the plan, will then be submitted to the Planning Inspectorate (on behalf of the Secretary of State), which will appoint an Inspector to carry out an examination of the plan.

How to respond to this Local Plan and the Preliminary Draft CIL Charging Schedule consultation

1.11 The Local Plan Options and the Preliminary Draft CIL Charging Schedule consultations will run from **28 February 2014 to 23.59 hours Wednesday 30 April 2014**. There are three different ways to respond to the *Options Consultation Document* and *Preliminary Draft CIL Charging Schedule*:

- the preferred consultation response is online via the consultation website: <http://consult.southdowns.gov.uk>
- by filling in an electronic comment form and emailing it to planningpolicy@southdowns.gov.uk, cil@southdowns.gov.uk, or
- by either filling out a paper copy comment form or writing to:

Options Consultation

SDNPA Local Plan Team
Hatton House, Bepton Road
Midhurst, West Sussex
GU29 9LU

CIL Charging Schedule Consultation

CIL Project Manager
Hatton House, Bepton Road
Midhurst, West Sussex
GU29 9LU

So that the responses can be accurately recorded, please ensure that for each comment that you outline the part of the topic, issue and option you are commenting on.

- Further information on how to respond can be found at: <http://www.southdowns.gov.uk/localplan> and www.southdowns.gov.uk/cil

National context

National Park Purposes and Duty and Section 62

1.12 National Park status recognises, and gives great weight to, its high-quality landscape, natural beauty, wildlife and cultural heritage.

The SDNPA has statutory purposes and socio-economic responsibilities as specified in the *Environment Act 1995*:

1) of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area, and

2) of promoting opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Shall seek to foster the economic and social well-being of the local communities within the National Park, without incurring significant expenditure in doing so and shall co-operate with local authorities and public bodies.

1.13 In addition, Section 62 of the *Environment Act 1995* requires all relevant authorities,² including statutory undertakers and other public bodies, to have regard to these Purposes. Where there is an irreconcilable conflict between the statutory purposes, the Sandford Principle³ is statutorily required to be applied and the first Purpose of the National Park will be given priority.

² Relevant authorities are listed in the *Environment Act 1995*, <http://www.legislation.gov.uk/ukpga/1995/25/contents>.

³ The Sandford Principle – a statement first made by Lord Sandford in his committees report on possible changes to the management and legislation governing National Parks and now in the *Environment Act 1995* which states that: ‘if it appears that there is a conflict between those two Purposes, any relevant Authority shall attach greater weight to the first [Purpose]’.

English National Parks and the Broads: UK Government Vision and Circular 2010⁴

- 1.14 In 2010 the Government published the Circular as guidance for National Park Authorities as to how to achieve the Purposes and Duty. The Circular refocuses attention on achieving National Parks' Purposes of conserving and enhancing the natural and cultural environments and ensuring the widest range of people are able to access and enjoy National Parks responsibly.
- 1.15 The Circular makes clear the responsibility of National Park Authorities to be: 'exemplars in achieving sustainable development'.⁵ The Circular builds on this by adding that the National Parks have a key role as exemplars of how to adapt to and mitigate the impacts of climate change, and to lead the way as exemplars of how to live within environmental limits.
- 1.16 The Circular also provides further guidance on delivery of the second Purpose. It focuses on the opportunities for people from within and visitors to National Parks to learn about these areas and what makes them special. It stresses the need for people to enjoy those special qualities responsibly, so as to enable future generations to enjoy them too, with an emphasis on new educational tools to engage a variety of users, as well as sustainable tourism.
- 1.17 The Circular recognises the key role that people have had in shaping the landscapes of National Parks. People have lived, worked, farmed and enjoyed these areas for centuries and their activities have shaped how our National Parks appear today. The importance of sustaining the communities who live and work within the National Park is recognised and supported through the Duty placed on National Park Authorities. The Circular describes the different elements which can contribute to

⁴ <https://www.gov.uk/government/publications/english-national-parks-and-the-broads-uk-government-vision-and-circular-2010>.

⁵ *English National Parks and the Broads: UK Government Vision and Circular 2010*, para.28.

sustainable local communities, including supporting the rural economy, the importance of truly affordable housing to sustain the long-term needs of local communities and the infrastructure which underpins these rural, and often remote, communities with a particular emphasis on electronic communication networks.

National Planning Policy Framework

- 1.18 The *National Planning Policy Framework* (NPPF) was published in March 2012. It sets out the Government's priorities and principles for development across the country and replaces the previous Planning Policy Statements. Its core principles reflect the need to identify and plan for the housing and employment needs of the area, with specific mention of supporting thriving rural communities. It makes clear the preference for efficient use of resources by identifying the re-use of previously-developed land and existing buildings, including the re-use or conversion of cultural and historical assets. It recognises the wider contribution of open land and the varied functions that it performs, such as for recreation, carbon storage and food production, acknowledging the wider benefits of ecosystem services and that development should be directed to land of lesser environmental value. Climate change, carbon reduction and energy from renewable resources are embedded principles within the NPPF.
- 1.19 The NPPF is based on the principle of 'sustainable development', which combines environmental sustainability, social sustainability and economic sustainability. These three elements underpin the policies and aims of the NPPF – the delivery of sustainable development. The NPPF promotes a 'presumption in favour of sustainable development', emphasising the need for positive plan-making and that local planning authorities must objectively assess the need for future housing and then meet that need unless specific policies in the NPPF indicate development should be restricted (para. 14), such as those for land within National Parks.

1.20 The NPPF makes several references to the importance of National Parks and states that ‘*great weight should be given to conserving landscape and scenic beauty in National Parks*’, areas which have the highest status of protection. National Parks are highlighted as one of the important instances where specific policies in the NPPF indicate development should be restricted. It also states that the conservation of wildlife and cultural heritage are important considerations and should be given ‘great weight’ and refers to the *English National Parks and the Broads: UK Government Vision and Circular 2010* for further guidance.

1.21 The NPPF goes on to say that:

‘planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.’*
(para.116, emphasis added)

It is, therefore, important to be clear what is considered to be ‘major development’ in the National Park.

1.22 The interpretation of the major development test for National Parks and Areas of Outstanding Natural Beauty varies. Some NPAs in England and Wales have used the definition of major development set out in the *Town and Country Planning Development Management Procedure Order 2010*.⁶

1.23 The SDNPA has sought legal advice on this point.⁷ The definition that the SDNPA has taken with regard to major development is development that: by reason of its scale, character or nature, has the potential to have a serious adverse impact on either the natural beauty of, or recreational opportunities provided by, the National Park. Generally the SDNPA expects that within the urban forms of Petersfield and Lewes, in recognition of their unique size and scale in a National Park context, major development assessment will take into account how different these settlements are from other parts of the National Park.

South Downs National Park context

Current planning policy context for the South Downs National Park

1.24 The current set of planning policies for the National Park is made up of the districts’ planning policies (inherited by the SDNPA on 1 April 2011), as well as adopted and emerging joint planning policies that the SDNPA has worked on with neighbouring local authorities, including:

- *Worthing Borough Core Strategy* – adopted August 2011
- *Winchester Joint Core Strategy* – Local Plan Part I – adopted March 2013
- *Wealden Core Strategy (Incorporating Part of the South Downs National Park)* – adopted February 2013

⁶ *Town and Country Planning Development Management Procedure Order 2010*, section 2, p.5, http://www.legislation.gov.uk/uksi/2010/2184/pdfs/uksi_20102184_en.pdf.

⁷ Maurici legal opinion: www.southdowns.gov.uk/localplan.

- *East Hampshire District Local Plan: Joint Core Strategy* – submitted May 2012, and
- *Lewes District Local Plan Part 1 – Joint Core Strategy* – due for submission May 2014.

1.25 While much of the development of the joint plans was carried out prior to the National Park coming into being they do (or will) provide an up-to-date policy framework for much of the National Park. The Local Plan will incorporate as far as possible the recently developed policies in these joint plans.

1.26 Neighbourhood planning provides the opportunity for local people to influence the types and location of development for their community. The ambition of the community should be aligned with the strategic needs and priorities of the wider area and Neighbourhood Plans must be in general conformity with the policies of the local plan. Once adopted Neighbourhood Plans will form part of the ‘development plan’.

1.27 Neighbourhood Plans are one form of community-led planning. Others include Village Design Statements and Parish Plans. These can provide valuable local insight to issues in a specific town, village or parish. The SDNPA encourages all communities to be actively involved in shaping the planning process through direct input either into the Local Plan, or more focused community-level plans. These other community-led plans, where it is considered that they provide guidance to the planning process, will be formally adopted by the SDNPA as Supplementary Planning Documents which gives them ‘material weight’ in determining planning applications.

Delivering the Partnership Management Plan and National Park Vision

1.28 The Local Plan will represent the last in the suite of documents produced by the SDNPA since its inception in April 2011:

- *South Downs National Park Special Qualities* (2011)
- *State of the South Downs National Park Report* (2012)
- *South Downs National Park Partnership Management Plan* (2014).

The South Downs National Park Special Qualities

1.29 During 2011 the SDNPA and partners established what it is about the National Park that makes it such a very special place – the ‘Special Qualities’, and also agreed the Vision for the South Downs to 2050,⁸ setting out how we would like the National Park to look and feel in the long term. The seven Special Qualities⁹ of the National Park are in Figure 2 below:

⁸ <http://www.southdowns.gov.uk/about-us/vision>.

⁹ http://www.southdowns.gov.uk/_data/assets/pdf_file/0017/180017/SDNPA_Special_Qualities.pdf.

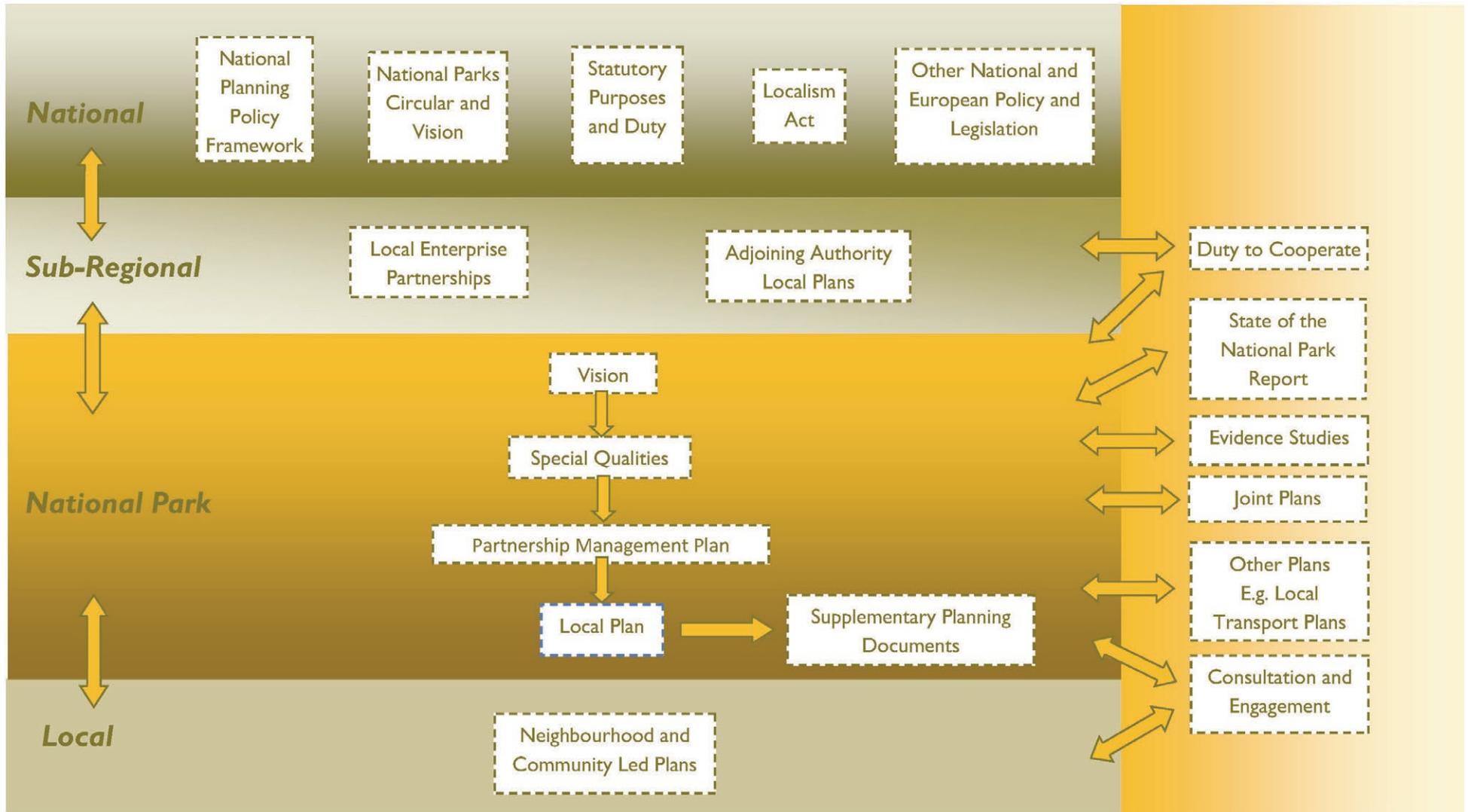


Figure 1: Policies and Plans

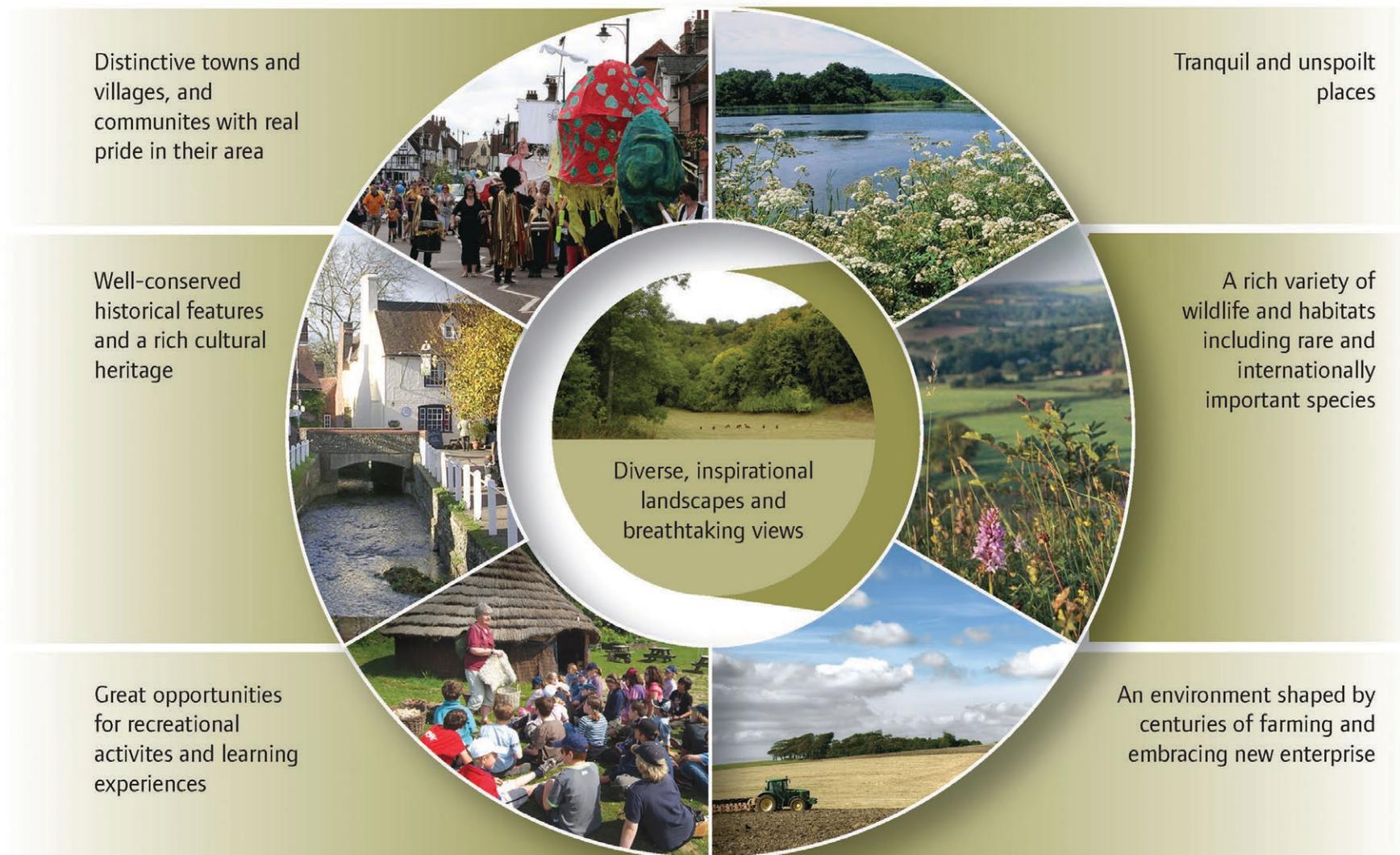


Figure 2: The Seven Special Qualities

1. Diverse, inspirational landscapes and breathtaking views

The geology of the South Downs underpins so much of what makes up the special qualities of the area: its diverse landscapes, land use, buildings and culture. The rock types of the National Park are predominately chalk and the alternating series of greensands and clays that form the Western Weald. Over time a diversity of landscapes has been created in a relatively small area which is a key feature of the National Park. These vary from the wooded and heathland ridges on the greensand in the Western Weald to wide-open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these diverse landscapes are hidden villages, thriving market towns, farms both large and small and historic estates, connected by a network of paths and lanes, many of which are ancient.

There are stunning, panoramic views to the sea and across the Weald as you travel the hundred mile length of the South Downs Way from Winchester to Eastbourne, culminating in the impressive chalk cliffs at Seven Sisters. From near and far, the South Downs is an area of inspirational beauty that can lift the soul.

2. A rich variety of wildlife and habitats including rare and internationally important species

The unique combination of geology and microclimates of the South Downs has created a rich mosaic of habitats that supports any rare and internationally important wildlife species. Sheep-grazed downland is the iconic habitat of the chalk landscape. Here you can find rare plants such as the round-headed rampion, orchids ranging from the burnt orchid and early spider orchid to autumn lady's tresses, and butterflies including the Adonis blue and chalkhill blue.

The greensand of the Western Weald contains important lowland heathland habitats including the internationally designated Woolmer Forest, the only site in the British Isles where all our native reptile and amphibian species are found. There are large areas of ancient woodland, for example the yew woodlands of Kingley Vale and the magnificent 'hanging' woodlands of the Hampshire Hangers.

The extensive farmland habitats of the South Downs are important for many species of wildlife, including rare arable wildflowers and nationally declining farmland birds. Corn bunting, skylark, lapwing, yellowhammer and grey partridge are notable examples.

The river valleys intersecting the South Downs support wetland habitats and a wealth of birdlife, notably at Pulborough Brooks. Many fish, amphibians and invertebrates thrive in the clear chalk streams of the Meon and Itchen in Hampshire where elusive wild mammals such as otter and water vole may also be spotted. The extensive chalk sea cliffs and shoreline in the East host a wide range of coastal wildlife including breeding colonies of seabirds such as kittiwakes and fulmars.

3. Tranquil and unspoilt places

The South Downs National Park is in south-east England, one of the most crowded parts of the United Kingdom. Although its most popular locations are heavily visited, many people greatly value the sense of tranquillity and unspoilt places which give them a feeling of peace and space. In some areas the landscape seems to possess a timeless quality, largely lacking intrusive development and retaining areas of dark night skies. This is a place where people seek to escape from the hustle and bustle in this busy part of England, to relax, unwind and re-charge their batteries.

4. An environment shaped by centuries of farming and embracing new enterprise

The rural economy has strongly influenced the landscape and over 80 per cent of the South Downs is farmed. Past agricultural practices have produced some nationally valuable habitats including chalk downland and lowland heath, with traditional breeds specific to the area such as Southdown and Hampshire Down sheep significant in the past and still bred today. Many farmers and landowners are helping to conserve and enhance important habitats through environmental stewardship schemes. Large estates such as Goodwood, Cowdray, Petworth and Firle, with their designed parklands, have a significant effect on the landscape and the rural economy. The ownership of large areas of the eastern Downs by local authorities or the National Trust is a legacy of the early 20th century conservation movements to protect the iconic cliffs and Downs and the water supply to coastal towns.

Farming has always responded to the economy of the day and continues to do so. Some farmers are diversifying their businesses, for example by providing tourist accommodation and meeting the growing market for locally produced food and drink. Climate change and market forces continue to influence the landscape leading to new enterprises such as vineyards, and increasing opportunities for producing alternative energy, for example wood fuel. However, the economy of the National Park is by no means restricted to farming. There are many popular tourist attractions and well-loved local pubs which give character to our towns and villages. The National Park is also home to a wide range of other businesses, for example new technology and science, which supports local employment.

5. Great opportunities for recreational activities and learning experiences

The South Downs offers a wide range of recreational and learning opportunities to the large and diverse populations living both within and on the doorstep of the National Park, and to visitors from further afield.

With 3,200 kilometres (2,000 miles) of public rights of way and the entire South Downs Way National Trail within the National Park there is exceptional scope for walking, cycling and horse riding. Many other outdoor activities take place, such as paragliding, orienteering and canoeing. There is a chance for everyone to walk, play, picnic and enjoy the countryside, including at Queen Elizabeth Country Park in Hampshire and Seven Sisters Country Park in East Sussex.

The variety of landscapes, wildlife and culture provides rich opportunities for learning about the South Downs as a special place, for the many school and college students and lifelong learners. Museums, churches, historic houses, outdoor education centres and wildlife reserves are places that provide both enjoyment and learning. There is a strong volunteering tradition providing chances for outdoor conservation work, acquiring rural skills, leading guided walks and carrying out survey work relating to wildlife species and rights of way.

6. Well-conserved historical features and a rich cultural heritage

The distinct character of many areas of the South Downs has been created by well-conserved historical features, some of which are rare and of national importance. Bronze Age barrows, Iron Age hill forts, Saxon and Norman churches, dew ponds, historic houses and landmarks of the two World Wars help to give the National Park strong links to its past human settlement. These links are reinforced by the variety of architectural building styles spanning the ages. Evidence of earlier farming traditions can still be seen today in the pattern of field boundaries, and relics of the industrial past remain in the form of old iron workings, brickworks, quarries and ancient coppiced woodlands.

The South Downs has a rich cultural heritage of art, music and rural traditions. There is a strong association with well-known writers, poets, musicians and artists who have captured the essence of this most English of landscapes and drawn inspiration from the sense of place: Virginia Woolf, Jane Austen, Hilaire Belloc, Edward Thomas, Gilbert White, Edward Elgar, Joseph Turner, Eric Gill and Eric Ravilious, among many others. Today traditions continue through activities such as folk singing and events like Findon sheep fair. Culture lives on with new art and expression, celebrating the strong traditions of the past.

7. Distinctive towns and villages, and communities with real pride in their area

The South Downs National Park is the most populated National Park in the United Kingdom, with around 110,000 people living within the boundary. Significantly more people live in the major urban areas and villages that surround the National Park including communities that are actively involved in the South Downs, such as Brighton & Hove, and Eastbourne.

The South Downs is unique in having the largest market towns of any UK National Park – Lewes, Petersfield and Midhurst. The character and appearance of these and many other settlements throughout the National Park derives in large part from the distinctive local building materials. Picturesque villages like Selborne, Charlton and Alfriston blend into their landscapes.

Many of these settlements contain strong and vibrant communities with much invested in the future of where they live, and a sense of identity with their local area, its culture and history. Across the South Downs there are also communities of people who come together through common interests, for example farming, conservation and recreation. These communities dedicate time and resources to enhancing community life, conserving what is important to them and planning for future generations.

The State of the National Park Report

- 1.30 These special qualities were used as the basis for the *State of the Park Report 2012*¹⁰ which paints a picture of the National Park at that time against which future progress can be measured. This document provides a baseline of information and data on a wide range of aspects of the National Park. For example, the current condition of protected sites, the number of historic buildings and assets considered to be ‘at risk’, and key data on levels and types of employment.

South Downs National Park Partnership Management Plan

- 1.31 Throughout 2012 and 2013 the SDNPA, together with partners and stakeholders, developed a series of outcomes, or long-term goals, for the National Park that would help to achieve the Vision, and defined a set of shorter-term policies, which will guide work over the next five years towards achieving the outcomes and the Vision:

¹⁰ <http://www.southdowns.gov.uk/about-us/state-of-the-national-park-report-2012>.

The South Downs National Park Vision

By 2050 in the South Downs National Park:

- the iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures;
- people will understand, value, and look after the vital natural services that the National Park provides. Large areas of high-quality and well-managed habitat will form a network supporting wildlife throughout the landscape;
- opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities. The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly;
- its special qualities will underpin the economic and social well-being of the communities in and around it, which will be more self-sustaining and empowered to shape their own future. Its villages and market towns will be thriving centres for residents, visitors and businesses and supporting the wider rural community;
- successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.

1.32 Together these formed the *Partnership Management Plan (PMP) 2014–2019*, which was formally adopted by the SDNPA in December 2013. The PMP¹¹ is a five-year plan for the National Park. While it is not part of the formal ‘development plan’¹² it can be a material consideration¹³ in determining planning applications. The Local Plan and subsequent development management decisions are key ways that the SDNPA will help deliver the PMP’s policies and work towards delivering the 2050 Vision.

1.33 The PMP has had a comprehensive engagement programme with key stakeholders, residents and recreational users of the National Park and the results of this engagement have helped inform this *Options Consultation Document*. The PMP consultation identified policy areas where there was agreement on the priorities for the National Park, such as the importance of encouraging sustainable modes of transport, support for facilities in rural communities and provision of enhanced communication technology, including high-speed broadband and mobile-phone coverage. There were also several areas of disagreement and differing views, such as balancing the needs of different users of the National Park, for example the needs of residents, business, recreational users and visitors. The planning-related issues are explored in this *Options Consultation Document*. By looking in more detail at these issues and listening to the responses of stakeholders, the SDNPA will begin to identify the right approaches for the National Park.

¹¹ <http://www.southdowns.gov.uk/about-us/management-plan>.

¹² The South Downs National Park Development Plan includes adopted Local Plans, including the Joint Minerals and Waste Plans for Hampshire, West Sussex and East Sussex and Neighbourhood Plans.

¹³ A ‘material consideration’ is a factor or issue that should be taken into account when determining a planning application, these can include previous planning decisions, nature conservation, government policy or noise.

Landscape and natural beauty: the Local Plan's golden thread

1.34 In planning for the future of the National Park it is essential to understand the value of this unique environment. The landscape that we know today has been shaped by centuries of interaction between human activity and natural processes and it is this interaction (see Figure 3) which has created the places, vistas and townscapes we value so greatly. The places we live and work in, visit and enjoy are part of and embedded in the natural environment. This can be seen in the way settlements sit in their surrounding landscape, the building materials sourced locally or the way settlement patterns can follow the contours or other physical features of the land.

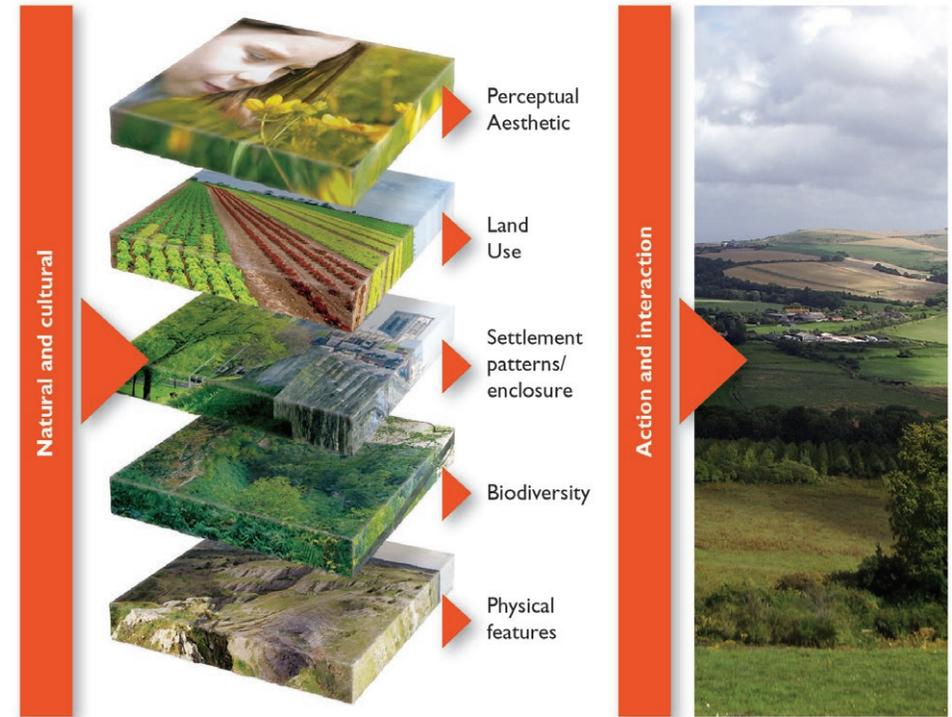


Figure 3: How Landscape is Formed



Figure 4: 'People supporting landscape, landscape supporting people'

1.35 From land use practices to settlement patterns and building designs, there are relationships between people and places. These patterns and relationships need to be fully understood and reflected in both new development and the adaptation of existing buildings to accommodate new uses, for the National Park first purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage to be met. The definition of sustainable development within the National Park's context must take account of the complex relationship between the landscape and people that has developed over centuries, see Figure 4 above.

The importance of well-connected green infrastructure (GI)

- 1.36** The natural environment underpins the National Park's economy, providing an enormous range of products and services making a considerable contribution to the local, regional and national economies. In addition, a well-planned and managed natural environment is fundamental to shaping the character and quality of places in which people live and work. Contact with nature contributes to people's physical and mental health and well-being. Nature is also a valuable resource for the whole community, providing opportunities for learning, artistic expression, spiritual refreshment, research, outdoor education, exploration, recreation, exercise and play.
- 1.37** To maximise all the environmental, economic and social benefits that development can facilitate, biodiversity and recreational improvements should be carried out in a coordinated way (as set out in a green infrastructure (GI) strategy). Green infrastructure (GI) is defined in Government policy as: *'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities'*.
- 1.38** GI makes use of natural features and systems to create places that are more resilient to climate change, have distinct local character, offer increased recreational opportunities, promote well-being, productivity,

educational benefits and crime reduction, and where communities can actively engage with their local environment. In order to conserve and enhance the natural environment within the National Park it is important to look at the overall existing location, type and condition of the green and blue features¹⁴ and systems, and assess what needs to be done to support and improve their size, quality and condition.

- 1.39** The response to climate change is a cross-cutting issue that is discussed in several chapters and will require policies in different contexts of the Local Plan. The Local Plan provides the opportunity to put in place planning policies that take into account the changes that are, and will be, occurring during the plan period due to climate change. Issues such as rising sea levels, changes in weather patterns and increases in severe weather events need to be factored into the Local Plan. Our ability to adapt to climate change is greatly dependent on a well-functioning natural environment with connected and robust ecological networks. GI also helps to mitigate the impacts of climate change by reducing greenhouse gas emissions, for example through carbon storage and sequestration and by reducing car use through facilitating walking and cycling. The Local Plan will provide strategic guidance as to how the National Park will contribute towards national objectives to reduce carbon emissions.

¹⁴ Blue features relate to water-borne features such as rivers, streams, lakes and canals.

I.40 The impacts of climate change can be dealt with in two ways: firstly through ‘mitigation’ measures, and secondly through ‘adaptation’.

Mitigation measures focus on:

- reducing emissions of CO₂ and other greenhouse gas, and
- carbon sequestration, that is, the planting of woodland and other vegetation to absorb and store CO₂, and the management of soils.

Adaptation measures are those that help communities and businesses prepare for the consequences of climate change, in order to safeguard what we value in our historic and natural environment for future generations.

2. A Portrait of the South Downs National Park

Introduction

- 2.1** The South Downs National Park (see Figures 5 and 6) contains over 1,600 square kilometres of some of the most varied and beautiful landscapes in the country. The quintessentially English scenery – the iconic chalk cliffs of Beachy Head, sheep-grazed open chalk grassland, gently rolling hills, ancient woodlands and wide views south to the sea – is dotted with peaceful, picture-perfect hamlets, flint-knapped farmsteads, imposing castles and grand country estates. Signs of the past are everywhere, from Neolithic earthworks and Bronze Age barrows to Roman villas, Iron Age hill forts and medieval drove ways. Located in the most populated region in the country, and with cities like Brighton and Winchester on its doorstep, the South Downs National Park provides an escape from the stress and clamour of city living with its calm and tranquil space, offering a welcome breath of fresh air.
- 2.2** Modern life goes on here too, in lively towns like Lewes, Petersfield and Midhurst, and over 300 other villages and hamlets. About 112,000 people live in the National Park (Census 2011), and millions of visits are made every year, visitors drawn as they have been for generations by the peaceful hills and stunning views. Many families have a long connection with the area, having lived and worked here for generations. The landscape we see today has been shaped by those who live and work on the land and maintain the forests and woodlands. The National Park is also home to an incredible variety of flora and fauna, some rare and endangered: wild orchids, Duke of Burgundy butterflies, nightjars, larks, natterjack toads, dragonflies, water voles, field crickets and cheese snails, to name just a few.
- 2.3** The South Downs Way, a 162.5km (101-mile) long National Trail bridleway, stretches across the National Park from Winchester to Eastbourne, following the ridgeline for most of the way. Amongst the many other routes are the Hangers Way from Alton to the Queen Elizabeth Country Park and the Centurion Way in West Sussex.



Figure 5: The South Downs National Park

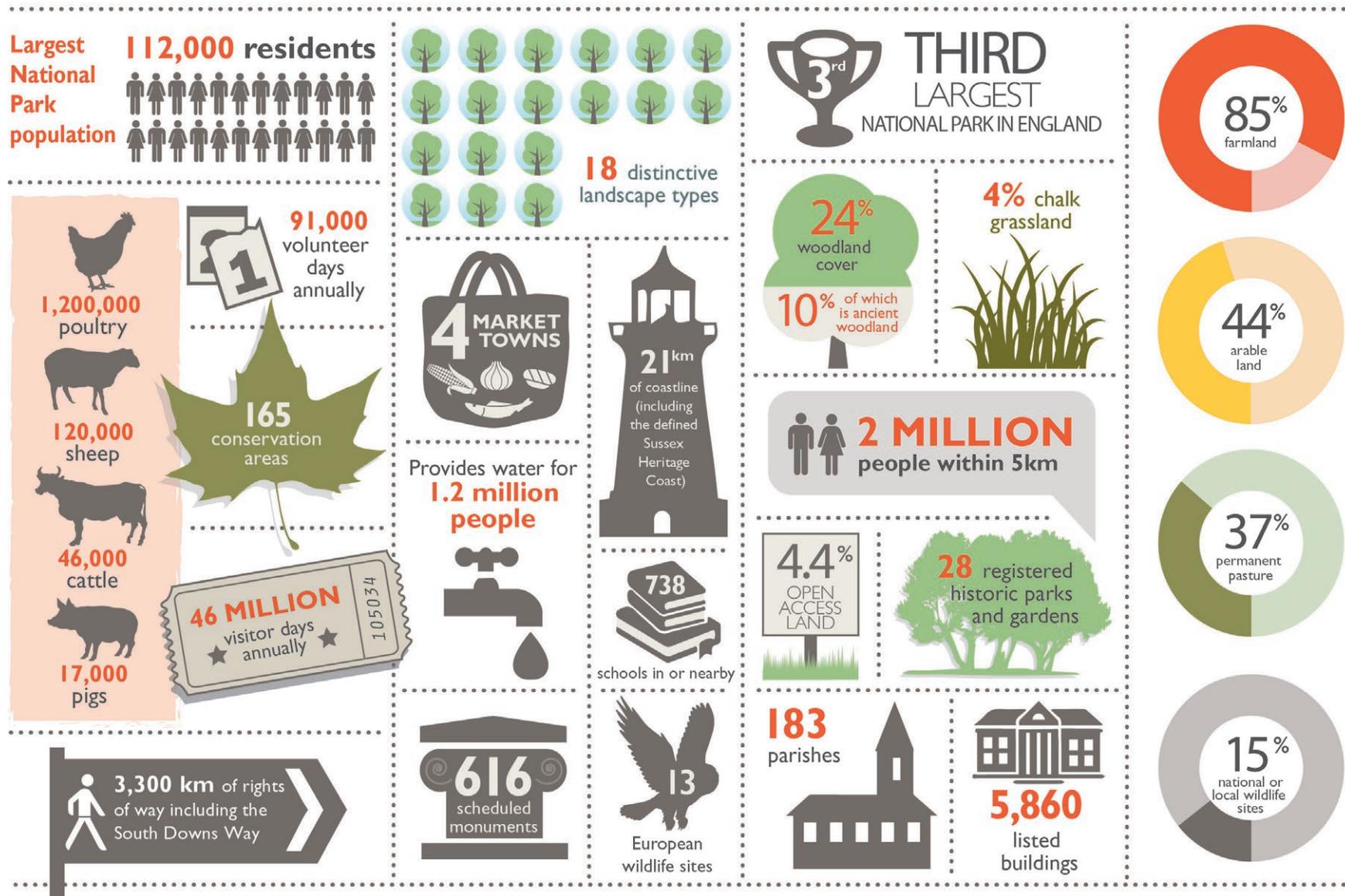


Figure 6: A Snapshot of the South Downs National Park

Hampshire Downs and chalk valleys

- 2.4 This is an area of wide-open spaces, with large-scale rolling farmland punctuated by dense blocks of woodland. It is a sparsely populated area with small villages nestling in the landscape. The South Downs Way follows the old drove ways and ridges from the historic city of Winchester, passing Bronze Age tumuli and Iron Age hill forts on the way, and has some of the best viewpoints in the south of England, many of them nature reserves and all worth the climb. On the western edge of the National Park is St Catherine's Hill, with views along the Itchen valley. It is the site of an Iron Age hill fort and distinctive turf maze (*mizmaze*). Heading east the South Downs Way crosses Beacon Hill and Old Winchester Hill. With little light pollution, Beacon Hill is a magnet for orchid spotters with 13 rare species found here, and Old Winchester Hill attracts clouds of butterflies in the summer. Butser Hill, the highest point on the South Downs ridge, is perfect for star gazing – on a clear night the spectacular Milky Way, rarely visible in towns, can be seen with the naked eye. To the south, the landscape changes. The ancient royal Forest of Bere is a mix of woodland, open spaces and heathland, containing ponds and streams, as well as farmland and downland. A network of walking and cycling trails lead you through coppice and woods, ablaze with bluebells in the spring.
- 2.5 The clear chalk rivers of the Itchen and Meon are among the best fly-fishing spots in the world, with abundant wild trout in beautiful, peaceful settings. The world-famous Itchen flows through the Winnall Moors nature reserve where many protected species are found, including otters and water voles. The Meon flows through lush wet woodlands and water meadows, past the picturesque and quintessentially old English villages of East Meon, Exton and Droxford. At Warnford, the famous watercress beds grow along the river banks in the pure spring water.

- 2.6 The city of Winchester lies on the edge of the National Park, as do the attractive and historic market towns of Bishops Waltham, Wickham, Alton and New Alresford, all gateways into the National Park.

Hampshire Hangers and Western Weald

- 2.7 The eastern edge of the Hampshire Downs is marked by steep chalk and greensand escarpments. This area of dramatic landscape is dominated by ancient woodland, known as 'The Hangers', that houses habitats and wildlife of international importance (designated a Special Area of Conservation). Sunken lanes lead through the dark, enclosed hangers, climbing the steep scarp to emerge on open commons such as Noar Hill, known for its wild flowers and rare butterflies, like the brown hairstreak. High on Selborne Common you can see for miles to the east and beyond. The open grassland bristles with gorse and bracken, and in the spring and summer is dotted with wood anemone and yellow archangel. Selborne is an attractive village in a beautiful setting at the foot of Selborne Hanger, surrounded by beech woodlands and farmland, and made famous by Gilbert White. The village has a Norman church, known locally for the remains of its huge yew tree – said to have been 1,400 years old when it was blown down by a storm in 1990.
- 2.8 There are many nature reserves and woods, which are linked by old trails and tracks. The 34km (21-mile) Hangers Way runs the length of this landscape, starting in Alton and going south through the hanger woods and finishing at Queen Elizabeth Country Park, Hampshire's largest country park, with 800 hectares (2,000 acres) of woodland and downland, and 32 km (20 miles) of trails for walking, cycling and horse riding. The new 80km (50-mile) Shipwright's Way starts in Alice Holt Forest, the most northerly part of the National Park, and runs south following the route travelled by medieval shipbuilders transporting oak trees to Portsmouth dockyards.

- 2.9 The River Rother rises here, at Noar Hill, and then runs south through Liss and down to Petersfield, the second largest town in the National Park. Petersfield is a historic market town built around two squares, The Spain and The Square, the latter the venue for the town's twice weekly market. The river then meanders eastwards across the valley, through pasture, wet woodland, marsh and wet meadow, which contain breeding and feeding grounds for birds including snipe and Bewick swan. The river loops to the north of the town of Midhurst, running between the eastern edge of Midhurst and the neighbouring village of Easebourne. Midhurst is a busy market town with a historic centre containing buildings dating back to the 16th and 17th centuries, like the Spread Eagle Hotel. Many buildings in the village of Easebourne sport the bright-yellow painted window frames of the Cowdray Estate. The river continues east until it meets the river Arun in the village of Stopham just outside Pulborough. Tranquil Pulborough Brooks RSPB¹⁵ reserve includes extensive wetlands as well as woodlands and heathland, havens for a wide range of wildlife. Hedge-lined paths lead to viewing areas and hides where birds can be watched feeding and wading. In the summer butterflies and dragonflies flutter and swoop around the trails and ponds.
- 2.10 To the east and north of the Rother steep greensand hills are shrouded in beech, oak and coppiced sweet chestnut. Sunken lanes, worn down by centuries of human activity, criss-cross the countryside, secluded and quiet beneath tunnels formed by arching trees. A scattering of medieval villages and timber-framed houses survive, along with other signs of the past including low, round Bronze Age barrows and the hammerponds used in the Middle Ages by the Wealden iron industry. Ebernoe Common National Nature Reserve near Petworth is a classic Low Weald woodland, containing grassy meadows in the clearings.
- 2.11 The historic and picturesque market town of Petworth was mentioned (as Pettorde) in the Domesday Book. Backed by the high wall of Petworth House, a late 17th-century mansion set in a deer park and pleasure grounds landscaped by 'Capability' Brown, the quaint cobbled streets of the old centre remain unspoilt, with fine merchants' and landowners' houses and tiny cottages, many quite ancient. The town is a renowned antiques centre, with over 30 dealers located there.
- 2.12 Scattered through the Western Weald are a series of heathlands, large and small. Woolmer Forest, a remnant of the former medieval royal hunting forest, is the largest and most diverse area of lowland heath in the National Park and in Hampshire outside the New Forest. Its value is recognised by the Special Area of Conservation designation. The heather, mosses, lichens and ponds are teeming with wildlife. This area is the only site in Britain that supports all six native reptiles including the sand lizard, and all six native amphibians including the great crested newt. Together with the adjacent Longmoor, it is internationally designated as a Special Protection Area for its ground nesting birds. On Black Down in West Sussex, the highest point in the National Park, the heathland is wild and beautiful – hazy purple heather and vibrant golden patches of sweet-smelling gorse stretch out to the horizon and there are sweeping views to the English Channel and the Weald. The heathland flowers teem with butterflies and insects and attract rare birds like nightjars and woodlarks. Other notable areas of lowland heath include Woolbeding, Iping and Trotton, Steadham, Ambersham and Duncton.

¹⁵ The Royal Society for the Protection of Birds.

Central wooded downs

- 2.13** The northern edge of this area is marked by the dramatic steep north escarpment of the chalk ridge. From the ridge there are impressive views out across the Western Weald to the north. Distinctive hangers of beech and yew trees cling to the steepest hillsides. The ridge is home to many important and protected habitats including the Duncton to Bignor Escarpment Special Area of Conservation, Harting Down Site of Special Scientific Interest (SSSI), a large area of ancient chalk downland with an area of rare juniper scrub, and Heyshott Down, shrouded with ancient beech and yew woodland with a small chalkland nature reserve on the site of old chalk pits.
- 2.14** From Rowlands Castle to Arundel the rolling chalk slopes gently southwards with views out to the English Channel. Large areas are covered with mainly oak, birch and holly woodlands. On open summits like The Trundle, an Iron Age hill fort, you feel on top of the world, looking down over ancient woods and fields across the coastal plain to as far as the Isle of Wight. This area is dominated by large fields, with areas of ancient woodlands, such as the Charlton Forest near Cocking, one of the largest beech plantations in Europe, Eartham Wood near Chichester, and Houghton Forest near Arundel. From the fresh air and open skies of the hill tops, one can drop into the sheltering, enclosed woods and dry valley coombes furrowing the slopes. The intermittent Lavant and Ems rivers flow through floodplains of wet woodland, water meadows and open water, home to many species of birds. Kingley Vale National Nature Reserve is famous for its grove of ancient yew trees, among the oldest living things in Britain.
- 2.15** Away from the roads it is peaceful and quiet. Medieval villages scatter the slopes, many relatively untouched by modern development. This rich legacy includes the great landed estates with their grand houses and 18th-century landscaped parks, adding to the picturesque appearance of this

part of the National Park. Once a medieval hunting lodge, Stansted House evokes the atmosphere of Edwardian life in a great house, both upstairs and down. In a tranquil downland setting, Uppark is an elegant 18th-century house with Georgian interiors, though entirely rebuilt after a fire in 1989. Goodwood House sits in beech forest which surrounds the estate. Some of the oldest trees at Goodwood are the Cedars of Lebanon, planted in 1761, by the third Duke of Richmond, who introduced species from many parts of the world. There are many attractive villages, such as unspoilt Slindon, set on a slope of the South Downs and the estate village for Slindon House (now a school). Singleton is a pretty village in the Lavant valley near Goodwood racecourse. South Harting has a beautiful setting below Harting Down, and its copper green church spire is a local landmark.

The East: open downland and Heritage Coast

- 2.16** Stretching from the River Arun to Beachy Head, this is an iconic South Downs landscape carved through by the Arun, Adur, Ouse and Cuckmere rivers that, curve across the landscape under big skies and provide sweeping views stretching out to the sea. These chalk grasslands provide habitats for a range of flora and fauna. In the spring and early summer the rare chalk heath and the sheep-nibbled downland turf is scattered with harebells, orchids and sweet-smelling herbs, and butterflies like the grizzled skipper can be seen. The ponds, lakes and reedbeds at Arundel Wildfowl and Wetlands Centre are home to over a thousand exotic ducks, geese and swans. On Castle Hill NNR and SSSI near Woodingdean the chalk grassland is scattered with rare wild flowers such as the early spider orchid and blue gentian, and the chalkhill blue butterfly and the rare longwinged cone-head cricket are often seen here. Mill Hill nature reserve near Shoreham-by-Sea has over 160 species of flowering plants, attracting butterflies including the vibrant adonis blue.

- 2.17** This is perfect walking country, and the South Downs Way National Trail runs along the northern edge of the South Downs. On the skyline the outlines of Arundel Castle and Lancing College shimmer in the distance, bringing history right to the present. The north-facing slopes form a distinctive escarpment and a dramatic undulating ridgeline. Steep, rounded coombes and deep, dry valleys are covered by chalk grassland. From both Chanctonbury Ring, with its distinctive ring of trees, and the Devil's Dyke, the longest, deepest and widest dry valley in the UK, there are magnificent views northwards across the Weald. There are 360° views from the highest point in East Sussex, Ditchling Beacon, an Iron Age hill fort and nature reserve of chalk grassland and scrub. The village of Ditchling lies below Ditchling Beacon. Dating back to Saxon times, Ditchling has a picturesque village green with a willow-framed pond, and a mix of architecture, from the 12th-century St Margaret's Church to timber-framed Tudor houses, Georgian villas and Victorian cottages.
- 2.18** Lewes, the largest settlement in any national park in the UK, is considered to be one of the best preserved market towns in England. It has many historic buildings, including a Norman castle keep which dominates the townscape, the 16th-century Anne of Cleves' House and the ruins of Lewes Priory. The town, which sits astride the River Ouse, is the county town of East Sussex and an important administrative centre for the wider area.
- 2.19** To the east of Lewes is Malling Hill, and nearby is Mount Caburn, the latter an Iron Age hill fort. Both areas are rich in wildlife. The upper slopes are mainly chalk grassland, as at Willingdon Down and the Firle Escarpment, with some shrouded in dense woodland hangers. From the ridge and hill tops such as Edburton Hill the views stretch for miles across the lowlands of the Weald, and paragliders can be seen drifting into the blue overhead. Below the steep north-facing ridge streams bubble up from chalk springs and flow north, through narrow, hidden valleys. Peaceful, sheltered underhill lanes, that often follow old coaching tracks, feel remote and timeless and lead to pretty flint and brick villages, and historic parklands such as Firle and Glyndebourne.
- 2.20** The Long Man of Wilmington, a mysterious cut-out chalk figure, lies on the side of Windover Hill. There are numerous bostals, the deeply sunken lanes that zigzag across the hills and were once used by farmers to move their herds from the Weald to the chalk downland for summer grazing. On the floodplains of Cuckmere Haven are distinctive ox-bow lakes and saltmarsh meadows. The peaceful and quiet Friston Forest is popular with walkers, horse riders and mountain bikers, and contains waymarked bridleways and trails. The chalk grassland on Willingdon Down SSSI near Eastbourne is rich in rare varieties of orchid.
- 2.21** Here, at the eastern-most part of the National Park the South Downs dramatically meet the sea, revealing their chalk layers in the famous white cliffs of the Seven Sisters, and Beachy Head.

3. Landscape and Natural Resources

Introduction

- 3.1** The rich and diverse landscapes – that is, the natural beauty, wildlife and cultural heritage – of the National Park, described in Chapter 2: A Portrait of the South Downs National Park, is the reason for its designation as a national park. These landscapes are the result of a wide variety of natural and man-made interactions that have been experienced throughout the area over the centuries. Its valued natural beauty, wildlife and cultural heritage contribute to the overall quality of life of everyone living, working, or visiting the National Park. Ensuring its conservation and enhancement in the future, whilst also supporting our local communities and businesses, is one of the key challenges for the Local Plan.
- 3.2** National parks, alongside Areas of Outstanding Natural Beauty, receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage.** This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.
- 3.3** This chapter considers in more detail what approaches the Local Plan might adopt in relation to landscape and natural resources. The issues that are considered in this chapter are:
- Issue 1** – How can the Local Plan best help conserve and enhance landscape character?
- Issue 2** – How can the Local Plan provide resilience for people, businesses and their environment?

Issue 3 – How can the Local Plan best ensure designated and undesignated habitats and protected species are conserved and enhanced?

Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?

Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

South Downs National Park context

- 3.4** The key outcomes in relation to landscape and natural resources within the *Partnership Management Plan* are:

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Outcome 2: There is increased capacity within the landscape for its natural resources, habitats and species to adapt to the impacts of climate change and other pressures.

Outcome 3: A well-managed and better connected network of habitats and increased population and distribution of priority species now exist in the National Park.

Outcome 4: Well planned and managed landscapes contribute to the social, environmental and economic interests of communities, stakeholders and visitors.

Background

3.5 The National Park designation provides the highest status of protection relating to conserving landscape and scenic beauty. The *National Planning Policy Framework (NPPF)* draws upon the requirements of legislation and other government policy that underpins this conservation and enhancement of the environment. Paragraph 115 of the NPPF sets out that:

- great weight be given to conserving landscape and scenic beauty in National Parks, and
- the conservation of wildlife and cultural heritage are important considerations in these areas.

3.6 In addition, the NPPF makes it clear that the planning system should contribute to and enhance the natural environment through the protection and enhancement of valued landscapes, geological conservation interests and soils, minimising the impacts on biodiversity and, where possible, providing net gains in biodiversity. It also recognises the wider benefits of ‘ecosystem services’¹⁶ (para.109).

3.7 As described in Chapter 1: Introduction, the *English National Parks and the Broads: UK Government Vision and Circular (Defra 2010)* provides more detailed guidance on implementing, through policy, the Purposes and the Duty on the National Park Authorities (NPAs). It recognises the major impact that the planning system and planning decisions have on the landscape, biodiversity, cultural heritage and access to the National Parks and the role of planning in balancing the differing demands of the statutory Purposes and Duty placed on the NPAs.

3.8 The *European Landscape Convention (ELC)* came into force in the UK in 2007. It is a key policy document in relation to landscape which aims to promote landscape planning, management and protection across Europe.

This applies to all landscapes in the UK and aims to ensure that all landscapes are properly valued and looked after. Specific measures promoted by the ELC that are relevant to the Local Plan include:

- recognition of the importance of landscape in law
- proper assessment and planning for landscape change with the active involvement of local communities
- the implementation of landscape policies through the establishment of plans and programmes that deliver effective protection, management and planning of landscape
- improved consideration and integration of landscape within both spatial and sectoral planning
- monitoring what is happening in terms of landscape, and
- raising awareness of the value of landscape with the public, and society’s role in shaping it.

3.9 Of particular significance in the maintenance and restoration of natural habitats and species, and their wider landscape implications, is the European Habitats Directive (*Conservation of Natural Habitats and of Wild Fauna and Flora, Council Directive 92/43/EEC*). The Directive allows the designation of Ramsar sites, Special Areas of Conservation (SACs). These designations, together with Special Protection Areas (SPAs) classified under the European Birds Directive (*Conservation of Wild Birds, Council Directive 2009/147/EC*), form a network of internationally protected areas known as Natura 2000 sites.

3.10 The Directives advise that any plan should be adopted only if it is shown that it will not adversely affect Natura 2000 sites. However, the Directives further state that if an assessment indicates that there will be a negative impact on Natura 2000 sites that the plan may be adopted if there are imperative reasons of overriding public interest and all compensatory measures to ensure the Natura 2000 sites are protected. In the UK, the Habitats Directive is implemented by the *Conservation of*

¹⁶ Ecosystem services: economic and social benefits that society gets from the natural environment.

Habitats and Species Regulations 2010, and the Environmental Assessment of Plans and Programmes Regulations 2004.

Evidence base studies

South Downs Integrated Landscape Character Assessment

3.11 Landscape character assessments (LCAs) categorise landscapes into a pattern of distinct, recognisable and consistent elements which distinguish one landscape from another. An LCA identifies the features that create local distinctiveness and give landscapes a ‘sense of place’. An LCA is an aid to decision making – a tool to help understand what the landscape is like today, and how it may change in the future. Its role is to help ensure:

- that change and development does not undermine the characteristics or value of a landscape, and
- ways of improving the character of a place can be considered.

3.12 The key piece of landscape evidence for the National Park is the South Downs Integrated Landscape Character Assessment (updated 2011). The Assessment (ICLA) was first completed in 2005 and was updated in 2013. It is designed to produce a comprehensive, fully integrated assessment of all aspects of the landscape character of the South Downs, so that greater understanding of this nationally important landscape and its needs and opportunities can lead to improved management and enjoyment. It builds on a wide range of existing information and combines this with new work by landscape, archaeology and biodiversity specialists, hence the title ‘Integrated’. The study follows the accepted method for landscape character assessment as set out in *Landscape Character Assessment: Guidance for England and Scotland 2002*, published by the Countryside Agency and Scottish Natural Heritage, and subsequent topic papers. It is presented as a written report with associated mapping and a geographic information systems (GIS) database.

3.13 Part One of the ILCA study sets out the context, including a method statement. This is followed by an overview of the physical and human

influences which together have created the landscape of the South Downs that is cherished and valued today.

3.14 The main Part Two of the ILCA study comprises the detailed LCA of the National Park. The landscape classification defines 18 generic landscape types (see Figure 7). These are further sub-divided into 51 character areas. A detailed description and evaluation is presented for each of the landscape types and further specific information is provided for each of the character areas.

3.15 The collection of further landscape evidence is an on-going task for the SDNPA to help inform decision-making, including the development of the Local Plan policies. It is proposed that the following research studies will be undertaken as part of the evidence base for the Local Plan:

- landscape analysis of key views
- tranquillity mapping
- landscape assessment for the strategic housing land availability assessment (SHLAA), and
- landscape sensitivity analysis for the *Settlement Hierarchy Study* update (see para.6.9).

Local landscape character assessments carried out by local communities will also be encouraged and supported.

KEY

Landscape Character Type

 A: Open Downland	 G: Major Valley Sides	 N: Greensand Hills
 B: Wooded Estate Downland	 H: Major Scarps	 O: Low Weald
 C: Clay Plateau	 I: Scarp Footslopes	 P: Wooded Claylands
 D: Downland Mosaic	 J: Greensand Terrace	 Q: Upper Coastal Plain
 E: Chalk Valley Systems	 K: Mixed Farmland and Woodland Vale	 R: Shoreline
 F: Major River Floodplains	 L: Wealden Farmland and Heath Mosaic	 South Downs National Park
	 M: Sandy Arable Farmland	

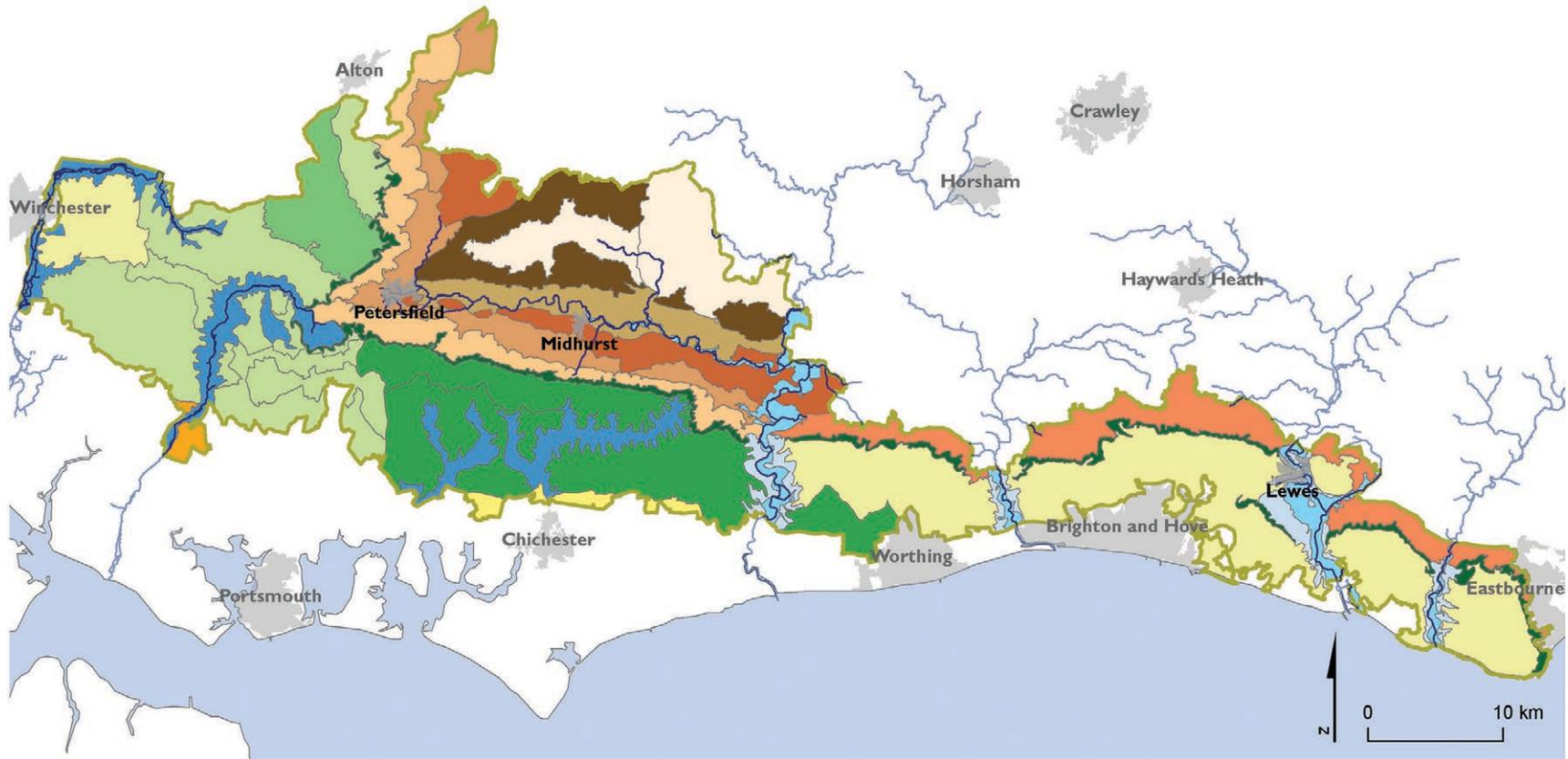


Figure 7: Landscape Character Types

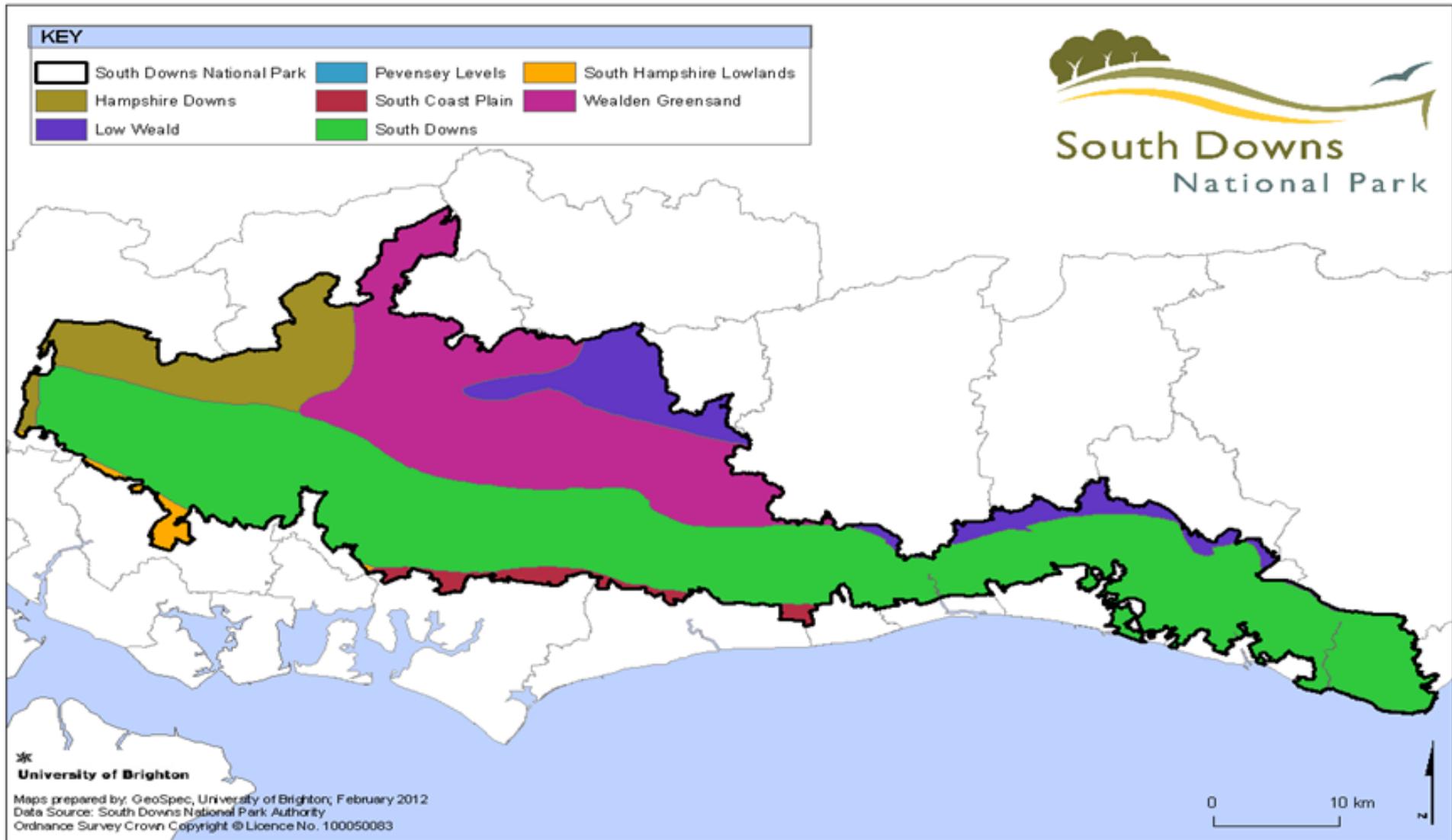


Figure 8: National Landscape Character Areas

Access Network and Accessible Natural Greenspace Study

3.16 Phase One of the Access Network and Accessible Natural Greenspace Study for the National Park was completed in 2013. The study covers 27 local planning authority areas, to take into account wider connections. The study identifies:

- deficits in access to greenspace and vulnerabilities of habitats and species to the effects of development and climate change
- opportunities for strategic green infrastructure (GI) initiatives in GI 'Investment Areas' including newly created accessible greenspace connected by green and blue corridors and access routes, considerations for incorporating water sensitive urban design, such as sustainable urban drainage schemes (SUDS), and initiatives to help cool urban environments and schemes for improving river environments, and
- further analysis relating to Accessible Natural Greenspace Standard (ANGSt).¹⁷

3.17 It also considers how development will influence access to existing GI, where access can be improved and the role of GI in creating and improving wildlife corridors between habitats, including international, national and locally designated sites.

3.18 The National Park Authority is commissioning a Water Cycle Study with the following objectives:

- (i) assess capacity of current water infrastructure to accommodate growth without adversely affecting the environment by considering:
 - availability of water resources and the supply network

- capacity of existing wastewater infrastructure and the drainage network
- environmental capacity of receiving watercourses to receive wastewater, and
- potential of development to increase flood risk.

- (ii) determine the potential impact of proposed development in the context of requirements of environmental legislation including the *Water Framework Directive* (Directive 2000/60/EC), *Habitats Directive* and any other relevant water policy
- (iii) identify the infrastructure necessary to achieve proposed growth within the constraints of the environment and legislation, and
- (iv) develop a strategy for a phased approach to development that allows key growth targets to be met whilst providing sufficient time for the identified infrastructure to be adopted.

Strategic Flood Risk Assessment

3.19 The Strategic Flood Risk Assessment (SFRA) is required to demonstrate the essential information on flood risk, taking climate change into account, that allows a local plan to understand the risk across its area so that the flood risk sequential test can be properly applied. SFRAs should be a key part of the evidence base to help inform the allocation of development in a local plan area through the preparation of local plans. A local plan not supported by an adequate evidence base on flood risk is unlikely to be found to be 'sound'. For the National Park the intention is that the SFRA will be carried out through the Water Cycle Study.

Issues and potential options

Landscape

3.20 In meeting the responsibility for conserving and enhancing the National Park's natural beauty, wildlife and cultural heritage (first Purpose), the Local Plan will, as a principle, use landscape:

¹⁷ ANGSt is based on the Natural England standard which recommends that everyone, wherever they live, should have accessible natural greenspace of at least two hectares in size, no more than 300 metres (a five-minute walk) from their home.

- as an integrating concept – encompassing natural beauty, wildlife and biodiversity, and cultural heritage, and
- to provide a framework for managing change within the National Park.

3.21 The approach the Local Plan adopts will set out the general principles, strategies and guidelines aimed at protecting, managing and planning for landscapes. The use of criteria-based policies, by which proposals for development will be judged, will help achieve this objective.

Issue 1 – How can the Local Plan best help conserve and enhance landscape character?

3.22 The Local Plan will need robust policies that will encourage development that inspires and respects its landscape setting. Most successful development is rooted in the landscape: in the setting and shape of the land, its character, its appearance and its ecologies – all of which are the result of the interaction between natural and cultural processes. Traditionally the landscape, and the materials that can be won from it, have shaped the patterns of building, helping to make places locally or regionally distinctive. High-quality, well-designed sustainable development is that which respects its context and is shaped by the built and natural landscape and local distinctiveness.

3.23 In sharp contrast, development in the wrong location can have a negative impact on the landscape and can result in the loss or reduction of landscape character or local distinctiveness. The scale and location of some developments can also harm important views or landmarks and detract from the visual integrity, identity and scenic quality that are characteristic of the National Park. These impacts can also extend to developments beyond the boundary of the National Park that can affect its setting. The use of standard design solutions erodes local distinctiveness in urban and rural areas. Poor or inappropriate design can increase the sense of urbanisation in the countryside. Ineffectual landscape enhancement, or mitigation of certain developments, can also

impact on the special qualities of the landscape, such as the erosion of tranquillity or the impact on dark night skies by increased light pollution.

3.24 The cumulative impact of development or land-use change, including some changes in agricultural practices, can change landscape character. The importance of the historic character of landscape patterns, like historic field patterns and boundaries, are all too often undervalued. These important landscape features need to be protected in the context of the Local Plan.

Issue 1 – How can the Local Plan best help conserve and enhance landscape character?

What we propose to do

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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 2 – How can the Local Plan provide resilience for people, businesses and their environment?

- 3.25 Green infrastructure (GI) planning, with its emphasis on linking ecological networks and ecosystem services, make it a valuable tool to enable people and wildlife to adapt to rising temperatures and extreme weather events associated with climate change. GI initiatives are undertaken in the context of resilience for climate change.

Issue 2 – How can the Local Plan provide resilience for people, business and their environment?

What we propose to do

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 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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Biodiversity

Issue 3 – How can the Local Plan best ensure designated and undesignated habitats and protected species are conserved and enhanced?

- 3.26 The National Park contains valuable and diverse wildlife habitats, including farmland habitats, chalk grassland, lowland heath, woodland (including ancient woodland), floodplain grazing marsh, rivers and streams, coastal and marine habitats and urban habitats. There are many sites with national or international designations for the quality of their wildlife (see Figure 9). Whilst activity to conserve and manage these habitats has been largely effective and created new habitats, some species and habitats have continued to decline.

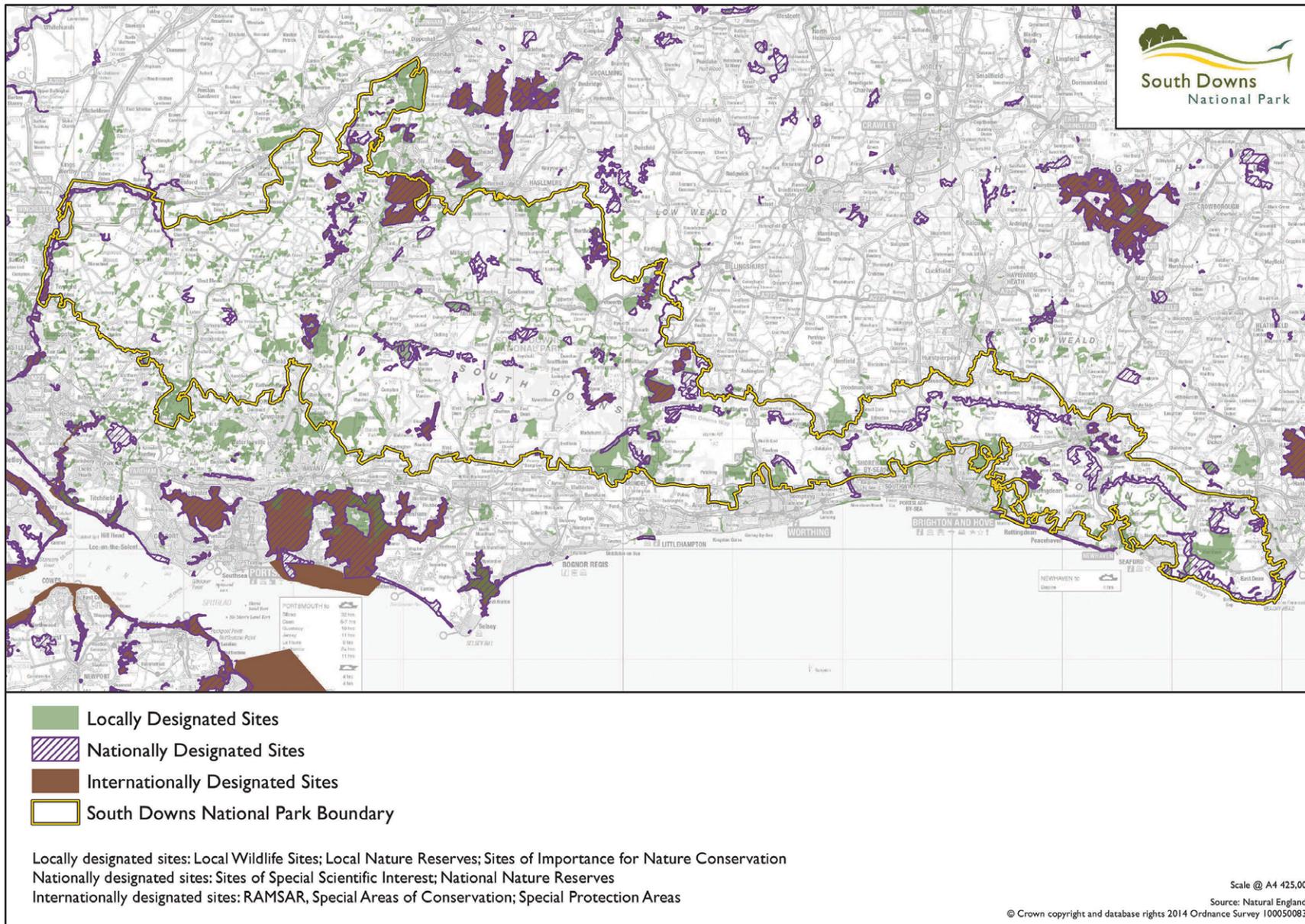


Figure 9: Designated Nature Conservation Sites

- 3.27** The Local Plan needs to minimise and mitigate the potential direct and indirect impacts from new development on designated habitats and protected species, in addition to maximising the opportunities for enhancement and management. It also needs to prevent the detrimental impact of development on the wider network of habitats and valuable species beyond the designated sites. This also includes the potential impact of development on areas on or near designated sites and consideration of the overall network of sites of biodiversity importance.
- 3.28** While national policy encourages re-use of previously developed land where not of high environmental value, many ‘brownfield’ sites do enjoy biodiversity value and these valuable features should be retained and enhanced. Opportunities to incorporate biodiversity in and around developments on brownfield sites should also be encouraged.
- 3.29** Rivers provide an example of a valuable habitat which acts a corridor or connection across a network of habitats. The Local Plan will need to consider how best planning policy can prevent loss or deterioration of such valuable assets. In accordance with the *Water Framework Directive*, development should not have a detrimental impact on visual quality, water quality or ecological value of existing river corridors.

Issue 3 – How can the Local Plan best ensure designated and undesignated habitats and protected species are conserved and enhanced?

What we propose to do

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.

The following designated site hierarchy will be applied:

International Sites – Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites

National Sites – Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)

Local Sites – Sites of Interest for Nature Conservation (SINCs) in Hampshire and Sites of Nature Conservation Interest (SNCl) in Sussex, Local Nature Reserves (LNRs), Local Geological Sites and semi-ancient woodland not identified within (ii) above.

Outside of these areas, new development, where appropriate, will be required to contribute to the protection, management and enhancement of biodiversity.

In line with national policy, a sequential approach to the impact of development on biodiversity should be applied as follows:

1. harm will be avoided
2. if 1. cannot be avoided (that is, through locating development on an alternative site with less harmful impacts) then the impact of development should be adequately mitigated, and
3. if both 1. and 2. are demonstrated as being unachievable, then the impact should be compensated for.

Do you agree with this approach?

Do you agree with either of the following options?

Option 3a – The Local Plan could develop specific policies to deal with potential impact of development on particular habitats, such as river corridors.

Option 3b – The Local Plan could specify the types of development appropriate within Nature Improvement Areas.

Are there any other options you think need to be considered?

Geodiversity

Issue 4 – How can the Local Plan best ensure that geodiversity is conserved and enhanced?

3.30 Geological processes have played a major role in shaping and defining the landscapes of the National Park. Through the existence of visible exposures on cliffs, foreshore, quarries and cuttings it is possible to see and study the geological record and impact of environmental change over millennia. The combinations of underlying geology, and natural processes, have produced the wide range of landforms and soil types that are present in the National Park (see Figure 10). In turn these have influenced the historic land-use patterns, habitats, landscape character and settlement patterns. Geology also exerts a strong influence on the built vernacular through the use of local stone and building materials that occur within the National Park.

3.31 The underlying geology also provides many of the essential natural resources that society depends upon. These include:

- soils in which we grow our food, timber and other produce
- aggregates for building and other material uses
- natural resources that help maintain economic growth, and
- the filtering and storage of our water supplies.

3.32 Nationally important geological sites are protected through designations as a Site of Special Scientific Interest (SSSI). In the National Park there are 10 geological SSSIs (see Figure 11: Designated Geological Features of

the South Downs National Park). There is also a secondary tier of non-statutory or local geological sites that are known as Regionally Important Geological/Geomorphological Sites (RIGS). There are 50 RIGS/local sites that have been notified within the National Park (see Figure 11: Designated Geological Features of the South Downs National Park).

3.33 There are number of potential threats to geological sites. Important geological features can be lost through burial or damage by coastal defence schemes, landfill and other development. Important geological features can also be lost through overgrowing vegetation and scrub encroachments. The conservation of geological features and landforms is a crucial consideration for mineral extraction and quarrying. The impact on geomorphological features or processes needs to be considered when planning for coastal defences and re-engineering of river catchments. Removal of fossil or mineral specimens through irresponsible or unregulated collecting is also an issue for some designated sites.

Issue 4 – How can the Local Plan best ensure that geodiversity is conserved?

What we propose to do

The Local Plan to include a policy that seeks to conserve geological conservation interests and geodiversity.

Do you agree with this approach?

Are there any other options you think need to be considered?

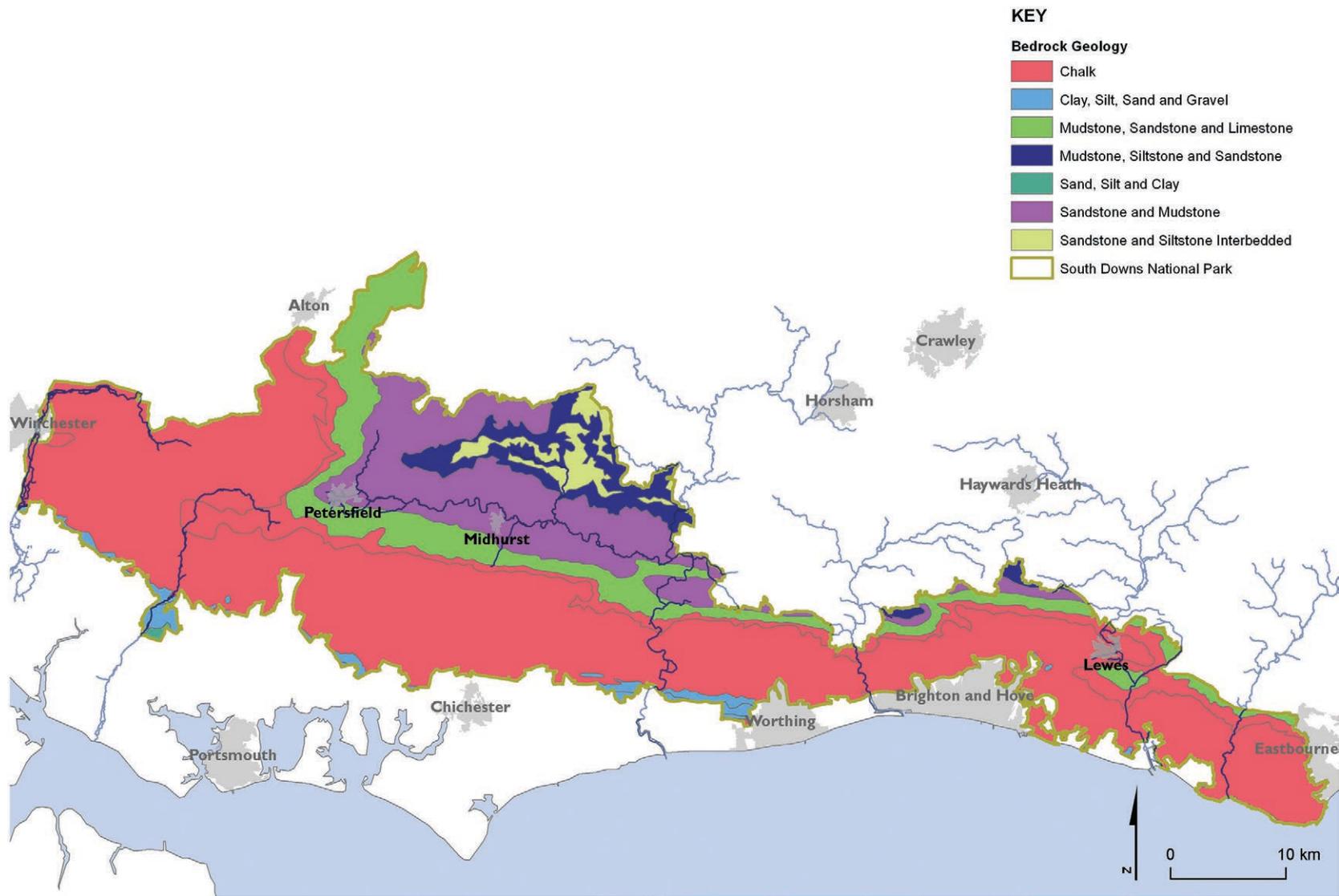


Figure 10: Geology of the South Downs National Park

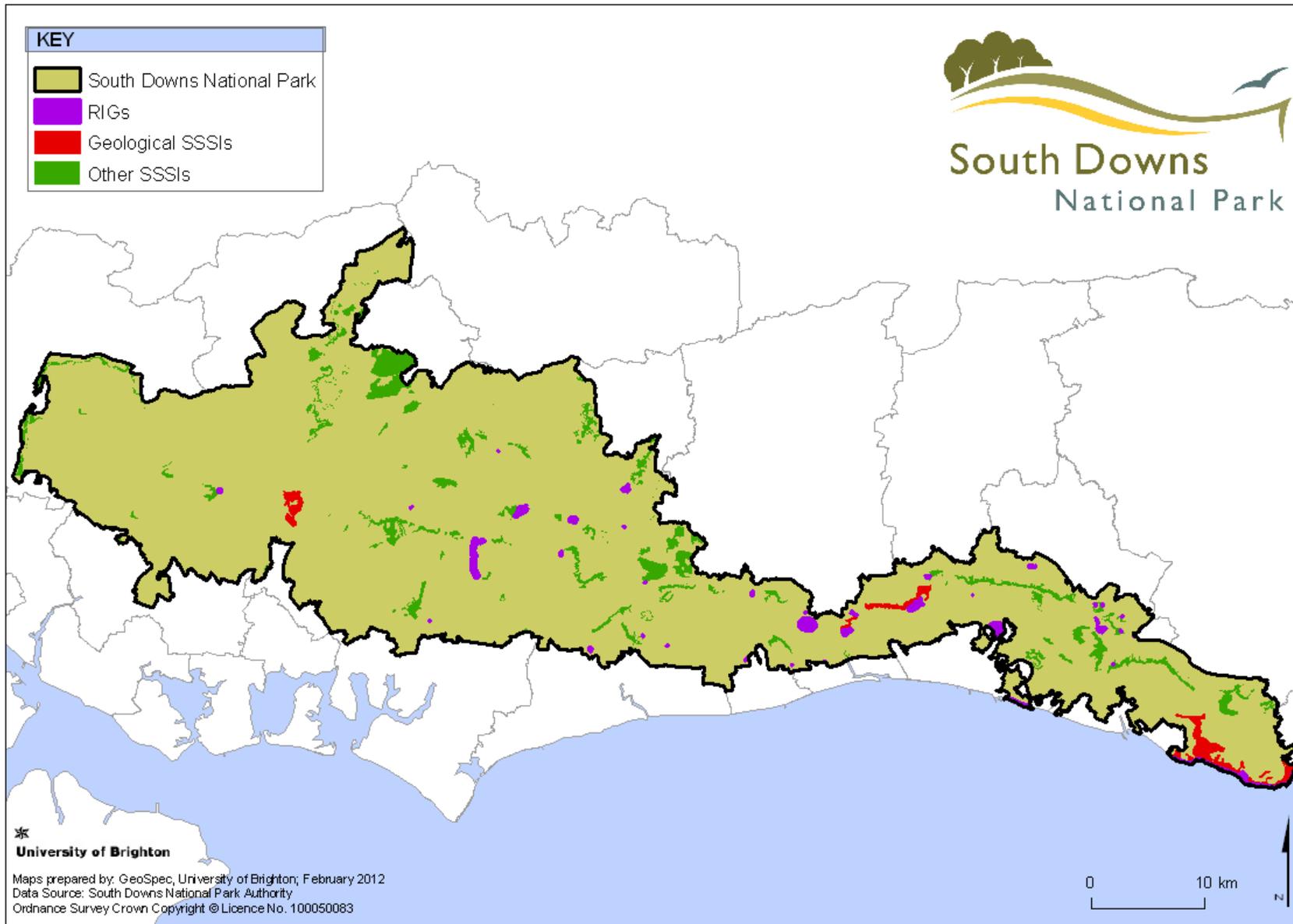


Figure 11: Designated Geological Features of the South Downs National Park

Protection of natural resources

Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?

- 3.34** Within the National Park the chalk aquifer plays a critical role in providing a clean water supply for 1.2 million people in and surrounding the National Park boundary. Forty-one per cent of the rivers and streams and 90 per cent of the groundwater bodies within the National Park are defined as having a ‘poor’ status, under the European *Water Framework Directive*. In addition, recent flooding has shown the importance of managing water resources. Therefore, it is crucial that the Local Plan considers the importance of water at a catchment scale to reverse further deterioration of the water environment and ensure improvements in water management. The emerging Water Cycle Study will assist in informing us on addressing these, and other, crucial water-related issues.
- 3.35** There is a limit to the increase in the amount of water the environment can provide to consumers. Equally, there is a limit to the amount of, and rate, waste water can be returned safely to the rivers and sea without having a detrimental impact on the environment. In addition, extreme rainfall can overwhelm drains and flood defences, and climate change may make more intense rainfall events more common. Planning for water has to take into account these natural constraints, and the impact of development.

Issue 5 – How can the Local Plan best address issues of water resources, water quality and flooding?

What we propose to do

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.

Do you agree with this approach?

Do you agree with the following options?

Option 5a – The Local Plan could include a policy focusing on demand management/water efficiency.

Option 5b – The Local Plan could include policies that address a ‘twin-track approach’ to water management, that is:

- (i) a policy on demand management/water efficiency, and
- (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.

Option 5c – The Local Plan could include a policy of ‘water neutrality’, whereby there would be no net additional water resource required over the course of the plan to meet the needs of new development.

Are there any other options you think need to be considered?

Trees and woodland

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

- 3.36** Trees, hedgerows and woodlands provide valuable habitats and connections for wildlife between sites of biodiversity, and play an important role in the mitigation and adaptation to climate change. The importance of ancient woodland and hedgerows in the function of priority and protected species and habitats is also recognised. It is also important to consider the value of all trees, woodland and hedgerows beyond those in designated habitats and/or protected sites.
- 3.37** In addition to the environmental value of woodland, it is important to recognise the recreational value and the economic benefits it can provide. The Local Plan will need to take into account the need for sustainable management of woodland and the value of forestry, including for the construction industry and wood fuel.
- 3.38** Ancient and veteran trees are a valuable resource for biodiversity, as cultural connections to the past and as significant markers of our landscape heritage. Ancient and veteran trees outside areas of ancient woodland, wood pasture and parkland require special protection and management. The replacement and relocation of ancient and veteran trees is usually not possible, given their age and value within the landscape, and therefore protection and buffering within developments is essential.
- 3.39** Ancient woodland¹⁸ covers 10.5 per cent of the National Park. It includes: areas of ancient semi-natural woodland, which retains a native tree and shrub cover that has not been planted, although it may have been managed by coppicing or felling and allowed to regenerate naturally, and plantation on ancient woodland sites, where the original tree cover has been felled and replaced by planting, often with conifers, and usually

over the last century. Some areas of ancient woodland, particularly those under two hectares, are not afforded statutory protection by designations, despite being of prime ecological importance and of unique character. It is important that sufficient protection is provided around ancient woodland to prevent detrimental impact and allow expansion and long-term management.

Issue 6 – How can the Local Plan adequately protect, manage and enhance trees and woodland?

What we propose to do

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.

Do you agree with this approach?

Do you agree with either of the following options?

Option 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.

Options 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.

Are there any other options you think should be considered?

¹⁸ Ancient woodland is defined as an area continuously wooded since before 1600 AD.

Other issues that can be considered in the Local Plan are:

- Biodiversity offsetting, and
- Flood risk

Are there other Landscape and Natural Resource issues that the Local Plan should address?

4. Historic Environment

Introduction

- 4.1** The South Downs National Park has a rich and varied historic environment. It ranges from archaeological sites of all periods through to historic buildings and settlements and other less tangible expressions of local cultural distinctiveness, as well as extensive literary and artistic connections of national importance. This rich resource was one of the reasons why the area was designated as a national park, and the conservation and enhancement of this cultural heritage is required by the first Purpose.
- 4.2** The planning system is an important mechanism for underpinning the protection of the historic environment, particularly the historic buildings, archaeological sites and other surviving physical features. The planning system refers to physical remains (listed buildings, conservation areas, historic parks and gardens, historic battlefields and archaeological sites) collectively as ‘heritage assets’ and recognises the distinction between ‘designated’ and ‘undesigned’ assets whilst protecting both types of heritage assets.
- 4.3** This chapter focuses on the issues associated with cultural heritage that we believe need a planning response and specific policies in the Local Plan. These issues are:
- Issue 7** – What approach should the Local Plan adopt to heritage at risk?
- Issue 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?

Issue 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?

Issue 10 – How can the Local Plan best ensure the appropriate management of the climate change impact upon the historic environment?

Issue 11 – How can the Local Plan best protect non-designated heritage assets from loss or incremental change?

Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?

Issue 13 – What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?

South Downs National Park context

- 4.4** The National Park’s first Purpose requires the conservation and enhancement of the cultural heritage. The key outcomes for cultural heritage within the *Partnership Management Plan* are:

Outcome 4: The condition and status of cultural heritage assets and their settings are significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.

Outcome 7: The range and diversity of traditional culture and skills have been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park.

Background

- 4.5 National parks, receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage**. This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.
- 4.6 The *Planning (Listed Buildings and Conservation Areas) Act 1990* provides the legal framework, including the requirement to secure Listed Building Consent for works to listed buildings. The *National Planning Policy Framework* supports that 1990 Act with national planning policy.

Evidence base studies

- 4.7 In 2013, the SDNPA commissioned a survey of historic buildings and structures at risk.¹⁹ Of the 5,861 historic buildings surveyed the study found that the vast majority are in good order, with only 1.5 per cent of buildings at risk and another 4.5 per cent vulnerable. In many cases, the buildings at risk are structures where there is difficulty in finding a use, which makes securing their repair particularly difficult.

Issues and potential options

Issue 7 – What approach should the Local Plan adopt to heritage at risk?

- 4.8 Buildings at risk arise largely from neglect by their owners, whilst the main threat to ancient monuments stem from farming practices, burrowing animals and plant roots. There is not an explicit duty on the owners of heritage assets to maintain them.
- 4.9 As the local planning authority, the SDNPA has responsibility for monitoring the condition of designated heritage assets and is empowered to step in when they are being allowed to fall into an unacceptably poor condition. However, the SDNPA prefers to help and encourage owners to keep their assets in good order.

Issue 7 – What approach should the Local Plan adopt to heritage at risk?

What we propose to do

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, 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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

¹⁹ *Buildings at Risk in the South Downs National Park* (Handley Associates, 2013).

Issue 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?

- 4.10 The uses to which buildings are put can change and evolve over time, sometimes dramatically. For example, churches and chapels have seen changes in patterns of worship over recent years. Some faith institutions have worked hard to develop more secular uses within their buildings, to re-position themselves and the services they offer within the communities they serve. This has led to escalating demand for adaptations and extensions to church buildings, as kitchens and toilets, meeting rooms and halls are added to traditional structures. This can be a delicate process, as these buildings are often the finest heritage structures in any settlement, but it is often necessary if the core use is to be maintained for the long term.
- 4.11 The global economic recession and the expansion of retailing on the internet have had an impact in traditional town centres, with ‘bricks and mortar’ retailers closing. In the towns of Petersfield, Midhurst and Lewes there has always been some ‘ebb and flow’ of retail activity along central streets – buildings which started life as houses have often been converted into shops – and now the process may reverse again. This can present problems where a historic shopfront survives, of interest and value in its own right. It also has an implication on the vitality of the street scene, as shops will always present a more lively frontage to the pavement than houses would.
- 4.12 Left entirely to market forces, there is a perennial danger that uses will gravitate to those of the highest value. This could ultimately lead to serious imbalances of use, with lower value but still essential uses ‘frozen out’ of certain locations. There is a risk that this, unchallenged, could diminish the vitality of town centres over time.

Issue 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?

What we propose to do

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.

Do you agree with this approach?

Do you agree with either of the following options?

Option 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.

Option 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 shopfronts.

Are there any other options you think need to be considered?

Issue 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?

- 4.13 This issue is related to Issue 8 but is treated separately in reflection of the importance of farm buildings to the National Park. It is also subject to any possible changes in the General Permitted Development Order that were part of a recent consultation by Central Government.
- 4.14 There is evidence that this category of heritage assets is subject to rapid change, whether designated or non-designated. Thirty-five per cent of the listed stock remains in agricultural use and these listed farm buildings are an important part of the landscape, including offering habitats for species such as owls, swallows and bats. The groupings of these buildings into farmyards can have an important and beneficial impact on the landscape and heritage of an area.
- 4.15 The issue is that with changing agricultural practices, the growth of mechanisation and the ever-increasing size of farm machinery, many traditional farm buildings are now an obsolescent or wholly redundant part of farming operations. Also, in the current economic climate, farmers are looking for opportunities to diversify, so there is demand to use such barns for more intensive economic uses, business units or holiday lets or dwellings – all of which produce an income or capital receipt to maintain the buildings in the future as well as subsidise the farm as a business and employer, but carry the potential to profoundly alter the character of the buildings and their farmyards.
- 4.16 Some of the Local Plans the SDNPA has inherited have policies preferring business use to residential conversion for redundant farm buildings. This can cause delay in the development process whilst the owner seeks a business use that is viable, but for which there may be limited demand. This can contribute to continuing decay in the building stock. Business use in itself is not therefore necessarily a panacea. However, conversion to office or light industrial use will often preserve spacious open volumes

within buildings. Intensive parking, external lighting and signage can compromise the setting of a building, although planning conditions can be enforced to ensure an acceptable development.

Issue 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?

What we propose to do

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.

Do you agree with this approach?

Do you agree with either of the following options?

Option 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.

Option 9b – The Local Plan could adopt a more permissive policy approach to new uses, including residential, which allows for greater variety of proposed uses.

Are there any other options you think need to be considered?

Issue 10 – How can the Local Plan best ensure the appropriate management of the climate change impact upon the historic environment?

- 4.17 Climate change is a challenge that will have a range of impacts on the historic environment, including archaeological sites. However, the main interface with the historic environment and the planning system will arise from the impact of retro-fitting technology (including insulation) to traditional buildings, both as a potential challenge to their intrinsic character and the way in which they perform as buildings.
- 4.18 There is mounting evidence that current methods of modelling a building's energy performance significantly underestimate the actual performance of buildings of traditional construction. It is also the case that the re-use of old buildings, which constitute a store of embodied energy and carbon, should be an inherently sustainable activity.
- 4.19 There are many low-impact, relatively low-cost ways of improving the performance of a building. It is widely accepted that the second most cost-effective energy saving measure for most traditional buildings after loft insulation is the provision of a modern condensing boiler, along with an adequate suite of controls to monitor the temperature of different parts of the building. In considering the retro-fitting of some insulation techniques and other energy-saving technology to a building of traditional construction, the SDNPA needs to be alert to the possibility that works may harm the character of the building. 'Character' is a rather more subtle concept than 'appearance'.
- 4.20 Ill-considered insulation can also have an adverse impact on the performance of a building of traditional construction, with potential to promote dampness within the wall fabric, thereby accelerating decay. The challenge for the SDNPA, therefore, is to balance the desire of making the area's stock of traditional buildings as energy efficient as possible whilst protecting their character and fabric.

Issue 10 – How can the Local Plan best ensure the appropriate management of the climate change impact upon the historic environment?

What we propose to do

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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 11 – How can the Local Plan best protect non-designated heritage assets from loss or incremental change?

- 4.21 The National Park Authority bears the major responsibility of managing change in the historic environment within its boundary, largely through the operation of the planning system. The *Planning Act 2008* and the *Planning (Listed Buildings and Conservation Areas Act) 2008* provides the statutory framework for this duty and the responsibility is also supported by the National Park's first Purpose to: 'conserve and enhance ... the cultural heritage of the area' (emphasis added).
- 4.22 The NPPF establishes a fundamental division between those heritage assets which are protected to varying degrees by established heritage designations (such as listed buildings, buildings within conservation areas, scheduled monuments, registered parks and gardens or battlefields) and undesignated assets which do not enjoy statutory or local protection. It is only necessary to recognise and assess the significance of these undesignated assets as a material consideration in the wider planning process.
- 4.23 The challenges in dealing with non-designated heritage assets fall into two broad categories: (i) the protection of heritage assets that are currently unknown, and (ii) those whose interest might reasonably be predicted, but do not meet the strict criteria for statutory listing or scheduling. Unknown assets will usually comprise archaeological features, but might also include heavily eroded landscape features such as former deer parks, or individual buildings containing an ancient core, wholly unseen from the exterior. As sites are gradually analysed and recorded on Historic Environment Records, it might be expected that such 'surprises' diminish in frequency over time. However, the interpretation and accessibility of information kept on Historic Environment Records may present an issue in this regard. There is guidance available from the Institute for Archaeology on undertaking assessments for archaeology on

development sites, and advice should be sought from archaeological officers in local authorities as part of the pre-application process.

- 4.24 In terms of the second category, the National Park contains a large number of unlisted buildings which, nevertheless, possess some architectural or historic merit. Many stand beyond the boundaries of conservation areas. Some local planning authorities have attempted to survey and list such buildings, selecting them against published criteria to screen them in terms of quality and significance. Many stakeholders and some developers welcome the greater degree of certainty that these 'local lists' offer. On assuming its duties as local planning authority the SDNPA inherited local lists in Arun District and Eastbourne Borough.

Issue 11 – How can the Local Plan best protect non-designated heritage from total loss or incremental change?

What we propose to do

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.

Do you agree with this approach?

Do you agree with either of the following options?

Option 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.

Option 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.

Are there any other options you think need to be considered?

Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?

- 4.25 Enabling development is a well-established term to describe development that would normally be contrary to planning policy, but which, in certain exceptional circumstances, is justified because of the benefits it will bring to heritage assets. The majority of heritage assets at risk across the National Park are either archaeological features or small structures of limited or no economic use. It is anticipated that this level of heritage at risk can be addressed by conventional means, co-operation with owners, fund-raising packages and, in difficult cases, the use of statutory provisions and partnerships with Building Preservation Trusts active in the area.
- 4.26 It is, therefore, not considered that enabling development should be considered as a usual means of addressing heritage at risk problems. Given the prosperity of the south-east England region, the close proximity to London, and the resultant high property prices, the use of enabling development should be **exceptional** in the National Park. The best tool to assess any proposal for enabling development remains an English Heritage published guidance document, *Enabling Development and the Conservation of Significant Places*.

Issue 12 – Should the Local Plan include a policy on enabling development to address heritage at risk issues?

What we propose to do

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.

Do you agree with this approach?

Are there any other options you think need to be considered?

Issue 13 – What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?

- 4.27 New infrastructure projects can have a major direct impact on heritage assets, for instance the archaeological sites discovered, excavated but destroyed by the M3 Twyford Down cutting and the A27 Brighton bypass. Such infrastructure projects can also have a significant impact on the visual setting of the National Park’s landscape and seascape, or on the setting of designated heritage assets such as archaeological sites, listed buildings or battlefields. This can include projects which are outside the boundaries of the National Park.
- 4.28 The planning system is well placed to consider the impact of infrastructure proposals on known heritage assets. It is the discovery of previously unknown heritage assets (which will be for the most part archaeological sites) that is more problematic. Where new heritage assets are affected, the first option is to establish whether there is a viable alternative that would not damage archaeological remains – ‘mitigation by design’. For some projects ‘mitigation by design’ may not be feasible and then the impact on the cultural heritage assets should be carefully considered and a proposal for recording the assets should be prepared as part of any planning application or application to the Secretary of State. This is called ‘mitigation by record’.
- 4.29 The investigation works associated with infrastructure projects often represent a good opportunity for community engagement and learning during project work on site, and the information from the investigations can feed into a wider understanding and appreciation of the National Park’s cultural heritage.

Issue 13 – What approach should the Local Plan adopt in relation to new infrastructure projects affecting the historic environment?

What we propose to do

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.

Do you agree with this approach?

Do you agree with the following option?

Option 13a – 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.

Are there any other options you think need to be considered?

Other issues that can be considered in the Local Plan are:

- Archaeology/archaeological assets
- Historic parks and gardens
- Historic cemeteries
- Battlefields, and
- Local lists

Q2 – Are there other Historic Environment issues that the Local Plan should address?

5. Design

Introduction

'The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.' (NPPF, para.56)

- 5.1 Design is the process of transforming ideas into material representation. The design process in relation to development should address economic, social and environmental aspects of sustainable development and it will be important that the key aspects to this are integrated within and represented through design proposals.
- 5.2 The role of design in delivering sustainable development is a cross-cutting issue that relates to other issues throughout this *Options Consultation Document* and will be an important policy driver in the development of policies in the Local Plan. This chapter considers how the various aspects of sustainable development may be brought together in a strategic approach that is tailored to the specific context of the National Park. Conserving and enhancing sustainable places within the National Park depends on a shift in mindsets, expectations and practices about the design of new development in towns, villages and the countryside. To support achieving this goal the South Downs Design Review Panel has been established as an independent panel of architects, urban designers and landscape designers who review emerging development proposals within the National Park, providing feedback and critique throughout the development of planning proposals.
- 5.3 The issues discussed in this chapter are:

Issue 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?

Issue 15 – How can the Local Plan best ensure the use of appropriate materials?

Issue 16 – How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?

Issue 17 – Should the Local Plan include minimum space standards for new residential development?

Issue 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?

Issue 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?

Issue 20 – How can the Local Plan address carbon reduction targets through energy-efficiency schemes?

South Downs National Park context

- 5.4 The design approach set out in the policies of the Local Plan will reflect the principles and objectives set out in the *Partnership Management Plan* (PMP). The fundamental principle guiding the PMP is of a landscape supporting the communities within it, and the communities supporting the landscape through balanced, sustainable and mutually-beneficial processes (see Figure 4). This relationship between people and the landscape has shaped the land, the location and layouts of settlements

and the look and types of building, open spaces and streets that we see today.

5.5 The Local Plan will consider design in the following ways:

- the need for new buildings and infrastructure to support the sustainable management of the landscape – ‘sustainable landscapes’
- the need for buildings and infrastructure to support the conservation and enhancement of landscape and built environment character; the wildlife, natural beauty and cultural heritage – ‘sustainable character’, and
- the need for buildings and infrastructure to support the people living and working within the National Park and to be most closely aligned with sustainable landscape management, the conservation and enhancement of the wildlife, natural beauty and cultural heritage – ‘sustainable communities’.

5.6 As a cross-cutting theme, design relates to many of the outcomes of the PMP. The outcomes which are most pertinent to design are:

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Outcome 4: The condition and status of cultural heritage assets and their settings are significantly enhanced, many more have been discovered and they contribute positively to local distinctiveness and sense of place.

Background

5.7 National Parks, alongside Areas of Outstanding Natural Beauty, receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage.** This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.

5.8 The *English National Parks and the Broads: UK Government Vision and Circular 2010* sets out a clear objective for National Parks to be exemplars of sustainable development. If this is to be achieved there needs to be a major shift in attitudes, awareness and actions in terms of resource management and energy efficiency. The *Environment Act 1995* emphasises the importance of the economic and social well-being of communities to the long-term sustainability of the National Park and its special qualities.

5.9 It is the intention that the Local Plan policies will encourage communities to become more sustainable, where residents have better access to housing, jobs, facilities and services they need locally, and to make them less reliant on private transport or lengthy journeys on public transport. The Local Plan will also seek the creation of more balanced communities (communities with a diverse range of age and socio economic and social groups).

Issues and potential options

Issue 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?

5.10 From a design perspective, landscape and built environment character is affected by the use, location, form and materials of a new development including the infrastructure associated with the provision of energy, communications, lighting, industry, agriculture and transport.

5.11 The built environment is one of the key defining characteristics of the South Downs National Park. It is important in:

- underpinning the quality of life
- attracting economic activity
- defining the cultural identity
- indicating adaptable, sustainable modes of living, and

- for the evidence it gives us of past human activity.

Therefore, a key consideration of the Local Plan is how this can be conserved and enhanced.

- 5.12** From large country estates and market towns to churches, farm buildings and industrial works, the buildings of the National Park are a reflection of the historic, social, political and cultural development of the landscape over time. The extent of their survival is testament to their value to owners, residents and visitors, as well as the strength of the planning system. However, although the level of protection offered to the built historic environment is high, the extent of our understanding of characteristic vernacular building traditions, materials, form, layout and relationship with the wider landscape is relatively undeveloped and more work is needed to understand it better.
- 5.13** Whilst good design can greatly reduce the impact of new development on its surroundings, ensuring the right building is located in the right place is also crucially important. A well designed building, be it housing, retail, for agriculture or industry, must take account of its setting. This involves understanding and responding to both the built and natural environments. The same is also true when conversions or alterations are made to existing buildings where an understanding of the existing structure and its relationship to surrounding buildings and the wider landscape is vital. An important way to address this is through the production of Design Guidance. This can inform and be informed by working with local communities in the development of Village Design Statements which will help define local built environment characteristics and how they may be conserved and enhanced.

Issue 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?

What we propose to do

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.

Do you support this approach?

Do you agree with the following option?

Option 14a - 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.

Are there any other options that need to be considered?

Issue 15 – How can the Local Plan best ensure the use of appropriate materials?

5.14 The choice of type and source of construction materials has a substantial bearing on sustainability and local distinctiveness. Locally sourced materials can support sustainable land management (for example, coppiced sweet chestnut cladding and sheep’s wool insulation) and sustainable communities, and reduce the carbon emissions of transportation. The use of local materials also expresses the relationship between the built and natural landscape, adding to local distinctiveness. There are also a growing number of building materials that are certified as ‘responsibly sourced’, indicating that they have been sustainably mined or harvested, manufactured and processed. Use of these materials can reduce the overall environmental impact of development.

Issue 15 – How can the Local Plan best ensure the use of appropriate materials?

What we propose to do

The Local Plan to encourage the use of local building materials, particularly where their use will contribute to sustainable landscape management and local employment.

Do you support this approach?

Do you agree with either of the options below?

Option 15a – The Local Plan could encourage the use of the most sustainable, energy efficient materials regardless of source.

Option 15b – The Local Plan could encourage the use of materials which match locally distinctive appearances, regardless of source or energy performance.

Are there any other options you think need to be considered?

Issue 16 – How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?

- 5.15** Buildings and places which can be adapted to accommodate different uses and users over time do not become obsolete when circumstances change and so are more sustainable. Designing for adaptability has a bearing on building design and the design of public spaces. New buildings can be designed from the outset to enable accessibility to the widest range of people (including level floorings between spaces and wide doorways allowing wheelchair access) or ensuring the construction of the building could accommodate the extra weight and have space for hoists or stair lifts. This can allow the building to be adapted²⁰ as the circumstances of occupants/residents change, for example as families grow. Buildings can also be designed in such a way that they can accommodate different uses, for example a building that can be open plan and used as one large space, or that could be subdivided to create many smaller units. This can allow buildings to adapt to different users and uses over time.

Issue 16 – How can the Local Plan encourage the creation of buildings and developments that are adaptable and flexible over time?

What we propose to do

The Local Plan to require development to demonstrate robustness to changing social, economic and environmental circumstances.

The Local Plan to require public spaces to demonstrate viability for multiple uses, rather than specific or inflexible uses.

The Local Plan to require buildings to be designed so that they can be adapted.

Do you agree with this approach?

Do you agree with the following option?

Option 16a – The Local Plan could include a policy whereby buildings within major developments incorporating mixed-use and commercial activities will be required to 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.

Are there any other options you think need to be considered?

²⁰ Further information on adaptable and inclusive design, refer to Lifetime Homes, <http://www.lifetimehomes.org.uk/pages/welcome.html>.

Issue 17 – Should the Local Plan include minimum space standards for new residential development?

- 5.16** Research has found that the size of housing can have an impact on the flexibility of housing to meet people’s changing lifestyles and physical requirements, and on rates of antisocial behaviour, educational attainment and productivity (due to the opportunity to work and study at home), a stable family life and general health and well-being.²¹
- 5.17** Some local planning authorities have identified the small size of dwellings in their area as a problem and introduced minimum internal space standards for new development, on the basis of research into local needs. The NPPF allows for the principle of local planning authorities identifying the size of dwellings that is required in particular locations.²²
- 5.18** In August 2013, the Government published a paper on housing standards for consultation.²³ This included a possible national approach to the issue of space standards for new dwellings. Whilst Government prefers either an ‘industry-led voluntary space labelling’ system, or a national space standard, the consultation paper recognised the potential for local planning authorities to produce robust evidence justifying the need for such standards. Therefore the option of local planning authorities producing local space standards was included in the consultation. The consultation is now closed and responses are being considered by Government.

- 5.19** Recent housing evidence²⁴ has identified that the National Park has a higher representation of larger dwelling types (detached and semi-detached) and under-representation of smaller dwelling types. This is a factor in the high average house prices that characterise the area, and the difficulty of those on average or lower quartile earnings being able to access home ownership. The research does not directly assess minimum or average local space standards. Therefore, further studies are needed to establish local minimum space standards in the National Park.

Issue 17 – Should the Local Plan include minimum space standards for new residential development?

Do you agree with any of the following options?

Option 17a – The Local Plan could set local minimum space standards for new residential development.

Option 17b – The Local Plan could follow the Government’s approach, adopting nationally set space standards, if introduced.

Option 17c – The Local Plan could avoid setting minimum space standards.

Are there any other options you think need to be considered?

²¹ *Space Standards: The Benefits* (UCL, 2010), <http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/space-standards-the-benefits.pdf>.

²² NPPF, para.50.

²³ Housing Standards Review Consultation (DCLG, 2013), <https://www.gov.uk/government/consultations/housing-standards-review-consultation>.

²⁴ South Downs National Park Housing Requirements Study (DTZ, 2011), http://www.southdowns.gov.uk/__data/assets/pdf_file/0011/179219/South-Downs-National-Park-Final-Report.pdf.

Issue 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?

- 5.20 Signage, street furniture and highways infrastructure are put in place to guide or inform people, for their convenience (for example, seating) and to manage traffic movements, but they are often applied without direct reference to the social and economic context of local communities. This can impact on local character and the pedestrian accessibility and quality of towns and villages. Inappropriately designed or located signage or street furniture can detract from a place’s overall setting and character as well as blocking pedestrian movements. ‘Street furniture’ includes bollards, seating, signposts, bus shelters and lighting columns.
- 5.21 Inappropriately designed lighting schemes can also have a wider impact on the environment, adding to light pollution and to the ‘sky glow’ and affecting wildlife. It can also have more local impact, for example the glare from inappropriately positioned security lighting.

Issue 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?

What we propose to do

Develop Design Guidance and a Design Protocol for highways.

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.

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.

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.

The Local Plan to ensure that additional light spill is kept to the absolute minimum.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 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?

- 5.22 Sustainable development requires consideration of location, design and construction, along with improving the resilience to the effects of climate change as part of the development proposals. In guiding new sustainable development, the Local Plan will need to take account of the increased vulnerability to climate change affecting flood risk, coastal change, water supply, biodiversity and landscape. The Local Plan will also need to ensure that development is sustainable by ensuring that it does not add to the vulnerability of the natural beauty, wildlife and cultural heritage of the National Park but conserves and enhances the features at risk.
- 5.23 The creation of sustainable communities, characterised by a balance between the amount and types of housing and jobs, can help reduce distances travelled and therefore levels of carbon dioxide produced. However, given the rural nature of most of the National Park, dependency on the car is likely to remain high. There is also a recognised trade-off between achieving residential developments that meet the highest standards of sustainability in terms of design and the affordability of the properties.

Issue 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?

What we propose to do

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.

Do you agree with this approach?

Do you agree with one of the following options?

Option 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')²⁵

Option 19b – The Local Plan could set sustainability standards, specifically tailored to the SDNPA.

Are there any other options you think need to be considered?

²⁵ <http://www.oneplanetliving.org>.

Issue 20 – How can the Local Plan best address carbon reduction targets through energy-efficiency schemes?

- 5.24** As part of the national response to climate change, there needs to be a prioritisation of where energy savings and carbon emission reductions can be targeted through planning. Government policy in relation to the introduction of zero-carbon new build homes from 2016 is in a significant state of flux and is now likely to be linked with other low-carbon measures via a related policy of ‘allowable solutions’.²⁶ The *Building Regulations 2013* require a 29.5 per cent improvement on the energy performance requirements for the *Building Regulations 2006*, which is roughly in the middle of the Code for Sustainable Homes Levels 3 and 4 for Energy.
- 5.25** The call for NPAs to be exemplars of sustainable development, ‘development that meets the needs of the present without compromising the ability of future generations to meet their own needs’²⁷ suggests that the SDNPA should take every opportunity to avoid adding to the problems caused by climate change and minimise the impact of new development.
- 5.26** A significant issue is that approximately one third of homes are not connected to the national gas grid. Many of these properties incur higher than average carbon emissions and heating bills that can trigger fuel poverty. Thus, measures improving energy efficiency of such properties will also help to achieve economic and health benefits.
- 5.27** The SDNPA recognises that standard assessment procedures to evaluate the thermal efficiency of buildings can underestimate performance in older traditional properties (particularly pre-World War I construction). As a consequence, the significance and integrity of important historic

²⁶ ‘Allowable solutions’ offers the mechanism for achieving zero carbon for the residual emissions associated with new development that cannot be achieved by developers – principally encompassing the household consumed energy demands over and above heating and lighting.

²⁷ From the World Commission on Environment and Development (the Brundtland Commission), *Our Common Future* (Oxford University Press, 1987).

assets can be threatened by poorly designed adaptation and mitigation responses. Energy efficiency and renewable energy in historic buildings are discussed further in Chapter 4: Historic Environment.

Issue 20 – How can the Local Plan address carbon reduction targets through energy-efficiency schemes?

What we propose to do

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 schemes including energy-efficiency schemes.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 20b – For new buildings, the Local Plan could require a greater level of energy 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).

Option 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).

Are there any other options you think need to be considered?

Other issues that can be considered in the Local Plan are:

- Health and well-being
- Public spaces
- Space for food growing
- Community involvement
- Public art, and
- Signage and advertisements

Q3 – Are there other Design issues that the Local Plan should address?

6. Settlement Strategy

Introduction

6.1 Based on conserving and enhancing the natural beauty, wildlife and cultural heritage and the landscape golden thread described in Chapter 1: Introduction, this chapter sets out potential options for the appropriate amount and type of development for different parts of the National Park. These options reflect landscape characteristics, the hierarchy of settlements, accessibility by public transport, tourism routes and attractions, and the mitigation of climate change through an efficient pattern of development and protection of the open countryside from sporadic building.

6.2 Options are explored for delivering a sustainable pattern of development that also conserves and enhances its landscape and natural beauty, its special qualities and its local distinctiveness. This pattern should reflect, as well as influence, the infrastructure that connects settlements, both transport routes ('grey' infrastructure) and 'green' infrastructure, which may include wildlife corridors, pedestrian routes and cycling links.

6.3 This chapter focuses on the following issues that need a planning response and possibly specific policies in the Local Plan:

Issue 21 – What development should the Local Plan permit outside settlements?

Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?

Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

Issue 25 – What approach should the Local Plan adopt to development in Tier 2 settlements?

Issue 26 – What approach should the Local Plan adopt to development in Tier 1 settlements?

Issue 27 – How can the Local Plan best take account of the adjoining settlements outside the National Park?

Issue 28 – What approach should the Local Plan adopt for development proposals on sites adjoining settlements outside the National Park?

Issue 29 – What approach should the Local Plan adopt for the redevelopment of major brownfield sites?

South Downs National Park context

6.4 The key outcomes from the National Park's *Partnership Management Plan* that relate to the settlement strategy are:

Outcome 1: The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Other outcomes will be influenced by the settlement strategy but those above are critical to determining what the settlement strategy for the National Park should be. The Local Plan is one mechanism for delivering most of the positive, long-term outcomes in the PMP.

National policy and guidance

English National Parks and the Broads: UK Government Vision and Circular 2010

- 6.5 The *English National Parks and the Broads: UK Government Vision and Circular* states that National Parks have an important role to play in the delivery of affordable housing and Local Plans should proactively respond to local housing needs. However, it recognises that the National Parks are not suitable locations for unrestricted housing. *‘The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services’* (para.78). It also suggests that, in order to sustain their communities, authorities should, through their role as planning authorities, be instrumental in encouraging developments that are appropriate to their setting. They should also maximise the benefits of a high-quality environment, in order to provide a broader economic base and foster more diverse and higher value local employment opportunities and provide the critical mass needed to drive provision of modern communications infrastructure.

National Planning Policy Framework

- 6.6 The *National Planning Policy Framework* (NPPF) states that local plans should follow the presumption in favour of sustainable development, with *‘clear policies that will guide how the presumption should be applied locally’* (para.15). The presumption means that the Local Plan should meet objectively-assessed needs for development unless specific policies in the NPPF indicate development should be restricted. Such policies include those for protected habitats and species, local green space, heritage assets, flood risk areas and nationally designated landscapes, including National Parks. The NPPF, states that:

‘great weight should be given to conserving landscape, scenic beauty, wildlife and cultural heritage within a National Park’ (para.115), and

‘major development will be refused except in exceptional circumstances and where it can be demonstrated that it would be in the public interest’ (para.116).

- 6.7 When developing *‘clear policies that will guide how the presumption should be applied locally’*, one of the key considerations is which are the most appropriate and sustainable locations for development.

Other national policy and reports

- 6.8 The National Park’s socio-economic duty was given added weight by the *Taylor Report*²⁸ and the *Rural Advocacy Reports*,²⁹ which both pointed to the need to accommodate growth, development and investment in all rural areas at an appropriate scale and form.

Background

- 6.9 National parks, alongside Areas of Outstanding Natural Beauty, receive **the highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage**. This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.

Evidence base studies

Settlement Hierarchy Study

- 6.10 The aim of the National Park’s first Settlement Hierarchy Study³⁰ is to establish the level of services and facilities available to communities throughout the area. The score of each settlement within the Settlement

²⁸ *Living Working Countryside, The Taylor Review of Rural Economy and Affordable Housing* (2007), http://www.wensumalliance.org.uk/publications/Taylor_Review_Livingworkingcounterside.pdf.

²⁹ Commission for Rural Communities, *Report of the Rural Advocate* (2007 and 2010).

³⁰ http://www.southdowns.gov.uk/_data/assets/pdf_file/0003/378300/Settlement-Hierarchy-Study_June-2013.pdf.

Hierarchy Study is determined by the number and type of services and facilities present. These were surveyed in 2011. Following consultation with parish councils, further desktop analysis was undertaken in 2012. The number and type of services have been quantified using a scoring system. The scores for each settlement provide an indication of the relative access to services and facilities in each of the settlements and its position within the National Park's settlement hierarchy. Final scores were then separated into 'tiers' to identify groups of settlements with broadly similar characteristics. **During 2014 this study will be updated to feed into the 'Preferred Options' version of the Local Plan. We will be consulting with town and parish councils to ensure the information on each settlement is up to date.**

Landscape Character Assessment

6.11 Landscape character assessment (LCA) is an important tool in helping us plan for the National Park, given that landscape protection and enhancement have great weight in planning decisions. LCA is a way of classifying, mapping and describing the distinct and recognisable elements that make up a landscape. It provides a framework within which elements that are important to the quality and distinctiveness of the landscape can be maintained, change can be managed and positive environmental benefits secured. In order to analyse the National Park in greater detail, the *South Downs Integrated Landscape Character Assessment 2011* was carried out.³¹ This defined 18 landscape types (see Figure 8 in Chapter 3: Landscape and Natural Resources), with several sub-categories of landscape areas within each.

Employment Land Review

6.12 The *Employment Land Review* assesses the need for, and supply of, employment land. It recommends that the Local Plan includes criteria-based policies to deal with applications for new employment uses and to

guide diversification. It recommends that a tiered-policy approach is used, for example:

- large towns – Adopt a more proactive policy to ensure that sustainable economic growth is facilitated in these areas. This could encourage new business development and growth which is not directly connected to the land economy and include the provision of new land to meet future demand.
- market towns/larger villages – Use criteria based policies to control the loss of employment land and floorspace, which could require minimum marketing periods and/or viability assessments to justify a change of use.
- rural sites (including existing isolated estates) – Allow replacement floorspace only and/or encourage smaller units, offices and light industrial to meet local demand. Consider how to encourage the redevelopment of less desirable sites.

³¹ <http://www.southdowns.gov.uk/about-us/integrated-landscape-character-assessment>.

Issues and potential options

Issue 21 – What development should the Local Plan permit outside settlements?

- 6.13** As described in Chapter 2: A Portrait of the South Downs National Park, the National Park has a diversity of landscapes, varying from the wooded and heathland ridges on the greensand in the Western Weald to wide-open downland on the chalk that spans the length of the National Park, both intersected by river valleys. Within these distinctive landscapes are villages and market towns, farms and historic estates, connected by a network of paths, historic lanes and main roads.
- 6.14** Paragraphs 115 and 116 of the NPPF and the 2010 Circular lead to a generally restrictive approach to development outside existing settlements in the National Park. How a range of development pressures could be accommodated within the National Park is dealt with in the other chapters of this *Options Consultation Document* and different considerations will apply to each of these uses. The NPPF also states that isolated new homes in the countryside should be avoided unless there are special circumstances (para.55).
- 6.15** The SDNPA seeks to balance the demands for development such as that listed above, much of which would support growth in the economy as well as the duty to seek to foster social and economic well-being of local communities, against the great weight to be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area (first Purpose). The NPA's role is also to promote opportunities for the understanding and enjoyment of the special qualities of the National Park (second Purpose) which could be covered by some developments. Because of the primacy of the first Purpose, the options for how to respond, in general terms, to development in the open countryside in the National Park are relatively limited.

Issue 21 – What development should the Local Plan permit outside settlements?

What we propose to do

Within the countryside outside settlements, and where consistent with the National Park's first Purpose, the Local Plan to:

Normally allow development on previously developed land (brownfield sites) in relation to agriculture and forestry (including related infrastructure), farm diversification, tourism, appropriate recreation³² and the promotion of the understanding and enjoyment of the countryside but put in place strict controls on greenfield land.

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 discussed in Chapter 7: Housing and Chapter 4: Historic Environment).

Do you agree with this approach?

Please choose one of the following options to deliver the proposal outlined above:

Option 21a – The Local Plan could apply the same policy across the whole

³² ' 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.

National Park.

Option 21b – The Local Plan could identify specific locations that are of high landscape sensitivity in which an especially restrictive approach should apply.

Option 21c – The Local Plan could apply different policies for development in the countryside in each of the four main National Landscape Character Areas.

Are there any other options you think need to be considered?

Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?

- 6.16 The Settlement Hierarchy Study shows that there are about 250 small settlements in the National Park with very few facilities (Tier 5). A few, whilst maintaining their individual character and identity, are close to services in larger settlements and can be treated functionally as parts of them. Nearly 70 per cent of Tier 5 settlements have no facilities at all. With very few exceptions these settlements have no public transport, medical facilities or schools.
- 6.17 The absence of a primary school can have a significant adverse impact on the sustainability of a settlement and would be a concern if new houses were to be developed in a village. Reliance on a private car for all journeys also makes a settlement less sustainable, although there is no guarantee that even the currently poor rural bus services will be maintained, given pressures on local authority budgets. Due to the lack of services and facilities in these settlements, with the possible exception of those with a railway station, these settlements are not considered to be locations in which development should be encouraged.

Issue 22 – What approach should the Local Plan adopt to development in Tier 5 settlements?

What we propose to do

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.

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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?

- 6.18** The Settlement Hierarchy Study indicates that there are about 50 Tier 4 settlements, although a few are close to services in larger settlements and can be treated functionally as parts of them, while maintaining their individual character and identity. Most of these villages have a school and about half have a shop. Whilst many of these settlements do have a bus service, almost half operate only on weekdays at present. Very few have medical facilities.
- 6.19** The limited extent of services in Tier 4 villages casts doubt on whether expansion should be encouraged if the overall aim is to achieve a sustainable pattern of development. On the other hand, it might be argued that some development would assist in the retention of the limited services and facilities that exist, although experience elsewhere suggests that the amount of development required to achieve this is likely to be out of proportion with the character of the villages and potentially harmful to the landscape of the area.
- 6.20** One solution might be to explore if groups of neighbouring villages (preferably within walking distance of each other) making use of each other's services and facilities would enable the retention of services. This approach is supported by paragraph 55 of the NPPF: *'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby.'*

Issue 23 – What approach should the Local Plan adopt to development in Tier 4 settlements?

What we propose to do

The Local Plan to:

- 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.
- Ensure housing development will be for affordable and local housing needs only.
- 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.
- Ensure that, unless reviewed through Neighbourhood Plans, current settlement boundaries in Tier 4 villages will be incorporated into the Local Plan unchanged.
- 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.

Do you agree with this approach?

In addition to the above approach we could also consider the following options:

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.

Option 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 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.

Option 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).

Are there any other options you think need to be considered?

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

- 6.21 The Settlement Hierarchy Study identifies 12 Tier 3 settlements, although some are close to services in larger settlements and can be treated as functional parts of them, while maintaining their individual character and identity (for example, Easebourne). Most of these villages have a school, convenience store, doctors' surgery and evening or weekend bus service. These villages are relatively sustainable and, subject to landscape and other constraints, could contribute towards meeting objectively assessed housing needs for the National Park. Indeed such a contribution is desirable if these villages are to continue to be able to provide the current level of services and facilities for their communities and those nearby, in furtherance of the National Park's Duty.

Issue 24 – What approach should the Local Plan adopt to development in Tier 3 settlements?

What we propose to do

- Within Tier 3 villages, development on brownfield land and other sites within the built-up area/ settlement boundary will normally be allowed.
- 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.
- A limited allocation/settlement extension may be made to meet local development needs, including for affordable and local housing.
- 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.

- 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.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 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).

Option 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.

Are there any other options you think need to be considered?

Issue 25 – What approach should the Local Plan adopt to development in Tier 2 settlements?

- 6.22** Midhurst has a reasonable range of facilities and services, including regular bus services, medical and educational facilities and a range of employment although there is no hospital or railway connection. Liss has fewer facilities than Midhurst but it does have a main-line railway station with direct services to London Waterloo and Portsmouth Harbour.
- 6.23** These Tier 2 settlements are well placed to make a significant contribution towards meeting objectively assessed housing needs in the National Park, subject to environmental constraints. A key consideration will be the landscape impact on the National Park. This will include a consideration of the impacts of development when viewed from outside the settlements as well as of views from within the settlements outwards. It must also include impact within the settlement, since the urban landscape is as much part of the designated area as the rural landscape. Further key constraints are flood risk and the Special Areas of Conservation/Special Protection Areas near Liss.
- 6.24** Given these constraints, the objectively assessed need for housing is likely to exceed the capacity of the National Park to accommodate it.

Issue 25 – What approach should the Local Plan adopt to development in Tier 2 settlements?

What we propose to do

- Within Tier 2 settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.
- 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).
- 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.
- A presumption in favour of community, tourism, 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.
- 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.
- 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.

Do you agree with this approach?

In addition to the above approach do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 26 – What approach should the Local Plan adopt to development in Tier I settlements?

- 6.25** Lewes and Petersfield are the largest settlements within any National Park in the country. Due to their size and significant populations, they are substantially and significantly different when considered against other settlements within the South Downs National Park. Both settlements provide a good range of services and facilities, including hospitals, health centres, secondary schools, railway stations, supermarkets, employment sites and good bus networks.
- 6.26** It can be argued that the qualities of these two settlements, when compared to all other settlements within all National Parks in the country, would meet the ‘exceptional circumstances’ test as set out in paragraph 116 of the National Planning Policy Framework in relation to major applications. Therefore, given the scale of these settlements, their level of facilities and high levels of accessibility by public transport, these two towns are capable of accommodating higher levels of growth than other settlements across the National Park.

Issue 26 – What approach should the Local Plan adopt to development in Tier I settlements?

What we propose to do

- Within Tier I settlements, development on brownfield land and other sites within the settlement boundary will normally be allowed.
- 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).

- 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.
- A presumption in favour of community, tourism, 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.
- 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.
- 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 housing, business and other uses, in close consultation with the community.

Do you agree with this approach?

In addition, to the above approach do you agree with the following option?

Option 26a – To allocate sufficient sites in the Tier I 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.

Are there any other options you think need to be considered?

Issue 27 – How can the Local Plan best take account the adjoining settlements outside the National Park?

- 6.27 In developing a settlement strategy for the National Park it is important not to treat it as an island. Just outside the designated area are a large number of towns which provide services, facilities and jobs for the National Park residents and whose residents' represent important 'consumers' of the National Park's special qualities. Some of these places can also perform important gateway functions for those arriving to enjoy the National Park, particularly by train.
- 6.28 There are options, however, around how the Local Plan could take account of these adjoining centres and settlements in meeting the needs of the National Park. These needs will include:
- retail (other than convenience)
 - secondary and further education
 - health centres and hospitals
 - leisure and cultural
 - employment
 - transport facilities (including park and ride)
 - housing, and
 - green infrastructure.
- 6.29 If the National Park is unable to meet its objectively assessed needs for housing, there will need to be detailed discussion and agreement with adjoining authorities as to how much, if any, of the National Park's housing requirements could be met in settlements outside its boundaries, which would be in addition to meeting their own needs. Unless all the housing need of the National Park can be met within its boundaries the SDNPA will be required to demonstrate how the authorities have met this obligation.

- 6.30** With regard to retail, leisure and employment uses, the Local Plan will have only a limited influence on what are commercial decisions. However, levels of provision in settlements within the National Park will be influenced by the extent to which such development can be accommodated in towns outside the National Park to serve the National Park's residents in a sustainable way. The Local Plan may choose to be more restrictive about such development if provision is being made just outside but, on the other hand, it may wish to encourage such development for the benefit of local communities and accessibility within the National Park. Similar considerations will apply to education and health facilities, with many of the decisions as to how to serve the National Park's population being made by organisations and businesses (County Councils, academies, clinical commissioning groups and hospital trusts) based outside its boundaries.
- 6.31** There may be a difference between how these matters are dealt with in different parts of the National Park. In the more central parts of the National Park settlements are more self-contained (especially around Petersfield and Midhurst), whilst in areas closer to the boundary the settlements appear to be more dependent on adjoining large towns outside the National Park (for example, Eastbourne, Brighton, Worthing, Chichester, Havant and Winchester) as well as on smaller towns along the boundary, for example Bishop's Waltham, Alresford, Alton, Liphook, Haslemere, Pulborough, Storrington, Steyning and Hassocks.
- 6.32** While the Local Plan cannot set policies for sites outside the National Park, its settlement strategy should recognise these destinations and gateways. We need to consider what options are realistically available to make provision for links to and from them, especially by bus, cycle or on foot. These options will also include park and ride, recognising that many will wish to access the National Park by car, but that we wish to minimise the impact of this on the environment and climate change.

Issue 27 – How can the Local Plan best take account of the adjoining settlements outside the National Park?

What we propose to do

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.

Do you agree with this approach?

In addition to the above approach do you agree with either of the following options?

Option 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.

Option 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.

Are there any other options you think need to be considered?

Issue 28 – What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?

6.33 As there are many settlements which sit just outside the National Park, along the boundary (for example, Bishop’s Waltham, Liphook, Pulborough, Hassocks), a particular issue arises when a site is put forward on the edge of one of these settlements with the site falling within the National Park. Whilst this Local Plan cannot set out policies for these settlements outside the National Park or set out criteria for assessing proposals which affect the setting of the National Park,³³ there are options as to how to deal with sites within the National Park but on the edge of settlements outside it.

Issue 28 – What approach should the Local Plan adopt for development proposals on sites within the National Park that adjoin settlements outside the National Park?

What we propose to do

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.

The Local Plan to include a policy that will only permit development on such sites where it can be demonstrated that it will not have an adverse landscape impact and conserves and enhances the natural beauty, wildlife and cultural heritage.

Do you agree with this approach?

In addition to the above approach do you agree with either of the following options?

Option 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.

Option 28b – The Local Plan to include a 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.

Are there any other options you think need to be considered?

³³ When considering proposals outside the National Park consideration must be given to the Purposes of the National Park and the impact of proposals on the National Park as set out in the *Environment Act 1995*, section 62.

Issue 29 – What approach should the Local Plan adopt for the redevelopment of major brownfield sites?

6.34 There are currently three important strategic brownfield sites in key locations within the National Park:

- **Syngenta, Fernhurst** – A former research establishment in the ownership of a house-builder in a relatively isolated but well-screened location adjacent to the A286 south of Haslemere. It comprises a former office block (Highfields), a former conference centre (the Pagoda), car-parking and various temporary buildings. It is allocated in the existing Local Plan for employment uses. Previous proposals for housing development were withdrawn. Current proposals in the draft Fernhurst Neighbourhood Plan are for 150 dwellings and 2,000sqm employment uses, but the developer is seeking about 250 dwellings.
- **Shoreham Cement Works, Upper Beeding** – A large former chalk quarry and semi-derelict works in the ownership of a developer but leased to a waste operator and to various temporary users (west of the A283). This is one of the most prominent sites in the National Park, in a key location where the Park is at its narrowest. It is allocated in the existing Local Plans for employment use. A previous proposal for mixed-use development was rejected on appeal mainly because of the proposed housing content on the western part of the site.

- **North Street, Lewes** – A site of approximately nine hectares at North Street and the neighbouring part of Eastgate is a proposed allocation within the *Lewes District Joint Core Strategy (Pre-Submission)* for a mixed-use development creating a new neighbourhood in Lewes. A detailed masterplan is being prepared in advance of a planning application based on the broad level of development set out in the pre-submission *Lewes Joint Core Strategy* of: 350 homes, 4,000–5,000 sqm of B1a office floorspace, retail floorspace, a hotel, the redevelopment of the existing food superstore and other uses.

Issue 29 – What approach should the Local Plan adopt for the redevelopment of major brownfield sites?

Do you have any views on how these sites should be developed?

Other issues that can be considered in the Local Plan are:

- Settlement policy boundaries
- Whether policies on the allocation and safeguarding of employment land should be settlement based
- Town centre hierarchies (e.g. designation of primary and secondary shopping areas), and
- ‘Grandfather’ rights and how we deal with existing major sites as well as the ones above, in terms of potential future expansion.

Q4 – Are there other Settlement Strategy issues that the Local Plan should address?

7. Housing

Introduction

- 7.1** The provision of new housing is a major issue for the National Park which will need to be addressed through the Local Plan. The Local Plan must determine the extent to which the ‘objectively assessed housing need’³⁴ of the area’s local communities can be met for the plan period while ensuring that the first Purpose, to conserve and enhance the natural beauty, wildlife and cultural heritage is met. It will also need to ensure that paragraphs 115 and 116 of the NPPF are met, that is: National Parks have the highest level of landscape protection and only in exceptional circumstances should major development in National Parks be permitted.
- 7.2** The ‘objectively assessed housing need’ will be assessed through a National Park-wide Strategic Housing Market Assessment (SHMA), which builds on the existing joint SHMAs carried out for parts of the National Park and surrounding areas. If the National Park is unable to meet its objectively assessed housing need then the NPA must discuss how the shortfall will be met with its neighbouring local authorities through the duty to co-operate.
- 7.3** Having determined the extent to which the objectively assessed housing need can be met within the National Park, and the way that it is to be achieved, the Local Plan must set out housing allocations. The distribution of new housing will need to follow the settlement strategy. The housing policies of the Local Plan will also need to set out the types of housing that will be encouraged and general criteria setting out where housing development may be permitted.
- 7.4** The Local Plan will incorporate as far as possible the policies within the adopted and emerging Joint Core Strategies. This will include housing allocations made within these jointly prepared policy documents and where levels of housing development are proposed. These existing commitments will be considered against any updated National Park-wide evidence and incorporated as appropriate.
- 7.5** The Local Plan will also address the need for different types of accommodation to meet the specific needs of different sections of the community. This includes provision of low-cost/affordable housing, housing to meet the needs of the elderly, and accommodation for gypsies, travellers and travelling showpeople.
- 7.6** This chapter focuses on issues that we consider need a planning response and possibly specific policies in the Local Plan. These are:
- Issue 30** – How can the Local Plan best ensure a ‘sufficient’ supply of housing?
- Issue 31** – How can the Local Plan best address housing mix in the National Park?
- Issue 32** – What approach should the Local Plan adopt to best meet local need?
- Issue 33** – What approach should the Local Plan adopt for rural exception sites?
- Issue 34** – How can the Local Plan best meet the housing needs of agricultural and forestry workers?

³⁴ Objectively assessed need is explicitly referred to in the NPPF (para.14). Within the context of the reference to objectively assessed need in the NPPF it also identifies that in the case of the national landscape designations other factors will play an important determining role in what is the appropriate level of housing.

Issue 35 – How can the Local Plan best ensure the housing needs of older people are met?

Issue 36 – How can the Local Plan best ensure that the housing needs of gypsies, travellers and travelling showpeople are met?

Issue 37 – How can the Local Plan best encourage Community Land Trusts?

South Downs National Park context

7.7 The key outcome related to housing within the *Partnership Management Plan* is:

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Background

7.8 National Parks, alongside Areas of Outstanding Natural Beauty, receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage**. This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.

7.9 There were 112,343 National Park residents in 2011 (Census 2011) and about 50,100 homes. Of these homes about 2,800 are second or holiday homes, or vacant. Thus, the average household size is approximately 2.37 people per household. An estimated 2,500 new homes were built in the National Park area between 2001 to 2011, based on wards predominantly in the National Park, an average of approximately 250 per year.

7.10 House prices across the National Park are well above the national and regional averages, and there are significant differences in price between

the towns and the surrounding rural areas. The average rural house price is approximately £400,000, while in the towns it is significantly less at £265,000, although this may partly be a reflection of the different types of properties that are found in the rural areas compared to the towns. In general, housing is more affordable outside the National Park to the south, whereas to the north of the National Park house prices are higher, reflecting proximity to London and the M25 corridor.

7.11 With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of 'affordable' homes (both market, intermediate and social rented), it can be difficult for people working in the National Park to afford to live within it. This impacts on the availability of people resident in the National Park to fill lower paid jobs and consequently adds to the high level of traffic movements. Given the high proportion of larger houses and the associated high prices of housing, access to affordable housing is a key issue facing many local communities. Young people and young families, in particular, have difficulty finding low-cost housing and, therefore, may have to leave the area.

7.12 There were 3,780 households on housing waiting lists in 2010, about seven per cent of all households in the National Park. However, it is important to note that the housing needs waiting list is not always a good indicator of urgent housing need, and that numbers on waiting lists in individual areas can fluctuate significantly over time.

7.13 The National Park's resident population is ageing at an increasing rate, with a median age of residents being 46.6 years in 2010. This overall ageing mirrors the wider national trend. However, the number of people in the National Park aged over 65 is significantly higher in percentage terms than in the south-east England region, though this characteristic is common in many of the more rural areas.

7.14 There are currently 75 gypsy, traveller and travelling showpeople’s pitches within the National Park. These are shown in the table below, grouped according to which County or Unitary Authority area they are in.

Number of Existing Gypsy and Traveller Pitches

Area of the National Park within each County/Unitary Authority	Total	Permanent	Transit	Temporary
East Sussex and Brighton & Hove	36	4	32	0
Hampshire	18	9	0	9
West Sussex	21	19	0	2
TOTAL	75	32	32	11

7.15 In Hampshire the three largest communities are English gypsies (Romany), Irish travellers and travelling showpeople. In West Sussex in the south of the county the largest population is English gypsies and a small population of new travellers and travelling showpeople. The largest gypsy population in the county is in Chichester District. Within the north of the county there are English, Irish and a small population of ‘new travellers’. Over the last few years the number of travellers passing through and staying for short periods has increased, although there is no known reason for this.

7.16 Within East Sussex and Brighton & Hove there is a small but significant population of English gypsies, most of whom are settled in the area. Brighton & Hove is predominantly visited by Irish travellers and a smaller number of Romany gypsies and new travellers. It also has a

comparatively high number of people locally known as ‘van dwellers’, predominantly outside the National Park. Van dwellers usually live in their vehicles on the roadside or on unauthorised encampments and are generally not nomadic. Van dwellers are not dealt with further in this *Options Consultation Document* because they do not meet the definition of a ‘traveller’ as collectively they are not a recognised ethnic group nor are they considered ‘new travellers’ as they are effectively permanently resident.

National policy and guidance

7.17 The policies of the Local Plan will need to accord with national planning policy, the authority’s evidence studies, which are currently underway, and evidence jointly commissioned with other authorities. As referred to in para.7.2 of this chapter Local Plans should meet:

‘objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole, or
- specific policies in the NPPF indicate development should be restricted (including National Parks)’ (para.14, emphasis added).

7.18 Paragraphs 115 and 116 of the NPPF say that National Parks have the highest level of landscape protection and only in exceptional circumstances should major development in National Parks be permitted.

7.19 To achieve the delivery of a wide choice of high-quality homes, widening opportunities for home ownership and the creation of sustainable, inclusive and mixed communities, local planning authorities should:

- plan for a mix of housing based on current and future demographic trends, market trends and needs of different groups

- identify the size, type, tenure and range of housing required in particular locations, reflecting local demand
- develop policies for meeting affordable housing need on site, unless off-site provision or a financial contribution can be robustly justified.

7.20 The *English National Parks and the Broads: UK Government Vision and Circular 2010* states that NPAs have important roles to play as planning authorities in the delivery of affordable housing and that the expectation is that new housing will be focused on meeting affordable housing requirements and that authorities will maintain a focus on affordable housing, working with local authorities and others to ensure that the needs of local communities are met and affordable housing remains so in the longer term (paras 78 and 79). The reference to not providing general housing targets (para.78) is dated as following publication of the NPPF the Government does not provide any general housing targets. It is now for local authorities to identify the extent of local housing need and then to make provision in their Local Plans to meet that need.

7.21 National planning policy, *Planning Policy for Traveller Sites 2012 (PPTS)*, requires all local planning authorities to assess the need for sites for gypsies, travellers and travelling showpeople within their area for both permanent and temporary accommodation; to identify suitable land for sites and include fair, realistic and inclusive policies³⁵ within their Local Plans. The document states that local planning authorities should, in producing their Local Plan:

- identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets
- identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11–15

- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to co-operate on planning issues that cross administrative boundaries)
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density, and
- protect local amenity and environment.

Evidence base studies

Strategic Housing Market Assessments

7.22 Strategic Housing Market Assessments (SHMAs) are intended to provide an assessment of the needs for all types of housing taking into account demographic projects, economic projections and the needs of different groups in the community, as well as housing demand and the level of housing supply necessary to meet this demand.

7.23 To arrive at an 'objectively assessed need' figures or ranges for the National Park, the SDNPA is commissioning an update of the SHMAs and related work that have already been carried out for different parts of the National Park, that is:

- *Coastal West Sussex Strategic Housing Market Assessment* (GL Hearn, 2012)
- *Coastal West Sussex Duty to Co-Operate Housing Report* (GL Hearn, 2013)
- *East Hampshire Strategic Housing Market Assessment* (NLP, 2013)
- *Winchester Housing Market and Housing Need Assessment Update* (DTZ, 2012).

³⁵ *Planning Policy for Traveller Sites* (CLG, 2012), para.4.

Strategic Housing Land Availability Assessment

7.24 As part of the evidence regarding potential housing sites the NPA is required to carry out a Strategic Housing Land Availability Assessment (SHLAA). The SHLAA will consider all sites that the NPA has been made aware of that have potential for housing development under the three assessment criteria set out in the Government's SHLAA practice guidance of: suitable, available and achievable. Work on the SHLAA is being carried out by officers of the SDNPA and a draft report will be available in spring 2014. This SHLAA will be central in determining which potential housing sites are proposed in the preferred options draft Local Plan as housing allocations.

Gypsy and Traveller Accommodation Assessments

7.25 In order to meet the requirements of the *Planning Policy for Travellers Sites* the SDNPA, in partnership with adjoining local planning authorities, is undertaking several accommodation assessments.³⁶ These evidence base studies provide an assessment of the current needs for traveller sites as well as the need for sites in the future. At the time of publication studies in Hampshire and West Sussex have been completed and the East Sussex and Brighton & Hove study has commenced but is not completed. Until updated studies have been completed, the existing data for Brighton & Hove, Lewes, Wealden, Eastbourne and Horsham are based on the

studies³⁷ completed prior to the SDNPA being established. Therefore, the data for the need for additional pitches are based on the district-wide need.

- Brighton & Hove – *Brighton & Hove City Plan Part 1* identifies a five-year need of 18 pitches (2014–2019)
- Lewes District – *Lewes Joint Core Strategy* states a need for nine pitches until 2018
- Wealden District – *Wealden District (Incorporating the South Downs National Park) Core Strategy Local Plan* identifies a need for 23 additional pitches within the district by 2016
- Eastbourne Borough – *South East Plan* identifies a need of three permanent pitches and one for travelling showpeople by 2016
- Horsham District – there is an identified need for 10 pitches (2012–2017).

³⁶ *Travellers Accommodation Assessment for Hampshire 2013* (working with East Hampshire and New Forest District Council, Eastleigh, Fareham, Gosport, Havant and Test Valley Borough Councils, New Forest National Park Authority and Winchester City Council); *Coastal West Sussex Authorities Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2013* (working with Chichester, Arun, Adur District Councils and Worthing Borough Council); *Mid Sussex District Gypsy and Traveller and Travelling Showpeople Accommodation Assessment 2013*; *Horsham District Gypsy and Traveller Accommodation Assessment*; *East Sussex and Brighton & Hove Gypsy and Traveller Accommodation Assessment* (working with Brighton & Hove City Council, Lewes, Wealden, Rother District Councils and Eastbourne and Hastings Borough Councils).

³⁷ *West Sussex Gypsy and Traveller Accommodation Needs Assessment 2007*; *East Sussex and Brighton & Hove Gypsy & Traveller Study 2005*.

7.26 The newly completed studies (since the establishment of the SDNPA) show the following need for new pitches within the National Park:

Identified Need for Gypsy and Traveller Permanent Pitches

Area of the National Park within each district	Identified need (Permanent pitches)
East Hampshire and Winchester	7 (2012–27)
Adur, Arun, Chichester, Worthing (Coastal West Sussex)	4 (2012–27) ³⁸
Mid Sussex	1 (2013–31)

7.27 Many travelling showpeople across the National Park actively travel across the country to funfairs and shows, which serves as regular employment. Many own and transport large rides and attractions to these shows. These require safe areas for storage when not in use. Therefore, the space requirement for accommodation for travelling showpeople is different to that considered appropriate for those of the gypsy or traveller communities. The studies that have been undertaken have considered these specific needs of travelling showpeople and established that there is a need for at least one additional travelling showpeople’s plot in the Hampshire area of the National Park. Once completed, the East Sussex and Brighton & Hove study will provide up-to-date data on the need for additional plots within the eastern area of the National Park.

7.28 Working with neighbouring authorities, the SDNPA has assessed the need for transit pitches across the sub-region. The joint study with Adur, Arun, Chichester and Worthing Councils identified a need for 10 transit pitches across the Coastal West Sussex area and a site has been identified within the area which would provide nine new transit pitches.

7.29 The Hampshire study differentiated the identified need between the western and the eastern part of Hampshire. The eastern area covers Fareham, Winchester, Gosport, Havant and East Hampshire Districts (including the Hampshire part of the National Park) and has a notional target of 29 transit pitches.

³⁸ Since December 2012 nine new pitches have been granted permanent planning permission in the Coastal West Sussex area within the South Downs National Park. One additional pitch has been granted permanent personal permission within the Coastal West Sussex area of the SDNP.

Issues and potential options

Issue 30 – How can the Local Plan best ensure a ‘sufficient’ supply of housing?

- 7.30** The NPPF requires Local Plans to meet the full objectively assessed needs for market and affordable housing in the housing market area, where consistent with the rest of the NPPF. This policy reflects that set out in NPPF, para.14 – need should be met in full only so far as is consistent with the rest of the policies in the NPPF. In other words, if restrictive policies within paragraphs 115 and 116 of the NPPF mean that the full objectively assessed need cannot be met, the approach is that those needs do not have to be met in full.

Issue 30 – How can the Local Plan best ensure a ‘sufficient’ supply of housing?

What we propose to do

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:

- the ‘objectively assessed need’ of the National Park as determined through the SHMA, and
- 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.

Do you agree with this approach?

Do you agree with any of the alternative approaches set out below?

Option 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.

Option 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.

Option 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).

Are there any other options you think need to be considered?

Issue 31 – How can the Local Plan best address housing mix in the National Park?

7.31 In helping to achieve sustainable communities it is important for the South Downs National Park to have a well balanced mix of tenures and dwelling types within its housing stock. Due to its attractive environment and location, the housing stock of the National Park is skewed towards large, owner-occupied, detached properties, with a relatively small proportion of smaller homes and affordable tenures. Consequently it is important that, through new development over time, a better balance of tenures, sizes and types is achieved. This approach is consistent with para.50 of the NPPF.

Issue 31 – How can the Local Plan best address housing mix in the National Park?

What we propose to do

The Local Plan to set out how, through meeting housing requirements and building sustainable communities, residential development will provide:

- 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
- a range of affordable housing types and sizes, based on the local need.

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.

Do you agree with this approach?

To deliver the above approach, do you agree with one or more of the following options?

Option 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.

Option 31b – Existing properties should not be extended excessively,³⁹ further diminishing the existing property stock of small and medium sized dwellings.

Option 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.

Option 31d – Existing properties should not be replaced (one for one) by significantly larger⁴⁰ properties.

Option 31e – Any proposed size restrictions to extensions and replacement dwellings should apply only to dwellings outside settlement policy boundaries.

Are there any other options you think need to be considered?

³⁹ Definition of 'excessive' in this context would be developed for the Preferred Options Draft Local Plan stage should this option be selected.

⁴⁰ Definition of 'significantly larger properties' would be developed for the Preferred Options Draft Local Plan stage should this option be selected.

Issue 32 – What approach should the Local Plan adopt to best meet local need?

- 7.32** The high cost of housing in the National Park raises issues over accessibility to both affordable market and social housing for those households with strong local connections to the area but without significant equity or above-average incomes. The provision of affordable housing is one of the National Park Authority’s priorities, working in partnership with the housing authorities.
- 7.33** The provision of new housing within the National Park will be focused on meeting affordable housing need, while recognising the necessity for development schemes to be economically viable. There are other aspirations that will also limit the level of affordable housing that can be achieved, such as high-quality design, sustainable construction and energy-efficient buildings, and the collection of developer contributions. The SDNPA will need to work closely with local authorities, parish councils and other partners to ensure the needs of local communities are met, where they can be within the constraints of the National Park designation, and affordable housing remains so in the longer term.
- 7.34** The level of local affordable housing need within most of the communities of the National Park is such that it can rarely be fully met through the building of new market homes to subsidise the affordable housing element.

Issue 32 – What approach should the Local Plan adopt to best meet local need?

What we propose to do

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.⁴¹ 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.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 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.

Option 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.

Option 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.

Are there any other options you think need to be considered?

⁴¹ *South Downs National Park Authority Viability Assessment Community Infrastructure Levy and Affordable Housing* (Dixon Searle LLP, 2013), <http://www.southdowns.gov.uk/planning/planning-policy/local-plan.>

Issue 33 – What approach should the Local Plan adopt for rural exception sites?

- 7.35** Rural exception sites provide a significantly higher proportion of affordable housing than elsewhere (the NPPF encourages some element of market housing on exception sites to encourage developers to come forward more readily for development proposals on rural exception sites). For a rural exception scheme to be approved the local community's need for additional affordable housing must be proven by an up-to-date local housing need survey.

Issue 33 – What approach should the Local Plan adopt for rural exception sites?

What we propose to do

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:

- settlement policy boundaries, or
- the built form, where there is no settlement policy boundary defined, and
- where the National Park's first Purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage is supported.

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 Viability Assessment.

Do you agree with this approach?

Do you agree with either of the following options?

Option 33a — The Local Plan could set a site threshold for rural exception sites.⁴²

Option 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.

Are there any other options you think need to be considered?

⁴² If the option of setting a site threshold for the number of homes on rural exception sites was taken forward that threshold would be defined at the Preferred Options Draft Local Plan stage.

Issue 34 – How can the Local Plan best meet the housing needs of agricultural and forestry workers?

7.36 The agricultural and forestry industries are an essential part of the National Park. Whilst the numbers of workers required in these operations has declined significantly over recent decades there is still a need for a local workforce to work on the land, generally on modest salaries, that mean they are unable to afford the high values of market housing.

Issue 34 – How can the Local Plan best meet the housing needs of agricultural and forestry workers?

What we propose to do

The Local Plan to set a policy whereby tied affordable residential accommodation for local workers within close proximity⁴³ to agricultural or forestry enterprises, including temporary workers, will be permitted in the countryside as an exception provided:

- it is essential for the workers to live permanently at or near their place of work in the countryside
- it is in keeping with the local context, and does not adversely affect National Park Purposes
- is retained in perpetuity as accommodation for local agricultural and forestry workers, and

⁴³ The definition of ‘close proximity’ in this context will be provided through the Preferred Options Draft Local Plan.

- other residential properties on the farm or economic unit have not been sold or redeveloped for other uses within the recent past.⁴⁴

Do you agree with this approach?

Do you agree with either of the following options?

Option 34a – In addition to the approach described above, the Local Plan could limit the size of such accommodation for agricultural or forestry workers.⁴⁵

Option 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.

Are there any other options you think need to be considered?

⁴⁴ The definition of the ‘recent past’ in this context will be developed through the Preferred Options Draft Local Plan should this option be taken forward.

⁴⁵ The definition of the threshold on property sizes permitted should this option be taken forward will be defined in the Preferred Options Draft Local Plan.

Issue 35 – How can the Local Plan best ensure the housing needs of older people are met?

7.37 As the proportion of the resident population that is older increases there is a need to ensure that their housing requirements, where they do change, are addressed.

Issue 35 – How can the Local Plan best ensure the housing needs of older people are met?

What we propose to do

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.

Do you agree with this approach?

Do you agree with any of the alternative options set out below?

Option 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.

Option 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.

Option 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.

Option 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.

Are there any other options you think need to be considered?

Issue 36 – How can the Local Plan best ensure that the housing needs of gypsies, travellers and travelling showpeople are met?

7.38 *Planning Policy for Traveller Sites* states that local planning authorities should, when producing their Local Plan, identify and maintain a five year supply of specific, deliverable sites. Local planning authorities should also identify a supply of developable sites or broad locations for growth for future growth (up to 15 years). This is for permanent and transit sites in either public or private ownership.

Issue 36 – How can the Local Plan best ensure that the housing needs of gypsies, travellers and travelling showpeople are met?

What we propose to do

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.

Do you agree with any of the following options?

Option 36a – The Local Plan could identify specific locations for temporary stopping places⁴⁶ to provide alternatives to illegal encampment for those gypsies and travellers passing through.

Option 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 through the granting

of subsequent planning permissions.

Option 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.

Are there any other options you think need to be considered?

⁴⁶ 'Temporary stopping places' are areas where gypsies or travellers can stop for up to 28 days.

Issue 37 – How can the Local Plan best encourage Community Land Trusts?

7.39 A Community Land Trusts (CLT) is defined in Statute as a corporate body satisfying the conditions laid out in Section 79 of the *Housing and Regeneration Act 2008*. The *Localism Act 2011* introduced new opportunities for communities to shape their local area by developing a vision through a Neighbourhood Plan. This provides an opportunity for CLTs to be identified as part of the solution to locally identified needs. CLTs can range in size and provide a variety of housing tenures as well as other community facilities. Despite the diversity in the sector, there are five key features of a CLT:

- Community-controlled and community-owned – assets can only be sold or developed in a manner that benefits the local community
- Open democratic structure – people living and working in the defined local community must have the opportunity to become members of the CLT
- Permanently affordable housing or other assets – they will endeavour to keep the homes or assets permanently affordable
- Not for profit – CLTs are not for profit and any profit that is made must be used to further the community's interests
- Long-term stewardship – a CLT has a long-term stewarding role, including when the homes are sold or re-let.

Issue 37 – How can the Local Plan best encourage Community Land Trusts?

What we propose to do

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.

Do you agree with this approach?

Are there any other options you think need to be considered?

Other issues that can be considered in the Local Plan are:

- self-build

Q5 – Are there other Housing issues that the Local Plan should address?

8. Economy and Tourism

Introduction

- 8.1** In delivering the National Park's statutory Purposes the National Park Authority (NPA) has a Duty to: 'seek to foster the economic and social well-being of the communities within the National Park'. The challenge is to encourage sustainable development within the limits of the environment and ensuring the National Park's Purposes are not compromised in meeting the Duty.
- 8.2** The National Park's socio-economic Duty was given added weight by the Taylor and Rural Advocacy Reports,⁴⁷ which all pointed to the need to accommodate growth, development and investment in rural areas at an appropriate scale and form. *Valuing England's National Parks (2013)*⁴⁸ recognises the valuable contribution National Park economies make at a local, regional and national level. Estimated turnover of businesses within the National Park was £3.6 billion in 2012.
- 8.3** The Vision for English National Parks to 2030 set out in the DEFRA Circular states that that National Parks will be: 'recognised as fundamental to our prosperity and well-being' (*English National Parks and the Broads: UK Government Vision and Circular 2010*, p.5). It goes on to suggest, that in order to sustain their communities, NPAs should:
- encourage developments appropriate to their setting, and

- maximise the benefits of a high-quality environment, to provide a broader economic base and foster more diverse and higher-value employment opportunities.

8.4 The National Park is a major resource for recreation and tourism, which plays a significant role in the local economy. The latest estimate is that the National Park has about 46 million visitor days per year, generating an income of £464.3 million and supporting around 11,700 jobs. By supporting and promoting sustainable tourism and recreation across the National Park, there is an opportunity to contribute to economic growth within the area. This contributes to meeting the National Park's second Purpose: to promote opportunities for the understanding and enjoyment of the National Park's special qualities by the public, whilst also meeting the National Park Authority's Duty.

8.5 This chapter focuses on economic and tourism issues that the Local Plan may need to address with specific policies. These are:

Issue 38 – What strategic goals should the Local Plan set for the local economy?

Issue 39 – Should the Local Plan safeguard existing employment sites?

Issue 40 – What approach should the Local Plan take to the allocation of additional employment land?

Issue 41 – How can the Local Plan support new businesses, small local enterprises and the rural economy?

Issue 42 – What approach should the Local Plan take to the diversification of agricultural land and buildings?

Issue 43 – What approach should the Local Plan take to equine-related development?

⁴⁷ *Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing* (July 2008), and Commission for Rural Communities, *Report of the Rural Advocate* (2007 and 2010).

⁴⁸ Cumulus Consultants and ICF & GHK for National Parks England, *Valuing England's National Parks* (May 2013).

Issue 44 – How should the Local Plan consider visitor accommodation?

Issue 45 – How should the Local Plan consider types of tourism developments and recreational activities?

Issue 46 – What approach should the Local Plan take to static holiday caravan sites?

South Downs National Park context

The key outcomes related to the local economy and tourism within the *Partnership Management Plan* are:

Outcome 5: Outstanding visitor experiences are underpinned by a high-quality access and sustainable transport network providing benefits such as improved health and well-being.

Outcome 6: There is widespread understanding of the special qualities of the National Park and the benefits it provides.

Outcome 7: The range and diversity of traditional culture and skills have been protected and there is an increase in contemporary arts and crafts that are inspired by the special qualities of the National Park.

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

Outcome 10: A diverse and sustainable economy has developed which provides a range of business and employment opportunities many of which are positively linked with the special qualities of the National Park.

Outcome 11: Local people have access to skilled employment and training opportunities.

Background

8.6 National parks, alongside Areas of Outstanding Natural Beauty, receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage.** This, the first Purpose, will underpin the objectives and policies within the emerging Local Plan.

National policy and guidance

8.7 In pursuing the National Park Purposes the SDNPA will support and promote a diverse and sustainable economy, by promoting thriving villages and market towns and supporting the wider rural community. This will underpin the economic and social well-being of communities and is in line with the Government's commitment to economic growth and the importance placed on ensuring that the planning system supports sustainable growth. This includes the need to recognise and seek to address potential barriers to investment in the area. There are three Local Enterprise Partnerships (LEPs)⁴⁹ which cover the National Park: Coast to Capital LEP, Enterprise M3 LEP and South East LEP. The Strategic Economic Plans⁵⁰ they develop will determine the investment priorities that will support and sustain economic growth in the area.

8.8 There are an estimated 7,000 businesses within the National Park, providing employment for more than 58,000 people. This is within a range of employment sectors and a variety of types and sizes of businesses, which operate within both rural areas and the main employment centres of Lewes and Petersfield.

⁴⁹ Local Enterprise Partnerships have been designated by the Secretary of State for Communities and Local Government and established for the purpose of creating or improving the conditions for economic growth for their local area.

⁵⁰ The draft Coast to Capital Strategic Economic Plan can be viewed at: <http://www.coast2capital.org.uk/strategic-objectives/strategic-economic-plan-consultation#sthash.rzvTvjdL.dpbs>.

8.9 The Local Plan should seek to encourage economic development that supports National Park Purposes, and economically prosperous and thriving town centres. The NPPF also highlights the need for Local Plans to recognise the value of town centres to local communities and the local economy, and the challenges that high streets and town centres currently face. Growth should be focused in existing centres, and planning policy should support town centres, providing choice and a diverse retail offer (NPPF, para.23).

8.10 The *South Downs National Park Employment Land Review (ELR)*⁵¹ draws on existing evidence on employment land from across the National Park and provides information on the employment land currently available and the potential future need for employment land by area and sector. This will support decisions on the allocation, protection or release of employment sites which will be considered in the Local Plan. The ELR identifies some of the characteristics of the National Park economy:

- Tourism accounts for 15 per cent of all employment and it is expected that this sector will grow.
- There is a lower proportion of jobs in sectors which would normally occupy B-class⁵² employment space.
- There is a higher proportion of residents employed in agriculture, forestry and fishing, compared to those living in the surrounding area.
- There are higher percentages of managers and senior officials, and those in professional occupations and skilled trades living within the National Park, than in surrounding areas. Given the employment

⁵¹ *South Downs National Park Employment Land Review* (May 2012) http://www.southdowns.gov.uk/_data/assets/pdf_file/0008/275309/Land-review-Final-Report-May-12.pdf

⁵² B1 business – offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area; B2 general industrial – use for industrial processes other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste); and B8 storage or distribution – includes open air storage.

structure of the area, this suggests out-commuting by higher paid and higher skilled workers.

- The profile of business is skewed towards smaller business, with over three quarters of businesses employing fewer than five people.

8.11 The ELR makes the following policy recommendations:

- Recognise that within the National Park there are some relatively large settlements and in order to sustain economic prosperity and growth there is a need to continuously refresh the stock of commercial and industrial buildings. Policy should therefore facilitate appropriate changes and/or expansion.
- Adopt development management policies for small sites and to guide new farm diversification.
- Consider a tiered policy approach to employment policy, for example market towns, villages and rural sites.

South Downs National Park Visitor Survey 2013

8.12 Currently, only 36 per cent of employment in the National Park is in sectors normally occupying B-class employment space (that is business, general industrial or storage and distribution). Therefore, it is important to recognise other sectors and principal among these is the tourism sector. The *South Downs National Park Visitor Survey 2013*⁵³ provides the findings of research including two key components:

- an audit of visitor-related businesses, including surveys on business performance and future plans, and
- visitor and resident surveys, including a profile of who uses the area, how they use it and their experience of visiting. The environmental part of the surveys identified and quantified the impacts visitors have on the landscape, biodiversity and cultural heritage they come to

⁵³ *South Downs National Park Visitor and Tourism Impact Study* (January 2013).

enjoy, so that appropriate visitor management, conservation and enhancement programmes can be developed and implemented.

- 8.13 The *Visitor Survey* provides some important findings to consider for the emerging Local Plan including:
- existing tourism- and recreation-related businesses have aspirations to expand
 - a need to promote sustainable tourism
 - dominance of day visitors – day visitors from homes within the National Park represent six per cent of all visits, and those resident nearby, 72 per cent of all visits. Only four per cent of visits are from people from further afield who stay within the National Park, and
 - visitors staying within the National Park are likely to spend six times more than day visitors travelling from home.
- 8.14 Studies into the future opportunities for visitor accommodation have been carried out in East Hampshire, Lewes, Chichester and Wealden. The most recent is for East Hampshire District.⁵⁴

Issues and potential options

Issue 38 – What strategic goals should the Local Plan set for the local economy?

- 8.15 Local Plans are required to set out clear strategic goals for the economy in their area to encourage sustainable economic growth (NPPF, para.21). In setting out these goals the authority will take into account the National Park’s Purposes and the NPA’s Duty to foster the economic and social well-being of the communities within the National Park.

Issue 38 – What strategic goals should the Local Plan set for the local economy?

What we propose to do

The Local Plan will set clear strategic goals for the local economy, which will support the *Partnership Management Plan*.

Do you agree with this approach?

What strategic goals for the local economy should we consider in the Local Plan?

⁵⁴ *East Hampshire Hotel and Pub Accommodation Futures Study (2013)*.

Issue 39 – Should the Local Plan safeguard existing employment sites?

- 8.16 Partly due to the disparity between housing and employment land values, there can be pressure to release employment land for residential development. Whilst this could contribute to helping meet housing need, it is important that the Local Plan considers both the short- and long-term needs of the local economy. However, national policy recognises that in some cases employment sites are no longer required and could have an alternative use. It is therefore important that we have a clear understanding of the need for employment land and/or commercial floorspace, in addition to an assessment of the existing and future supply of land available and its sufficiency and suitability to meet this need.
- 8.17 The Local Plan may want to consider identifying the criteria by which it will be considered acceptable to allow the change of use of employment land to other uses. This could include a demonstrated lack of developer interest, persistently high vacancy rates, serious adverse impacts from existing operations, or loss of some space could facilitate further or improved provision of floorspace. Other factors which we may want to consider are the redevelopment potential of the site for other employment uses or a mix of uses, including the scope for intensifying use or improving existing buildings to meet the requirements for modern employment floorspace.

Issue 39 – Should the Local Plan safeguard existing employment sites?

What we propose to do

The Local Plan to:

- 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.
- 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 better use of the site.

Do you agree with this approach?

What criteria do you think are important in determining if an employment site is retained?

Do you agree with either of the following options to help deliver the approach outlined above?

Option 39a – The Local Plan could adopt a sequential approach to the loss of employment land/floorspace as follows:

- (i) preference given to the redevelopment of the site whilst retaining the employment use on the whole site
- (ii) if (i) is demonstrated as being unachievable, we will consider a mixed-use development on the site, which includes some employment land/floorspace
- (iii) if both (i) and (ii) are demonstrated as being unachievable, we will then consider the loss of the employment land floorspace.

Option 39b – Where development is proposed which would result in loss of an existing active industrial or business use, the Local Plan could explore options for mitigation.

Are there any other options that need to be considered?

Issue 40 – What approach should the Local Plan take to the allocation of additional employment land?

- 8.18** There is a broad range of employment sectors and a variety of types and sizes of businesses operating within the National Park. In order to sustain economic prosperity and growth, there is a need to ensure the supply of sufficient suitable land and property for commercial enterprise built to a high-quality design and construction standard that contributes to conserving and enhancing the natural beauty and landscape of the National Park.
- 8.19** Policies must be sufficiently flexible to accommodate changing business needs and economic circumstances. Whilst there is evidence of existing need in some parts of the National Park, the *Employment Land Review* recommends that no National Park-wide quantitative target needs to be set for additional employment land. It does recommend that existing employment allocations are retained and acknowledges that a balance is required between allocation and achieving flexibility and responsiveness to meeting emerging needs as they arise.
- 8.20** National policy states that local planning policies should 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. The Local Plan will need to consider this when reviewing any existing allocations and must be mindful that any new allocations would need to be regularly reviewed in line with the NPPF.

Issue 40 – What approach should the Local Plan take to the allocation of additional employment land?

What we propose to do

The Local Plan to:

- 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.
- set criteria for the provision of new employment land/floorspace.

Do you agree with this approach?

In addition to the above approach do you agree with any of the following options?

Option 40a – Allocate new employment sites to accommodate the need for new or expanding businesses in appropriate locations.

Option 40b – Allocate mixed-use sites to accommodate the need for new or expanding businesses.

Are there any other options that need to be considered?

What criteria do you think are important in determining the location of new employment sites?

Issue 41 – How can the Local Plan support new businesses, small local enterprises and the rural economy?

8.21 The *Employment Land Review* finds:

- the National Park has a high proportion of smaller business, with over three quarters of businesses employing fewer than five people, and
- evidence of a need for small units and start-up enterprise centres.

Enterprise centres provide flexible space and facilities to encourage, support and nurture businesses during start-up and the early stages of their development. With a large proportion of small rural business, the National Park's economy is especially vulnerable in difficult economic times and it is important to provide support. Rural-based businesses show a potential for growth, but remain smaller overall, and survival rates are mixed. This may be a result of lack of premises for expansion, and lack of access to skills and infrastructure issues, such as poor broadband and transport links.

Issue 41 – How can the Local Plan support new businesses, small local enterprises and the rural economy?

What we propose to do

The Local Plan to:

- 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.
- 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.

Do you agree with this approach?

Do you agree with the following option?

Option 41a – Allocate land for start-up enterprise centres⁵⁵ located where there is demonstrated to be a strong market demand.

Are there any other options that need to be considered?

⁵⁵ An enterprise centre provides flexible space and facilities to encourage, support and nurture businesses during start-up and during the early stages of their development.

Issue 42 – What approach should the Local Plan take to the diversification of agricultural land and buildings?

- 8.22** Farm diversification can provide additional income to support agricultural businesses and potentially create more employment opportunities. It is estimated that around half of the farms within the National Park have diversified into a range of other activities including storage, farm shops, business and light industrial premises, horse liverys and tourism-related activities, including visitor accommodation and educational facilities. This can provide both investment into the rural economy and wider conservation and community benefits.
- 8.23** The NPPF requires Local Plans to promote the diversification of agricultural and other land-based rural businesses. However, it is crucial to ensure that diversification does not have a detrimental impact on the special qualities of the National Park and is consistent with the National Park's Purposes.

Issue 42 – What approach should the Local Plan take to the diversification of agricultural land and buildings?

What we propose to do

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 landscape setting.

Do you agree with this approach?

Do you agree with either of the following options to deliver the approach outlined above?

Option 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 sale of products grown on site.

Option 42b – The Local Plan could allow for more diverse economic use of agricultural buildings where it is considered to promote the National Park Purposes.

Are there any other options that need to be considered?

Issue 43 – What approach should the Local Plan take to equine-related development?⁵⁶

- 8.24** Equestrian activities can range from those of a commercial nature such as livery stables, polo-related activities and riding schools to small domestic stables and field shelters. The ‘keeping’ of horses has the potential to make a positive contribution to the management of the local landscape and can offer an opportunity for diversification. There are potential individual and cumulative impacts associated with an increase in areas of the National Park being used for equine-related development. Therefore, whilst the National Park Authority will support the appropriate use of land for equine development, it is important that guidance is included in the Local Plan to ensure that a balance is struck between protecting the landscape and maintaining the living and working environment.
- 8.25** Whilst the ‘grazing’ of horses on land is a form of agriculture that does not require planning permission, the ‘keeping’ of horses and related development does require planning permission. The distinction between ‘grazing’ and ‘keeping’ is not always clear, although a judgement can normally be made on the basis of the area of grazing land available per animal, the existence of stables and other facilities, and the condition of the land. The sub-division of agricultural land into paddocks with shelters provided for horses is likely to consist of ‘keeping’ and, therefore, will require permission. More information and guidance on the keeping of horses is available from DEFRA at <https://www.gov.uk/keeping-horses-on-farms>.
- 8.26** There are a number of factors which need to be taken into account when considering equine development. This includes the impacts of development on the landscape, which can be both individual and cumulative, for example fencing, lighting, new buildings, manèges, polo grounds, horse walkers, parking areas for horse boxes, intensification of

human activity associated with livery yards, new access provisions and the appropriate re-use of traditional agricultural buildings. There are also associated land-management issues such as the impact on pasture of stock density, manure and waste management and associated infrastructure and access to the site, including the potential impact of horse-related development on rights of way.

Issue 43 – What approach should the Local Plan take to equine-related development?

What we propose to do

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 beauty, wildlife and cultural heritage (Purpose One) and the landscape character of the National Park
- 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.

Do you agree with this approach?

Do you agree with the following option?

Option 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 equine-related development.

Are there any other options that need to be considered?

⁵⁶ ‘Equine’ includes domestic horses and ponies (including feral and semi feral ponies), donkeys and hybrids (including mules).

Issue 44 – How should the Local Plan consider visitor accommodation?

- 8.27** The National Park is a popular visitor destination with a number of visitor attractions (see Figure 12). A significant proportion of visits are day trips from those living in or close to the National Park. Tourism and visitors make a positive contribution to the overall local economy. Currently, due to the dominance of day visits, there are low levels of average visitor expenditure because the majority of those visiting are travelling from home or staying in accommodation outside the National Park. By increasing the level of accommodation provision within the National Park, it may be possible to increase the number of visitors who stay within the National Park, rather than travelling beyond the Park's boundary to accommodation elsewhere.
- 8.28** Visitor accommodation includes serviced accommodation such as bed and breakfast, guest houses, camping and touring caravans, hotel accommodation and youth hostels, and non-serviced accommodation including self-catering accommodation and other holiday lets (for example, ecopods, lodges and cabins). The *Visitor Survey* assesses the range of current accommodation available, with the most popular accommodation being the homes of friends or relatives in and around the National Park. There are camping and caravanning sites available within the National Park, however 55 per cent of the capacity is located in three large sites.

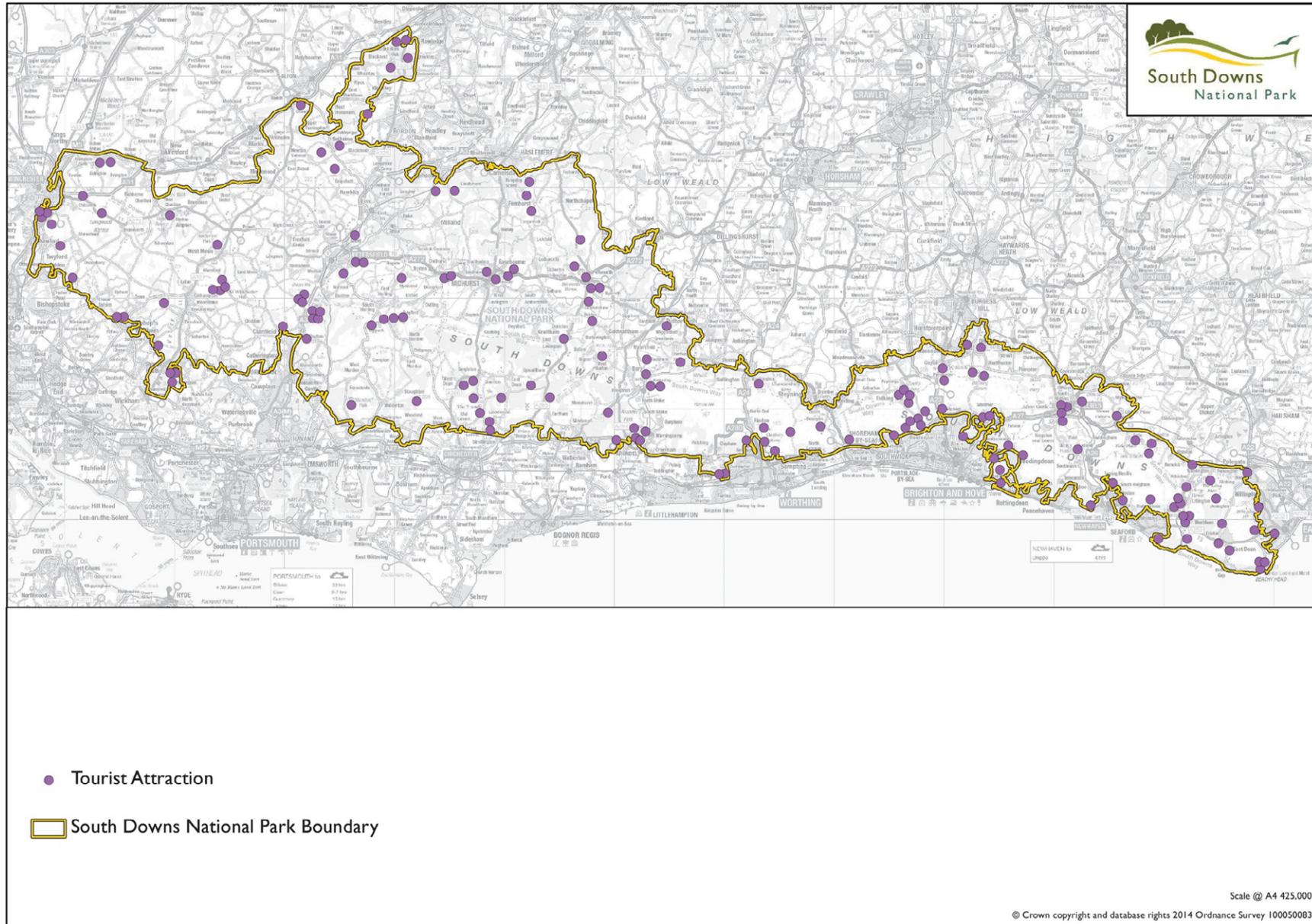


Figure 12: Visitor Attractions

- 8.29** In order to cater for all preferences and incomes there needs to be a greater variety of accommodation provided throughout the National Park. Gaps in accommodation provision have been identified, such as for lower-cost accommodation and for accommodation along the South Downs Way.
- 8.30** Evidence from the various *Hotel Futures Studies* suggest that occupancy levels are relatively high. This indicates the need to safeguard existing accommodation to prevent further loss. However, further evidence on the occupancy levels and provision of visitor accommodation across the National Park is required to ensure comprehensive cover and to update five-year-old statistics.
- 8.31** The Local Plan may want to consider identifying the criteria by which it will be considered acceptable to allow the loss of visitor accommodation. This could include a demonstrated lack of developer interest, persistently high vacancy rates, considerable adverse impacts from existing operations, or replacement by improved provision at a more appropriate location elsewhere.

Issue 44 – How should the Local Plan consider visitor accommodation?

What we propose to do

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.

The Local Plan to have a presumption against the loss of visitor accommodation and set criteria within policy, against which the loss of

accommodation will be judged.

What criteria do you think are important in determining if visitor accommodation should be retained?

Do you agree with any of the following options to deliver the proposal outlined above (relating to visitor accommodation)?

Option 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.

Option 44b – The Local Plan could encourage development associated with visitor accommodation **away** from certain parts or areas, such as the less accessible areas.

Option 44c – The Local Plan could take a more flexible approach to visitor accommodation, informed by landscape character assessments.

Are there any other options that need to be considered?

Issue 45 – How should the Local Plan consider types of tourism development and recreational activity?

8.32 Due to the large numbers of visitors to certain parts of the National Park, there are concerns regarding the potential impact of tourism and recreational activities. It is important that whilst recreational activity is encouraged, it does not damage the special qualities or other people's enjoyment of the area. This includes tranquillity, and therefore some activities may not be appropriate. The Local Plan will need to consider how we manage certain activities in more sensitive areas where disturbance or damage could occur. In addition, there are currently issues related to the fragmentation of the tourism sector and limited opportunities for visitors to use more sustainable modes of transport.

Issue 45 – How should the Local Plan consider types of tourism development and recreational activity?

What we propose to do

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.

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.

Do you agree with any of the following options?

Option 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).

Option 45b – The Local Plan could encourage recreational activity away from certain parts or areas of the National Park, such as less accessible areas.

Option 45c – The Local Plan could take a more flexible approach to recreational development, which is informed by landscape character assessments.

Are there any other options that need to be considered?

Issue 46 – What approach should the Local Plan take to static holiday caravan sites?

- 8.33** Static holiday caravan sites contribute to the range of visitor accommodation currently available across the National Park. However, the location and scale of new sites or extensions to existing sites must be seriously considered due to the potential impact on the landscape. It may be that smaller sites could be acceptable, in an appropriate location. We will not define small as a set number of pitches or size of site, as what is appropriate in terms of size will vary depending on location.
- 8.34** Due to the potential impact on the landscape, we may want to be more restrictive on the provision of static holiday caravan sites. It could be that the Local Plan applies a more restrictive policy, which will allow the relocation of existing sites or provision of alternative camping and caravan provision only, where this would conserve and enhance the landscape.

Issue 46 – What approach should the Local Plan take to static holiday caravan sites?

Do you agree with any of the following options?

Option 46a – The Local Plan could have a presumption against the development of new static caravan parks across the National Park.

Option 46b – The Local Plan could restrict the development of new static caravan sites and support the appropriate redevelopment or relocation of existing sites only.

Option 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.

Are there any other options that need to be considered?

Other issues that can be considered in the Local Plan are:

- Home working
- Farming infrastructure
- Forestry
- Outdoor learning provision
- Enterprise hubs
- Farm diversification
- Viticulture, and
- Golf courses

Q6 - Are there other Economy and Tourism issues that the Local Plan should address?

9. Community Facilities and Infrastructure

Introduction

- 9.1 Providing housing and employment opportunities alone will not be sufficient to create sustainable communities. A range of services and facilities is necessary to ensure social needs such as schools, medical facilities, sporting and recreational facilities and open spaces⁵⁷ are available. Development can increase the pressure on existing infrastructure, services and facilities, whether from large-scale strategic assets serving an entire settlement or to small-scale works provided for just a single development.
- 9.2 Services and facilities across the South Downs National Park are a source of local pride and greatly contribute to the quality of life and well-being of communities. They have generally been in decline over many years, particularly in smaller villages, causing increased dependency on the larger settlements, and eroding the autonomy, vitality and vibrancy of communities.
- 9.3 The planning system has an important role in helping protect existing community services and facilities and providing a positive framework for proposed new provision and service innovation. The Community Infrastructure Levy (CIL) is a new form of funding for infrastructure which largely replaces the existing system of negotiated financial contributions from developers. The CIL will provide an opportunity to fund local priorities and support new development. A proportion of CIL funds will be passed to parish councils to spend on projects of their choosing.

- 9.4 This chapter focuses on issues that we consider need a planning response and possibly specific policies in the Local Plan. These are:

Issue 47 – How can the Local Plan best ensure communities have access to local services?

Issue 48 – How can the Local Plan best resist the loss of community infrastructure?

Issue 49 – How best can the Local Plan best ensure adequate infrastructure provision for new development?

Issue 50 – How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/renewable-energy schemes?

Issue 51 – How can the Community Infrastructure Levy be best allocated?

Issue 52 – How should the Local Plan deal with proposals for strategic infrastructure?

South Downs National Park context

- 9.5 The key outcomes related to community facilities and infrastructure in the *Partnership Management Plan* are:

Outcome 8: More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.

Outcome 9: Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.

⁵⁷ Section 216 of the *Planning Act 2008*.

- 9.6 In the past development has been directed towards larger villages and towns through the designation of settlement boundaries or policy areas. The Settlement Hierarchy Study identifies the relative accessibility of settlements to key services and facilities. There are many smaller, isolated communities where accessing essential services can be challenging. Over 250 settlements were identified as having minimal or no provision across seven categories of socio-economic infrastructure.
- 9.7 The on-going shift in the population of the National Park over time towards older, retired age groups will change the nature of facilities and services required. The majority of the National Park is in the 20 per cent most deprived areas in the country for access to services and housing, according to the *Indices of Multiple Deprivation 2010*, indicating a need for better accessibility to community infrastructure.

Background

- 9.8 National Parks receive the **highest protection in the UK in relation to conserving and enhancing their natural beauty, wildlife and cultural heritage**. This, their first Purpose, will underpin the objectives and policies within the emerging Local Plan.
- 9.9 The availability of local services such as a post office, sports field or pub is often a good indicator of the sustainability of a community and the quality of life for residents. Reasons for the loss of facilities include the reorganisation of the post office service, the consolidation of health and education facilities, and cuts in public budgets. There has also been a general decline in the number of pubs, although many of the remaining rural pubs continue to be highly valued and play an important part in village life. The most active communities have responded to this challenging backdrop by taking on the running of services themselves. Innovative forms of service delivery have sprung up from community-run buses to community-energy schemes providing low-cost electricity.

- 9.10 In the market towns new development has outpaced infrastructure provision. There is a need to increase and upgrade provision in certain areas as new development takes place. This includes provision of formal and informal green infrastructure (for example sports pitches, parks, and habitat creation schemes).
- 9.11 Public transport in many areas is limited or unavailable, increasing dependency on travel by car to the larger towns and villages and main settlements outside the National Park. For the most vulnerable in society and those without access to a car, this can result in isolation. Parish and Neighbourhood Plans provide further evidence of infrastructure needs including a lack of necessary local services, community transport, banking, schools, village shops and village hall provision.
- 9.12 A core planning principle in the National Planning Policy Framework (NPPF) states there is a need to take account of and support '*local strategies to improve health, social and cultural well-being for all*', and deliver '*sufficient community and cultural facilities and services to meet local needs*'. Local strategies in this context could include Parish Plans and Neighbourhood Plans.
- 9.13 The NPPF identifies the importance of community facilities in underpinning the sustainability of communities, guarding against their loss and ensuring they are able to develop and modernise in a sustainable way. Particular mention is made of public open spaces/green spaces, recreational buildings and land and public rights of way. There is strong support for the provision of new schools, including 'free' schools.

Evidence base studies

Settlement Hierarchy Study

The aim of the National Park's Settlement Hierarchy Study is to establish the level of services and facilities available to communities throughout the

area. The score of each settlement within the Settlement Hierarchy Study is determined by the number and type of services and facilities present. These were surveyed in 2011. Following consultation with parish councils, further desktop analysis was undertaken in 2012. The number and type of services have been quantified using a scoring system. The scores for each settlement provide an indication of the relative access to services and facilities in each of the settlements and its position within the settlement hierarchy. Final scores were then separated into 'tiers' to identify groups of settlements with broadly similar characteristics. **During 2014 this study will be updated to feed into the 'Preferred Options' version of the Local Plan. We will be consulting with town and parish councils to ensure the information on each settlement is up to date.**

Access Network and Accessible Natural Greenspace Study

- 9.14 Phase One of the Access Network and Accessible Natural Greenspace Study for the National Park was completed in 2013. The study covers 27 local planning authority areas, to take into account wider connections. The study identifies:
- deficits in access to greenspace and vulnerabilities of habitats and species to the effects of development and climate change
 - opportunities for strategic green infrastructure (GI) initiatives in GI 'Investment Areas' including: newly created accessible greenspace connected by green and blue corridors and access routes, considerations for incorporating water sensitive urban design, such as sustainable urban drainage schemes (SUDS) and, initiatives to help cool urban environments and schemes for improving river environments, and

- further analysis relating to the Accessible Natural Greenspace Standard (ANGSt).⁵⁸

- 9.15 It also considers how development will influence access to existing GI, where access can be improved and the role of GI in creating and improving wildlife corridors between habitats, including international, national and locally designated sites.

Energy Study

- 9.16 The Energy Study highlights:

- the predicted potential carbon savings for the National Park of several energy-efficiency measures against a 2034 target (based upon 80 per cent reduction by 2050) indicates that despite significant potential carbon reduction associated with energy-efficiency measures for existing buildings, the saving falls well short of the 2034 target
- once opportunities for reducing energy demand have been exhausted, further carbon reduction can be achieved only through lowering the carbon content within the energy supply, and
- full take-up of micro-generation opportunities along with full take-up of the energy-efficiency measures is unlikely to achieve the targeted emissions savings.

Issues and potential options

Issue 47 – How can the Local Plan best ensure communities have access to local services?

- 9.17 Easily accessible facilities and services support the vitality and vibrancy of local communities. The range of facilities and services should be sustained or enhanced where there is a need and suitable land or

⁵⁸ ANGSt is based on the Natural England standard which recommends that everyone, wherever they live, should have accessible natural greenspace of at least two hectares in size, no more than 300 metres (a five-minute walk) from their home.

premises are available. Many communities have little or no access to public transport and so it is important to locate services and facilities as close as possible to users. However, the Local Plan is relatively limited in the influence that it has over the provision of new services and facilities. The CIL may be able to assist in funding some community-based projects. These projects can be identified on the Infrastructure Delivery Plan which supports the CIL Charging Schedule, or through community-led plans such as Parish Plans or Neighbourhood Plans.

- 9.18 Increased land and property prices, a fluctuating economy and technological and cultural change have led to the loss of certain key village facilities and services. An ageing population will increase the need for facilities and services for older age groups over the period of the Local Plan. At the same time, it is important that a broad mix of facilities is retained to meet the needs of all age groups. High-speed broadband will generally improve the lives of residents as well as their capability to work at home, thus reducing travel. However, this is still unavailable across many rural locations.

Issue 47 – How can the Local Plan best ensure communities have access to local services?

What we propose to do

The Local Plan to:

- take a flexible and positive approach to the delivery of new and expanded community facilities to address identified needs.
- provide certainty of where the SDNPA wishes to encourage new facilities and the circumstances in which such development will be supported.

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 of the special qualities of the National Park and other Local Plan policies.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 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 for facilities and services which can demonstrate a benefit to a cluster of settlements.

Option 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.

Option 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.

Are there any other options that need to be considered?

Issue 48 – How can the Local Plan best resist the loss of community infrastructure?

- 9.19 Some communities have lost essential services, thus increasing the need for journeys to other settlements, particularly the larger settlements in the National Park and adjacent to its boundary. Over time, this trend can progressively weaken a community's identity and cohesion by increasing its dependence on services and by reducing the opportunities for the community to meet and participate in local life.

Issue 48 – How can the Local Plan best resist the loss of community infrastructure?

What we propose to do

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.

Do you agree with this approach?

Do you agree with either of the following options?

Option 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.

Option 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.

Are there any other options that need to be considered?

Issue 49 – How can the Local Plan best ensure adequate infrastructure provision for new development?

9.20 New development places a burden on the existing infrastructure provision, particularly on school places. There are minimum requirements for associated infrastructure to support new development. This can include highways and access, broadband and utilities provision. Development sites will be expected to be ‘self-supporting’ with associated infrastructure delivered through a combination of on-site provision and developer contributions.

Issue 49 – How can the Local Plan best ensure adequate infrastructure provision for new development?

What we propose to do

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 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.

Do you agree with this approach?

Are there any other options that need to be considered?

Issue 50 – How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/domestic-scale renewable-energy schemes?

- 9.21 All planning decisions on renewable-energy development proposals will have to be made in the context of the nationally important landscapes of the National Park. For example, wind turbines and photo-voltaic and solar thermal schemes could affect the expansive views experienced from the chalk scarp, and from the Western Weald. The cumulative impact of these schemes and associated infrastructure could harm the essentially undeveloped character of the National Park.
- 9.22 It is perhaps helpful to distinguish between different scales of renewable development that may comprise:
- strategic renewables and commercially financed industrial-scale community renewable projects, such as
 - community-initiated schemes that are primarily aimed at providing renewable energy to a settlement or group of settlements, or
 - a community share within a larger strategic renewables scheme
 - domestic micro-renewable serving the needs of an individual property or business.
- 9.23 The list above differentiates between the objective of the scheme rather than the scale of the development. Depending upon the size/nature of the installation, any scheme could be major development. Some other NPAs have adopted policies to indicate that strategic renewables are schemes that constitute major development not consistent with National Park Purposes and Duty while supporting appropriate micro-renewables, particularly those that are community-initiated projects that support the Purposes and Duty. The SDNP *Partnership Management Plan* sets out an energy hierarchy to guide decisions and help prioritise delivery.⁵⁹

⁵⁹ *South Downs National Park Partnership Management Plan 2014–2019*, Energy Hierarchy, p.60,

Issue 50 – How can the Local Plan best address statutory requirements to support carbon-reduction targets through low-carbon/domestic-scale renewable-energy schemes?

What we propose to do

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.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 50b – The Local Plan could include a variation on **Option 50a** that gives overriding preference to community energy schemes.

Option 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.

Are there any other options you think need to be considered?

Issue 51 – How can the Community Infrastructure Levy be best allocated?

9.24 Insufficient infrastructure provision in the past has increased the resistance of communities to new development and the Community Infrastructure Levy (CIL) is intended to reverse this trend by directly funding infrastructure to support and incentivise that development. CIL funds are designed to deliver infrastructure to support new development, alongside negotiated section 106 agreements, to secure affordable housing and certain on-site infrastructure and section 278 agreements for highways works. However, whilst a proportion of the CIL funding will go directly to the parish council in which development occurs, the remaining CIL funds may be spent anywhere in and around the National Park, irrespective of the location of the development.

Issue 51 – How can the Community Infrastructure Levy be best allocated?

What we propose to do

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.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 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.

Are there any other options you think need to be considered?

Issue 52 – How should the Local Plan deal with proposals for strategic infrastructure?

- 9.25** New housing and commercial development often requires significant infrastructure upgrades and new provision, including roads, power lines and even reservoirs. This strategic infrastructure has a positive social impact and can reduce or resolve infrastructure capacity limitations elsewhere. However, it can be harmful to the natural environment, landscape and, therefore, contrary to the first Purpose and will need to be considered under the major development test (see paragraph 1.22). Within the National Park, this may include the creation of new environmental assets, such as strategic open space and recreational facilities designed to divert people away from the most sensitive areas of the National Park, such as sites of national and international importance for biodiversity and other areas subject to visitor pressure. Green infrastructure networks (for example, green and blue corridors) can provide benefits for people, by improving links between towns and villages and the wider countryside and for wildlife, by joining up and extending habitats.
- 9.26** Major new infrastructure projects go beyond local administrative boundaries and are often planned at a county (or bigger) scale. It is therefore important that the SDNP Local Plan is in accordance with the Local Transport Plans prepared by the counties which will set out the long-term aims and objectives for their area as well as any specific area-based policies which need to be taken into account in the Local Plan, for example safeguarding of a proposed new road or rail route.
- 9.27** The individual or cumulative landscape impact of strategic infrastructure should be considered when assessing development proposals.

Issue 52 – How should the Local Plan deal with proposals for strategic infrastructure?

What we propose to do

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 paragraph 116 of the NPPF, including demonstrating that it is in the public interest.

Do you agree with this approach?

Do you agree with the following options?

Option 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 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.

Are there any other options you think need to be considered?

Other issues that can be considered in the Local Plan are:

- Telecommunications infrastructure
- Provision of high-speed broadband
- Water infrastructure (including sustainable drainage)
- Sports facilities, and
- Community facilities (including public houses, libraries, post offices, village halls)

Q7 – Are there other Community Facilities and Infrastructure issues that the Local Plan should address?

10. Transport and Accessibility

Introduction

- 10.1** The Local Plan needs to consider how accessible places are and how well they are served by public transport – both in terms of social accessibility and carbon reduction. While the Local Plan can dictate where development should be focused, it is the County Councils for Hampshire and East and West Sussex, together with Brighton & Hove City Council – the Local Transport Authorities (LTAs) – that are responsible for local transport and highways matters. Network Rail, as the national rail operator, and the train and bus operators are key transport partners.
- 10.2** The SDNPA can influence decisions on sustainable transport through working with these partners on actions and projects as part of delivering the *Partnership Management Plan* objectives. These are primarily operational matters rather than planning matters and are not dealt with further in this *Options Consultation Document*.
- 10.3** The content of this chapter is therefore focused on planning-related transport and accessibility issues that could have specific policies in the Local Plan. Considerable work has already been done by the constituent local authorities of the National Park and other bodies to identify transport issues and devise policy responses. There is a degree of commonality between the issues highlighted by the constituent LTAs, including:
- Issue 53** – How can the Local Plan best protect existing routes for use as sustainable transport routes?
- Issue 54** – What should be the Local Plan’s approach to car parking?
- Issue 55** – How can the Local Plan best ensure that new developments are accessible?

South Downs National Park context

- 10.4** There are key outcomes relating to sustainable transport within the *Partnership Management Plan* are:
- Outcome 1:** The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing land and the negative impacts of development and cumulative change.
- Outcome 5:** Outstanding visitor experiences are underpinned by a high-quality access and sustainable transport network providing benefits such as improved health and well-being.
- Outcome 8:** More responsibility and action is taken by visitors, residents and businesses to conserve and enhance the special qualities and use resources more wisely.
- Outcome 9:** Communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities.
- 10.5** The policies which guide the achievement of the outcomes for the National Park are wide ranging and will need to be supported by a broad spectrum of communities, groups and activities. The Local Plan is one mechanism for delivering these positive, long-term outcomes.
- 10.6** The Local Sustainable Transport Fund (LSTF) bid in 2011 (jointly submitted for the New Forest and South Downs National Parks by Hampshire County Council) is also an important foundation for identifying sustainable transport policies. The bid included four key objectives, within which a series of actions were identified for potential implementation using LSTF and other funding. The four objectives are:

- improve key public transport gateways
- make it easy to reach key attractions
- promote sustainable travel packages to visitors before they arrive and while they are in the National Parks, and
- manage all traffic effectively so that it does not detract from visitors' experiences.

Background

- 10.7** National Parks receive the highest level of protection in the UK in relation to conserving and enhancing the natural beauty, wildlife and cultural heritage. This, the first Purpose, will underpin the objectives and policies of the emerging Local Plan.
- 10.8** There is significant traffic generated by commuting, business and visitor related traffic. The increasing use of vehicular transport can threaten tranquillity and other environmental qualities that attract visitors, as well as causing congestion at popular visitor sites. The Government's travel hierarchy is the starting point for the National Park's transport policies:
- reduce the need to travel
 - switch to sustainable modes
 - manage existing networks more effectively, and
 - create extra (car-related) capacity only when alternative methods have been fully explored.
- 10.9** Transport accounts for around one third of carbon emissions, so reducing the need for travel is an important objective for sustainable development. This is discussed in Chapter 6: Settlement Strategy, which explores options for locating new development at sites that have good access to service centres thereby minimising the need for travel, and Chapter 8: *Economy and Tourism*, in relation to the need for sustainable and flexible working practices, including home working.

- 10.10** It is vital that local residents, businesses and visitors can travel to employment, schools and other educational institutions, services and facilities, markets and visitor attractions. Walking, cycling or taking the bus are the most eco-friendly and healthy ways for visitors to enjoy the National Park, and the National Park Authority and partners have set up a number of transport projects to support this. But with the quality of public transport provision in the National Park being relatively poor, accessibility for those without regular access to their own private vehicle is a significant issue.
- 10.11** The *English National Parks and the Broads: UK Government Vision and Circular 2010* highlights that there needs to be close liaison between the NPAs and the transport authorities in order to help promote sustainable travel choices. Where there is additional demand for travel in National Parks, transport authorities are expected to have firstly considered demand management measures before new infrastructure. Where new transport capacity is considered necessary within the National Parks, low-carbon initiatives, such as enhancements to public transport, car club and sharing schemes, improved cycling and walking connections – particularly between train stations and other nodes – need to be given consideration.
- 10.12** National policy on car parking (Issue 54) is restricted to considerations of how to determine parking provision for new development and for town centres. Sustainable transport options should guide such decisions in addition to other factors such as the accessibility, type of development and general levels of car ownership. Parking in town centres should be convenient, safe and secure and accommodate motorcycles and bicycles, as well as cars and other vehicles.
- 10.13** Local planning authorities should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice. This policy links directly to Issue 53. New development should be accessible by sustainable transport, although Government policy

acknowledges that the extent to which this can be achieved varies from urban to rural areas. In this respect, the predominantly rural nature of the National Park, which includes 179 communities with little or no access to public transport, is a key consideration in considering where new development could be sustainably located.

Evidence base studies

South Downs Transport Study

10.14 The South Downs Transport Study Phase One includes a review of the existing policies for the LTAs together with some high-level analysis of transport movements, trends and characterisation of key issues. Key policy implications arising from the study are:

- public transport accessibility as a spatial planning criterion
- growth in visitor access and activity as a means of achieving a more sustainable local economy
- managing access points to reduce negative impacts at hotspots
- planning access points and interchanges to boost visits by sustainable means, and
- planning rights of way improvements in relation to access by sustainable means of travel.

All of the above are of importance, either in contributing to the objective of sustainable transport or in view of their susceptibility to influence through the Local Plan. Each issue is dealt with in the following issues and options.

Issues and potential options

Issue 53 – How can the Local Plan best protect existing routes for use as sustainable transport routes?

10.15 Some 7,200 kilometres (4,500 miles) of abandoned railway lines now form a stunning network of green cycling routes and footpaths across the

UK. A number of these abandoned railway lines exist within the National Park, including:

- part of the Meon Valley line connecting Wickham and Alton
- the north section of Centurion Way connecting Lavant with Chichester, and
- the Downs Link route connecting Guilford with Shoreham-by-Sea.

10.16 Following a successful grant application to government, the SDNPA has been awarded a further £3.81 million to extend the network of cycle routes (see Figure 13: Existing and Planned Cycle Routes within the South Downs National Park³). In the longer term, existing disused rail routes could be used to connect:

- Petersfield with Pulborough, via Midhurst
- Chichester with Midhurst, and
- Wickham with Alton, all via non-motorised user routes.



Figure 13: Existing and Planned Cycle Routes within the South Downs National Park

10.17 To offer additional options for public transport in the future and/or cycle/footpath routes there may be a case for safeguarding former rail routes for reinstatement of railways, either to connect to the existing rail network, as light rail options, or for cycleways, footpaths and bridleways. For example, there is the opportunity of reinstating the link between Uckfield and Lewes to offer an alternative rail route between London and Brighton (BML2). Decisions to reinstate rail routes will not be made by the SDNPA but it will be important for the Local Plan to safeguard such opportunities. If a route is safeguarded as a non-motorised user route, this would not prevent its later consideration for a potential light rail connection, providing that an alternative replacement non-motorised user route forms part of the scheme.

Issue 53 – How can the Local Plan best protect existing routes for use as sustainable transport routes?

What we propose to do

The Local Plan to identify and protect disused railway line routes which could be critical in efforts to widen sustainable transport choice.

Do you agree with this approach?

Do you agree with the following option?

Option 53a – Safeguard the following routes:

- Lewes–Uckfield disused railway line route that lies within the National Park
- Disused Bordon–Bentley light railway line route that lies within the National Park
- Petersfield–Pulborough (via Midhurst) disused railway line route
- Chichester–Midhurst (Centurion Way) disused railway line route
- Wickham–Alton (Meon Valley Line) disused railway line route, and
- Guildford–Shoreham-by-Sea (Downs Link) disused railway line route.

Are there any other options you think need to be considered?

Issue 54 – What should be the Local Plan’s approach to car parking?

10.18 Determining an appropriate approach towards future car parking is challenging, particularly with public transport services limited in all but a few locations in the National Park. Residents, businesses and visitors use vehicles for different reasons and have different needs in terms of parking. The approach to car parking in the Local Plan needs to respond to these different requirements whilst respecting the Purposes of the National Park designation.

10.19 Car-parking provision cannot be tackled with a one-size-fits-all approach. There are several important car-parking categories applicable in the National Park, including:

- public on-street and off-street parking in larger villages and towns
- parking at railway stations
- parking at ‘honeypots’ and other visitor attractions
- residential car parking, and
- parking for special events.

These uses can conflict with one another, a point which reinforces the importance of integrating planning for visitors into the Local Plan. Imaginative solutions can also be explored, such as the use of business or school car-park facilities by visitors at weekends.

Issue 54 – What should be the Local Plan’s approach to car parking?

What we propose to do

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:

- 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.

Do you agree with this approach?

Do you agree with the following option?

Option 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.

Are there any other options you think need to be considered?

Issue 55 – How can the Local Plan best ensure that new developments are accessible?

- 10.20** There is a clear case for new developments being focused in places that have good public transport services providing easy access to key facilities like surgeries, hospitals supermarkets and schools. In the National Park, there are only a limited number of locations that have good accessibility to services and facilities by non-car modes.
- 10.21** Accessibility maps provide a starting point in the search for possible locations for housing and other development. Many rural locations, such as Meonstoke, are very poorly served by public transport compared to larger settlements, for example Petersfield. However, accessibility by public transport is but one factor amongst many that should guide planning decisions. Other factors include making best use of brownfield sites and maintenance of landscape character. The Settlement Hierarchy Study⁶⁰ is another key piece of evidence that we will use to investigate how well villages and towns are served by key facilities, including employment. Scoring for the Settlement Hierarchy Study is partly based upon access to hourly bus services or rail travel.
- 10.22** Linking suitable development sites to a tourism strategy for the National Park that considers hubs and gateways, largely based upon accessibility criteria, offers multiple benefits in providing focal points of economic activity and employment that have the critical mass to support services that can serve both visitors and residents.

⁶⁰ <http://www.southdowns.gov.uk/planning/planning-policy/local-plan/settlement-hierarchy-study>.

Issue 55 – How can the Local Plan best ensure that new developments are accessible?

What we propose to do

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.

Do you agree with this approach?

Do you agree with any of the following options?

Option 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.

Option 55b – The Local Plan could require all major development proposals to ensure that sustainable transport and accessibility are key components of sustainability assessments.

Option 55c – The Local Plan could encourage consideration of locally funded community transport provision via the neighbourhood planning process.

Are there any other options you think need to be considered?

Q8 – Are there other Transport and Accessibility issues that the Local Plan should address?

Appendices

Appendix I – Definitions

Affordable housing – social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices.

Area of Outstanding Natural Beauty (AONB) - is an area of high scenic-quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape. AONB landscapes range from rugged coastline to water meadows to gentle lowland and upland moors. They are different from National Parks because of their more limited opportunities for extensive outdoor recreation.

Biodiversity – the variety of plants and animals which has been shaped over thousands of years by a complex set of social, historical and economic factors, all against the backdrop of the landscape itself. The types and abundance of wildlife can play a significant role in shaping the character – and in some cases the function – of each particular landscape.

Code for Sustainable Homes - The code for sustainable homes is the national standard for the sustainable design and construction of new homes. It aims to reduce carbon emissions and promote higher standards of sustainable design above the current minimum standards set out by the [building regulations](#). The code provides 9 measures of sustainable design: energy/CO2, water, materials, surface water runoff (flooding and flood prevention), waste, pollution, health and well-being, management and ecology. It uses a 1 to 6 star system to rate the overall sustainability performance of a new home against these 9 categories. The code is voluntary.

Community Infrastructure Levy – a new system of developer financial contributions introduced by the Government which will fund infrastructure. This will largely replace section 106 agreements in 2015.

Community Right to Bid – the registration of a community asset such as a local shop, playing field or pub so that it cannot be sold without the community first being notified. This provides time for a bid to be prepared in order to acquire the asset.

Community Right to Build Order – allows communities to bring forward small developments in their area without the need for planning permission. The order is subject to an examination and referendum.

Community land trusts - is a non-profit corporation that develops and stewards affordable housing, community gardens, civic buildings, commercial spaces and other community assets on behalf of a community.

Community-led planning – the preparation of a document setting out the priorities of a community and the actions they wish to see taken for their local community. They can be a material planning consideration while Neighbourhood Plans form part of the statutory development plan.

Conservation areas – areas formally designated as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.

Criteria-based policies – Local Plan policies that give a range of criteria, or factors, that all need to be met in order for a development to be viewed positively.

Designated heritage assets – heritage assets which have been formally designated as listed buildings, conservation areas, historic parks and gardens, historic battlefields or scheduled monuments.

Ecosystem services – the benefits we get from nature and culture – the services provided by the natural environment that benefit people.

General Permitted Development Order 1995 - is a [Statutory Instrument](#), applying in England and Wales, that grants planning permission for certain types of development (such development is then referred to as permitted development). [Schedule 2 of the GPDO 1995](#) specifies the classes of development for which planning permission is granted, and specifies the exceptions, limitations, and conditions that apply to some of these classes.

Geodiversity – geodiversity is the variety of rocks, minerals, fossils, soils, landforms and natural processes.

Geographic information systems (GIS) - is a system designed to capture, store, manipulate, analyze, manage, and present all types of [geographical data](#).

Green infrastructure (GI) – a network of high-quality green and blue spaces and other environmental features. It needs to be planned and delivered at all spatial scales from national to neighbourhood levels. The greatest benefits will be gained when it is designed and managed as a multi-functional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. Green infrastructure includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors allotments and private gardens.

Green Infrastructure Strategy – a Green Infrastructure Strategy should set out to:

- prioritise the planning, development of and investment in green infrastructure for the future
- present a shared vision for the development of a strategic green infrastructure network across the National Park and beyond
- highlight the means by which organisations, communities and partnerships can work to create and sustain a fit-for-purpose green infrastructure network across the wider area, and

- identify and consolidate the essential role green infrastructure will play in the sustainable development of the National Park and beyond.

Green travel plans - are one of the ways in which authorities can seek to minimise the impacts of travel from a development proposal by reducing the need for journeys, reducing the number of single occupancy car journeys we make and by encouraging the use of sustainable modes such as walking, cycling, public transport and car sharing.

Gypsies and travellers – for the purposes of the planning system, gypsies and travellers means: *‘Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependents’ educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such’* (Planning Policy for Traveller Sites, CLG, March 2012).

Heritage assets – a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Includes both designated and undesignated heritage assets (see below).

Historic battlefields – battlefields included in a national register. This is a non-statutory designation but is a material issue when determining planning applications.

Historic environment – all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora (NPPF definition).

Historic Environment Records (HERs) - provide comprehensive information and evidence about the historic environment in a particular area. They are an essential source of information for managing, caring for and understanding the historic environment. HERs are maintained by local planning authorities and are used for planning and development control, as well as for public benefit and educational use.

Historic parks and gardens – highly-valued designed landscapes that are referenced in a national register of such landscapes. This is a non-statutory designation but is a material issue when determining planning applications.

Housing demand – the demand for open-market housing, that is either owner-occupied or private market rented.

Housing need – those households that have registered, either through the local housing waiting list or through a housing-need questionnaire, that they are in need of ‘affordable’ (non-market) housing. There can be additional ‘hidden’ housing need, that is those households who are in need of a home but have not registered either formally on the housing waiting list or through a housing-need survey.

Infrastructure Delivery Plan (IDP) - lists all infrastructure needed to support sustainable growth, as set out in Neighbourhood Plans and the National Park Authority’s emerging Local Plan. The IDP will inform future funding decisions through the Community Infrastructure Levy so it is important to include all necessary infrastructure projects on the IDP list. However, projects identified in the IDP are not guaranteed funding because prioritisation and spending decisions are made by the National Park Authority and parish councils taking into account many other factors.

Landscape – landscape is about the relationship between people, place and nature. It can mean a small patch of urban wasteland as much as a mountain range, an urban park as much as a lowland plain, and everything in between. Landscape is produced from the way that different components of the environment – both natural and cultural – interact together and are perceived by us.

Landscape character – what makes an area unique. It can be defined as a distinct, recognisable and consistent pattern of elements, be it natural (soil, landform) and/or human (for example, settlement and development) in the landscape that makes one landscape different from another, rather than better or worse.

Landscape character assessment (LCA) – a technique used to develop a consistent and comprehensive understanding of what gives England’s landscape its character. It uses statistical analysis and application of structured landscape assessment techniques. LCAs provide more detailed descriptions and analysis at a local level within the framework of the 159 National Character Areas.

Listed buildings – buildings formally designated as being of special architectural or historic interest.

Local connection – test that is met by households that can demonstrate a genuine link to a defined local area, either through a residential (current or recent past), employment or close family connection.

Local Sustainable Transport Fund (LSTF) - the Department for Transport has awarded £3.81M to Hampshire County Council, the New Forest National Park Authority and South Downs National Park Authority - together with the neighbouring highways authorities of Brighton & Hove, East Sussex, West Sussex, Surrey and Wiltshire – for initiatives to reduce the impact of traffic on the two National Parks and to encourage the use of more sustainable transport by visitors and residents.

Local green space designation – a designation introduced by the NPPF (para.76). The NPPF states that the designation should only be used: where the green space is in reasonably close proximity to the community it serves, where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife, and where the green area concerned is local in character and is not an extensive tract of land.

Major development test – Para.116 of the NPPF sets out the criteria that would need to be met for a ‘major’ development proposal to be met for it to be granted planning permission within a National Park.

Market housing - housing which has no occupancy restriction or legal tie and that can be bought or rented by anyone (that is. the majority of existing housing within the National Park).

Natural beauty – is not exhaustively defined in the legislation. It is also a very subjective characteristic of a landscape and ultimately involves a value judgement. In deciding whether an area has natural beauty, Natural England must therefore make a judgement as to whether people are likely to perceive a landscape as having sufficient natural beauty. In order to make these judgements (some of which are subjective) in a transparent and consistent way, Guidance from Natural England, *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England*

(http://www.naturalengland.org.uk/Images/BI DesignationGuidanceMar11_tcm6-26242.pdf), sets out which criteria Natural England intends to use.

National Nature Reserves (NNRs) - represent many of the finest wildlife and geological sites in the country. The first NNRs emerged in the post-war years alongside the early National Parks, and have continued to grow since then. NNRs were initially established to protect sensitive features and to provide ‘outdoor laboratories’ for research but their purpose has widened since then. As well as managing some of the most pristine habitats, our rarest species and our most significant geology, most NNRs now offer great opportunities to the public as well as schools and specialist audiences to experience England’s natural heritage.

Natural resources – occur naturally within environments that exist relatively undisturbed by humanity, in a natural form. A natural resource is often characterized by amounts of biodiversity and geodiversity existent in various ecosystems. Natural resources are derived from the environment. Some of them are essential for our survival while most are used for satisfying our wants. Natural resources may be further classified in different ways.

Objectively-assessed housing need or, more accurately, 'objectively assessed housing requirement' – the scale and mix of housing and range of tenures that is likely to be needed in the housing market area over the Plan period. The draft National Planning Policy Guidance indicates that there is no one method or dataset which will provide a definitive assessment. The draft Guidance indicates that the starting point should be the latest household Government projections, currently the 2011-based interim household projections, and wherever possible assessment should take account of the latest demographic evidence including ONS population estimates. The draft Guidance sets a number of specific tests which should be considered in establishing an objective assessment of need.

Perceptual aesthetic (see Figure 3) – in the context of national parks is a concept dealing with the understanding and appreciation of the natural and landscape beauty of the area by visitors, residents and others using the area.

Ramsar sites – sites of nature conservation importance recognised under the Ramsar Convention (formally, the Convention on Wetlands of International Importance, especially as Waterfowl Habitat), which is an international treaty for the conservation and sustainable utilisation of wetlands, to stem the encroachment on and loss of wetlands, recognising the fundamental ecological functions of wetlands and their economic, cultural, scientific and recreational value.

Rural exception sites - a site that would not usually secure planning permission for open-market housing, for example agricultural land next to but not within a local settlement area.

Scheduled monument – a monument referenced in a schedule compiled by the Secretary of State which is: any building, structure or work, whether above or below the surface of the land, and any cave or excavation, any site comprising the remains of any such building, structure or work or of any cave or excavation, or any site comprising, or comprising the remains of, any vehicle, vessel, aircraft or other movable structure or part thereof which neither constitutes nor forms part of a monument as defined above.

Section 106/section 278 payments – current system of financial obligations paid by developers to fund infrastructure. The section 106 regime will be limited by legislation from 2015.**Setting of a heritage asset** – the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Sites of Special Scientific Interest (SSSIs) - there are over 4,100 Sites of Special Scientific Interest (SSSIs) in England, covering around seven per cent of the country's land area. Over half of these sites, by area, are internationally important for their wildlife, and designated as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites. Many SSSIs are also National Nature Reserves (NNRs) or Local Nature Reserves (LNRs). SSSIs are the country's very best wildlife and geological sites.

Social rented affordable housing – owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency. Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable).

Special Areas of Conservation (SACs) – an area which has been given special protection under the European Union’s Habitats Directive. SACs provide increased protection to a variety of wild animals, plants and habitats and are a vital part of global efforts to conserve the world’s biodiversity.

Special Protection Areas (SPAs) - an area of land, water or sea which has been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within the European Union. SPAs are European designated sites, classified under the European Wild Birds Directive which affords them enhanced protection.

Temporary stopping places – also known as ‘emergency stopping places’ – less formal and less well serviced than transit sites and generally intended for shorter stays. They might, for example, be loops of by-passed roadway, old chipping depots, poor agricultural land or small urban sites where development is planned but not immediate. Water supply and rubbish disposal might be the only services provided. It is noted that transit sites could also be used as temporary stopping places.

Tranquillity – areas undisturbed by the presence of noise and visual intrusion (taken from CPRE website).

Transit sites – formal sites provided on a permanent basis, with basic amenities and services including boundary fencing, hard standings, water supply, toilet and washing facilities, waste disposal and electricity supply.

Travelling showpeople – *Planning Policy for Travellers Sites 2012* provides a useful definition which we have adopted for this document: *‘Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on grounds of their own, or their family’s or dependents’, more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes gypsies and travellers as defined above.’*

Undesignated heritage assets – heritage assets which have not been formally designated but which have been identified by the local planning authority. This includes locally listed buildings.

Village Design Statements (VDSs) - is a practical tool to help influence decisions on design and development. A VDS will provide a clear statement of the character of a particular village or town against which planning applications may be assessed.

Water neutrality – no net additional water resource required over the course of the plan to meet the needs of new development.

Appendix 2 – Further Information

- Information for all designated heritage assets can be found at the Heritage Gateway: <http://www.heritagegateway.org.uk/gateway/>
- SDNPA Buildings at Risk Survey, compiled over the winter of 2012–13 and including all listed buildings and unlisted buildings in most conservation areas
- English Heritage ‘Heritage at Risk 2013’ Register: <http://www.english-heritage.org.uk/publications/har-2012-registers/>
- Good Practice Guidance:
- <http://www.english-heritage.org.uk/publications/pps-practice-guide/pps5practiceguide.pdf>
- English Heritage publishes a wide range of guidance literature covering many aspects of the historic environment. These can be found at: <http://www.helm.org.uk/guidance-library/>
- State of the Park Report, SDNPA, 2012: <http://snpr.southdowns.gov.uk/files/default.html>
- Local Sustainable Transport Bid, Hampshire County Council, January 2013: I:\Planning_Directorate\Planning_Policy\SDNP_Local_Plan\Issues\Topic_Papers\7-Sustainable_Transport\SupportingMat\National_Parks_LSTF_FINAL_Bid.pdf
- SDNPA Transport Study – Phase I Report, Metropolitan Transport Research Unit (MTRU), March 2013: I:\Planning_Directorate\Planning_Policy\Transport\TransportStudy\Deliverables\SDNP_PHASE_I_REPORT_Final_21Mar13.doc
- Note on the LSTF analysis of hubs and gateways, MTRU, April 2013: [I:\Planning_Directorate\Planning_Policy\Transport\TransportStudy\Hubs&Gateways\MTRU Note LSTF analysis of hubs and gateways.docx](I:\Planning_Directorate\Planning_Policy\Transport\TransportStudy\Hubs&Gateways\MTRU_Note_LSTF_analysis_of_hubs_and_gateways.docx)

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South Downs National Park Authority
Hatton House
Bepton Road
Midhurst
West Sussex
GU29 9LU
Tel: 0300 303 1053
info@southdowns.gov.uk
www.southdowns.gov.uk

