

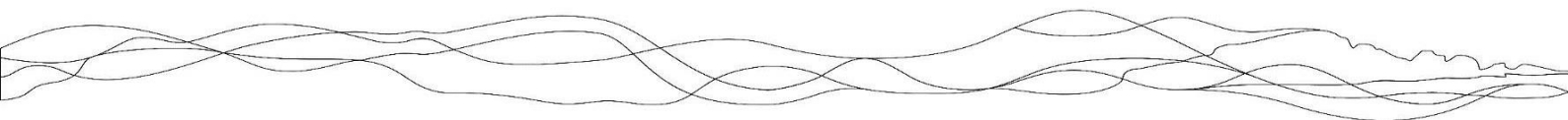


# **Landscape Background Paper**

## **South Downs Local Plan**

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**September 2017**



# I. INTRODUCTION

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## Policies covered:

- **Policy SD4:** Landscape Character
- **Policy SD6:** Safeguarding Views
- **Policy SD7:** Relative Tranquillity
- **Policy SD9:** Dark Night Skies

- 1.1** This paper outlines the basis upon which Policies SD4, SD6, SD7 and SD8 of the Local Plan have been formulated. It explains the context behind why the policies are necessary to ensure that the Purposes and Duty of the National Park are met, briefly summarises national policy, and summarises the key evidence base studies which have fed into the policies. It also looks briefly at the way the landscape has been protected through other policies in the Local Plan.
- 1.2** The Local Plan has been written to give priority to the protection and enhancement of the landscape, both through specific landscape policies and through the great weight accorded to landscape evidence in the drafting of the other Local Plan policies. This is described as a “landscape led approach”. This paper sets out in detail how such an approach has been translated into Local Plan policies.

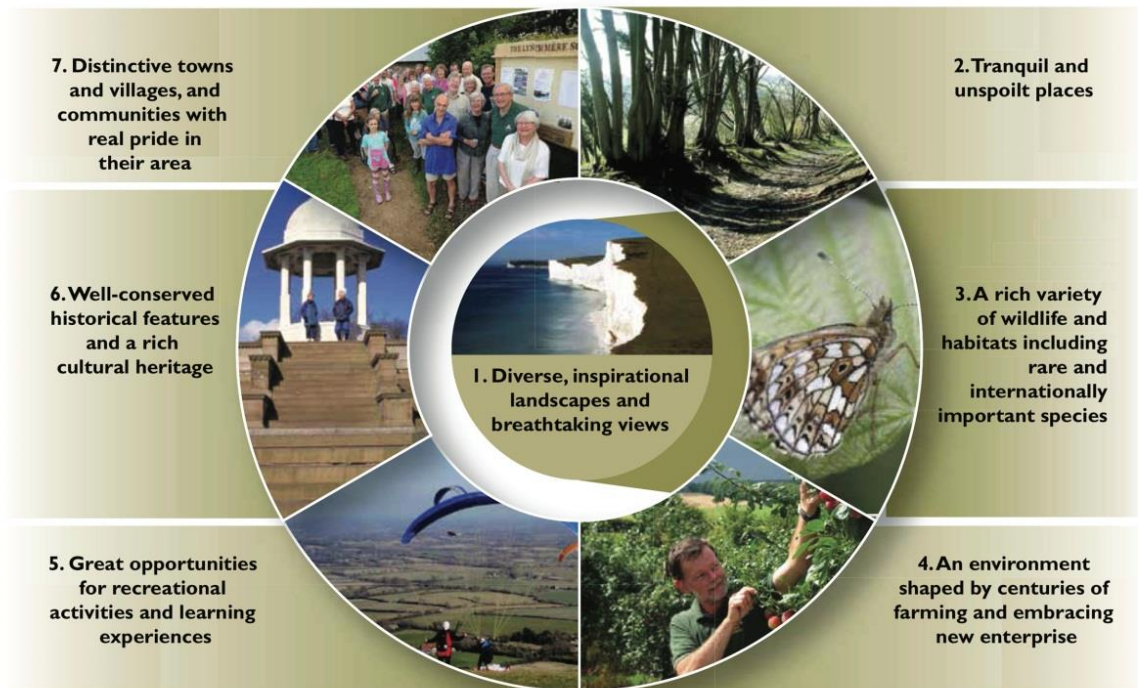
## 2. PURPOSE / DUTY AND SPECIAL QUALITIES TO WHICH THE POLICY RELATES

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- 2.1** The landscape policies of the Local Plan are particularly focussed on delivering the First Purpose of the National Park- to conserve and enhance the natural beauty, wildlife and cultural heritage of the area. They are intended to be read alongside other policies in the Local Plan which have more of a focus on delivering the second purpose of the National Park, or the National Park Authority’s duty.
- 2.2** At the same time, the conservation and enhancement of the landscape has significant benefits for the social and economic wellbeing of communities in the National Park (supporting the Duty), and especially for the growth of landscape-based recreational activities (supporting Purpose 2). The landscape policies reflect this by including criteria that protect the experiential and amenity qualities of the landscape.
- 2.3** The landscape policies are closely connected to the special qualities 1 (Diverse, inspirational landscapes and breathtaking views), and 2 (Tranquil and unspoilt places). The wider evidence base that has been developed to support these special qualities have fed into the development of the landscape and design policies. In particular Policy SD6 (Safeguarding Views) draws on the research conducted into Special Quality 1, and Policies SD7 (Relative Tranquillity) and SD8 (Dark Night Skies) on the research into Special Quality 2. This process is explored in more detail in Sections 4 and 5 of this document.

**2.4** The special qualities do not sit in isolation. Rather they are interconnected and mutually reinforcing. Landscape is the key to all of the other special qualities and is therefore shown at the centre of Figure 1.2 in the Local Plan (reproduced as Figure 1 below).

**FIGURE 1: SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK**



## 3. NATIONAL POLICY AND GUIDANCE

### European Landscape Convention (ELC) 2004

**3.1** The ELC<sup>1</sup> is the first international instrument to deal in an integrated manner with the whole landscape. It provides an international context for landscape, placing this important resource alongside biodiversity and cultural heritage. The Convention is an international treaty ratified by members of the Council of Europe, and will therefore be unaffected by Britain’s departure from the European Union. Landscape is defined in the ELC as:

“An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”

<sup>1</sup> European Landscape Convention (Council of Europe Treaty Office, 2004)

**3.2** The ELC came into force in the UK in 2007. It aims to promote landscape planning, management and protection across Europe, and aims to ensure that all landscapes are properly valued and looked after. Specific measures promoted by the ELC that are relevant to the Local Plan include:

- recognition of the importance of landscape in law;
- proper assessment and planning for landscape change with the active involvement of local communities;
- the implementation of landscape policies through the establishment of plans and programmes that deliver effective protection, management and planning of landscape;
- improved consideration and integration of landscape within both spatial and sectoral planning; and
- monitoring changes to the landscape.

**3.3** Natural England guidelines on implementing the ELC<sup>2</sup> highlight the need for landscape to be integrated throughout all aspects of the plan, rather than being represented by a single 'landscape policy'. It sets the aim of delivering multiple functions from each area of land, which should be matched with objectives for landscape character and quality. It states that policy development should be informed by landscape objectives. Section 5 of this document illustrates how landscape considerations have informed policies throughout the Local Plan.

#### **Environment Act 1995 (as amended)<sup>3</sup>**

**3.4** This Act of Parliament incorporates what is known as the Sandford Principle, which states that 'If it appears that there is a conflict between [the National Park's] purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area'. The same Act also makes clear that the duty of the national park authority, to seek to foster the economic and social well-being of local communities, must be carried out in pursuit of the purposes. The priority of the conservation and enhancement of the landscape of the National Park, where it comes into irreconcilable conflict with other aims, is therefore clear. This is why the South Downs Local Plan is designed as 'landscape led'. The position of the landscape policies near the beginning of the document, preceded only by the three core policies, reflects the fact that their subject carries overwhelming material weight in National Park planning decisions as a result of the Sandford Principle.

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<sup>2</sup> *Guidelines for Implementing the European Landscape Convention Part 2: Integrating the Intent of the ELC into Plans, Policies and Strategies* (Natural England/LUC, 2009)

<sup>3</sup> Environment Act 1995 (The Stationery Office Ltd, 2002)

## National Planning Policy

**3.5** The National Planning Policy Framework (NPPF)<sup>4</sup> as a whole has informed and guided development of these policies. The key paragraph of the NPPF in this context is Paragraph 115, which states that in National Parks great weight should be given to conserving landscape and scenic beauty, the conservation of wildlife and cultural heritage. The NPPF seeks to protect and enhance the landscape in many other ways including recognising the intrinsic character and beauty of the countryside, ensuring that developments respond to local character, integrating new development into the natural environment, protecting and enhancing valued landscapes, setting strategic priorities and criteria based policies for protected landscape areas, identifying and protecting areas of tranquillity, limiting the impact of light pollution on intrinsically dark landscapes, and requiring landscape character assessments.

## Planning Practice Guidance (PPG)

**3.6** National Planning Practice Guidance includes a section on landscape, which expands slightly on the NPPF and also recommends that where appropriate, landscape character assessments should be prepared, to complement Natural England's National Character Area profiles. The guidance provides links to the National Parks Vision and Circular and Natural England's LCA guidance.

**3.7** The guidance also contains a brief paragraph on how to identify areas of tranquility (under the 'noise' section), and a section on light pollution, which mentions protected areas of dark sky as one area where it may be desirable to limit new light sources, and where lighting schemes for developments should be carefully assessed as to their necessity and degree.

## English National Parks Vision and Circular 2010<sup>5</sup>

**3.8** The Vision and Circular recognises that cultural heritage and landscape are fundamental to quality of place and, as they are central to attractiveness, distinctiveness, diversity and quality of place in national parks, should be conserved and enhanced. As the relevant local planning authorities, national park authorities are expected to follow and promote with partners and stakeholders the principles of the ELC in all decisions and discussions concerning planning, management, and protection.

**3.9** The document says authorities should aim to protect and/or restore dark night skies, encourage and promote the reduction or elimination, where practicable, of unnecessary artificial outdoor lighting within the Parks. It also states that cultural heritage and landscape are fundamental to quality of place and, as they are central to attractiveness, distinctiveness, diversity and quality of place in the Parks, should be protected and enhanced.

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<sup>4</sup> National Planning Policy Framework (CLG, 2012)

<sup>5</sup> English National Parks and the Broads: UK government vision and circular 2010 (Defra, 2010)

## Natural England guidance for assessing landscapes for designation

**3.10** The designation process for National Parks, as set out in the National Parks and Access to the Countryside Act 1949<sup>6</sup>, includes ‘natural beauty’ as one of the two primary criteria on which a potential National Park is to be judged. The other primary consideration is ‘the opportunities they afford for open-air recreation’. The wildlife and cultural heritage of the area are important as well but not central to the designation process.

**3.11** Natural England assesses natural beauty in this context by using the factors set out in Figure 2 below:

**FIGURE 2: EVALUATION FRAMEWORK FOR NATURAL BEAUTY CRITERION IN NATIONAL PARK DESIGNATION ASSESSMENT**

Factor	Example sub-factor	Example Indicator
<b>Landscape quality</b>	Intactness of the landscape in visual, functional and ecological perspectives	Characteristic natural and man-made elements are well represented throughout
	The condition of the landscape’s features and elements	Landscape elements are in good condition
	The influence of incongruous features or elements (whether man-made or natural) on the perceived natural beauty of the area	Incongruous elements are not present to a significant degree, are not visually intrusive, have only localised influence or are temporary in nature
<b>Scenic quality</b>	A distinctive sense of place	Landscape character lends a clear and recognisable sense of place
	Striking landform	Landform shows a strong sense of scale or contrast
		There are striking landform types or coastal configurations
	Visual interest in patterns of land cover	Land cover and vegetation types form an appealing pattern or composition in relation to each other and/or to landform which may be appreciated from either a vantage point or as one travels through a landscape
Appeal to the senses	Strong aesthetic qualities, reflecting factors such as scale and form, degree of openness or enclosure,	

<sup>6</sup> Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England (Natural England, 2011)

		colours and textures, simplicity or diversity, and ephemeral or seasonal interest
		Memorable or unusual views and eye-catching features or landmarks
		Characteristic cognitive and sensory stimuli (e.g. sounds, quality of light, characteristic smells, characteristics of the weather)
<b>Relative wildness</b>	A sense of remoteness	Relatively few roads or other transport routes
		Distant from or perceived as distant from significant habitation
	A relative lack of human influence	Extensive areas of semi-natural vegetation
		Uninterrupted tracts of land with few built features and few overt industrial or urban influences
	A sense of openness and exposure	Open, exposed to the elements and expansive in character
	A sense of enclosure and isolation	Sense of enclosure provided by (e.g.) woodland, landform that offers a feeling of isolation
A sense of the passing of time and a return to nature	Absence or apparent absence of active human intervention	
<b>Relative tranquillity</b>	Contributors to tranquillity	Presence and/or perceptions of natural landscape, birdsong, peace and quiet, natural-looking woodland, stars at night, stream, sea, natural sounds and similar influences
	Detractors from tranquillity	Presence and/or perceptions of traffic noise, large numbers of people, urban development, overhead light pollution, low flying aircraft, power lines and similar influences
<b>Natural heritage features</b>	Geological and geo-morphological features	Visible expression of geology in distinctive sense of place and other aspects of scenic quality
		Presence of striking or memorable geo-morphological features
	Wildlife and habitats	Presence of wildlife and/or habitats that make a particular contribution to distinctive sense of place or other aspects of scenic quality
		Presence of individual species that contribute to sense of place, relative wildness or tranquillity

<b>Cultural heritage</b>	Built environment, archaeology and designed landscapes	Presence of settlements, buildings or other structures that make a particular contribution to distinctive sense of place or other aspects of scenic quality
		Presence of visible archaeological remains, parkland or designed landscapes that provide striking features in the landscape
	Historic influence on the landscape	Visible presence of historic landscape types or specific landscape elements or features that provide evidence of time depth or historic influence on the landscape
		Perceptions of a harmonious balance between natural and cultural elements in the landscape that stretch back over time
	Characteristic land management practices	Existence of characteristic land management practices, industries or crafts which contribute to natural beauty
	Associations with written descriptions	Availability of descriptions of the landscape in notable literature, topographical writings or guide books, or significant literature inspired by the landscape.
	Associations with artistic representations	Depiction of the landscape in art, other art forms such as photography or film, through language or folklore, or in inspiring related music
Associations of the landscape with people, places or events	Evidence that the landscape has associations with notable people or events, cultural traditions or beliefs	

Extracted from Appendix 1 of 'Guidance for assessing landscapes for designation...'

**3.12** These criteria were used at the outset of work on the Landscape policies- alongside the SDNP's special qualities- to help establish the structure of the section. The factors 'Landscape quality,' 'Scenic quality' and 'Relative tranquillity' informed the creation of three separate policies on 'Landscape character', 'Safeguarding views' and 'Relative tranquillity'; the sub-factors and example indicators helped to structure the content of those policies as well as informing other Local Plan policies.

### **Guidance Notes for the Reduction of Obtrusive Light<sup>7</sup>**

**3.13** This guidance published by the Institute of Lighting Professionals identifies types of obtrusive light and sets out guidance for the choice of lamps, luminaires and methods of installation. It recommends local planning authorities to identify a set of environmental zones for exterior lighting control, and provides guide limits for exterior lighting installations to be applied in each of those zones.

<sup>7</sup> Guidance Notes for the Reduction of Obtrusive Light GN01:2011 (Institute of Lighting Professionals, 2011)



## 4. LOCAL CONTEXT AND EVIDENCE

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### National Character Area Profiles<sup>8</sup>

**4.1** Natural England has identified high-level landscape character areas called National Character Areas across the whole country, and created profiles of the landscape issues affecting each area. The South Downs National Park covers the great majority of the South Downs National Character Area, as well as minor portions of five others. The profiles for these areas each identify various opportunities for landscape improvements, which have been incorporated into the work and evidence base of the SDNPA and thereby fed into the Local Plan indirectly.

### South Downs Integrated Landscape Character Assessment (SDILCA): 2011<sup>9</sup>

**4.2** The South Downs Integrated Landscape Character Assessment (SDILCA) divides the rich and complex landscape character of the National Park into 18 general landscape types and 49 local level character areas. It describes seven key integrating themes of the local landscape character: variety and contrast; distinctive form; time-depth; biodiversity; special perceptual qualities; buildings and settlement; and views. The report summarises forces for change in the landscape as follows:

- Development squeeze (including the effects of adjacent development on dark night skies and water abstraction)
- Changing agriculture (including an increase in smallholdings, paddocks and clutter)
- Traffic arising from population growth and through traffic
- Recreational pressures, including recreational car traffic, demand for new facilities, and loss of the feeling of remoteness
- Development, in particular loss of agricultural character through conversion of farm buildings, the introduction of clutter to open landscapes, and the use of unsuitable materials
- Climate change- including changes to habitats, land uses, water resources, the coastline and potential pressure for renewable energy development
- Erosion of isolated, island quality: blurring of the contrast between adjacent, more built up areas and the National Park, including through visual impacts, traffic, recreational impacts, loss of connection between the rural economy and landscape management, and increasing demand for utilities infrastructure in the countryside.

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<sup>8</sup> NCA Profile: 120 Wealden Greensand (NE465), NCA Profile:121 Low Weald (NE450), and NCA Profile:125:South Downs (NE432) (Natural England, 2013); NCA Profile:126 South Coast Plain (NE525), NCA Profile:128 South Hampshire Lowlands (NE543), and NCA Profile:130. Hampshire Downs (NE549) (Natural England, 2014)

<sup>9</sup> South Downs Integrated Landscape Character Assessment (Updated) (LUC/SDNPA, 2011)

## South Downs National Park Partnership Management Plan (PMP) 2013<sup>10</sup>

- 4.3** The Partnership Management Plan fed directly into the development of the landscape policies in the Local Plan. The most relevant of the statements it contains is Outcome 1: ‘The landscape character of the National Park, its special qualities and local distinctiveness have been conserved and enhanced by effectively managing the land and the negative impacts of development and cumulative change’. The PMP policies include Policy 1: ‘Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures’; and Policy 3, ‘Protect and enhance tranquillity and dark night skies’.

## Historic Landscape Characterisation

- 4.4** Historic Landscape Characterisation involves applying to aspects of landscape a long-established archaeological and historical method, the classifying and interpreting of material through identifying and describing essential or distinguishing patterns, features and qualities, or attributes. The sources used when doing this are comprehensive and systematic, like modern and historic maps or aerial photographs.
- 4.5** More detailed understanding of small parts of the historic environment, obtained through techniques like landscape survey, analytical survey, geophysical survey, excavation, architectural investigation and various forms of documentary and cartographic research is then applied to the types identified to extend that generalised understanding.
- 4.6** This recognises different kinds of patterns in the landscape; these are identified as ‘characters’. Within these characters, one or more ‘types’ are identified. Historic landscape characterisation identifies the elements in the landscape that have survived and influenced the current landscape. It doesn’t try to reconstruct landscape at a particular date. It is very useful in understanding how the landscape has changed and helping us all to think about managing future changes.
- 4.7** Historic Landscape Characterisation work is carried out on a county basis, therefore the National Park is included in the Sussex<sup>11</sup> and Hampshire studies of Historic Landscape Characterisation reports and maps. The National Park part of Hampshire has recently been reviewed<sup>12</sup>, which has brought it to an equivalent level of detail to the Sussex study.

## View Characterisation and Analysis 2015<sup>13</sup>

- 4.8** A Viewshed Characterisation Study, carried out by the SDNPA in 2015, provides baseline information about the major viewtypes and possible and likely ranges of visibility within, to and from the National Park. It has identified 80 views which are representative of their type – for example views from/to the scarp slope, views over the open downs and views from the greensand hills – and plotted the area that is theoretically visible from each location (the

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<sup>10</sup> South Downs National Park Partnership Management Plan (SDNPA, 2013)

<sup>11</sup> Sussex Historic Landscape Characterisation (Dr Nicola Bannister/WSCC, ESCC, BHUA, English Heritage, 2010)

<sup>12</sup> Historic Landscape Characterisation Report (Hampshire) South Downs National Park (Wyvern Heritage and Landscape, 2017)

<sup>13</sup> South Downs National Park: View Characterisation and Analysis (LUC/SDNPA, 2015)

viewshed, also known as the zone of theoretical visibility) and the height at which objects would become visible within views. The viewshed for each view is based on Ordnance Survey topography information and does not take into account woodland or other above ground features.

- 4.9** The Viewshed Study Report of the South Downs National Park takes 120 of the most widely known views and landmarks in the National Park and maps them using computer modelling to a 35 kilometre distance. These plots of views are called Zone of Theoretical Visibility (ZTVs). These are used to help assess and understand the impact of visible change in the views.
- 4.10** The viewpoint locations together with information about landscape character, historic landscape character, and biodiversity and cultural heritage, are available to the public to download from Google Earth. This tool allows the user look at and do a virtual 'fly over' the land and with the use of overlays, access a range of more detailed research information about the National Park landscape.

#### **SDNPA Tranquillity Study 2017<sup>14</sup>**

- 4.11** 'Tranquil and unspoilt places' are one of the identified Special Qualities of the South Downs National Park. This study uses a proven survey methodology, originally developed by CPRE, to assess and map the relative tranquillity across the Park. It finds that the National Park contains some highly tranquil areas that need to be preserved, and highlights other areas that may be highly susceptible to changes brought about by increased noise and visual impacts.

#### **International Dark Sky Reserve Application, 2016<sup>15</sup>**

- 4.12** An application to designate the whole South Downs National Park as a dark skies reserve was submitted to the International Dark Sky Association (IDSA) in 2016. The application was accompanied by comprehensive supporting evidence including 25,000 measurements of sky quality across the area, proposals for core and periphery areas to be designated on the basis of those measurements, a demonstration of existing and proposed planning policies for the area on this topic, a review of the source of lighting threats, the nature and quantity of existing external lighting in the area, and demonstrations of public and community engagement. In May 2016 the reserve was designated after the IDSA approved the application.

#### **Dark Sky Reserve: Lightscape Management Plan<sup>16</sup>**

- 4.13** The Lightscape Management Plan for the International Dark Sky Reserve is divided into sections on lighting inside and outside planning control, and on streetlights. The section on lighting inside planning control highlights extant and draft planning policies for the area, and a hierarchy used to decide whether lighting is needed and if so, how its impact can be minimised.

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<sup>14</sup> South Downs National Park Authority Tranquillity Study 2017 (SDNPA, 2017)

<sup>15</sup> SDNP International Dark Sky Reserve Application (SDNPA, 2016)

<sup>16</sup> Lightscape Management (SDNPA, 2016)

**4.14** The management plan sets out the following principles, intended to underlie the Local Plan dark night skies policy:

1. Development must meet or exceed the Institute of Lighting Professionals guidance and other standards or guidance for lighting within environmental zones;
2. Light should avoid being visible from the surrounding landscape;
3. Any development must not reduce the measured and observed sky quality in the surrounding area;
4. Light should not unnecessarily visible in any adjacent wildlife sites;
5. Control measures such as timers, curfews, proximity sensors, or additional shielding should be used where possible;
6. Light should not unnecessarily visible in dark sky zones;
7. Where possible, existing lighting should be brought up to specification when considering new installations;
8. Large open buildings that vent a large proportion of indoor light should be avoided; unless suitable controls are implemented;
9. Non-UV Narrow band colour temperatures of less than 3100K should be used, particularly close to nocturnal wildlife sites;
10. Skylights should be avoided, unless suitable control measures are implemented.

#### **South Downs Dark Night Skies: Technical Planning Guidance forthcoming**

**4.15** This document provides further information and guidance for how development proposals can conserve and enhance the dark night skies, providing detailed guidance on implementation of Policy SD8: Dark Night Skies in the South Downs Local Plan. The technical guidance sets out zones across the National Park which reflect the quality of the dark night skies overhead and the level of street lighting. These zones are:

- **The Dark Sky Core** – the heart of the reserve which includes the best quality skies of the National Park.
- **2km Buffer Zone** – an area of high protection surrounding the core in order to protect the integrity of the core.
- **Intrinsic Rural Darkness** – these are areas that can be classified as ‘dark sky’ and includes isolated areas not connected to the main core.
- **Transition Zone** – areas between dark zones and urban environment and light conditions in the zone will be particularly variable.
- **Urban** – areas of high ambient brightness where street lighting will typically be present.

**4.16** For each zone, requirements for protecting the relative quality of the dark sky is set out. Guidance is given for how development proposals can address these requirements.

**4.17** The research and analysis described in this document has been honed towards producing the Local Plan policy relating to dark night skies.

## Strategic Housing Land Availability Assessment (SHLAA) 2016: Landscape Assessments<sup>17</sup>

**4.18** The SHLAA was, for both iterations, landscape led, and in particular provides an assessment of potential landscape capacity for housing development in the National Park. The SHLAA process began with site identification, and then excluded sites covered by certain wildlife and heritage designations, greenfield sites detached from and unrelated to settlements, and sites too small to deliver five or more dwellings.

**4.19** All sites which passed through these initial stages were then subject to landscape assessment, with direct input from the National Park Authority's Landscape Officer, as the next level of filter. A site assessed as having high landscape sensitivity, or medium-high landscape sensitivity where any development impact could not be fully mitigated, were generally found unsuitable for housing development. Sites entirely within urban areas such as Lewes and Petersfield (and in a few cases, previously developed sites within parts of villages with an urban character) were not subject to landscape assessment in the SHLAA. The landscape assessment was not of the detail that would be required on a planning application but did incorporate assessment against a number of factors, as follows (based on the criteria contained in Appendix A of the 2016 SHLAA:

### **1. Historic Landscape Analysis**

Historic Landscape character (HLC) maps time depth in the existing landscape in terms of land use patterns. Of particular relevance to the National Park designation, HLC is important for identifying old landscapes which have remained unchanged or 'intact'. Typically, older areas of landscape exhibit high sensitivity in landscape, biodiversity and cultural heritage terms and have a landscape quality which is highly valued. Reference was made to the HLC for the South Downs National Park and the Pan-Sussex HLC where relevant. Historic mapping may also be used.

### **2. Landscape Character**

The landscape in which the site is located was considered in terms of Landscape character with reference to the South Downs Integrated Landscape Character Assessment 2017 and local landscape character assessments (where available and relevant).

### **3. Visual Sensitivity**

This was assessed in the following 3 ways:

- i)** The probability of change in the landscape being highly visible, based particularly on the nature of the landform and the extent of tree cover, both of which have a major bearing on visibility;
- ii)** The numbers of people likely to perceive any changes and their reason for being in the landscape, for example as residents, staying visitors, or as visitors engaged in recreation or work;
- iii)** The likelihood that change could be mitigated without the mitigation measures in themselves having an adverse effect on landscape character or visual quality.

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<sup>17</sup> SDNP Strategic Housing Land Availability Assessment (SDNPA, 2016)

#### **4. Relationship to settlement pattern and settlement edge qualities**

This considered:

- i) Does the site relate to the settlement pattern in terms of location and scale?
- ii) What features comprise the settlement edge? E.g. open space, topography, proximity to historic core.
- iii) How does the site relate to these features?
- iv) What are the qualities of these features? Are they weak or strong?
- v) Are there opportunities to improve the settlement edge through new development?

#### **5. Landscape Framework and scale**

- i) What are the component features of the landscape?
- ii) What is the scale of the landscape?
- iii) How does the site relate to these components?

#### **6. Impact on key characteristics and special qualities of the National Park**

This was considered for each site in relation to the Special Qualities of The National Park and the South Downs Integrated Landscape Character Assessment 2011. Any statutory designations were also referenced in this section. Reference to the National Park designation criteria and the designation process for the South Downs National Park may also be made.

## **5. POLICY FORMULATION**

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### **Local Plan Options stage**

**5.1** The initial phase of work on the Local Plan was the preparation of an Options consultation document, published in 2014. Planning officers assimilated the outputs of the landscape evidence (listed in section 3 and 4 above) that was available at the time, in particular the SDILCA and the landscape designation criteria used by Natural England to designate the National Park, and set out landscape issues that were considered particularly relevant to new development requiring planning permission. The document proposed the inclusion of a criteria-based policy on landscape. This proposal was well received at consultation.

### **Preferred Options stage**

**5.2** The production of the first full draft of the Local Plan- the Preferred Options- incorporated continuous engagement with specialist officers working on landscape outside the Planning department. This led to improved consistency between the Local Plan landscape-specific policies and the priorities set out in the Partnership Management Plan, and also more robust level of detail in the policies themselves, backed up by evidence base documents (as summarised above) which were then in production. The most immediate effect of the new approach was the splitting of the Landscape policy into separate policies on Landscape Character, Safeguarding Views, Relative Tranquillity and Dark Night Skies, to reflect aspects of landscape highlighted by the evidence base, as described below.

**5.3** The evolution of each of the landscape policies from this point onwards will now be set out in turn.

#### **SD4: Landscape Character**

**5.4** This policy is focussed on protecting and enhancing the first factor of Natural England's evaluation framework for natural beauty (landscape quality); the first part of the National Park's first special quality (diverse, inspirational landscapes); and Policy I of the Partnership Management Plan 'Conserve and enhance the natural beauty and special qualities of the landscape...'. The policy contains a range of criteria, each of which were informed by different issues.

#### **Landscape context**

**5.5** Part I(a) of the policy, and the accompanying supporting text, deals with the issue raised by the SDILCA of development that does not take into account the local landscape context, for example through inappropriate location or scale, or the use of non-locally specific urban style designs and materials in the countryside. The Preferred Options Local Plan included a set of criteria that would be applied across the National Park require developers to show a meaningful understanding of local landscape character, including being informed by local evidence documents, and through Landscape and Visual Impact Assessment. In response to the Preferred Options consultation, additional detail on the process of Landscape and Visual Impact Assessment was inserted into the supporting text.

#### **Landscape features**

**5.6** The second issue considered- and dealt with under part I(b) of the policy- was that of ensuring new development conserves and enhances existing landscape features. For example, one of the indicators in Natural England's evaluation framework for natural beauty is 'Visible presence of ... specific landscape elements or features that provide evidence of time depth or historic influence on the landscape'. A need was identified to protect features of cultural significance- however minor- which reveal a landscape's 'time-depth'. Time-depth is defined as the long-term interaction between human and natural processes. Many landscape features such as hedgerows, isolated trees, ponds and abandoned chalk pits provide local people and visitors with visible evidence of past human activity and natural processes and how they have interacted. The main evidence base documents associated with this issue are the Historic Landscape Characterisation studies.

#### **Planting**

**5.7** Part I(d) of the policy deals with planting as part of development schemes. Three factors predominated in the consideration of how landscape planting should be addressed by the Local Plan. The first factor, based on officer experience and knowledge of the area, is the need to avoid screening planting being used as a justification for inadequately designed, laid out or located development, but instead for it to be well integrated into the existing landscape framework. Secondly, there was a problem identified through the SDILCA of harm to landscape character arising from the use of non-native species in planting schemes. The third factor was the need to ensure landscape planting delivers multiple ecosystem services, in line with the broader objectives of the Local Plan.

### ***Designed landscapes***

**5.8** Part 2 of the policy protects designed landscapes- including not only those on the Historic Parks and Gardens Register, but all those historic parkscapes identified in the Historic Landscape Characterisations. Designed landscapes are specified as part of a sub-factor under the ‘Cultural Heritage’ Factor in Natural England’s evaluation framework for natural beauty. The policy ensures that development proposals in such landscapes are complementary to their design principles. This requirement was extended to cover developments in the setting of such landscapes, in response to the Preferred Options consultation.

### ***Open land between settlements***

**5.9** There are currently ‘settlement gaps’ designated in Local Plans in numerous locations around the National Park, covering open land between pairs of neighbouring settlements. However, national policy and guidance no longer require or advise the creation of such gaps. The retention of these gaps therefore requires robust landscape-based justification, which would need to be provided as part of the local evidence base for a Neighbourhood Plan, in a way that is objective and consistent with SIDILCA and other relevant strategic evidence. To support this, and also to embed the principle of settlement gaps as a strategic issue in the context of a landscape-led Local Plan, a general policy criterion- Part 3 of the policy- was drafted, protecting the open and undeveloped nature of existing gaps between settlements.

### ***Green and blue corridors***

**5.10** A green corridor is a corridor of vegetated land; a blue corridor is the landscape corridor functionally associated with a watercourse. The concept of protecting and enhancing green and blue corridors was introduced to the Local Plan - Part 4 of policy to reflect the need to link the town centres of the National Park with their surrounding countryside. This is important in delivering Purpose 2, since the market towns are all considered ‘hubs’ for visitors to the National Park, and it also improves contact with nature for urban residents (including in a context where housing developments are being allocated at the urban edge), and improves the connectivity of the landscape for wildlife. The three largest settlements in the National Park all have notable green/blue corridors, based on stream or river valleys, whose recreational potential is being realised by ongoing work by the SDNPA and partners.

### ***Restoration of lost or degraded landscape features***

**5.11** The South Downs National Park was initially rejected as a potential National Park in 1956 due in part to the loss and degradation of many of its landscape features in the preceding decades. Now the SDNPA and partners are seeking to restore features like dew ponds and historic boundaries to the landscape. A policy encouraging the appropriate restoration of landscape features will facilitate such projects, and should also achieve positive benefits to the landscape from some developments. The Historic Landscape Characterisation will provide part of the context to inform such restoration.

### ***Strategic Policy SD6: Safeguarding Views***

**5.12** Policy SD6 is intended to conserve and enhance the ‘Breathtaking views’ referred to in Special Quality I of the National Park, and the ‘Scenic quality’ which forms the second factor of Natural England’s evaluation framework for natural beauty.. The main piece of evidence underpinning



this policy is the Viewshed Characterisation Study (VCS) (2015), which was commissioned after the need for a policy on this topic was identified.

- 5.13** The VCS presents the key view types and patterns including representative views which are important with regard to the special qualities or characteristics of the National Park. Appendix 2 of the VCS also identifies some of the key landmarks of the National Park. The second criterion of the policy requires that the view types, patterns and landmarks identified in the VCS, plus those which, although not specifically identified also relate the special qualities, heritage assets or biodiversity features of the National Park, are conserved and enhanced.
- 5.14** In response to detailed comments made during the Preferred Options consultation, a requirement for development ‘not to harm the visual integrity, identity and scenic quality of the National Park’ was inserted into the policy. Some extra wording on views from heritage assets was also introduced. A paragraph in the supporting text on the importance of views of the National Park from outside was deleted, since this had caused uncertainty among consultees about whether it was intended to apply to development taking place outside the National Park. This reflects that the Local Plan only applies to development within the National Park, though neighbouring authorities must have regard to the purposes of the National Park when their activities might affect it.
- 5.15** The supporting text to Policy SD6 contains an essential set of detailed guidance, largely in relation to landscape and visual impact assessment, to ensure developments avoid harm to this important quality of the National Park.

#### **Strategic Policy SD7: Relative Tranquillity**

- 5.16** Policy SD7 is intended to conserve and enhance Special Quality 2, ‘Tranquil and unspoilt landscape’, and the factor of natural beauty described as ‘Relative tranquillity’ in Natural England’s evaluation framework for natural beauty. The policy draws heavily on the SDNP Tranquillity Study, setting differing criteria for developments in highly tranquil, intermediate tranquillity and poor tranquillity areas. These were all identified in the Tranquillity Study. The supporting text refers directly to the Tranquillity Study and requires developers to use it as a baseline for their assessment of development impacts on relative tranquillity.
- 5.17** The policy also contains criteria describing factors which should be considered in assessing a development’s impact on tranquillity.

#### **Strategic Policy SD8: Dark Night Skies**

- 5.18** Under Natural England’s evaluation framework for natural beauty, one of the identified ‘contributors to tranquillity’ is ‘stars at night’, and one of the identified ‘detractors from tranquillity’ is ‘presence and/or perception of overhead light pollution’. The darkness of the night sky is thus one of the determinants of relative tranquillity, and is included under the National Park’s Special Quality 2, ‘Tranquil and unspoilt landscape’. Since the establishment of the National Park, this issue has been given additional weight by Paragraph 125 of the NPPF which states that by encouraging good design, planning policies should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Most importantly, the designation of ‘Moore’s Reserve’, an International Dark Sky Reserve encompassing the whole of the National Park, has resulted in a clear need for this policy. Preventing light pollution is a complex issue which many developers may not be familiar with, making a policy on the issue even more important.

- 5.19** The policy embeds the principles of the International Dark Sky Reserve Lightscape Management Plan into the Local Plan. It requires developers to follow a hierarchy of options: first avoiding the installation of lighting, then (if that is not possible) avoiding adverse impacts, then (if that is not possible) minimising those adverse impacts.
- 5.20** The policy then identifies different requirements to be applied in each of the ‘Dark Sky Zones’. These zones are set out in paragraph 4.15 above and are generally based on the relative quality of the dark night sky, including the Dark Sky Core which contains the highest quality skies as identified in the Dark Sky Reserve application. The exception is a buffer zone designated within 2km of the Dark Sky Core area, specifically to protect the skies within the core.
- 5.21** The *South Downs National Park Dark Night Skies Technical Planning Guidance* (see paragraphs 4.15-4.17 above) has been developed alongside Strategic Policy SD8 (Dark Night Skies) in the Local Plan. It provides further technical guidance to planners and developers on the implementation of the dark night skies policy and sets out the detail of the technical standards and principles which apply. The guidance is currently being finalised and will be published in due course. Other details of the requirements for levels of protection are informed by the ten principles outlined in the IDSR Management Plan, as set out in Section 4 above.

### **Landscape influence on other policies in the Local Plan**

- 5.22** Landscape considerations have had a strong impact on other policies in the Local Plan, in particular as a result of issues identified in the SDILCA. Policies most strongly influenced by landscape considerations include:

#### ***SD2 Ecosystem Services***

- 5.23** All ecosystem services are connected with the landscape, but there is a particularly close relationship between the definition of landscape as an area ‘as perceived by people’ and the way the landscape provides people with cultural ecosystem services. Policy SD2 strengthens the landscape-specific policies by requiring development to have an overall positive impact on the ability of the natural environment to contribute goods and services.

#### ***SD5 Design***

- 5.24** The design policy requires development to take a landscape-led approach to design. Development proposals must be informed by contextual analysis of the local landscape character: understating the various layers of landscape character and landscape function, and also the wider context and not just in isolation. It also requires hard and soft landscaping to take opportunities to connect to the wider landscape and be consistent with local character. The landscape-led approach to design is about understanding place, and designing a site based on its existing character. Taking a landscape-led approach means that local landscape features and patterns and the benefits they provide can be conserved and enhanced through a scheme’s design. More detail on the landscape-led approach to design will be set out in the SDNPA Design Guidance, currently in preparation.

#### ***SD9-SD11: Biodiversity policies, SD12-SD16: Historic Environment policies and SD17-SD18: Water policies***

- 5.25** These policies are closely tied to issues of landscape; natural and cultural heritage are both factors of ‘natural beauty’ their own right in Natural England’s evaluation framework for natural beauty, and references to wildlife and historic features appear repeatedly in the other criteria.

The difference is that the concept of landscape deals with human perceptions of the natural and built environment, while the specific biodiversity and historic environment policies protect those features for their own intrinsic value; but the outcomes of the two sets of policies will be complementary. Of particular relevance are the emphasis in SD9 on enhancing ecological networks, which will improve the intactness of landscapes from an ecological perspective; the whole of policy SD11: Trees, Woodlands and Hedgerows, given the importance of its subject matter to human perceptions of the landscape; and Policy SD15: Conservation Areas, whose criteria are complementary to those of the landscape-specific policies. Policy SD18: The Open Coast was originally conceived as one of the landscape-specific policies, drawing on the idea from the Options Consultation of identifying particularly sensitive areas where more restrictive policies will be applied. It draws on the Marine Policy Statement, South Marine Plan, Heritage Coast Definition for the Sussex Heritage Coast, and the Beachy Head to Selsey Bill Shoreline Management Plan.

### ***SD21: Public Realm, Highway Design and Public Art***

**5.26** The parts of this policy dealing with highway design are largely based on 'Roads in the South Downs'<sup>18</sup> a guidance document commissioned to address the issue of ubiquitous and standardised highway design, as highlighted in the SDILCA. Criterion 2 on historic rural roads was inspired more directly by the SDILCA (among other sources), which identified that the introduction of traffic could lead to effects on the special qualities of remoteness and tranquillity and the erosion of rural character.

### ***SD24: Equestrian Uses***

**5.27** This policy responds to concerns raised in the SDILCA regarding the increase of equestrian development in the countryside by providing a dedicated set of criteria by which applications for such development will be assessed, including on the location of buildings and facilities, ensuring landscape features are consistent with local character and taking a conservation based land management approach to increase the contribution of the land in question to the National Park's first purpose.

### ***SD25: Development Strategy; SD26 Supply of Homes; Allocation Policies SD58-96***

**5.28** The selection of settlements within which the principle of development will be supported was informed in part by landscape character, as set out in the background paper on the Development Strategy<sup>19</sup> and on Sites and Settlements<sup>20</sup>. The precise location of those settlement boundaries and housing allocations has also been informed by landscape considerations, as set out in the background papers on the Settlement Boundaries<sup>21</sup> and on Sites and Settlements. The selection of sites for housing allocation was heavily informed by the SHLAA process, the landscape element of which is set out under 'Local context and evidence' above. The sites found suitable in the SHLAA also underwent further assessment before reaching the stage of proposed allocations.

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<sup>18</sup> Roads in the South Downs (Hamilton-Baillie Associates Ltd/SDNPA, 2015)

<sup>19</sup> Development Strategy Background Paper, South Downs Local Plan (SDNPA, 2017)

<sup>20</sup> Sites and Settlements Background Paper, South Downs Local Plan (SDNPA, 2017)

<sup>21</sup> Settlement Boundaries Background Paper, South Downs Local Plan (SDNPA, 2017)

### ***SD39: Agriculture and Forestry, SD40: Farm and Forestry Diversification, SD41: Conversion of Redundant Agricultural or Forestry Buildings***

**5.29** These policies respond to issues identified in the SDILCA relating to the character of agricultural land and buildings. In particular, the SDILCA identified that smaller farms were at risk of decline, at the expense both of larger holdings and of smallholdings or ‘lifestyle farmers’. These changes may lead to increased demand for new buildings and to existing buildings falling out of use. These trends may be intensified by the impacts of leaving the EU’s Common Agricultural Policy. The policies are aimed at supporting the continued viability of land management through sustainable farming in the National Park (as defined by the Partnership Management Plan: profitable farming that operates in harmony with the environment, adapting as necessary to avoid long-term harm to the special qualities of the National Park); and the increased viability of farming techniques that increase the provision of multiple ecosystem services from the landscape. They aim to give farmers the ability to diversify their business to support the continuation of farming, while protecting the agricultural character of farm buildings and their setting. More detail is set out in the background paper on agricultural and forestry policies<sup>22</sup>.

### ***SD45: Green Infrastructure***

**5.30** This policy has significant links to the landscape-specific policies, in particular to criterion 1d of criterion SD4: Landscape Character relating to planting schemes on new development, and also criterion 4 which seeks to safeguard existing, and identify and take opportunities to create and connect, green corridors. While much of the focus of SD4 is on the qualities of the landscape, SD45 seeks to ensure that the green infrastructure assets and links within the landscape performs multiple functions.

### ***SD47: Local Green Spaces***

**5.31** Local Green Spaces have been designated where sites have been promoted to the National Park for this purpose and found suitable for designation. Beauty is one of the five criteria for designation of Local Green Spaces. The evidence paper ‘Local Green Spaces in the South Downs National Park<sup>23</sup>’ provides further details.

## **6. CONCLUSION**

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**6.1** This Background Paper shows how the Local Plan landscape-specific policies have been informed by a wealth of evidence, at both a national and a local level. It demonstrates that the policies are well equipped to conserve and enhance the natural beauty of the National Park, including by the use of policy ‘hooks’ to ensure that developers take direct account of more detailed information in other documents about the local context when preparing schemes. It also shows how the Local Plan is landscape led, and considerations of landscape have informed policies throughout the plan.

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<sup>22</sup> Agriculture and Forestry Background Paper, South Downs Local Plan (SDNPA, 2017)

<sup>23</sup> Local Green Spaces in the SDNP (SDNPA, 2017)