

DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: West Sussex County Council and the South Downs National Park Authority

DATE: April 2018

1. Introduction

1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between West Sussex County Council (WSCC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on either party, but sets out a clear and positive direction to inform ongoing strategy and plan-making.

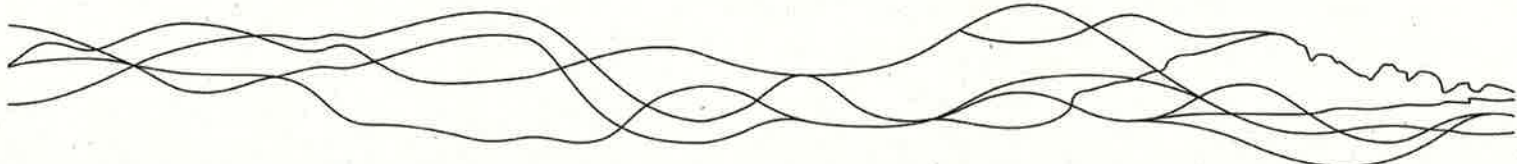
2. Context

2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as WSCC, to have regard to the purposes of national parks. These are:

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

2.2 As a National Park Authority and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park.

2.3 Furthermore, paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the



Broads, referenced in the NPPF at this point makes clear that the Government recognizes that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.

2.4 Part of the county of West Sussex falls within the South Downs National Park. All statutory planning responsibilities within the National Park area of the county fall to the National Park Authority including minerals and waste matters. A Minerals Plan has been jointly prepared by the two authorities, and is expected to be adopted by both authorities in summer 2018.

2.5 The SDNPA area in West Sussex fall partly within two housing market areas (HMAs): Coastal Sussex HMA and Northern West Sussex HMA. The two authorities work in partnership together with the relevant district authorities to ensure that strategic planning issues are properly and holistically addressed.

3. Purpose and objectives

3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the provision of goods and services arising from natural capital) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.

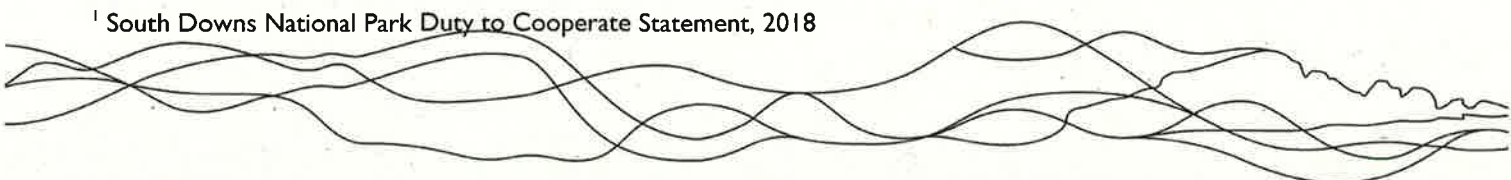
3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to the two authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed development needs, particularly housing needs. Further detail is given in the South Downs National Park Duty to Cooperate Statement¹, and in the jointly prepared documents referred to below.

4. Housing and employment provision

4.1 Both parties agree that the provision of 1,785 homes over the South Downs Local Plan period (2014/15 to 2032/33) within the part of West Sussex falling within the National Park can be accommodated in existing or proposed infrastructure mitigation and improvements/ falling under the responsibility of West Sussex County Council.

4.2 The greatest concentrations of housing development proposed in West Sussex within the National Park are at Midhurst (sites allocated for c. 175 dwellings) and Petworth (broad area allocation of 150 dwellings to be determined by Petworth Neighbourhood Plan). Site allocations are also proposed in Easebourne for c. 50 homes. Housing development overall will be dispersed across towns and villages of the National Park in line with the Spatial Strategy.

¹ South Downs National Park Duty to Cooperate Statement, 2018



4.3 In addition, the strategic site Shoreham Cement Works is allocated under Policy SD56 for sustainable tourism/recreational/leisure development related to the understanding and enjoyment of the National Park, B2 and B8 uses to support the local economy, and further types of development that would enable the environmentally-led restoration of the site. To enable an appropriate scheme to be developed, it is agreed that the National Park Authority, working with key partners, will prepare an Area Action Plan (AAP). The AAP will determine appropriate quanta and mix of development as well as infrastructure requirements to mitigate the development, including suitable access arrangements.

5. Provision of primary and secondary school places

5.1 Both parties confirm that the level of housing outlined above can be mitigated by the expansion of primary and secondary school places. In the areas where existing provision is not sufficient to meet the growth in demand, expansions will be brought forward through the allocation of Community Infrastructure Levy (CIL) funding as outlined in the Infrastructure Delivery Plan (IDP) which will be superseded by the Infrastructure Business Plan (IBP), which will be informed by the WSCC Strategic Infrastructure Plan (SIP).

6. Impact on the strategic and local highways network

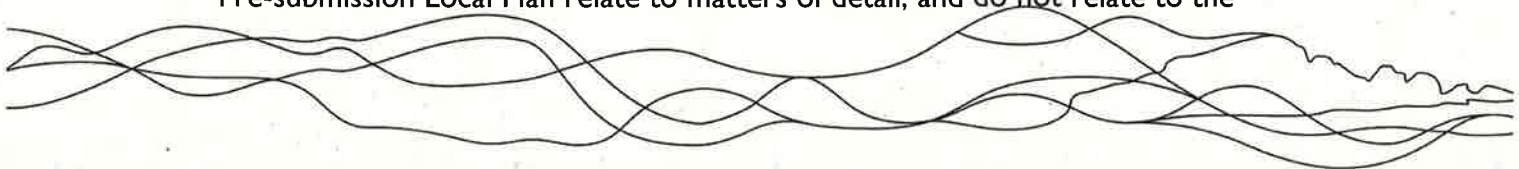
6.1 Both parties confirm that, taking into account the overall level of growth and specific locations anticipated to accommodate this, no severe residual cumulative impact on the local or strategic highways networks is likely to occur. Evidence to support this statement is contained in the Transport Assessment of the South Downs Local Plan (Hampshire Services, 2016) and the Midhurst and Petersfield Junction Assessments (Hampshire Services, 2017). Infrastructure mitigation and improvements have been outlined in the Infrastructure Delivery Plan (IDP) which will be superseded by the Infrastructure Business Plan (IBP), which will be informed by the WSCC Strategic Infrastructure Plan (SIP).

7. Other infrastructure requirements

7.1 There are many further types of physical, community and green infrastructure that future development will impact upon. Both parties agree that development will only be permitted where appropriate, necessary and reasonable infrastructure investment has been secured either in the form of suitable on-site or off-site works, and/or financial contributions to mitigate its impact. These matters will generally be addressed at the planning application stage, or where appropriate in Neighbourhood Plans.

8. Representations made by WSCC on matters of detail

8.1 It is confirmed that comments made by WSCC in response to consultation on the Pre-submission Local Plan relate to matters of detail, and do not relate to the



soundness of the Plan. It is agreed that these will be considered by SDNPA and may lead to minor changes to the Local Plan.

Signed on behalf of West Sussex County Council



Michael Elkington

Date:- 29/03/2018

Position:- Head of Planning Services

Signed on behalf of the South Downs National Park Authority



Date

Position 03/04/2018

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