



planning advisory service



South Downs

National Park Authority

Soundness Self-Assessment Checklist

South Downs Local Plan

April 2018

South Downs Local Plan Soundness Self-Assessment Checklist

This note was prepared by AMEC and URS on behalf of the Planning Advisory Service. It aims to help local authorities prepare their plans in advance of an examination, taking into account the requirements of the National Planning Policy Framework. A separate checklist looks at legal compliance.

In summary – the key requirements of plan preparation are:

- Has the plan been positively prepared i.e. based on a strategy which seeks to meet objectively assessed requirements?
- Is the plan justified?
- Is it based on robust and credible evidence?
- Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
- Is it deliverable?
- Is it flexible?
- Will it be able to be monitored?
- Is it consistent with national policy?

The Tests of Soundness at Examination

The starting point for the examination is the assumption that the Council has submitted what it considers to be a sound plan. Those seeking changes should demonstrate why the plan is unsound by reference to one or more of the soundness criteria.

The tests of soundness are set out in the National Planning Policy Framework (NPPF) (para 182): “The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is ‘sound’”, namely that it is:

1. Positively Prepared: based on a strategy which seeks to meet objectively assessed development and infrastructure requirements

This means that the Development Plan Document (DPD) should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. The NPPF, together with the Marine Policy Statement (MPS) set out principles through which the Government expects sustainable development can be achieved.

2. Justified: the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence

This means that the DPD should be based on a robust and credible evidence base involving:

- Research/fact finding: the choices made in the plan are backed up by facts.
- Evidence of participation of the local community and others having a stake in the area; and

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The DPD should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The DPD should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

3. Effective: deliverable over its period based on effective joint working on cross-boundary strategic priorities

This means the DPD should be deliverable, requiring evidence of:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities, including neighbouring marine planning authorities.
- The DPD should be flexible and able to be monitored.

The DPD should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the DPD should make clear that major changes may require a formal review including public consultation. Any measures which the Council has included to make sure that targets are met should be clearly linked to an Annual Monitoring Report.

4. Consistent with national policy: enabling the delivery of sustainable development

The demonstration of this is a 'lead' policy on sustainable development which specifies how decisions are to be made against the sustainability criterion (see the Planning Portal for a model policy www.planningportal.gov.uk). If you are not using this model policy, the Council will need to provide clear and convincing reasons to justify its approach.

The following table sets out the requirements associated with these four tests of soundness. Suggestions for evidence which could be used to support these requirements are set out, although these have to be viewed in the context of the plan being prepared. Please don't assume that you have got to provide all of these, they are just suggestions of what could be relevant.

In addition, the Legal Compliance checklist (a separate document, see www.pas.gov.uk) should be completed to ensure that this aspect is covered.

The Duty to Co-operate will also be assessed as part of the examination process.

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<i>Positively Prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</i>		

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<p><i>Vision and Objectives</i></p> <p>Has the LPA clearly identified what the issues are that the DPD is seeking to address? Have priorities been set so that it is clear what the DPD is seeking to achieve?</p> <p>Does the DPD contain clear vision(s) and objectives which are specific to the place? Is there a direct relationship between the identified issues, the vision(s) and the objectives?</p> <p>Is it clear how the policies will meet the objectives? Are there any obvious gaps in the policies, having regard to the objectives of the DPD?</p> <p>Have reasonable alternatives to the quantum of development and overall spatial strategy been considered?</p> <p>Are the policies internally consistent?</p> <p>Are there realistic timescales related to the objectives?</p> <p>Does the DPD explain how its key policy objectives will be achieved?</p>	<ul style="list-style-type: none"> • Sections of the DPD and other documents which set out (where applicable) the vision, strategic objectives, key outcomes expected, spatial portrait and issues to be addressed. • Relevant sections of the DPD which explain how policies derive from the objectives and are designed to meet them. • The strategic objectives of the DPD, and the commentary in the DPD of how they derive from the spatial portrait and vision, and how the objectives are consistent with one another. • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments through evidenced infrastructure delivery planning. • Confirmation from the relevant agencies that they support the objectives and the identified means of delivery. • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. 	<p>1. The Local Plan Options Consultation Document (2014) identified issues for the Local Plan to deal with, on the basis of the work carried out on the Partnership Management Plan (2015).</p> <p>2. An audit of how the policies have emerged in response to these issues and the consultation responses received to the Options Consultation is set out in 'Progress from Issues and Options to Preferred Options – September 2015'. The Interim Consultation Statement further updates this in relation to progressing the Plan to pre-submission and the Consultation Statement finalises this with regard to the preparation of the Plan for submission. The background papers on various topics, published alongside the Local Plan- Pre-Submission Version, and some subsequently updated for the Submission, describe how policies evolved further into their current form.</p> <p>3. The Sustainability Appraisal for the Local Plan: Preferred Options (September 2015) and Local Plan: Pre-Submission Version (September 2017); subsequently revised for the the Local Plan submission, set out how the reasonable alternatives to the quantum of development and spatial strategy have been considered. This is also set out within the Plan under the relevant sections:</p> <p style="padding-left: 20px;">Chapter 3: Spatial Portrait and Strategy</p> <p style="padding-left: 20px;">Chapter 7: Policy SD25: Development Strategy</p> <p style="padding-left: 20px;">Chapter 7: Policy SD26: Supply of Homes</p> <p>4. The Local Development Scheme (Fourth Revision</p>

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		<p>August 2017) sets out the scope of the Local Plan and explains its relationship with other plans.</p> <p>5. In addition to the above evidence, the relevant sections of the Local Plan: Pre-Submission version and Schedule of Changes accompanying the document for submission are as follows:</p> <ul style="list-style-type: none"> • Figure 2.1 in Chapter 2 presents the National Park Authority 2050 Vision which is set out in the Partnership Management Plan (PMP) and is the overarching vision for the Local Plan. • In delivering the vision, the National Park Authority has statutory purposes and socio-economic responsibilities as specified in the Environment Act 1995: these are set out in figure 1.1, Chapter 1. • Chapter 2 includes a number of strategic objectives, based on the National Park purposes and duty, which outline how the vision will be achieved. • The key outcome in the Local Plan is the contribution towards the delivery of the PMP Outcomes (as described in the Local Plan Preferred Options) and Local Plan Objectives. Chapter 10 on Monitoring and Implementation sets out how the Local Plan will be implemented and how that implementation will be monitored, in relation to meeting the Local Plan Objectives. • At relevant points in the document the relevant

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		<p>Local Plan Objectives are listed e.g. Local Plan objectives 4 and 5 are cited in the introduction of chapter 6 People Connected to Places. The Preferred Options version contained equivalent links between the Partnership Management Plan policies and the relevant sections of the Local Plan. This will remain as a record of how the policies have been developed.</p> <ul style="list-style-type: none"> • The Spatial Portrait (Chapter 3) identifies the opportunities and challenges for the broad areas of the National Park . These are informed by engagement on the LPOCD, LPPO and the PMP. • The Spatial Strategy (Chapter 3) summarises the chosen approach to meeting the issues and challenges. • The Vision and Objectives (Chapter 2) and Spatial Portrait and Spatial Strategy (Chapter 3) are clearly linked, with the ‘golden thread’ of a landscape-led local plan clearly articulated.
<p><i>The presumption in favour of sustainable development (NPPF paras 6-17)</i> Plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:</p>	<ul style="list-style-type: none"> • An evidence base which establishes the development needs of the plan area (see Justified below) and includes a flexible approach to delivery (see ‘Section 3 Effective’, below). • An audit trail showing how and why the quantum of development, preferred overall strategy and plan area distribution of development were arrived at. • Evidence of responding to opportunities for achieving sustainable development in different 	<p>The following evidence has been published, which identifies the development needs of the National Park:</p> <ul style="list-style-type: none"> • South Downs Strategic Housing Market Assessment (SHMA) (2015) • The Employment Land Review (2015) and Update (2017) • South Downs Housing and Economic Development

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<p>—any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or</p> <p>—specific policies in this Framework indicate development should be restricted.</p>	<p>areas (for example, the marine area)</p>	<p>Needs Assessment (2017) which builds on and updates the SHMA 2015 and ELR 2015</p> <ul style="list-style-type: none"> • The Visitor Accommodation Review (2014) <p>The Sustainability Appraisal for the South Downs Local Plan clearly audits the testing of different quanta of development and spatial distribution options.</p> <p>The justification for the preferred strategy, quantum of development and distribution of development is set out in paragraph 3.114-3.128, 7.17-7.33, and 7.142-7.154 of the Pre-Submission Local Plan</p> <p>The approach to allocating sites responds strongly to the opportunities in different areas, for example a high proportion of allocations in urban areas being on previously developed sites.</p>
<p>Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.</p>	<ul style="list-style-type: none"> • A policy or policies which reflect the principles of the presumption in favour of sustainable development (see model policy at www.planningportal.gov.uk) 	<p>Core Policy SDI sets out how the Local Plan takes a positive approach which reflects the presumption in favour of sustainable development, and sets out what this means in the context of the National Park statutory purposes and duty.</p>
<p><i>Objectively assessed needs</i></p> <p>The economic, social and environmental needs of the authority area addressed and clearly presented in a fashion which makes effective use of land and specifically promotes mixed use</p>	<ul style="list-style-type: none"> • Background evidence papers demonstrating requirements based on population forecasts, employment projections and community needs. • Technical papers demonstrating how the 	<p>Footnote 9 of the NPPF sets out examples of where development should be restricted. This includes national parks and other designations found in the South Downs such as international nature conservation designations and the Heritage Coast. It is therefore consistent with the</p>

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<p>development, and take account of cross-boundary and strategic issues.</p> <p>Note: Meeting these needs should be subject to the caveats specified in Paragraph 14 of the NPPF (see above).</p>	<p>aspirations and objectives of the DPD are related to the evidence, and how these are to be met, including from consultation and associated with the Duty to Co-operate.</p>	<p>NPPF that the South Downs Local Plan does not meet its objectively assessed housing need as to do so would have an adverse impact on its special landscape for which it is designated. Nevertheless the NPA considers that it has left no stone unturned looking at potential housing sites in order to meet unmet need that can be developed without causing a significant adverse impact upon the landscape.</p> <p>As the National Park covers parts of fifteen districts, boroughs, unitary authorities and counties the Duty to Cooperate has been integral to the preparation of the South Downs Local Plan particularly in regard to unmet housing need. This is addressed in the Duty to Cooperate Statement and Statements of Common Ground agreed with all the local authorities covered by the National Park; all documents are in the Core Document Library.</p> <p>Evidence documents relating to economic, social and environmental needs, including:</p> <ul style="list-style-type: none"> • Employment Land Review • Strategic Housing Market Assessment • Housing and Economic Development Needs Assessment • Visitor Accommodation Review <p>Background papers are published on a number of matters to provide a clear narrative on how the Plan objectives, consultation and technical evidence have shaped the spatial strategy and policies.</p>

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NPPF Principles: Delivering sustainable development		
I. Building a strong, competitive economy (paras 18-22)		
Set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth (21),	<ul style="list-style-type: none"> • Articulation of a clear economic vision and strategy for the plan area linked to the Economic Strategy, LEP Strategy and marine policy documents where appropriate. 	<p>A clear economic vision and strategy for the plan area is set out in the National Park Vision (chapter 2), the Partnership Management Plan and Local Plan Objectives 7 and 8.</p> <p>The section on Sustainable Economic Development, including strategic policies on ‘Sustaining the Local Economy’ (Policy SD34) and ‘Employment Land’ (Policy SD35), set out economic objectives for the area, this makes reference to the relevant Local Plan Objectives.</p>
Recognise and seek to address potential barriers to investment, including poor environment or any lack of infrastructure, services or housing (21)	<ul style="list-style-type: none"> • A criteria-based policy which meets identified needs and is positive and flexible in planning for specialist sectors, regeneration, infrastructure provision, environmental enhancement. • An up-to-date assessment of the deliverability of allocated employment sites, to meet local needs, (taking into account that LPAs should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of an allocated site being used for that purpose) para (22) 	<p>Policy SD34 is a positive and flexible, criteria-based policy which supports the objective to maintain and protect business activities that are compatible with the landscape and special qualities of the National Park. Other policies for specialist sectors of economic activity include SD23: Sustainable Tourism, SD24: Equestrian Uses, SD36: Town and Village Centres, SD37: Development in Town and Village Centres, SD38: Shops outside Centres, SD39: Agriculture and Forestry and SD40: Farm and Forestry Diversification.</p> <p>An up-to-date assessment of the deliverability of allocated employment sites to meet local needs is provided in the Employment Land Review 2015 and 2017 Update, and reflected in the supporting text to Policy SD35 (Employment Land). The Local Plan proposes the removal of protection for employment uses alone, from several sites currently allocated for employment use, and the</p>

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		<p>retention and expansion of one such site (Allocation Policy SD80: Malling Brooks, Lewes) which has planning permission for employment uses, and is required for businesses relocating from central Lewes to allow the regeneration of the North Street Quarter strategic site.</p> <p>A considerable number of constraints are recognised to the development of Shoreham Cement Works (chapter 8). The policy therefore states that development proposals for ‘further types of development that would enable the environmentally-led restoration of the site’ would be supported (SD56.2.c)</p>
<p>2. Ensuring the vitality of town centres (paras 23-37)</p>		
<p>Policies should be positive, promote competitive town centre environments, and set out policies for the management and growth of centres over the plan period (23)</p>	<ul style="list-style-type: none"> The Plan and its policies may include such matters as: definition of networks and hierarchies; defining town centres; encouragement of residential development on appropriate sites; allocation of appropriate edge of centre sites where suitable and viable town centre sites are not available; consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres. 	<p>Policies SD36: Town and Village Centres and SD37: Development in Town and Village Centres between them define a hierarchy of centres, and define the boundaries of those centres (where no Neighbourhood Plan is in place to do that). Evidence on retail needs does not suggest it is necessary to allocate edge-of-centre sites in the Local Plan; also Neighbourhood Plans have been considering this in detail for most of the larger settlements. Policy SD38: Shops outside Centres is a positively framed policy, which deals with the consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</p>
<p>Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community services and residential development needed in town centres (23)</p>	<ul style="list-style-type: none"> An assessment of the need to expand (the) town centre(s), considering the needs of town centre uses. Primary and secondary shopping frontages identified and allocated. 	<p>Town centre boundaries are set for Lewes and Midhurst in the Local Plan. Petworth and Petersfield neighbourhood plans set the town centre boundaries for these settlements. It was the first time that a town centre boundary had been set for Midhurst in a local plan and care was taken to include a potential town centre development</p>

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		site close to the Grange Leisure Centre within the boundary. Policy SD37 includes criteria regarding the primary and secondary frontages. These are identified on the Policies Map.
3. Supporting a prosperous rural economy (para 28)		
Support sustainable economic growth in rural areas. Planning strategies should promote a strong rural economy by taking a positive approach to new development. (28)	<ul style="list-style-type: none"> Where relevant include a policy or policies which support the sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. 	<p>Policy SD34: Sustaining the Local Economy supports the sustainable growth of rural businesses.</p> <p>Policy SD23: Sustainable Tourism supports sustainable rural tourism and recreational activities which are appropriate in the National Park.</p> <p>Policies SD38: Shops Outside Centres and SD43: New and Existing Community Facilities support local services and facilities.</p> <p>Policies SD39 and SD40 relating to Agriculture and Forestry and Farm and Forestry Diversification promote the development and diversification of agricultural businesses.</p>
4. Promoting sustainable transport (paras 29-41)		
<p>Facilitate sustainable development whilst contributing to wider sustainability and health objectives. (29)</p> <p>Balance the transport system in favour of sustainable transport modes and give people a real choice about how they travel whilst recognising that different policies will be required in different communities and</p>	<ul style="list-style-type: none"> Joint working with adjoining authorities, transport providers and Government Agencies on infrastructure provision in order to support sustainable economic growth with particular regard to the facilities referred to in paragraph 31. Policies encouraging development which facilitates the use of sustainable modes of 	<p>The SDNPA has engaged continuously with Local Transport Authorities (LTAs) on the transport policies in the Local Plan, and the transport requirements generated by the Local Plan allocations for sustainable growth, producing a Local Plan Transport Assessment in close collaboration with the relevant LTAs, in consultation with Highways England and drawing on information provided by neighbouring authorities. The SDNPA has carried out</p>

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<p>opportunities to maximise sustainable transport solutions will vary from urban to rural areas. (29)</p> <p>Encourage solutions which support reductions in greenhouse gas emissions and congestion (29) including supporting a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. (30)</p> <p>Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development. (31)</p> <p>Opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure. (32)</p> <p>Ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (34)</p> <p>Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. (35)</p> <p>Policies should aim for a balance of land uses so that people can be encouraged to minimize journey lengths for employment, shopping, leisure, education and other activities. (37)</p> <p>For larger scale residential developments in particular, planning policies should promote a</p>	<p>transport and a range of transport choices where appropriate, particularly the criteria in paragraph 35.</p> <ul style="list-style-type: none"> • A spatial strategy and policy which seeks to reduce the need to travel through balancing housing and employment provision. • Policy for major developments which promotes a mix of uses and access to key facilities by sustainable transport modes. • If local (car parking) standards have been prepared, are they justified and necessary? (39) • Identification and protection of sites and routes where infrastructure could be developed to widen transport choice linked to the Local Transport Plan. 	<p>Issues and Options, Preferred Options and Pre-Submission Consultations on the Local Plan, inviting representations from adjoining authorities, transport providers and Government Agencies, and incorporating their responses into the Local Plan as appropriate. The SDNPA has also actively pursued engagement with these bodies in preparing the Local Plan, holding dedicated meetings with them where possible, and incorporating the outcomes into the Local Plan.</p> <p>Policy SD19: Transport and Accessibility facilitates the use of public transport and a range of transport choices, while Policy SD20: Walking, Cycling and Equestrian Routes should increase the proportion of journeys made on foot or by bicycle (as well as horse-riding).</p> <p>The development strategy (Policy SD25) and supply of homes policy (SD26) seek to reduce the need to travel by only designating settlement boundaries and allocating housing (respectively) in settlements with a certain level of facilities, as assessed through the Settlement Facilities Assessment. Policy SD35 (Employment Land) complements this strategy by only safeguarding local employment sites in settlements listed in SD25, and only safeguarding principal employment sites or allocating new employment sites in the National Park's three largest settlements.</p> <p>Policy SD19: Transport and Accessibility requires development proposals that are likely to generate a significant number of journeys, to be located near existing town and village centres, public transport routes, main roads and, where relevant, the cycle network. The two strategic site policies, Policy SD56: Shoreham Cement Works and Policy SD57: North Street Quarter and</p>

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<p>mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties. (38)</p> <p>The setting of car parking standards including provision for town centres. (39-40)</p> <p>Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice. (41)</p>		<p>adjacent Eastgate area, are both for mixed use developments, although the mix of uses on the former site has yet to be determined. This will be determined through an Area Action Plan that is currently being prepared.</p> <p>Local car parking standards have not been prepared for this Local Plan. Given the large scale of the National Park which includes parts of four local transport authority areas, it is considered more appropriate to defer such matters to the local transport authority, or at a local level to neighbourhood plans.</p> <p>Policy SD20: Walking, Cycling and Equestrian Routes identifies and protects routes of former railway lines, where non-motorised travel routes could be developed in future to widen transport choice (among other benefits).</p>
<p>5. Supporting high quality communications infrastructure (paras 42-46)</p>		
<p>Support the expansion of the electronic communications networks, including telecommunications' masts and high speed broadband. (43)</p> <p>Local planning authorities should not impose a ban on new telecommunications development in certain areas, impose blanket Article 4 directions over a wide area or a wide range of telecommunications development or insist on minimum distances between new telecommunications development and existing development. (44)</p>	<ul style="list-style-type: none"> • Policy supporting the expansion of electronic communications networks, including telecommunications and high speed broadband, noting the caveats in para 44. 	<p>Policy SD44: Telecommunications and Utilities Infrastructure supports the expansion of the electronic communications network in a way that conserves and enhances the Special Qualities of the National Park. It does not ban telecommunications development in particular areas, impose any Article 4 directions, or include minimum distances between telecommunications equipment and existing development.</p>

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<p>6. Delivering a wide choice of high quality housing (paras 47-55)</p>		
<p>Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements; this should include an additional buffer of 5% or 20% (moved forward from later in the plan period) to ensure choice and competition in the market for land. 20% buffer applies where there has been persistent under delivery of housing(47)</p>	<ul style="list-style-type: none"> • Identification of: <ul style="list-style-type: none"> a) five years or more supply of specific deliverable sites; plus the buffer as appropriate • Where this element of housing supply includes windfall sites, inclusion of 'compelling evidence' to justify their inclusion (48) • A SHLAA 	<p>More than five years' supply of specific deliverable housing sites, plus a buffer, is set out in the 2017 Authority Monitoring Report (AMR), measured against the draft annualised housing figure set in the Local Plan Pre-submission Version of 250 dwellings per annum, which is a capacity-based figure as is appropriate for a National Park. The same document sets out compelling evidence to justify the inclusion of an allowance for windfall sites in years 3, 4 and 5. Further details are set out in the Housing Supply Update.</p> <p>The submission Local Plan plans for 250 homes per annum which reflects evidence on housing capacity, and allows for a 5% buffer to ensure the figure is met even if some sources of supply do not come forward as expected. The allocations in the Local Plan are backed up by the SHLAA, the most recent update of which was published in December 2016.</p>
<p>Identify a supply of developable sites or broad locations for years 6-10 and, where possible, years 11-15 (47).</p>	<ul style="list-style-type: none"> • Identification of a supply of developable sites or broad locations for: a) years 6-10; b) years 11-15 	<p>The 2017 AMR identifies a supply of developable sites or broad locations for years 6-15 of the plan period. When taken together with the anticipated supply in the first five years, the total supply exceeds the required number of dwellings.</p>
<p>Illustrate the expected rate of housing delivery through a trajectory; and set out a housing implementation strategy describing how a five year supply will be maintained. (47)</p>	<ul style="list-style-type: none"> • A housing trajectory • Monitoring of completions and permissions (47) • Updated and managed SHLAA. (47) 	<p>The 2017 AMR monitors completions and permissions, and sets out a housing trajectory for the whole plan period.</p> <p>The SDNPA SHLAA was first published in January 2015 and updated in December 2016. A call for sites is currently</p>

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		open for the next update of the SHLAA.
Set out the authority's approach to housing density to reflect local circumstances (47).	<ul style="list-style-type: none"> • Policy on the density of development. 	Policy SD25: Development Strategy states that development within settlements should make 'efficient and appropriate use of land'. Policy SD5: Design refers to the principle of utilising 'architectural design which is appropriate and sympathetic to its setting in terms of... density'; further details on this will be set out in a Design SPD.
Plan for a mix of housing based on current and future demographic and market trends, and needs of different groups (50) and caters for housing demand and the scale of housing supply to meet this demand. (para 159)	<ul style="list-style-type: none"> • Policy on planning for a mix of housing (including self-build, and housing for older people • SHMA • Identification of the size, type, tenure and range of housing) required in particular locations, reflecting local demand. (50) • Evidence for housing provision based on up to date, objectively assessed needs. (50) • Policy on affordable housing and consideration for the need for on-site provision or if off-site provision or financial contributions are sought, where these can these be justified and to what extent do they contribute to the objective of creating mixed and balanced communities. (50) 	<p>A SHMA was produced in 2015 and this was updated by way of a HEDNA (Housing and Economic Development Needs Assessment) published in 2017.</p> <p>Strategic Policy SD27: Mix of Homes sets out requirements based on local demand, as described in the SHMA, for the mix of dwelling sizes on site, and the provision of older peoples' housing and housing for people who are less mobile. Policy SD28: Affordable Homes sets out the mix of tenures required in on-site affordable housing.</p> <p>Two sites, including one large site, are allocated for self- or custom-build housing in the Petersfield Neighbourhood Plan.</p> <p>The number of dwellings whose provision is planned for in Policy SD26: Supply of Homes is informed by an up to date objectively assessed need (OAN) figure, derived from the HEDNA. Information on constraints has been applied to the OAN figure to determine the SD26 housing provision figure, as described in paragraphs 3.122 and 3.123.</p> <p>Policy SD28: Affordable Homes sets out requirements for</p>

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		affordable housing provision on- site or, in exceptional circumstances, financial contributions in lieu. The restricted circumstances where financial contributions will be considered, and the procedure to be followed when they do (set out in paragraphs 7.64-7.69), reflects the need to create mixed communities as set out in the SHMA and other evidence base documents.
<p>In rural areas be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate (54).</p> <p>In rural areas housing should be located where it will enhance or maintain the vitality of rural communities.</p>	<ul style="list-style-type: none"> • Consideration of allowing some market housing to facilitate the provision of significant additional affordable housing to meet local needs. • Consideration of the case for resisting inappropriate development of residential gardens. (This is discretionary)(para 53) • Examples of special circumstances to allow new isolated homes listed at para 55. 	<p>The ‘Medium Dispersed’ growth spatial strategy in the Local Plan allows for market housing in identified towns and villages, including allocations, which (in combination with Policy SD28: Affordable Homes) will facilitate the provision of new homes to reflect local needs, including additional affordable housing to meet local needs in rural locations.</p> <p>Policy SD29 allows for the development of 100% affordable housing rural exception sites. Consideration has also been given to allowing market housing on affordable housing rural exception sites; however, this option was not considered appropriate for inclusion in the policy, for reasons set out in paragraph 7.79 and in the Affordable Housing Background Paper. Inclusion of market housing to support rural exception sites coming forward may however be considered on a case-by-case basis if justified as an exception to the policy.</p> <p>Policy SD25: Development Strategy distinguishes between areas where development of residential gardens is acceptable in principle, subject to other Local Plan policies (within settlement boundaries) and areas where development of residential gardens will be restricted (outside settlement boundaries). The Settlement Boundary Review (2015, updated 2017) in many cases removed</p>

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		<p>residential garden land from the settlement boundary where it is located at the edge of identified settlements; the justification for this is set out in the introduction to the review.</p> <p>Various policies allow for the development of new isolated homes where special circumstances exist, including policies SD12: Historic Environment, SD25: Development Strategy, SD30: Replacement Dwellings, SD32: New Agricultural and Forestry Workers' Dwellings, SD33: Gypsies and Travellers and Travelling Showpeople and SD41: Conversion of Redundant Agricultural or Forestry Buildings.</p>
<p>7. Requiring good design (paras 56-68)</p>		
<p>Develop robust and comprehensive policies that set out the quality of development that will be expected for the area (58).</p>	<ul style="list-style-type: none"> • Inclusion of policy or policies which seek to increase the quality of development through the principles set out at para 58 and approaches in paras 59-61, linked to the vision for the area and specific local issues 	<p>Policy SD5: Design seeks to increase the quality of development through the principles contained in the NPPF. Policy SD21: Public Realm, Highway Design and Public Art does the same for highway design and design of the public realm; it has strong links to the local guidance document, 'Roads in the South Downs'. Both these policies, together with policy SD11: Trees, Woodlands and Hedgerows, will be supported by a forthcoming Design SPD.</p>
<p>8. Promoting healthy communities (paras 69-77)</p>		
<p>Policies should aim to design places which: promote community interaction, including through mixed-use development; are safe and accessible environments; and are accessible developments (69).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies on inclusive communities. • Promotion of opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through mixed-use 	<p>Several policies in the Local Plan are intended to promote inclusive communities, including:</p> <p>SD5: Design promotes regard to improving safety and perceptions of safety in the design of new development.</p>

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	<p>developments which bring together those who work, live and play in the vicinity; safe and accessible environments where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion; and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas. (69)</p>	<p>SD21: Public Realm, Highway Design and Public Art, which is intended to ensure the public realm is a safe and accessible environment, with clear and legible pedestrian routes and high quality public space, where people can meet, interact and experience the National Park’s special qualities as well as travelling from A to B. These principles are embedded in the document ‘Roads in the South Downs’, linked to by the policy.</p> <p>Policies SD27: Mix of Homes and SD28: Affordable Homes aim to create mixed communities by ensuring a mixture of dwelling types and tenures on all but the smallest sites, and restoring a better balance of dwelling types in communities more generally.</p> <p>Allocation Policies SD56: Shoreham Cement Works, SD57: North Street Quarter and adjacent Eastgate area, SD67: Cowdray Works Yard, and SD92: Stedham Sawmill, are all for mixed-use developments.</p>
<p>Policies should plan positively for the provision and use of shared space, community facilities and other local services (70).</p>	<ul style="list-style-type: none"> • Inclusion of a policy or policies addressing community facilities and local service. • Positive planning for the provision and integration of community facilities and other local services to enhance the sustainability of communities and residential environments; safeguard against the unnecessary loss of valued facilities and services; ensure that established shops, facilities and services are able to develop and modernize; and ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and 	<p>Policies SD38: Shops outside Centres, SD42: Infrastructure and SD43: New and Existing Community Facilities plan for the provision and integration of community facilities and other local services; safeguard against their unnecessary loss; and ensure that established ones are able to develop and modernise. The collection and spending of the Community Infrastructure Levy will also contribute to these aims.</p> <p>Policy SD26 and most of the housing allocations ensure that housing is developed in suitable locations which offer a range of community facilities and good access to key services and infrastructure.</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities; and set locally derived standards to provide these (73).</p>	<p>infrastructure.</p> <ul style="list-style-type: none"> • Identification of specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. (73) • A policy protecting existing open space, sports and recreational buildings and land from development, with specific exceptions. (74) • Protection and enhancement of rights of way and access. (75) 	<p>The SDNPA, as the local planning authority, works with the twelve local authorities responsible for the delivery of sports and recreation facilities. Local standards for each of those areas are based on local needs-based evidence and have been drawn together in the Open Space, Sports and Recreation Background Paper 2017 and included in Figure 7.8 of the Local Plan. This figure forms the basis for requirements on open space provision contained in Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries.</p> <p>Policy SD46, as well as Policy SD45: Green Infrastructure protect existing open space, sports and recreational buildings and land from development, with specific exceptions.</p> <p>Policy SD20: Walking, Cycling and Equestrian Routes protects, and encourages the enhancement of, rights of way and access land and their setting.</p>
<p>Enable local communities, through local and neighbourhood plans, to identify special protection green areas of particular importance to them – ‘Local Green Space’ (76-78).</p>	<ul style="list-style-type: none"> • Policy enabling the protection of Local Green Spaces. (Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period. The designation should only be used when it accords with the criteria in para 77). Policy for managing development within a local green space should be consistent with policy for Green Belts. (78) 	<p>Policy SD47: Local Green Spaces enables the protection of Local Green Spaces, listing those designated by the SDNPA and linking to the policies in the NPPF on their protection. Most neighbourhood plans also designate local green spaces.</p>
<p>9. Protecting Green Belt land (paras 79-92)</p>		

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>Local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. (81)</p> <p>Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. (83)</p> <p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (84)</p> <p>Boundaries should be set using ‘physical features likely to be permanent’ amongst other things (85)</p>	<ul style="list-style-type: none"> • Where Green Belt policies are included, these should reflect the need to: <ul style="list-style-type: none"> ○ Enhance the beneficial use of the Green Belt. (81) ○ Accord with criteria on boundary setting, and the need for clarity on the status of safeguarded land, in particular. (85) ○ Specify that inappropriate development should not be approved except in very special circumstances. (87) ○ Specify the exceptions to inappropriate development (89-90) ○ Identify where very special circumstances might apply to renewable energy development. (91) 	<p>There is no Green Belt in the South Downs National Park.</p>
<p>10. Meeting the challenge of climate change, flooding and coastal change (paras 93-108)</p>		
<p>Adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. (94)</p>	<ul style="list-style-type: none"> • Planning of new development in locations and ways which reduce greenhouse gas emissions. • Support for energy efficiency improvements to existing building. • Local requirements for a building’s sustainability which are consistent with the Government’s zero carbon buildings policy. (95)) 	<p>The spatial strategy and Policy SD25: Development Strategy, as well as the first criterion of SD19: Transport and Accessibility, direct most new development to relatively sustainable locations (i.e. not isolated nor unrelated to a settlement providing services) which will limit additional greenhouse gas emissions.</p> <p>Policy SD48: Climate Change and Sustainable Use of Resources supports the retrofitting of energy efficiency measures to existing buildings. Policy SD14: Climate</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
		<p>Change Mitigation and Adaptation of Historic Buildings ensures this will be done in a way consistent with the conservation of heritage assets.</p> <p>Policy SD48: Climate Change and Sustainable Use of Resources sets local requirements for building sustainability, consistent with the Government’s zero carbon buildings policy.</p>
<p>Help increase the use and supply of renewable and low carbon energy through a strategy, policies maximising renewable and low carbon energy, and identification of key energy sources. (97)</p>	<ul style="list-style-type: none"> • A strategy and policies to promote and maximise energy from renewable and low carbon sources, • Identification of suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources (see also NPPF footnote 17) • Identification of where development can draw its energy supply from decentralised, renewable or low carbon supply systems and for co-locating potential heat customers and suppliers. (97) 	<p>Policy SD51: Renewable Energy aims to promote and maximise the generation of energy from renewable and low carbon sources, while protecting the special qualities of the National Park. The supporting text to the policy identifies approaches to the siting and design of energy generation that are more likely to be suitable. The policy applies across the National Park as a whole, with applications to be taken on a case by case basis. However, the Low Carbon and Renewable Energy Study (2013) did map locations which may be more suitable for wind energy development. A Renewable and Low Carbon Energy Study supports Policy SD51, and sets out key issues in assessing the appropriateness of different low carbon and renewable alternatives in their context. Particular opportunities are identified in this Study, and in the Local Plan, for biomass energy production and Combined Heat and Power in the larger settlements of Lewes and Petersfield.</p> <p>The Strategic Site Policies SD56 and SD57 both require on site renewable energy generation, with the supporting text to SD56: Shoreham Cement Works suggesting a combined heat and power plant on site.</p>
<p>Minimise vulnerability to climate change and manage the risk of flooding (99)</p>	<ul style="list-style-type: none"> • Account taken of the impacts of climate change. (99) 	<p>The Local Plan has been informed by the SDNP Climate Change Adaptation Plan (2016). Policy SD48: Climate</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
	<ul style="list-style-type: none"> Allocate, and where necessary re-locate, development away from flood risk areas through a sequential test, based on a SFRA. (100) Policies to manage risk, from a range of impacts, through suitable adaptation measures 	<p>Change and Sustainable Use of Resources contains a standard for water usage and requires all development proposals to demonstrate how they address climate change adaptation. Other policies throughout the plan: for example, Policy SD9: Biodiversity and Geodiversity, and Policy SD17: Protection of the Water Environment, will help to deal with the impacts of climate change.</p> <p>The Local Plan is supported by an SFRA Level 1 and 2, which demonstrates that development has been allocated away from flood risk areas wherever possible, and where unavoidable, that adequate mitigation measures are in place. For example, parts of the site allocations SD57: North Street Quarter, Lewes and SD80: Malling Brooks, Lewes are located in flood zones 3. However, the sites are justified given the lack of suitable alternatives in the built-up area of Lewes, which as one of the two largest settlements is best placed to accommodate significant commercial and housing growth within the National Park. These allocation policies contain various criteria designed to robustly mitigate flood risk.</p> <p>Policies SD49: Flood Risk Management and SD50: Sustainable Drainage Systems support the management of flood risk through suitable adaptation measures</p>
Take account of marine planning (105)	<ul style="list-style-type: none"> Ensure early and close co-operation on relevant economic, social and environmental policies with the Marine Management Organisation 	<p>Early and close cooperation has taken place with the MMO, in particular regarding policy SD18: The Open Coast, which covers the whole of the National Park's coastline other than narrow tidal estuaries (much of this</p>

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	<ul style="list-style-type: none"> Review the aims and objectives of the Marine Policy Statement, including local potential for marine-related economic development Integrate as appropriate marine policy objectives into emerging policy Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	<p>area is also Heritage Coast). The preparation of this policy involved reviewing the aims and objectives of the Marine Policy Statement, the integration of appropriate marine policy objectives, and the policy supports integrated coastal management.</p>
<p>Manage risk from coastal change (106)</p>	<ul style="list-style-type: none"> Identification of where the coast is likely to experience physical changes and identify Coastal Change Management Areas, and clarity on what development will be allowed in such areas. Provision for development and infrastructure that needs to be re-located from such areas, based on SMPs and Marine Plans, where appropriate. 	<p>Policy SD18: The Open Coast states that all developments in the coastal area must be consistent with the local Shoreline Management Plan (SMP) or its replacement. A map is included in the Local Plan indicating on which stretches of open coast the SMP has a policy of 'hold the line' and on which it is 'no active intervention'.</p> <p>The SFRA Levels 1 and 2 considered the risks of tidal flooding, including in combination with climate change impacts. This was assessed in particular for Lewes town and Shoreham Cement Works, on the Ouse and Adur estuaries respectively.</p>
<p>II. Conserving and enhancing the natural environment (paras 109-125)</p>		
<p>Protect valued landscapes (109)</p>	<ul style="list-style-type: none"> A strategy and policy or policies to create, protect, enhance and manage networks of biodiversity and green infrastructure. Policy which seeks to minimise the loss of higher quality agricultural land and give great weight to protecting the landscape and scenic beauty of National Parks, the Broads and AONBs. 	<p>The South Downs Local Plan is a landscape-led plan. The first objective of the Local Plan is to 'conserve and enhance the landscapes of the National Park'. All of its policies are specifically framed to ensure that this objective is met.</p> <p>Policy SD4: Landscape Character sets out high level criteria relating to this objective.</p> <p>A further important objective is to achieve a sustainable use of ecosystem services (i.e. the benefits people and</p>

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		<p>society get from the natural environment, including from high quality agricultural land). Policy SD2: Ecosystem Services sets out the high-level spatial planning policy to achieve this. All policies in the Local Plan enshrine this principle.</p> <p>Policy SD9: Biodiversity and Geodiversity is intended to create, protect, enhance and manage habitat networks for biodiversity. Policy SD45: Green Infrastructure will do the same for green infrastructure networks more broadly.</p> <p>The SDNPA is currently producing a Green Infrastructure Strategy and a Landscape and Biodiversity Strategy.</p>
<p>Prevent unacceptable risks from pollution and land instability (109)</p>	<ul style="list-style-type: none"> Policy which seeks development which is appropriate for its location having regard to the effects of pollution on health, the natural environment or general amenity. 	<p>Policy SD2: Ecosystem Services requires development to have an overall positive impact on the ability of the natural environment to contribute goods and services, including the conservation and enhancement of soils, and supporting the sustainable production and use of food and raw materials.</p> <p>The Local Plan as a whole, but in particular the policies in Chapter 5: A Thriving Living Landscape, gives great weight to protecting the landscape, natural environment and scenic beauty of the National Park.</p> <p>Policy SD54: Pollution and Air Quality seeks to ensure development avoids a significant negative effect on people and the natural environment.</p>
<p>Planning policies should minimise impacts on biodiversity and geodiversity (117)</p> <p>Planning policies should plan for biodiversity at a landscape-scale across local authority</p>	<ul style="list-style-type: none"> Identification and mapping of local ecological networks and geological conservation interests. Policies to promote the preservation, 	<p>The Local Plan is supported by habitat connectivity mapping (2017) that identifies and maps local ecological networks. All sites designated at an international, national or local level for their wildlife and geological value are</p>

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boundaries (117)	restoration and re-creation of priority habitats, ecological networks and the recovery of priority species	<p>mapped on the Policies Map. Areas of priority habitat are also mapped on the SDNPA's GIS systems.</p> <p>Policy SD9: Biodiversity and Geodiversity promotes preservation, restoration and re-creation and general enhancement of priority habitats, ecological networks and the recovery of priority species. Policy SD10: International Sites affords strong protection of internationally protected sites.</p>
12. Conserving and enhancing the historic environment (paras 126-141)		
Include a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk (126)	<ul style="list-style-type: none"> • A strategy for the historic environment based on a clear understanding of the cultural assets in the plan area, including assets most at risk. • A map/register of historic assets • A policy or policies which promote new development that will make a positive contribution to character and distinctiveness. (126) 	<p>The SDNPA is currently producing a Historic Environment Strategy. The Partnership Management Plan contains outcomes and objectives on the historic environment, based on a clear understanding of the cultural assets in the plan area, including assets most at risk.</p> <p>Historic assets are mapped on the Authority's GIS system. Conservation areas, registered battlefields and Scheduled Monuments are shown on the Policies Map.</p> <p>Policies SD5: Design, SD11: Trees, Woodlands and Hedgerows, SD12: Historic Environment, SD13: Listed Buildings, SD14: Climate Change Mitigation and Adaptation of Historic Buildings, SD15: Conservation Areas, SD16: Archaeology and SD21: Public Realm, Highway Design and Public Art, and will promote new development that makes a positive contribution to character and distinctiveness.</p>
13. Facilitating the sustainable use of minerals (paras 142-149)		
It is important that there is a sufficient supply of	Account taken of the matters raised in relation to	The SDNPA is a minerals planning authority and has

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<p>material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation (142)</p> <p>Minerals planning authorities should plan for a steady and adequate supply of industrial materials (146)</p>	<p>paragraph 143 and 145, including matters in relation to land in national / international designations; landbanks; the defining of Minerals Safeguarding Areas; wider matters relating to safeguarding; approaches if non-mineral development is necessary within Minerals Safeguarding Areas; the setting of environmental criteria; development of noise limits; reclamation of land; plan for a steady and adequate supply of aggregates. This could include evidence of co-operation with neighbouring and more distant authorities.</p>	<p>cooperated with Hampshire, West Sussex and East Sussex County Councils and Brighton and Hove City Council on the production of joint minerals planning documents, which define minerals safeguarding areas, set out approaches if non-mineral development is necessary within them, and all other matters relating to minerals planning. The selection of sites for development allocation in the South Downs Local Plan has taken full account of minerals planning matters, including safeguarded areas, and minerals related criteria are included in the site allocation policies where relevant (for example, Policy SD89: Land at Pulens Lane, Sheet).</p>
<p>Justified: <i>The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</i></p> <p>To be 'justified' a DPD needs to be:</p> <ul style="list-style-type: none"> • Founded on a robust and credible evidence base involving: research / fact finding demonstrating how the choices made in the plan are backed up by facts; and evidence of participation of the local community and others having a stake in the area. • The most appropriate strategy when considered against reasonable alternatives. 		
<p><i>Participation</i></p> <p>Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>The consultation statement. This should set out what consultation was undertaken, when, with whom and how it has influenced the plan. The statement should show that efforts have been made to consult hard to reach groups, key stakeholders etc. Reference SCI</p>	<p>A Consultation Statement is published alongside the submission Local Plan in accordance with Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement shows that the NPA has worked hard to engage with all interested parties in the Local Plan particularly the town and parish councils.</p> <p>The latest version of the Statement of Community Involvement (SCI) was adopted by the NPA in August 2017.</p>
<p><i>Research / fact finding</i></p> <p>Is the plan justified by a sound and credible evidence base? What are the sources of</p>	<ul style="list-style-type: none"> • The studies, reports and technical papers that provide the evidence for the policies set out in the DPD, the date of preparation and who 	<p>The full evidence base is contained in the Core Document Library. This contains all studies, reports and technical papers that provide the evidence for the policies set out in</p>

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<p>evidence? How up to date, and how convincing is it?</p> <p>What assumptions were made in preparing the DPD? Were they reasonable and justified?</p>	<p>they were produced by.</p> <p>AND</p> <ul style="list-style-type: none"> • Sections of the DPD (at various stages of development) and SA Report which illustrate how evidence supports the strategy, policies and proposals, including key assumptions. <p>OR</p> <ul style="list-style-type: none"> • A very brief statement of how the main findings of consultation support the policies, with reference to: reports to the council on the issues raised during participation, covering both the front-loading and formulation phases; and any other information on community views and preferences. <p>OR</p> <ul style="list-style-type: none"> • For each policy (or group of policies dealing with the same issue), a very brief statement of the evidence documents relied upon and how they support the policy (where this is not already clear in the reasoned justification in the DPD). 	<p>the Local Plan, the date of preparation and who they were produced by.</p> <p>The introductory and supporting text to each policy, and, for some topics, the Local Plan Background Papers (2017/18), set out how the evidence base has supported the strategy, policies and key assumptions in the Local Plan.</p> <p>The Plan has undergone Sustainability Appraisal at Options, Preferred Options, and Pre-Submission (revised at Submission) stages. The Sustainability Appraisal further sets out further how the evidence gathered supports the strategy, policies and proposals in the Local Plan.</p>
<p><i>Alternatives</i></p> <p>Can it be shown that the LPA's chosen approach is the most appropriate given the reasonable alternatives? Have the reasonable alternatives been considered and is there a clear audit trail showing how and why the preferred approach was arrived at? Where a balance had to be struck in taking decisions between competing alternatives, is it clear how</p>	<ul style="list-style-type: none"> • Reports and consultation documents produced in the early stages setting out how alternatives were developed and evaluated, and the reasons for selecting the preferred strategy, and reasons for rejecting the alternatives. This should include options covering not just the spatial strategy, but also the quantum of development, strategic policies and development management policies. 	<p>The process of development and evaluation of alternatives and the selection of options, including reports on how decisions on the inclusion of policy were made, and how Sustainability Appraisal has influenced the choice of strategy and the content of policies, are set out in the Options Consultation paper, the Preferred Options Local Plan, the Preferred Options Sustainability Appraisal and the 2015 paper on "Progress from Issues and Options to Preferred Options". In particular, the Sustainability Appraisal was particularly important in assessing and</p>

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<p>and why the decisions were taken?</p> <p>Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the DPD from the start?</p>	<ul style="list-style-type: none"> • An audit trail of how the evidence base, consultation and SA have influenced the plan. • Sections of the SA Report showing the assessment of options and alternatives. • Reports on how decisions on the inclusion of policy were made. • Sections of the consultation document demonstrating how options were developed and appraised. • Any other documentation showing how alternatives were developed and evaluated, including a report on how sustainability appraisal has influenced the choice of strategy and the content of policies. 	<p>auditing alternative strategies and policy options, and providing evidence to point to the most appropriate approach in light of the evidence.</p> <p>Information on further development of the options can be found in the Pre-submission Local Plan and table of changes, Sustainability Appraisal documents presented at Submission stage, Consultation Statement and background papers on various topics.</p> <p>All changes made as a result of NPA Members' recommendations, and final decisions on iterations of the Plan, are recorded in various Planning Committee and Full Authority (NPA) papers and minutes.</p>
<p>Effective: <i>the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.</i></p> <p>To be 'effective' a DPD needs to:</p> <ul style="list-style-type: none"> • Be deliverable • Demonstrate sound infrastructure delivery planning • Have no regulatory or national planning barriers to its delivery • Have delivery partners who are signed up to it • Be coherent with the strategies of neighbouring authorities • Demonstrate how the Duty to Co-operate has been fulfilled • Be flexible • Be able to be monitored 		
<p><i>Deliverable and Coherent</i></p> <ul style="list-style-type: none"> • Is it clear how the policies will meet the Plan's vision and objectives? Are there any obvious gaps in the policies, having regard to the 	<ul style="list-style-type: none"> • Sections of the DPD which address delivery, the means of delivery and the timescales for key developments and initiatives. • Confirmation from the relevant agencies that 	<p>Delivery of the Local Plan is largely addressed by the Monitoring and Implementation Framework (Chapter 10), which identifies development partners, targets, monitoring indicators, and trigger points for the delivery of most of</p>

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<p>objectives of the DPD?</p> <ul style="list-style-type: none"> • Are the policies internally consistent? • Are there realistic timescales related to the objectives? • Does the DPD explain how its key policy objectives will be achieved? 	<p>they support the objectives and the identified means of delivery, such as evidence that the plans and programmes of other bodies have been taken into account (e.g. Water Resources Management Plans and Marine Plans).</p> <ul style="list-style-type: none"> • Information in the local development scheme, or provided separately, about the scope and content (actual and intended) of each DPD showing how they combine to provide a coherent policy structure. • Section in the DPD that shows the linkages between the objectives and the corresponding policies, and consistency between policies (such as through a matrix). 	<p>the policies.</p> <p>The Duty to Cooperate Statement contains evidence that all relevant agencies have been engaged throughout the preparation of the Local Plan. The Local Plan Background Papers (2017/18) explain where appropriate how the plans and programmes of these bodies have been taken into account in Local Plan production. The Consultation Statement sets out where changes have been made as a result of comments made by these agencies. No objection in principle on strategic issues has been received from any agency.</p> <p>The Local Development Scheme (updated August 2017) explains the scope and content of each DPD and shows how they relate to each other. All matters other than minerals and waste are covered by a single Local Plan, and Neighbourhood Plans where they exist.</p> <p>At the beginning of each chapter in the Pre-Submission Local Plan is a section showing the Local Plan objectives related to that chapter. The Monitoring and Implementation Framework (Chapter 10) sets out which Local Plan objectives relate to each specific policy.</p>
<p><i>Infrastructure Delivery</i></p> <ul style="list-style-type: none"> • Have the infrastructure implications of the policies clearly been identified? • Are the delivery mechanisms and timescales for implementation of the policies clearly identified? • Is it clear who is going to deliver the required infrastructure and does the timing of the 	<ul style="list-style-type: none"> • A section or sections of the DPD where infrastructure needs are identified and the proposed solutions put forward. • A schedule setting out responsibilities for delivery, mechanisms and timescales, and related to a CIL schedule where appropriate. • Confirmation from infrastructure providers that they support the solutions proposed and the identified means and timescales for their 	<p>Infrastructure needs arising from the allocations in the Local Plan are identified in each allocation policy. The Monitoring and Implementation Framework identified delivery partners and mechanisms in relation to specific Local Plan policies.</p> <p>The Local Plan Transport Assessment did not identify any need for measures to mitigate of traffic impact that would need to be secured by Local Plan policies. The need for</p>

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Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>provision complement the timescale of the policies?</p>	<p>delivery, or a plan for resolving issues.</p> <ul style="list-style-type: none"> • Demonstrable plan-wide viability, particularly in relation to the delivery of affordable housing and the role of a CIL schedule. 	<p>some on-line mitigation was identified. , West Sussex and Hampshire County Councils are now working on projects for inclusion in the IDP to deliver this mitigation.</p> <p>No other strategic issues or barriers relating to infrastructure provision to support the Local Plan have been identified, in the context of regular engagement with relevant delivery agencies. CIL came into force in the National Park in April 2017 which will provide ongoing funding to address the impacts of development on local and strategic infrastructure. The CIL Charging Schedule and Section 123 List are published on the SDNPA website.</p> <p>Plan-wide viability, including of the proposals for affordable housing and CIL, is demonstrated by the Local Plan and Affordable Housing Viability Assessment (BNP Paribas, 2017).</p>
<p><i>Co-ordinated Planning</i></p> <p>Does the DPD reflect the concept of spatial planning? Does it go beyond traditional land use planning by bringing together and integrating policies for the development and use of land with other policies and programmes from a variety of agencies / organisations that influence the nature of places and how they function?</p>	<ul style="list-style-type: none"> • Sections of the DPD that reflect the plans or strategies of the local authority and other bodies • Policies which seek to pull together different policy objectives • Expressions of support/representations from bodies responsible for other strategies affecting the area 	<p>The whole Local Plan seeks to deliver the outcomes of the South Downs Partnership Management Plan, a document prepared by a group of local partners including the National Park Authority, pulling together their policy objectives.</p> <p>The Local Plan writing process has also involved consulting and taking into account many different plans and policies, ranging from the Hampshire Countryside Access Plan to the Sussex Heritage Coast Definition. This is reflected in the introductory and supporting text to the Local Plan, and in the topic-specific background papers.</p>
<p><i>Flexibility</i></p> <ul style="list-style-type: none"> • Is the DPD flexible enough to respond to a variety of, or unexpected changes in, 	<ul style="list-style-type: none"> • Sections of the DPD setting out the assumptions of the plan and identifying the circumstances when policies might need to 	<p>The Monitoring and Implementation Framework contains guidance as to when the plan's policies might need to be</p>

South Downs Local Plan Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>circumstances?</p> <ul style="list-style-type: none"> Does the DPD include the remedial actions that will be taken if the policies need adjustment? 	<p>be reviewed.</p> <ul style="list-style-type: none"> Sections of the annual monitoring report and sustainability appraisal report describing how the council will monitor: <ol style="list-style-type: none"> the effectiveness of policies and what evidence is being collected to undertake this changes affecting the baseline information and any information on trends on which the DPD is based Risk analysis of the strategy and policies to demonstrate robustness and how the plan could cope with changing circumstances Sections within the DPD dealing with possible change areas and how they would be dealt with, including mechanisms for the rate of development to be increased or slowed and how that would impact on other aspects of the strategy and on infrastructure provision Sections of the DPD identifying the key indicators of success of the strategy, and the remedial actions which will be taken if adjustment is required. 	<p>reviewed, including trigger points for review.</p> <p>The Monitoring and Implementation Framework sets out how the effectiveness of policies will be monitored, including what evidence will be collected for such monitoring. The Authority Monitoring Report does not yet monitor all the indicators in the Monitoring and Implementation Framework, but will do so from 2018 onwards.</p> <p>The Monitoring and Implementation Framework includes a flow chart showing the process that would be run through when one of the 'trigger points' is reached, to determine whether the policy needs to be reviewed, whether we need to investigate ways to speed up development, or whether a range of other remedial actions are required.</p>
<p><i>Co-operation</i></p> <ul style="list-style-type: none"> Is there sufficient evidence to demonstrate that the Duty to Co-operate has been undertaken appropriately for the plan being examined? Is it clear who is intended to implement each part of the DPD? Where the actions required are outside the direct control of the LPA, is 	<ul style="list-style-type: none"> A succinct Duty to Co-operate Statement which flows from the strategic issues that have been addressed jointly. A 'tick box' approach or a collection of correspondence is not sufficient, and it needs to be shown (where appropriate) if joint plan-making arrangements have been considered, what decisions were reached and why. The Duty to Co-operate Statement could 	<p>The Duty to Co-operate Statement sets out the extensive work on the Duty to Co-operate that has been undertaken throughout the plan preparation process, in particular on the key cross-boundary strategic issues of natural beauty, biodiversity, homes, tourism, economy and transport. It describes the key outcomes of this work.</p> <p>Statements of Common Ground have been signed with all</p>

South Downs Local Plan Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<p>there evidence that there is the necessary commitment from the relevant organisation to the implementation of the policies?</p>	<p>highlight: the sharing of ideas, evidence and pooling of resources; the practical policy outcomes of co-operation; how decisions were reached and why; and evidence of having effectively co-operated to plan for issues which need other organisations to deliver on, common objectives for elements of strategy and policy; a memorandum of understanding; aligned or joint core strategies and liaison with other consultees as appropriate.</p>	<p>the local authorities partly covered by the National Park.</p> <p>Joint core strategies have been produced with Winchester City Council, East Hampshire District Council, Lewes District Council and Wealden District Council which provide strong evidence of joint working on strategic planning matters.</p>
<p><i>Monitoring</i></p> <ul style="list-style-type: none"> • Does the DPD contain targets, and milestones which relate to the delivery of the policies, (including housing trajectories where the DPD contains housing allocations)? • Is it clear how targets are to be measured (by when, how and by whom) and are these linked to the production of the annual monitoring report? • Is it clear how the significant effects identified in the sustainability appraisal report will be taken forward in the ongoing monitoring of the implementation of the plan, through the annual monitoring report? 	<ul style="list-style-type: none"> • Sections of the DPD setting out indicators, targets and milestones • Sections of the current annual monitoring report which report on indicators, targets, milestones and trajectories • Reference to any other reports or technical documents which contain information on the delivery of policies • Sections of the current annual monitoring report and the sustainability appraisal report setting out the framework for monitoring, including monitoring the effects of the DPD against the sustainability appraisal 	<p>Chapter 11 of the Local Plan (Monitoring and Implementation) contains a table setting out indicators, targets and milestones for the Local Plan policies. Many of these indicators are already reported on in the 2016 and 2017 AMR, whilst others will be reported on in the 2018 AMR.</p>
<p>Consistent with national policy: <i>the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</i></p> <p>The DPD should not contradict or ignore national policy. Where there is a departure, there must be clear and convincing reasoning to justify the approach taken.</p>		
<ul style="list-style-type: none"> • Does the DPD contain any policies or proposals which are not consistent with national policy and, if so, is there local justification? 	<ul style="list-style-type: none"> • Sections of the DPD which explain where and how national policy has been elaborated upon and the reasons. • Studies forming evidence for the DPD or, 	<p>As explained earlier in this Toolkit, the Local Plan does not meet the objectively assessed need for housing in the National Park. The housing provision figure in the Local Plan is capacity led and whilst seeking to meet local need</p>

South Downs Local Plan Soundness Self-Assessment Checklist

Soundness Test and Key Requirements	Possible Evidence	Evidence Provided
<ul style="list-style-type: none"> Does the DPD contain policies that do not add anything to existing national guidance? If so, why have these been included? 	<p>where appropriate, other information which provides the rationale for departing from national policy.</p> <ul style="list-style-type: none"> Evidence provided from the sustainability appraisal (including reference to the sustainability report) and/or from the results of community involvement. Where appropriate, evidence of consistency with national marine policy as articulated in the UK Marine Policy Statement Reports or copies of correspondence as to how representations have been considered and dealt with. 	<p>for new homes does not allocated sites that would have an adverse impact on this nationally protected landscape.</p> <p>Paragraphs 4.18-4.24 of the Local Plan explain why the ordinary meaning of ‘major development’ is used in national parks rather than that defined in the Town and Country Planning (Development Management Procedure)(England) Order 2015. This section of the Local Plan also contains links to legal opinions justifying this position.</p> <p>Paragraphs 7.49-7.73 explain why the threshold for affordable housing provision on market led sites differs from Government Guidance. This section of text also contains links to the Strategic Housing Market Assessment and Viability Assessment which support this decision.</p> <p>The Local Plan background papers provide evidence of how public and stakeholder feedback on specific policy areas have led to differences between national guidance and the Local Plan.</p> <p>The Preferred Options version of the Local Plan contained significant text setting out national policy and guidance. This was been removed for the Pre-submission Local Plan to avoid unnecessary repetition.</p>

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Planning policy for traveller sites

Planning Policy for Traveller Sites was published in 23 March 2012 and came into effect on 27 March 2012. Circular 01/06: Planning for Gypsy and Traveller Caravan Sites and Circular 04/07: Planning for Travelling Showpeople have been cancelled. Planning Policy for Traveller Sites should be read in conjunction with the National Planning Policy Framework, including the implementation policies of that document.

The government's aim in relation to planning for traveller sites is:

'To ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic life of travellers whilst respecting the interests of the settled community'.

Government's aims in respect of traveller sites are:

- That local planning authorities (LPAs) make their own assessment of need for the purposes of planning
- That LPAs work collaboratively, develop fair and effective strategies to meet need through the identification of land for sites
- Plan for sites over a reasonable timescale
- Plan-making should protect green belt land from inappropriate development
- Promote more private traveller site provision whilst recognising that there will always be those travellers who cannot provide their own sites
- Aim to reduce the number of unauthorised developments and encampments and make enforcement more effective.

In addition local planning authorities should:

- Include fair, realistic and inclusive policies
- Increase the number of traveller sites in appropriate locations with planning permission, to address under provision and maintain an appropriate level of supply
- Reduce tensions between settled and traveller communities in plan-making and decision-taking
- Enable provision of suitable accommodation from which travellers can access education, health, welfare and employment infrastructure
- Have due regard to protection of local amenity and local environment

South Downs Local Plan Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
Policy A: Using evidence to plan positively and manage development (para 6)		
Early and effective community engagement with both settled and traveller communities.	<ul style="list-style-type: none"> • Early and effective engagement undertaken, including discussing travellers' accommodation needs with travellers themselves, their representative bodies and local support groups. 	Gypsy and Traveller Accommodation Assessments have been undertaken for six study areas overlapping the National Park. All these assessments drew on a range of primary and secondary information such as interviews with people from the communities, waiting lists, records of unauthorised encampments and consultation with stakeholders like the Showmen's Guild.
Co-operate with travellers, their representative bodies and local support groups, other local authorities and relevant interest groups to prepare and maintain an up-to-date understanding of likely permanent and transit accommodation needs of their areas.	<ul style="list-style-type: none"> • Demonstration of a clear understanding of the needs of the traveller community over the lifespan of your development plan. • Collaborative working with neighbouring local planning authorities. • A robust evidence base to establish accommodation needs to inform the preparation of your local plan and make planning decisions. 	<p>The Gypsy, Traveller and Travelling Showpeople Background Paper (henceforward: the Background Paper) 2018 sets out how the SDNPA has worked with local and county authorities to identify the permanent and transit accommodation needs across the National Park. The studies covering Hampshire (East Hampshire & Winchester), the Coastal West Sussex area (Adur, Arun, Chichester & Worthing), Brighton and Hove and East Sussex (Eastbourne, Lewes & Wealden) have been undertaken jointly with the local authorities and through liaising with the County Councils. The studies in Horsham and Mid Sussex assessed need in the whole of each district, including the areas of Horsham and Mid Sussex Districts within the SDNP.</p> <p>A summary of the study findings on the level of need for permanent and transit sites is presented in Table 4 of the Background Paper.</p>
Policy B: Planning for traveller sites (paras 7-11)		

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Policy Expectations	Possible Evidence	Evidence Provided
<p>Set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in your area, working collaboratively with neighbouring LPAs.</p> <p>Set criteria to guide land supply allocations where there is identified need.</p> <p>Ensure that traveller sites are sustainable economically, socially and environmentally.</p>	<ul style="list-style-type: none"> • Identification, and annual update, of a supply of specific, deliverable sites sufficient to provide 5 years worth of sites against locally set target. Identification of a supply of specific, developable sites or broad locations for growth for years 6-10, and, where possible, for years 11-15. • An assessment of the need for traveller sites, and where an unmet need has been demonstrated a supply of specific, deliverable sites been identified. • Policy which takes into account criteria a-h of para 11 	<p>The Background Paper identifies a supply of specific, developable sites, although not enough to meet the identified need in all areas of the National Park. This is to be expected in the context of a National Park where the volume of suitable sites is heavily constrained by landscape capacity. The need for Gypsy and Traveller and Travelling Showpeople sites is assessed on the basis of study areas, of which there are six in the National Park area. Figure 7.6 of the Pre-submission Local Plan summarises the relationship between need for each type of development and site allocations in each of these areas, showing that the need is fully met in three areas, partially met in two and that there are no sites identified in one of the areas. Therefore Policy SD33 sets out that the SDNPA will seek to meet the remaining needs in those areas through planning permissions.</p> <p>The site selection methodology used in the preparation of the list of sites for the Pre-Submission Local Plan took account of criteria a-h of para.13 of the guidance.</p>
<p>Policy C: Sites in rural areas and the countryside (para 12)</p>		
<p>When assessing the suitability of sites in rural or semi-rural settings LPAs should ensure that the scale of such sites do not dominate the nearest settled community.</p>		<p>The criteria based policy in Policy SD22: Gypsies and Travellers and Travelling Showpeople includes a clause on ensuring sites are not disproportionate in size to nearby communities.</p>
<p>Policy D: Rural exception sites (para 13)</p>		
<p>If there is a lack of affordable land to meet local traveller needs, LPAs in rural areas,</p>	<ul style="list-style-type: none"> • If a rural exception site policy is used, and if so clarity that such sites shall 	<p>The SDNPA is allocating land in the countryside for Gypsy and Traveller usage only.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
where viable and practical, should consider allocating and releasing sites solely for affordable travellers' sites.	be used for affordable traveller sites in perpetuity.	
Policy E: Traveller sites in Green Belt (paras 14-15)		
<p>Traveller sites (both permanent and temporary) in the Green Belt are inappropriate development.</p> <p>Exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site ... should be done only through the plan-making process.</p>	<ul style="list-style-type: none"> Green Belt boundary revisions made in response to a specific identified need for a traveller site, undertaken through the plan making process. 	Not applicable- there is no Green Belt in the National Park
Policy F: Mixed planning use traveller sites (paras 16-18)		
Local planning authorities should consider, wherever possible, including traveller sites suitable for mixed residential and business uses, having regard to the safety and amenity of the occupants and neighbouring residents.	<ul style="list-style-type: none"> Consideration of the need for sites for mixed residential and business use (having regard to safety and amenity of the occupants and neighbouring residents), or separate sites in close proximity to one another. N.B. Mixed use should not be permitted on rural exception sites 	The Gypsy and Traveller site SD74: Fern Farm in Greatham is in close proximity to employment areas.
Policy G: Major development projects		

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Policy Expectations	Possible Evidence	Evidence Provided
(para 19)		
Local planning authorities should work with the planning applicant and the affected traveller community to identify a site or sites suitable for relocation of the community if a major development proposal requires the permanent or temporary relocation of a traveller site.	<ul style="list-style-type: none"> Where a major development proposal requires the permanent or temporary relocation of a traveller site, the identification of a site or sites suitable for re-location of the community. 	Not applicable

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Integration of marine and terrestrial planning

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As the UK marine area and marine plan area boundaries extend up to the level of mean high water spring tides while terrestrial planning boundaries generally extend to mean low water spring tides (including estuaries), the marine plan area will physically overlap with that of some terrestrial plan. Local authorities with any tidal frontage, even if far inland and not conventionally regarded as coastal, must therefore take full account of the MMO, the MPS and marine plans under S.58 of the Marine and Coastal Access Act and the Duty to Co-operate in Section 110 of the Localism Act 2011. A full list of the local planning authorities whose areas overlap with the UK marine area appears in Appendix One.

Furthermore, the Duty to Co-Operate requires all local planning authorities, even if landlocked, to take account, where relevant, of the MMO's plans and activities when preparing their Local Plans. Finally, the NPPF requires LPAs to take the MPS into account under the tests of soundness (specifically, to test if an emerging DPD is consistent with national policy, which includes the MPS).

The Marine and Coastal Access Act 2009 (the Act) provided for the introduction of a marine planning system for England's inshore and offshore marine area, establishing the Secretary of State as the Marine Planning Authority for these areas. The Act also provided for the establishment of the Marine Management Organisation (MMO) and for the Secretary of State to delegate various planning functions. The planning functions including preparation and review were delegated to the MMO in 2010. The Act also provided for the adoption of the UK Marine Policy Statement (MPS). The MPS was adopted on 18 March 2011 and provides the policy framework for marine planning and for all decisions likely to affect the marine area.

There are eleven plan areas in English waters, for each of which a Marine Plan will be prepared by the MMO and adopted by the Secretary of State for the Environment, Food and Rural Affairs.

In practical terms, all activities undertaken in the marine area require land based infrastructure, without which our ability to benefit economically and socially from activities in the marine area would be extremely limited.

The UK Government's vision for the marine environment, as articulated in the MPS, is:

'clean, healthy, safe, productive and biologically diverse oceans and seas'.

In the absence of a marine plan prepared by the MMO and adopted by the Secretary of State the MPS is the relevant marine policy document. Where a marine plan has been adopted both the MPS and the Marine Plan are relevant marine policy documents for the marine plan area.

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As articulated in the Marine and Coastal Act and the MPS, the Government aims for the MPS and marine planning systems to sit alongside and interact with existing planning regimes across the UK. Specifically, s.58 of the Marine and Coastal Access Act requires all¹ public bodies to:

- take authorisation or enforcement decisions that affect or might affect the UK marine area in accordance with the MPS and relevant Marine Plans, unless relevant considerations indicate otherwise
- state their reasons where authorisation or enforcement decisions are not taken in accordance with the MPS and relevant Marine Plans
- have regard to the MPS and relevant Marine Plans when taking decisions that affect or might affect the UK marine area which are not authorisation or enforcement decisions²

In addition, the MPS seeks integration of marine planning and the terrestrial planning system through:

- Consistency between marine and terrestrial policy documents and guidance
- Liaison between respective responsible authorities for terrestrial and marine planning, including in plan development, implementation and review stages
- Sharing the evidence base and data where relevant and appropriate so as to achieve consistency in the data used in plan making and decisions

These aims are further supported by footnote 36 in the NPPF.

¹ Like the Duty to Co-Operate, no distinction is made by the Marine and Coastal Access Act between public authorities with a tidal frontage and those without. Emphasis is placed on the likelihood of the decision being made affecting the marine area.

² For example, decisions about what representations they should make as a consultee or about what action they should carry out themselves.

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Policy Expectations	Possible Evidence	Evidence Provided
Key requirements under the Duty to Co-Operate		
Consistency between marine and terrestrial policy documents and guidance	<ul style="list-style-type: none"> • Demonstration of consistency of aim between relevant local plan policies and marine policy documents (i.e. the MPS and any relevant adopted marine plans) • Proof of collaborative working with the MMO and that the MPS has been taken into account. 	<p>Strategic policy SD18: The Open Coast covers the whole of the coastal area of the National Park, and is consistent with the Marine Policy Statement, emerging South Marine Plan, the Heritage Coast Definition applying to the Sussex Heritage Coast, and the Beachy Head to Selsey Bill Shoreline Management Plan.</p> <p>Evidence of collaborative working with the MMO is contained in the Duty to Cooperate Statement.</p>
Liaison between respective authorities responsible for terrestrial and marine planning, including in plan development, implementation and review stages	<ul style="list-style-type: none"> • Early and effective policy development engagement undertaken, including discussions with the MMO • Evidence of iteration of policies and plans as a result of engagement with the MMO • Evidence of engagement with the MMO in relation to monitoring, implementation and throughout the policy cycle • Support of integrated coastal management (ICM) in coastal areas in line with the requirements of the MPS 	<p>Early and effective policy development was undertaken with the MMO, as set out in the Duty to Cooperate Statement.</p> <p>The evolution of policies resulting from that engagement is set out in the paper 'Progress from Issues and Options to Preferred Options' (2015) and in the Consultation Statement (2018).</p>
Sharing the evidence base and data where relevant and appropriate so as to achieve	<ul style="list-style-type: none"> • Evidence that the LPA has shared or provided relevant data to the MMO that can help inform 	<p>The LPA has provided written input to the MMO's development of the South Marine Plan.</p>

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Policy Expectations	Possible Evidence	Evidence Provided
consistency in the data used in plan making and decisions	<p>Marine Plans or MPS review</p> <ul style="list-style-type: none"> • Demonstration that local plan policy has been underpinned by data provided by the MMO or the MPS • Explicit cross-referencing in local plan to MPS, the MMO, their roles, and relevant marine plans 	<p>The evolution of Local Plan policy to take into account the MPS and input from the MMO is set out in the paper 'Progress from Issues and Options to Preferred Options' (2015) and in the Consultation Statement (2017). The supporting text to Strategic Policy SD18: The Open Coast confirms that the policy is consistent with the MPS.</p> <p>Strategic policy SD18: The Open Coast and its supporting text, between them, explicitly cross refer to the MPS and the South Marine Plan, as well as to the Sussex Heritage Coast, Beachy Head West Marine Conservation Area, and to the local Shoreline Management Plan.</p>
Marine Policy Statement- Chapter 2: General Principles for Decision-Making³		
Sections 2.1 -2.2: The UK vision for the marine environment		
<p>The UK vision for the marine environment ('clean, healthy, safe, productive and biologically diverse oceans and seas')</p> <p>Achieving the vision through marine planning</p>	<ul style="list-style-type: none"> • Reference in DPD where appropriate to UK vision for the marine environment • Contribution to the vision through local plan policies and supporting text 	<p>The Local Plan contributes to the UK vision for the marine environment, in particular through the following policies:</p> <p>Policy SD18: the Open Coast governs development on and near the section of coast within the plan area.</p>

³ As the Marine Policy Statement was not targeted specifically at terrestrial planning authorities, some of its sections are, in practice, relevant to marine planning authorities only and/or there is already a comprehensive policy framework governing terrestrial development (e.g. energy infrastructure), Where this is considered to be the case, i.e. where it is considered likely that a terrestrial planning DPD would be found sound without referencing that section, the section in question has been omitted from this checklist.

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Policy Expectations	Possible Evidence	Evidence Provided
		<p>Policies SD17: Protection of the Water Environment and SD54: Pollution and Air Quality should limit the direct or indirect input of pollutants into the sea arising from new development anywhere in the National Park.</p> <p>Policies SD9: Biodiversity and Geodiversity and SD10: International Sites requires development to conserve and enhance biodiversity, including by mitigating the effects of recreational disturbance on the Solent Coast Special Protection Areas (which themselves lie outside the plan area).</p>
<p>Section 2.4: Considering benefits and adverse effects in marine planning</p>		
<p>Consider benefits and adverse effects of plan policies</p>	<ul style="list-style-type: none"> • Consideration of benefits and adverse effects of policy on the marine area as appropriate within the DPD's sustainability appraisal 	<p>The Sustainability Appraisal identifies the marine area of the National Park as a priority habitat under the Sustainability Objective of 'Biodiversity', and considers sea level rise under the objective of 'Climate Change Adaptation'. The whole plan and allocations are then considered against those objectives.</p>
<p>Section 2.5: Economic, social and environmental considerations</p>		
<p>Contribute to the objectives of relevant EU Directives (Marine Strategy Framework Directive and Water Framework Directive)</p>	<ul style="list-style-type: none"> • Reference to relevant EU Directives in DPD and sustainability appraisal • Consideration of contribution of DPD policies 	<p>Policy SD17: Protection of the Water Environment refers to the Water Framework Directive directly in the policy, requiring development proposals to help achieve its requirements, as well as in the</p>

South Downs Local Plan Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
	to the objectives of relevant EU Directives	supporting text. It makes clear that this includes coastal waters.
Marine Policy Statement- Chapter 3: Policy Objectives for Key Activities		
3.1 Marine Protected Areas		
<p>Incorporate identified areas and features of importance for nature conservation</p> <p>Activities or developments that may result in adverse impacts on biodiversity should be designed or located to avoid such impacts</p>	<ul style="list-style-type: none"> • Identification of relevant areas and features of importance for nature conservation within relevant marine plan area(s) • Consideration of impacts of policy and/or terrestrial development on those areas and features of importance • Measures to mitigate, monitor and manage negative impacts on those areas and features of importance 	<p>Local Plan Policy SD18: The Open Coast and its supporting text identify the Beachy Head West Marine Conservation Zone (which covers the great majority of the National Park’s coastline), illustrate it on a map and require development to conserve and enhance it and cause it no adverse impact (the latter requirement would also apply to any MCZ which may be designated in future).</p> <p>The Monitoring and Implementation Framework requires all developments within the area covered by Policy SD18 to be monitored for whether or not they meet the criteria of that policy. This would include conservation and enhancement of the MCZ.</p>
3.4 Ports and shipping		
<p>Take into account and seek to minimise any negative impacts on shipping activity, freedom of navigation and navigational safety</p> <p>Protect the efficiency and resilience of continuing port operations</p>	<ul style="list-style-type: none"> • Evidence that policy with potential impact on ports and shipping minimises negative impacts on sector • Where relevant, evidence that economic, employment and transport policies are protective of ports and shipping sector 	<p>Part of the Port of Newhaven- comprising greenfield and intertidal land, waterbodies and the remains of an abandoned settlement- is within the National Park. The Port’s masterplan identifies this land as for countryside access, wildlife and possible renewable energy generation. All these uses are compatible in principle with Policy SD18. It also requires all developments to be consistent with the</p>

South Downs Local Plan Soundness Self-Assessment Checklist

Policy Expectations	Possible Evidence	Evidence Provided
		local Shoreline Management Plan.
3.8 Fisheries		
Consider potential economic, social and environmental impacts of other developments on fishing activity	<ul style="list-style-type: none"> Where relevant, evidence that other policies minimise negative impacts on fishing activity and/or aquaculture 	There is no dedicated physical infrastructure for fishing or aquaculture on the National Park's coastline that could be affected by the Local Plan. Local Plan policies preventing pollution and protecting Marine Conservation Zones should have a positive impact on fish stocks.
3.9 Aquaculture		
Consider the benefits of encouraging the development of efficient, competitive and sustainable aquaculture industries	<ul style="list-style-type: none"> Where relevant, evidence that the benefits of aquaculture industry development have been considered 	N/a
3.10 Surface water management and waste water treatment and disposal		
Maximise opportunities for co-existence of waste water infrastructure with other activities in the marine environment	<ul style="list-style-type: none"> Reference to and consideration of the co-existence of waste water infrastructure with other marine activities, including the potential for waste water infrastructure to mitigate marine impacts through design or location 	N/a
3.11 Tourism and recreation		
Consider the potential for tourism and recreation in the marine environment and the benefits this will bring to the economy and	<ul style="list-style-type: none"> Where relevant, reference to marine tourism and recreation 	Policy SD18: The Open Coast requires development to conserve and enhance coastal access to/ from the coast and along the coastline.

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Policy Expectations	Possible Evidence	Evidence Provided
local communities	<ul style="list-style-type: none"> • Evidence that the potential for marine tourism and recreation has been recognised in plan-making 	The policy is designed to allow for the principle of relocation of the visitor centre at Birling Gap, which is threatened by coastal erosion.