

Agenda Item 8 Report PC56/15

Report to Planning Committee

Date II June 2015

By **Director of Planning**

Appraisal (SA) and Habitat Regulation Assessment (HRA)

Purpose of Report To comment on the draft composite Local Plan and Issues

arising from Sustainability Appraisal and Habitat Regulation

Assessment (HRA)

Recommendation: The Committee is recommended to:

- I) Endorse the direction of the draft composite Local Plan and the Schedule of Changes as detailed in Appendices I and 2 of this report, subject to any comments made by the Planning Committee being addressed.
- 2) Note the main issues arising from Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA) set out in this report, subject to any comments made by the Planning Committee being addressed.
- 3) Note that the Local Plan Preferred Options document will be subject to final approval by the National Park Authority (NPA) on 16 July 2015 prior to publication for public consultation.

I. Introduction and Summary

- 1.1 This report introduces the draft composite Preferred Options Local Plan. It recommends that the draft document is endorsed for consideration by the National Park Authority on 25 June 2015, subject to any comments made by the Planning Committee being addressed. This endorsement would also acknowledge that the draft document will be subject to further changes as recommended by officers and members before it is considered by the NPA on 16 July 2016 for final approval prior to publication for public consultation on 2 September for a period of eight weeks.
- 1.2 The majority of chapters, policies and explanatory text have been previously reviewed individually by both Local Plan Members Working Group (LPMWG) and Planning Committee. All recommended changes have been incorporated into this draft composite Local Plan.
- 1.3 The draft composite Local Plan forms **Appendix 1** of this report. **Appendix 2** is a schedule of changes, which logs all the changes proposed by LPMWG along with changes proposed by officers to an earlier version of the composite. The table notes progress on incorporating them into the composite plan. Please note that all the page references on this schedule relate to the version of the plan that was considered by LPMWG on 21 May 2015.
- 1.4 Finally, this report will set out the main issues arising from Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA).

2. Background

- 2.1 The Preferred Options Local Plan follows on from the Local Plan Options Consultation document, which was published in February 2014. The Preferred Options Local Plan takes on board all the representations that were made on this document.
- 2.2 Following the adoption of the Local Plan, it will be the first time that the National Park has been planned for as a single entity. It will also supersede all inherited Local Plans and Joint

- Core Strategies which cover the National Park. The Local Plan will be the key to delivering sustainable development in the National Park.
- 2.3 The Local Plan will form part of the 'Development Plan' alongside adopted Neighbourhood Plans, which are being developed by local communities in many settlements across the National Park. The Minerals and Waste Plans will also be part of the Development Plan. The new Local Plan must be in conformity with the National Planning Policy Framework (NPPF) (2012) and the DEFRA Vision and Circular for National Parks (2010).
- 2.4 It should be noted that this composite plan is still work in progress. Sections of the plan that are still work in progress are highlighted in yellow. There are still a number of typographical errors and inconsistencies in wording that need to be corrected. This work will be helped with a quality proof read by the Comms Team and a policy check by Keith Reed. This will all be done before a new composite is presented to the NPA in July.

3. The draft composite Preferred Options Local Plan

- 3.1 The Local Plan sets out a comprehensive set of planning policies for the National Park focusing on living landscapes, people and places and ensuring a sustainable future within environmental limits. Specific areas range from landscape, conservation, tourism and recreation through to land for development whether it be employment or housing land. This Local Plan period is 2014 to 2032; this means that it will shape growth and new development for 15 years after its proposed adoption in 2017.
- 3.2 The Local Plan contains a full spectrum of core, strategic, development management and allocation policies. All these policies will be taken into account in determining planning applications, along with other material considerations. Therefore the policies in this Local Plan do not list or cross-reference to other policies that may be relevant, but these nevertheless continue to apply. It is vital that all these policies are viewed together and not in isolation in the preparation and consideration of planning applications. The Local Plan includes several sets of policies:
 - Core policies deal with the overarching principles of development for the National Park.
 - Strategic policies are considered fundamental to achieving the overall vision for the National Park and are linked to its Special Qualities. There are three chapters of strategic policies, which relate to the three headings of the PMP.
 - Strategic site allocations relate to Syngenta in Fernhurst, Shoreham Cement Works in Upper Beeding and the North Street Quarter of Lewes.
 - Allocation policies allocate housing sites across the National Park.
 - Development management policies provide a detailed policy framework for assessing planning applications and guiding development in the National Park. These policies are set out in the same order as the strategic policies.
 - Appendices including a full set of inset maps of proposed allocations and designations.
 The final adopted version of the plan will be accompanied by a Policies Map, which is a spatial interpretation of all the Local Plan policies.
 - A glossary of technical terms used in the Local Plan.
- 3.3 The NPA is due to consider the Preferred Options Local Plan for final approval on 16 July 2015 prior to publication for public consultation from 2 September to 28 October. This consultation period will be under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.4 Work will continue on the Local Plan after the autumn consultation. All the representations will be addressed and changes made to the Local Plan as necessary. Further evidence will also be gathered particularly in regard to housing, local green spaces and Gypsies and Travellers. The next iteration of the plan will be published for further consultation and then the NPA will make the decision on whether to submit the Local Plan for independent examination. The SDNPA aims to adopt a sound Local Plan in 2017.

4. Main issues arising from Sustainability Appraisal (SA)

- 4.1 The Sustainability Appraisal (SA) and the Habitats Regulations Assessment (HRA) for the Local Plan, is being supported by AECOM. Members were briefed on progress with the SA by the consultants AECOM in March 2014, following the Issues and Options consultation. The key elements of work carried out to date are:
 - Scoping in 2012, updated Jun 2013
 - SA of Issues and Options Jan 2014
 - Stand-alone assessments of individual policies September 2014 to April 2014
 - Workshop on Reasonable Alternatives for the Local Plan 30 Mar 2015
- 4.2 In general, the SA work to date has endorsed the proposed policy options in the Options consultation and draft policies. Examples of specific issues identified and the planning policy response are identified below:

SA Observation	Planning Policy Response
Buildings at risk are not limited to	A Buildings at Risk Survey is in progress to
conservation areas and listed buildings.	address wider building conservation issues.
Green infrastructure (GI) provision should not be piecemeal.	In partnership with county / district authorities and the statutory advisers, SDNPA is leading on the development of a GI Framework for the South Downs and beyond.
Focussing housing in the larger settlements of the National Park (Tier I, Tier 2 and Tier 3 settlements), is favourable from in meeting SA objectives	Allocations for the preferred option is very much focussed on the larger settlements albeit, consultation feedback favoured a move away from the strict Settlement Hierarchy policies.

Current focus of SA Work

- 4.3 The assessment of Reasonable Alternatives for the Local Plan is the pivotal point of the SA and indeed a primary focus for the Examination in Public, not least because failure to demonstrate testing of reasonable alternatives is frequently a source of legal challenge by developers.
- 4.4 Officers from Planning Policy, Living Landscapes and Sustainable Futures have been meeting to consider alternatives for where to allocate development in the National Park under different development scenarios namely high 420-450, medium 250-280 and low 175-205 homes. These different growth scenarios were based on the interim findings of the Strategic Housing Market Assessment (SHMA) and endorsed informally by the Planning Inspectorate. Alternatives have been considered in terms of a concentrated approach, focusing all development in the five main settlements of Petersfield, Lewes, Midhurst, Liss and Petworth and a dispersed approach that equates with our preferred option. A sub-option has also been considered that restricts development to those settlements that have a sustainable transport link, proximity to a railway station or cycling commuting route.

5. Main issues arsing from the Habitat Regulation Assessment (HRA).

- 5.1 The first draft HRA for the Preferred Options Local Plan will be completed by 30 June. Initial informal feedback from the consultants is that the draft Preferred Options Local Plan is not envisaged to trigger likely significant effects on Natura 2000 designations providing the following recommendations are incorporated:
 - Re-allocate the proposed allocation of 30 homes in Greatham to another location where
 it will not result in adverse recreational pressure / urban edge effects upon Wealden
 Heaths Phase II SPA.
 - Provision will need to be made for buffer distances for development relating to The Mens SAC, Ebernoe Common SAC, Duncton to Bignor Escarpment SAC to protect barbastelle and Bechstein bat populations; pre-development surveys will be necessary to ensure that key features (foraging habitat and commuting routes) are retained;

- Site specific HRAs would be necessary for proposed development in the vicinity of Arun Valley SPA where land under consideration is deemed likely to be suitable for wintering Bewick swans. Pre-development surveys will be necessary to ensure that the integrity of the population is not affected.
- Further findings may emerge as the HRA progresses and the HRA will require updating following the publication of an additional round of SHLAA sites.

6. Resources

6.1 The Local Plan is one of the top corporate priorities for the SDNPA with adoption timetabled for 2017. Officers within the planning policy team are leading the work on the development of the Local Plan and utilising expertise elsewhere within the Authority.

7. Risk Management

7.1 Risk: That the Local Plan is not found sound at examination in public.

Mitigation: The policies are consistent with the NPPF and are based on robust evidence.

8. Crime and Disorder Implication

8.1 It is considered that the proposal does not raise any crime and disorder implications.

9. Human Rights Implications

9.1 This draft policy has been considered in light of statute and case law and any interference with an individual's human rights is considered to be proportionate to the aims sought to be realised.

10. Equalities Act 2010

13.1 Due regard, where relevant, has been taken to the South Downs National Park Authority's equality duty as contained within the Equalities Act 2010.

11. External Consultees

11.1 None at this stage. The Preferred Options Local Plan will be published for extensive consultation in 2015.

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Appendices I. Draft composite Preferred Options Local Plan

2. Schedule of Changes for Preferred Options Local Plan as considered by

LPMWG 21 May 2015 and other officers

SDNPA Consultees Chief Executive, Director of Strategy and Partnerships, Director of

Operations, Director of Corporate Services, Chief Finance Officer,

Monitoring Officer, and Legal Services.

Background South Downs National Park Local Plan Options Consultation Document;
Documents SDNPA Planning Committee, 23 January 2014; PC 9/14

http://www.southdowns.gov.uk/ data/assets/pdf file/0008/407789/Agenda-

Item-4.pdf

South Downs National Park Local Plan Options Consultation Document;

SDNPA, 4 February 2014; Report 2/14

http://www.southdowns.gov.uk/__data/assets/pdf_file/0018/410760/Agenda-

Item-7.pdf

South Downs National Park Local Plan Responses to Options Consultation Document and Community Infrastructure Levy Preliminary Draft Charging

Schedule, 26 June 2014, Report 13/14

http://www.southdowns.gov.uk/__data/assets/pdf_file/0010/458371/Agenda-

<u>ltem-11.pdf</u>

Proposed changes underlined for additions and crossed through for deletions

All page, policy and paragraph references refer to the version of the composite plan presented to LPMWG May 2015

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
ALL	ALL	ALL	Tables of 'audit trail' should be removed from main doc and put into separate document. (previously agreed)	Work in progress. Tables deleted and paragraphs written for chapters 4, 5 & 6. Work outstanding for chaps 7 & 10	Reduce the length of document	LPMWG 21-05-15	LH	Part
ALL	ALL	ALL	Supporting text needs to be checked that they are before	To be corrected through general proof read	Consistency	LPMWG 21-05-15	LH	No
ALL	ALL	ALL	Formatting of figures throughout. (chapter 1 is 1.1, 1.2, etc. But chapter 2 onwards is not.)	To be corrected through general proof read	Consistency	LPMWG 21-05-15	LH	No
ALL	ALL	ALL	National Park – capitals. General national parks – lower case	To be corrected through general proof read	Consistency	LPMWG 21-05-15	LH	No
			Rename policies:	All policies re-named accordingly	Clarification	LPMWG 21-05-15	LH	Yes
All	All	All	There is a general issue with duplication throughout the text parts of the document. For example there are numerous references to the special qualities and where they are set out in full.	To be corrected through general proof read	Duplication	BM	LH	No
All	All	All	There are references in the document to the 2010 Development Management Order. This is now replaced by the 2015 Order and the text should be updated to reflect this change.		Clarification	ВМ	LH	No
All	All	All	Consideration needs to be given to standardisation of how the policies are structured, particularly the introductory		Consistency	ВМ	LH	No

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
			sentence of all policies. Some policies have an extremely bold initial statement e.g. SD10. Policies such as this reference the fact that proposals must be in accordance with other relevant policies in the Plan. What they don't do however is strictly tie the bold initial statement to the paragraphs that then follow in the specific policy itself. For planning policy purposes I think this is an acceptable approach however there are other policies in the plan that explicitly make the link. What this means is that it could be used against you at an appeal – the argument being that if you had intended to subject it to other requirements you would have explicitly made the link as in other policies. An example of a policy where you have made this link is SD33 – this you will see is written in a different way. This may seem a minor point however it will be time well spent trying to get standardisation at this stage.					
All	All	All	Consistency is also needed where 'development' or 'proposals' or 'development proposals' are referenced in policies. All appear at present. Development for example is used in SD15. The same applies for references to 'Planning Permission' and 'Permission'.		Consistency	BM	LH	No
n/a	5	Contents	Rename policy	SD9 The <u>Open</u> Coast	Clarification of area	PC 21-05- 15	RD	Yes
SD9	68	5	Rename policy	SD9 The <u>Open</u> Coast	Clarification of area	PC 21-05- 15	RD	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
1.4	9	I						
n/a	5	Contents	Rename policy	SD47 Barn conversions Conversion of agricultural buildings	Clarification	Officers	RD	Yes
n/a	4	Contents	Add new appendix	Appendix 9: Special Qualities	Correct emphasis	LPMWG 21-05-15	LH	Yes
Policy SD9	134	10	Rename policy	SD47 Barn conversions Conversion of agricultural buildings	Clarification	PC 21-05- 15	RD	Yes
1.4	9	I	The statements here are incorrect. Neighbourhood plans will also form part of the overall Development Plan.	On adoption the South Downs Local Plan will become the statutory development plan for the whole National Park along with the minerals and waste plans and 'made' neighbourhood development plans.	Correction	ВМ	LH	Yes
1.4	9	ı	It is also the case that it is statute that dictates how planning applications are to be determined – referencing the NPPF is wrong.	Statute states that Government policy set out in the National Planning Policy Framework (NPPF) states that decisions on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise.	Correction	ВМ	LH	Yes
1.5	9	I	The plan will have some weight attached from the point of publication in 2014.		Clarification	BM	LH	No
Introd uction	9-17	I	Landscape as golden thread – not mentioned in Introduction, must be mentioned upfront. "Landscape designation". Landscape is the golden thread – this is delivered through things like Eco-S.	General re-write of paragraphs	Correct emphasis	LPMWG 21-05-15	LH	Yes
Introd uction	9-17	I	Confusion over how many golden threads there are (Ecosystem services, etc)	General re-write of paragraphs	Clarification	LPMWG 21-05-15	LH	Yes
Fig 1.4	14	1	Clearer county boundaries. Clearer Park boundary – apply mask outside Park boundary (faded)	Map amended	Clarification	LPMWG 21-05-15	DA	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
1.26	15		Engagement/Consultation – more information showing process (1.26 – not just Parish meetings!)	I.22 Local Plan policies have been formulated in consultation with the local communities. The NPA values the views of the local community and has undertaken a considerable amount of public engagement particularly with the town and parish councils. A full round of consultation took place with the town and parish councils in autumn 2014 following on from the Issues and Options consultation. This built on their formal representations and truly helped to form the Local Plan particularly in regard to the spatial strategy. Full details of this are set out in the SDNPA Statement of Consultation published at the same time as this Preferred Options document. This will be updated iteratively to accompany each stage of Local Plan preparation.	Correct emphasis	LPMWG 21-05-15	LH	Yes
1.28-	15	I	Other community Led Plans (no just NP's) need further explanation of other types of plans. Add a table of different types of (figure 1.2). VDS's which are adopted as SPD and those which are only endorsed (not SPDs) Appendix 4 – add status of each document listed. 1.31 reads as if VDSs can become SPDs – clarify.	I.31 It should be noted that there are other forms of community-led plans such as parish plans and village design statements that may be more appropriate for some towns and villages than neighbourhood plans. Although these other plans would not be made part of the development plan for the National Park they would still form material considerations in the determination of planning applications and can become supplementary planning	Correct emphasis	LPMWG 21-05-15	LH	Yes

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Fig 2.1	17	I	Update map, reconsider which settlements outside the Park are named.	documents (SPD) if they undergo the statutory periods of consultation set out in the regulations. All the Village Design Statement, Parish Plans and Landscape Assessments that have been adopted by or are currently under preparation in the National Park are listed in appendix 4. Updated	Clarification	LPMWG 21-05-15	DA	Yes
Chapt er 2 (Figur e I)	18		No tourist Info in Midhurst Add context or link to the Special Qualities- Separate appendix to be added to SDLP. Process of development of SQ, in appendix. We are not starting from scratch.	Appendix 9	Correct emphasis	LPMWG 21-05-15	LH	Yes
Para 2	2	2	'It has the highest population' – clarify that This National Park has the highest pop'	It has the highest population of all the British national parks, at 112,000 people and 2 million people live within 5 miles.	Clarification	LPMWG 21-05-15	LH	Yes
Para 2	2	2	Wordsmith – "at its heart" We are about landscape!	The story of the South Downs National Park is one of great diversity. It is a tapestry of landscape, wildlife, culture and heritage, worked and shaped by human hands, looking to the future while representing a quintessentially romantic Englishness of gentle green hills and picture postcard villages. Of all the national parks in the UK, the South Downs is, at its heart, about the relationship between people and place. The South Downs has the highest population of all the British	Consistency	LPMWG 21-05-15	LH	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
				national parks, at 112,000 people and 2 million people live within 5 miles. This landscape-led Local Plan has this relationship at its core and sets out seeks to ensure that any proposed growth in the National Park will not detract from the landscape for which the South Downs was designated.				
Para 3	2	2	Repetition of water figures.		Consistency	LPMWG 21-05-15	LH	No
Para 3	2	2	The 5 broad areas mentioned here are not mentioned anywhere else. Think about where these 5 broad areas are introduced. They require further intro. Say what they are and then explain		Consistency	LPMWG 21-05-15	LH	No
Para 3	4	2	Cannot be expansive and enclosed. "Expansive and wooded"	Expansive and wooded and enclosed	Clarification	LPMWG 21-05-15	LH	Yes
Para 3	5	2	Visitor figures are correct of this date – add date. Need to add source/dates of figures		Clarification	LPMWG 21-05-15	LH	No
Para 6	5	2	500 people – a whole lot more benefits from 100s of committed people		Clarification	LPMWG 21-05-15	LH	No
para I-3	6	2	Lower paid jobs in the National Park but then £2.23 billion ec. Activity. Needs to work when read together.		Clarification	LPMWG 21-05-15	LH	No
Para 2	6	2	Need a para about character of towns and villages, and that landscape principles apply just as much to these as to the "open countryside"		Correct emphasis	LPMWG 21-05-15	LH	No
Last senten ce	6	2	Remove word 'useful' – is just a snapshot.	A useful snapshot	Clarification	LPMWG 21-05-15	LH	Yes
Figure	7	2	Correct number of conservation areas	165-166 conservation areas	Factual	LPMWG	LH	Yes

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2.4					correction	21-05-15		
3.2 & text box	27	3	Remove Purposes and Duty from list of objectives. Add Purposes and Duty at 3.2 and Sandford Principle.	The South Downs National Park Authority has statutory purposes and socio-economic responsibilities as specified in the Environment Act 1995: Purpose I To conserve and enhance the natural beauty, wildlife and cultural heritage of the area. Purpose 2 To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Duty To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes. Where proposals appear to conflict with the first purpose, then the Sandford Principle will be applied and greater weight will be given to the	Consistency	LPMWG 21-05-15	LH	Yes
4.5	29	4	4.5 – change 'area' to 'National Park' at the end of the First Purpose	first purpose. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area-National Park	Clarification	ВМ	LH	Yes
SD4 and Sup. Text. (4.58- 4.64)	42-44	4	Settlement Policy Boundaries doesn't fit where they currently are – SD4. Move it later nearer other housing/allocations (beginning of Chapter 7).	Move Policy SD4 and Supporting Text (paras 4.58-4.64) to Chapter 7 (after para 7.1) before the Housing section. Renumber and rename policy to New introductory text for policy	Consistency	LPMWG 21-05-15	LH	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
				required. Remove references to Policy SD4 in following paragraphs: 4.36 4.46 4.49				
SD4/C P SD4/D S SD4/ WDS D4/SS SD4/ WW	42	4	Policy SD4 and Settlement Policy Boundaries should be moved, but keep broad area policies in this chapter. Amend the first criteria of each broad area policy to remove specific reference to Policy SD4.	Proposals in this broad area, which are in accordance with this Policy and the National Park Spatial Strategy (Policy SD4), will be supported	Clarification	LPMWG 21-05-15	LH	Yes
SDI	30	4	Policy SDI — is the 'and' in the correct place?	 Are consistent with the National Park Purposes, and Pay due regard to the Duty in pursuit of the Purposes; and Conserve and enhance the Special Qualities of the South Downs National Park, and Are in accordance with all policies within this Local Plan 	Clarification	BM	LH	Yes
SD2	31	4	Policy SD2 — is the 'and' in the correct place?	 The proven need for the development, including in terms of any national considerations, and The impact of permitting it, or refusing it, upon the local economy; and The cost of, and scope for, developing elsewhere outside 	Clarification	BM	LH	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
SD2	31	4	"opportunities for quiet recreation" rather than "recreational opportunities". And bullet point 4 Line 3 – " or cultural heritage" (not and)	the designated area, or meeting the need for it in some other way; and • Any detrimental effect on the environment, the landscape and quiet recreation, and the extent to which that could be moderated; and • Any detrimental effect on the special qualities of the National Park and whether they can be mitigated. had the potential to have a serious adverse impact on either the natural beauty, wildlife and or cultural heritage of, or recreation	Consistency	LPMWG 21-05-15	AL	Yes
				opportunities for quiet recreation provided by, the National Park. (Underline potential) Bullet point 4: Any detrimental effect on the environment, the landscape and recreational opportunities for quiet recreation, and the extent to which that could be moderated.				
Para 4.11, 4th bullet	31	4	"Potential for adverse impact"	Potential for adverse impact	Clarification	LPMWG 21-05-15	AL	Yes
4.15	32	4	Cumulative impact needs further description and clarification.		Clarification	LPMWG 21-05-15	AL	No
4.22	34	4	Repeats 4.7 (page 30)	The National Parks Vision and Circular (2010) sets out that whilst	Repetition	LPMWG 21-05-15	RF	Yes

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				delivering the two statutory Purposes of a national park, the National Park Authorities should be an exemplar in achieving sustainable development. It also outlines that				
4.25	34	4	Ecosystem Services repeated from 4.17	Ecosystems Services' is a term used to express the multi functional role that the natural environment performs and the wide range of important benefits to society. Better recognition of the functions the environment performs transforms the traditional way it is seen as a constraint to development and turns it into an asset that is valued for the variety of benefits it provides. This recognition is through the established term of 'Ecosystems Services.' Valuing the environment This provides opportunities for new environmental markets that take account of the full range of impacts of climate change and for positive planning outcomes from sustainable development	Repetition	LPMWG 21-05-15	RF	Yes
4.25	34	4	Last sentence – clarify "new environmental markets"	See changes to paragraph 4.25 above.	Clarification	LPMWG 21-05-15	RF	Yes
4.29	35	4	All our rivers are fed by groundwater (check with Chris Manning)	Regulating services like rivers help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere which are fed by groundwater also support habitats and biodiversity.	Clarification	LPMWG 21-05-15	RF	Yes
SD3	36	4	Proportionality – can a dormer window	Proposals, as appropriate, will	Proportionalit	LPMWG	RF	Yes

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			be expected to deliver all of these? "Proposals as appropriate will be expected to" (but don't create a loophole)	be expected to:	У	21-05-15		
4.37	37	4	Repetition (exemplars)	Delete paragraph	Repetition	LPMWG 21-05-15	LH	Yes
4.39	37	4	Very similar to 4.25. Another explanation. Reference back, rather than repeat.		Repetition	LPMVVG 21-05-15	AL	No
4.50	39	4	These will consider the alternatives under the two key elements.		Туро	LPMWG 21-05-15	AL	No
4.51	39	4	Reference para 4.51 – at 2.6 (in Spatial Portrait)		Consistency	LPMWG 21-05-15	AL	No
4.51	39	4	Should broad areas be introduced earlier in the doc?		Clarification	LPMWG 21-05-15	AL	No
4.54	39	4	Typo (remove 'of')		Туро	LPMWG 21-05-15	AL	No
SD4- 3a)	42	4	'relevant policies' – which are?		Clarification	LPMWG 21-05-15	AL	No
SD4-4	42	4	Potential sites on our boundary but within the Park. Add into supporting text/allocations policy/chapter		Not required in policy.	LPMWG 21-05-15	AL	No
n/a	43	4	Add something about diffuse settlements – they will be treated as open countryside in this Local Plan.		Clarification	LPMWG 21-05-15	AL	No
4.62	43	4	Need to be firmer that unless there is benefit to the NP and a plan is in place, it will treated as any other. "estates and farm enterprises" (add to first sentence)		Greater emphasis	LPMWG 21-05-15	AL	No
4.65/4. 66	44	4	Take out and add into 4.51 onwards		Re-order	LPMWG 21-05-15	AL	No
4.67	44	4	Move to allocations	Paragraph reworded and moved to Allocations chapter	Re-order	LPMWG 21-05-15	LH	LH
4.69	44	4	Cuckmere/Ouse not in Coastal Plain area		Correction	LPMWG	AL	No

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						21-05-15		
4.90	48	4	Remove "historic" before Hinton Ampner.	the National Trust house and historic gardens at Hinton Ampner	Correction	LPMWG 21-05-15	AL	No
4.99	49	4	Selbourne is below the chalk hanger but above the greensands hanger (speak to Roni/Chris F)		Correction	LPMVVG 21-05-15	AL	No
4.102	50	4	Dipslope to the south (not north)		Correction	LPMWG 21-05-15	AL	No
5.3	54	5	Peri-urban – use different phrase (rural- urban fringe) or add to glossary.		Clarification	LPMWG 21-05-15	AL	No
5.1 – 5.15	54-59	5	Clearer and more concise – hierarchy of terms/documents. Go very quickly to SDILCA and local landscape character assessments and very brief on national landscape character areas. Cross ref with PMP. Intro 5.1 and diagram are good – keep. Revise rest up to policy.		Re-order and clarify	LPMWG 21-05-15	AL	No
SD5	59	5	Remove second bullet from criterion I from policy. Remove f) as in coastal policy.	• The National Character Area descriptions, f) Where relevant, the undeveloped character of the coastline should be protected and enhanced, including the defined Sussex Heritage Coast, by making reference to the SDILCA and the South Coast Seascape Character Analysis and appropriate site based investigations.	Repetition	LPMWG 21-05-15	LH	Yes
5.17/5. 19	60	5	Repetition – amalgamate.		Repetition	LPMWG 21-05-15	AL	No

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5.20	60	5	Plain English – "time-depth" can be		Clarification	LPMWG	AL	No
			explained in simpler terms.			21-05-15		
5.20/5.	60	5	Cross ref/differentiate that this is		Clarification	LPMWG	AL	No
21			landscape not design.			21-05-15		
5.22	60-61	5	30 Parks and Gardens – need to clarify		Clarification	LPMWG	AL	No
			(others ref 28!)			21-05-15		
5.25	61	5	Seems like supporting text for SD4.		Repetition	LPMWG	AL	No
					·	21-05-15		
5.26	61	5	Para can go/move to coast policy		Repetition	LPMWG	AL	No
						21-05-15		
5.27	61	5	Make tighter and move to support		Repetition	LPMWG	AL	No
			estate/farm plans.			21-05-15		
5.28	61	5	Repetition. Remove all but last sentence		Repetition	LPMWG	AL	No
			- then mention S62 applies.			21-05-15		
5.32	62	5	Explain what viewshed study is.		Clarification	LPMWG	AL	No
			,			21-05-15		
5.34	62	5	LVIAs – default is that they are required		Clarification	LPMWG	AL	No
			and applicant needs to demonstrate that			21-05-15		
			one isn't required.					
5.35	62	5	Say what ZTV is then that they are		Clarification	LPMWG	AL	No
			necessary			21-05-15		
SD7,	63	5	"Adversely affect" not detract (and in		Consistency	LPMWG	AL	No
2)			SD6 – consistency)		,	21-05-15		
SD8	65	5	Footnote to be included in policy text or		Greater	LPMWG	AL	No
			removed.		emphasis	21-05-15		
SD8(3	65	5	Explain "areas vulnerable to change" -		Clarity	LPMWG	AL	No
) `			and do we need to map them so external		,	21-05-15		
,			officers are clear where they are.					
SD10	72	5	Move policy so that it comes after	Move policy so that it comes after	Re-order	LPMWG	LH	Yes
			Landscape (SD5)	Landscape (SD5)		21-05-15		
SDIO	72	5	Remove "locally appropriate materials"	b) Take account of the context	Clarification	LPMWG	RF	Yes
			(2c). Screen doesn't need to be negative.	and setting of settlements, including		21-05-15		
				farmsteads, land at the settlement				
				edge, green corridors and the links				

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				to the settlement. Be suitable for their location and use locally appropriate design and layout to reduce the need for screening planting whilst ensuring green infrastructure is effectively provided.				
SD10	72	5	Does this pass the dormer test? "proposals must where relevant/appropriate must".	which, where relevant, clearly	Proportionalit y	LPMWG 21-05-15	LH	Yes
SD10	72	5	Remove bullet point 2.	The National Character Areas descriptions	Repetition	LPMWG 21-05-15	LH	Yes
5.74	73	5	"underpinning the protection " check whether we can use protection		Proportionalit y	LPMWG 21-05-15	LH	No
5.80- 5.90	75-77	5	Maybe just tone down a little. Reality check.		Clarification	LPMWG 21-05-15	LH	No
SDII	77	5	Last sentence add — "to harm a nationally designated heritage asset". Add SQs. Officers to discuss further.		Clarification	LPMWG 21-05-15	LH	No
SDII	77	5	Amend first paragraph of policy.	Planning permission and where necessary listed building consent will be granted for proposals that accord with other relevant policies, conserve the cultural heritage of the National Park and realise opportunities to enhance historic assets or their setting to re-use redundant or underused heritage assets with an optimal viable use which secures it's long term	Clarification	Officer	RF	Yes

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				conservation and enhancement,				
				including setting.				
5.93- 5.106	81-83	5	Repetition. Tighten text. Consistent approach to GI definition	Delete para 5.93 in total; Delete paras 5.96 and 5.97 Delete Ist sentence of old para 5.98; For the purposes of spatial planning the term green infrastructure relates to the active planning, design and management of the natural and built environment to optimise its multifunctionality. Amend old para 5.99 to read: 5.96 National policy requires a strategic approach to the creation, protection, enhancement and management of networks of biodiversity and GI. Strategic policy XX SD14 promotes the provision of new GI and ecosystem services whilst protecting existing assets. Old para 5.100 replace Policy XY with Policy SD34 Old para 5.101 replace Policy YZ with Policy SD35.	Consistency	LPMWG 21-05-15	RD	No

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
				Old para 5.102,amend as follows:				
				Policies XX, XY and YZ SD14, SD34 and SD35 have				
				been informed by the				
				following evidence studies:				
				ionowing evidence studies.				
				Old para 5.105; delete in total.				
				Old para 5.106; add further				
				sentence: . Policy SD14 will support				
				the conservation and enhancement				
				of biodiversity supporting policy				
				SD12 and SD 43.				
				Delete following paragraph:				
				1 The Options Consultation				
				Document set out another issue				
				relating to how the Local Plan can				
				best ensure designated and				
				undesignated habitats and protected				
				species are conserved and enhanced.				
				The primary policy addressing				
				habitat considerations is in Policy XX Conservation and Enhancement				
				of Designated and Undesignated				
				Habitats and Protected Species.				
				Furthermore, Policy XX will seek to				
				maximise opportunities to enhance				
				Gl including the role it plays in				
				connecting habitats and corridors for				
				species movement.				
Text	82	5	Check through for consistency and	Amend 4th bullet as follows:	Consistency	LPMWG	RD	Yes
box			relevant to this NP			21-05-15		
e.g's				Allotments, city farms,				
of GI				orchards, and suburban and				

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				rural farmland.				
				Amend Source, as follows:				
				[Source Adapted from : Town & Country Planning Association, The Wildlife Trusts, July 2012. Planning for a Healthy environment – Good Practice Guidance for Green Infrastructure and Biodiversity.]				
SD14	84	5	Repeats Eco-system services policy. 1b)	GI is one of the primary delivery mechanisms for ecosystem services in the planning system. No change recommended.	Repetition	LPMWG 21-05-15	RD	No
SD14	84	5	Point 3 (supporting text after first sentence),	Remove text and place in new paragraph as follows:	Re-order	LPMWG 21-05-15	RD	No
				Supporting Text				
				5.103 The GI resource supported				
				by Policy SD14 needs to be planned				
				and managed to deliver the widest				
				range of linked environmental and				
				social benefits including conserving				
				and enhancing biodiversity as well as				
				landscape, recreation, water				
				management, social, cultural and economic benefits to underpin the				
				health, enjoyment and 'well being' of				
				residents and visitors, helping				
				communities to be more resilient to				
				the effects of climate change and				
				supporting the rural economy.				
SD15(85	5	Remove (SUDs policy)	d) Achievable Sustainable	Repetition	LPMWG	RD	Yes

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d)				Drainage Systems (SUDs) to manage and reduce surface water run-off are proposed, in accordance with Policy SD41.		21-05-15		
6.2	113	6	It is strongly recommended that the chapter also emphasises the needs on the access/travel needs of local people	In the first place, the SDNPA will use the policies to facilitate developments that make it easier for visitors, residents and workers to travel to and around the National Park by sustainable means.	Increased emphasis	ESCC 26-03-15	DA	Yes
6.10	115	6	Reference needs to be made to how rural community needs should be met locally, i.e. the need to support/enhance local services/facilities	However, the NPA will work to prevent the strengthening of this dependency, and aim to reduce it where possible by reducing the need to travel (for example by supporting community facilities) and making alternative means of travel easier.	Clarification	ESCC 26-03-15	DA	Yes
6.16	116	6	Amend definition of historic rural roads	historic rural roads (defined as those roads outside towns—the great majority—whose origins precede 1840 shown on the second edition of the Ordnance Survey) or their safety	Clarification	AB April 2015	DA	Yes
6.21	91	6	Cross ref with Strategic Infrastructure Policy	Proposals relating to any expansion of these roads will be eovered by dealt with in accordance with policy SD24 SD29 on strategic infrastructure provision and with the DEFRA National Parks Vision and Circular. The National Park Authority's position on the A27 is	Consistency	LPMWG 21-05-15	DA	Yes

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				set out in a position statement adopted in 2014 and rReference should also be made to the principles contained in this in dealing with proposals for other major roads.the position statement on the A27 adopted by the Authority in 2014.				
SD18(1)	92	6	Needs to strengthen the strong economic benefits of linking to the strategic road network to support the needs of local people and visitor access	Development that is likely to generate a significant number of vehicle movements will normally be expected to be located near existing centres and supportive infrastructure, including main roads.	Greater emphasis	ESCC 26-03-15	DA	Yes
SD23(4)	100	7	Reappraisal of local housing number following discussion with NDP group	Findon – 50 <u>20</u>	Reappraisal	Arising from meeting with NDP group	LH	Yes
Policy SD23(4)	100	7	Reappraisal of local housing number following discussion with NDP group	Fernhurst – 11 <u>211 (including Syngenta)</u>	Reappraisal	Arising from meeting with NDP group	LH	Yes
SD23(4)	101	7	Reappraisal of local housing number following discussion with NDP group	Washington 6*	Reappraisal	Arising from meeting with NDP group	LH	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
SD23(4)	100	7	Clarification	Lewes-650 (including North Street Quarter)	Clarification	Officers	LH	Yes
7.28- 7.54	103- 108	7	Need to add Low Cost Market Housing is included within Local Plan.		Clarification	LPMWG 21-05-15	GG	No
7.23	102	7	Duplication from chapter 4. Remove or reduce		Repetition	LPMWG 21-05-15	AL	No
7.30	103	7	duplication		Repetition	LPMWG 21-05-15	AL	No
Figure Y -	112	7	Permanent Pitch need within the SDNP	Figure Y: Indicative need across the SDNP. Permanent and transit need within the SDNP.	Clarification	LPMWG 21-05-15	RF	Yes
7.75	113	7	E-S approach will be adopted – remove ambiguity.	Whether an application is proposed on previously developed land or on a greenfield site, it is considered that an ecosystems services approach will need to be adopted in proposals, in accordance with Policy SD3.	Clarification	LPMWG 21-05-15	RF	Yes
7.73	113	7	Include Westhampnett Transit site. Explain that they operate county wide.	Transit sites serve wider areas and operate on a countywide basis. There are two existing large transit sites within the South Downs National Park, one outside the town of Lewes (Bridies Tan) and a second north of the A27 outside Brighton (Horsdean). There is also a site at Westhampnett which is outside of the National Park, however, it and the two sites in the National Park serve a need for transit pitches at a strategic county level.	Clarification	LPMWG 21-05-15	RF	Yes
SD25	114	7	Simplify SD25 (I) (too many needs)	I) Existing lawful permanent sites for Gypsies and Travellers and Travelling Showpeople which are required needed to	Clarification	LPMWG 21-05-15	RF	Yes

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				meet the identified needs of these communities will be safeguarded, unless it can be established that the site is no longer required necessary based on identified local need.				
SD25	114	7	Merge points 2 and 3.	2) Proposals for the provision of permanent accommodation to meet the needs of Gypsies and Travellers and Travelling Showpeople will be supported where they meet a proven need identified by a Gypsy and Traveller Accommodation Assessment and do not compromise the Special Qualities of the National Park. Proposals will only be permitted where they comply with other relevant policies and they: 3) Proposals for the provision of transit accommodation or temporary stopping places to meet the needs of Gypsies and Travellers and Travelling Showpeople will be supported where they meet a proven need identified by a Gypsy and Traveller Accommodation Assessment and do not compromise the Special Qualities of the National Park. 2) Proposals for the provision of	Repetition	LPMWG 21-05-15	RF	Yes
				permanent or transit				

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
				accommodation, or temporary stopping places, to meet the needs of Gypsies and Travellers and Travelling Showpeople will be supported where they meet a proven need, as identified by a Gypsy and Traveller Accommodation Assessment.				
SD25	114	7	Add if there is any harm to SQs then refused.	Add additional sentence below criterion (k): Proposals which adversely affect the Special Qualities of the National Park will be refused.	Greater emphasis	LPMWG 21-05-15	RF	Yes
SD29 (CF3)	119	7	Reword "maximum benefits" check EON/Rampion wording. Sought not secured		Clarification	LPMWG 21-05-15	GG	No
7.86	119	7	Remove ref to E-S Services. Delete last sentence of para	Sentence deleted	Repetition	LPMWG 21-05-15	LH	Yes
7.86- 7.88	119	7	Include ref to Section 62 Environment Act		Clarification	LPMWG 21-05-15	GG	No
Chap 10	122- 151	10	Try doing DM policies grouped by the three themes for PC.	Sub headings introduced and policies re-groued	Consistency	LPMWG 21-05-15	LH	Yes
10.2	122	10	Repetition of purposes wording/explanation. Reword – to support enforcement point.	Enforcement is a an important and necessary part of the development management system at the National Park Authority. Enforcement action is discretionary and should always be commensurate with the breach to which it relates. Every effort will be made to resolve minor breaches through mediation and retrospective	Clarification	LPMWG 21-05-15	LH	Yes

Para Policy ref	Page	Chapter	Feedback	Precise change for input to Local Plan	Reason for change	Change proposed by	Officer	Change made to Local Plan
				applications. However, compliance and respect for the planning process are not only essential but also expected within a National park and the Authority will not to hesitate to respond in a robust and direct manner where it is appropriate to do so.				
SD33	122	10	Plain English Ia). Retain existing open spaces (not open space infrastructure) Ic) remove "local" green infra. SD33Review wording of policy. Simplify.	Amend to read: a. Retain open spaces infrastructure, including children's play space and sports facilities, which are valued by local communities unless a superior alternative can be provided; or Amend Ic) to read: a. Create new open spaces that are located within or close to housing developments, that is safe and accessible for all members of the community and contributes to local green infrastructure; and	Clarification	LPMWG 21-05-15	RD	No
10.6-	123	10	Make it clearer. This is a draft policy that		Clarification	LPMWG	LH	No

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10.7			would apply if there are designated Local Green Spaces.			21-05-15		
10.8- 10.10	123	10	Delete paragraphs and sub heading 'Adaptation of Heritage Assets.'		Repetition with Policy SD47.	Officer	RF	No
SD35	124	10	Delete policy.	Policy deleted	Repetition with Policy SD47.	Officer	RF	Yes
SD38	126	10	At the end of policy text add "and fulfil NP Purposes"		Greater emphasis	LPMWG 21-05-15	LH	No
SD42 (3)	127	10	Replace word morphology (form, state or structure)	specific character, activities, heritage, and distinctive morphologybuilt form, layout, paving materials and street furniture of the location	Clarification	LPMWG 21-05-15	DA	Yes
SD43 3)	128	10	Refers to SD43 – check which policy it needs to refer to	All new private and public parking provision will comply with Policy SD42 SD43	Consistency	LPMWG 21-05-15	DA	No
SD44	130	10	"In perpetuity" is this possible any more - Right to buy		Clarification	LPMWG 21-05-15	GG	No
SD44	130	10	Delete positive from 2 – replace with proven local need.		Clarification	LPMWG 21-05-15	GG	
10.37, 10.38	130	10	Check for repetition		Repetition	LPMWG 21-05-15	GG	No
10.39	130	10	Needs redrafting. Confusion between exception sites and affordable housing more widely. Addressing the need within the SDNPA.		Clarification	LPMWG 21-05-15	GG	No
SD44	130	10	Move SD44 to follow affordable housing, as strategic policy.	Move Policy SD44 from DM chapter to Strategic policies after Affordable Housing	Greater emphasis	LPMWG 21-05-15	LH	Yes
SD46	133	10	Rename SD46	Agricultural and Forestry Dwellings Rural Workers' Dwellings	Clarification	Officers	LH	Yes
SD47	134	10	Rename SD47	Barn Conversions Conversion of	Clarification	Officers	LH	Yes

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				Agricultural Buildings				
10.65	142	10	Explain 'Prevalence for advance advertisements'	There is prevalence for advance advertisements on these roads to make people aware of businesses or events and not just at the premises themselves. There are notable continuing incidences of advance signage being erected on these roads to make people aware of businesses or events in their vicinity.	Clarification	LPMWG 21-05-15	RF	Yes
SD53	144	10	Remove wherever possible from bullet b)	b) The number of adverts is kept to a minimum and amalgamated with existing signage wherever possible	Greater emphasis	LPMWG 21-05-15	RF	Yes
SD53	144	10	Add reference to anything that harms the Special Qualities will be refused.	Additional sentence below criterion (f): Where an advertisement adversely affects the Special Qualities of the National Park it will be refused.	Greater emphasis of the Special Qualities	LPMWG 21-05-15	RF	Yes
10.72	143	10	SD16? What policy is it supposed to refer to?	SD16 <u>SD53</u>	Clarification	LPMWG 21-05-15	RF	No
10.75	144	10	SD16? What policy is it supposed to refer to?	Wherever possible, a All information should be displayed on one sign to avoid the proliferation of signage, subject to Policy SD16 SD53.	Clarification	LPMWG 21-05-15	RF	No
SD54 (first one)	147	10	Community Infra – need to be clear what we are trying to say		Clarification	LPMWG	GG (LH)	No