



1 INTRODUCTION

It is important that the plan is read as a whole. All Local Plan policies should be viewed together and not in isolation in the preparation and consideration of planning applications. All development plan policies will be taken into account in determining planning applications, along with other material considerations in a proportionate manner. The policies in this Local Plan do not list or cross-reference to all other policies that may be relevant. The core policies set out the overarching principles of development for the National Park.

WHAT IS THE LOCAL PLAN?

1.1 The South Downs was established as a National Park in 2010. The South Downs National Park Authority (National Park Authority) became the local planning authority for the National Park in 2011. The National Park contains over 1,600km² of England's most iconic lowland landscapes stretching from Winchester in the west to Eastbourne in the east. The South Downs Local Plan is the first Local Plan to plan for the National Park as a single entity.

1.2 This *Local Plan* is the statutory development plan for the whole National Park, along with the minerals and waste plans and 'made' (adopted) Neighbourhood Development Plans (NDP). The planning system in this country is plan-led and statute states that decisions on planning applications must be taken in accordance with the development plan unless material considerations indicate otherwise. Accordingly this Local Plan will be used in the determination of planning applications.

1.3 This Local Plan does not deal with minerals and waste. Instead, policies on this subject are developed through joint minerals and waste plans with the adjoining relevant authorities covering the National Park.

1.4 All planning applications should make reference to all relevant policies in minerals and waste plans, this Local Plan and NDPs. All parts of the development plan are complementary and aim to fulfil the statutory purposes and duty of the National Park Authority.

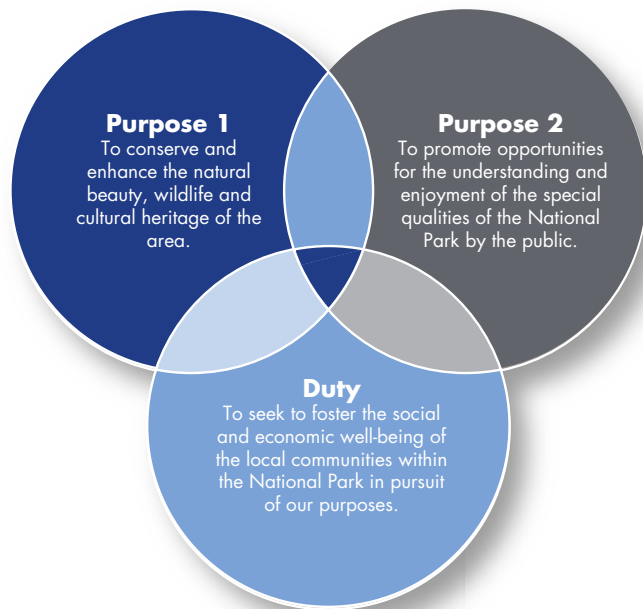
WHAT IS THE POLICIES MAP?

1.5 The South Downs Policies Map illustrates how the policies in the adopted development plan will apply. The Policies Map consists of three overview maps covering all of the National Park and about 50 inset maps. Together, these show all site allocations and designations that are most relevant to the determination of planning applications, including all those contained in made neighbourhood development plans. It also shows, where practicable, planning constraints, for example environmental designations and conservation areas. The published paper and PDF (portable document format) versions of the Policies Map show some but not all planning constraints. The National Park Authority will also maintain an interactive version of the Policies Map, which will include more features than the paper and PDF versions, and allow a more detailed look at specific localities.

1.6 The adopted Policies Map is not itself part of the statutory development plan. It will therefore be updated as required to reflect updated information, for example, the making of further neighbourhood development plans.

WHAT DOES THE LOCAL PLAN SEEK TO ACHIEVE?

1.7 The Local Plan sets out how the National Park Authority will manage development over the next 15 years. This is based on the statutory purposes and duty for national parks as specified in the *National Parks and Access to Countryside Act 1949, as amended by the Environment Act 1995*:

FIGURE 1.1: THE PURPOSES AND DUTY**The National Park purposes are:**

To conserve and enhance the natural beauty, wildlife and cultural heritage of the area

To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public

The National Park Authority also has a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park

In addition, *Section 62 of the Environment Act 1995* also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires *The Sandford Principle* to be applied and the first purpose of the National Park will be given priority.

1.8 The *DEFRA Vision and Circular on English National Parks and the Broads*¹ provides guidance to national park authorities on how to achieve their purposes and duty. The Local Plan builds on the framework of the *South Downs National Park Partnership Management Plan (PMP)*², which was adopted by the National Park Authority in 2013 following extensive consultation and dialogue with many interested parties and groups. The *PMP* sets out an overarching strategy for the management of the National Park. Local Plan policies deliver many of the outcomes and policies of the *PMP*; this was set out in greater detail in tables throughout the *Preferred Options* document.

1.9 The *PMP*'s starting point was the *State of the South Downs National Park Report*³, 2012, which provided baseline information against which the success of future action arising from the *PMP* could be measured. The facts set out in the report form a fundamental part of the Local Plan evidence base. The seven special qualities of the South Downs National Park formed the basis for the *State of the South Downs National Park Report*. The special qualities do not sit in isolation, but are interconnected and mutually reinforcing. The special qualities are illustrated in Figure 1.2.

- 1 Vision and Circular on English National Parks and the Broads (DEFRA, 2010)
- 2 Partnership Management Plan: Shaping the future of your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)
- 3 State of the South Downs National Park Report (South Downs National Park Authority, 2012)

FIGURE 1.2: THE SPECIAL QUALITIES OF THE SOUTH DOWNS NATIONAL PARK

1.10 Landscape is the key to all of the special qualities. The South Downs was designated as a National Park in recognition of its exceptional natural beauty, for the opportunities to learn about and appreciate its special qualities, and as a landscape of national importance. Therefore it is entirely appropriate to take a landscape-led approach to the formulation of its Local Plan. The *NPPF*⁴ states that great weight should be given to conserving landscape and scenic beauty in national parks, which have the highest status of protection in relation to landscape and scenic beauty along with the Broads and Areas of Outstanding Natural Beauty.

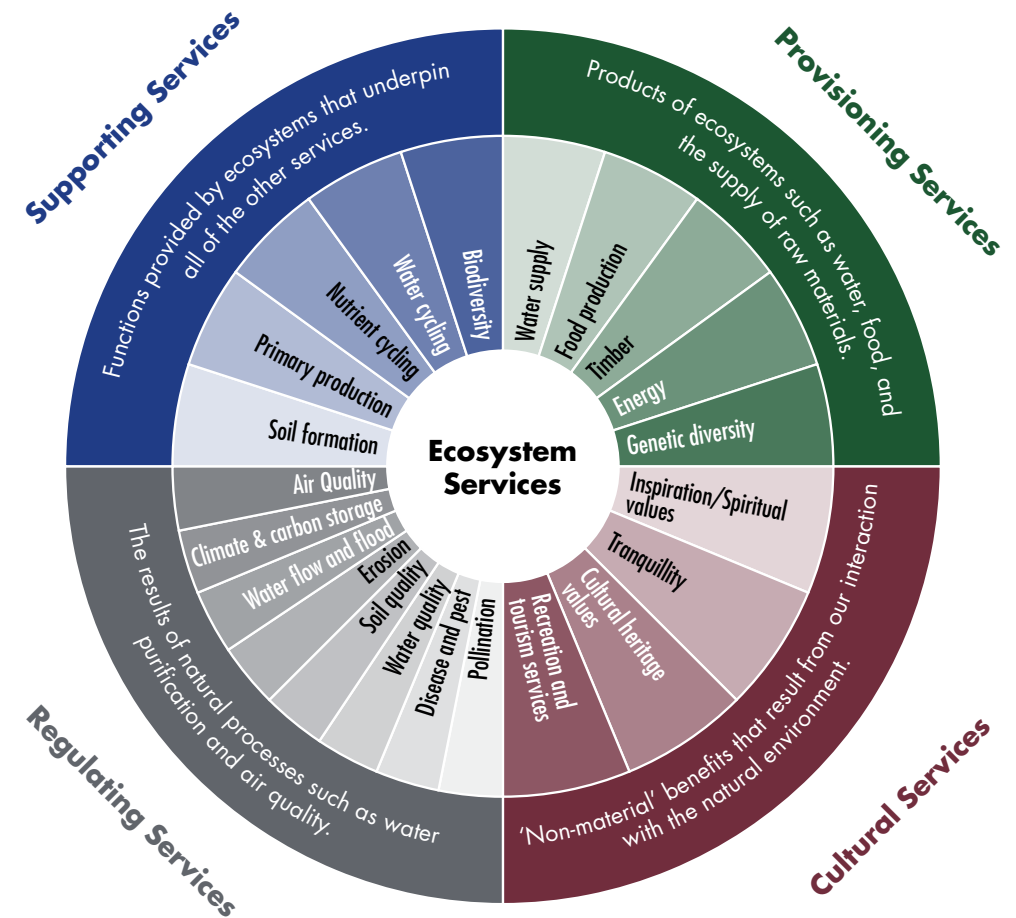
WHAT ARE ECOSYSTEM SERVICES?

1.11 Ecosystem services come from our natural capital – our natural assets which provide valuable resources to people in a range of different ways. Some examples of natural capital are:

- Animal and plant species and their habitats;
- Soils;
- Freshwater rivers, streams, lakes and ponds;
- Aquifers storing water below the ground;
- Minerals resources; and
- Coasts and sea.

1.12 People are able to enjoy a huge variety of benefits from these natural assets, ranging from the food they eat and water they consume, to outdoor experiences and improved health. These benefits to society can be seen as services, all of which are interlinked. These benefits are called ecosystem services. More and better quality natural capital should lead to more and better benefits for people and society – in other words, enhanced ecosystem services. The landscapes of the South Downs provide a multitude of ecosystem services. This is illustrated in Figure 1.3.

FIGURE 1.3: THE FOUR ASPECTS OF ECOSYSTEM SERVICES



1.13 Our natural capital is extremely vulnerable to impacts from human activities, as it cannot be readily substituted. It is therefore important that it is conserved and enhanced in good condition. The concept of ecosystem services allows the environment to be seen as a valuable asset to society, in a way which can in turn be used to steer growth to the right places, and ensure that growth incorporates features that support these benefits. In addition, our natural capital needs careful management and stewardship to ensure that the multiple benefits it gives to society are supported and protected.

WHAT IS THE STRUCTURE OF THE LOCAL PLAN?

1.14 The Local Plan includes a vision, objectives and sets of policies which together provide a policy framework for assessing planning applications and guiding development in the National Park as follows:

- The **2050 Vision** looks ahead to a future National Park. A set of objectives act as stepping stones between the Vision, the spatial strategy and the Local Plan's policies
- **The Spatial Portrait** provides a pen portrait of the National Park today. This includes a snapshot of the National Park in key facts and figures, and a description of the broad areas of the National Park, which represent the strategic landscape-defined areas upon which the Local Plan approach is built. The **Spatial Strategy** captures the high-level plan for managing growth and change across the National Park
- **Core Policies** deal with the overarching principles of development for the National Park. These core policies relate to the purposes and duty, the ecosystem services approach and major development
- The National Park-wide policies of the Local Plan are set out in three main chapters, which follow the headings of the *PMP*:
 - **A Thriving Living Landscape**
 - **People Connected to Places**
 - **Towards a Sustainable Future**

1.15 The policies in these sections have been defined as:

- **Strategic Policies**, which are considered fundamental to achieving the overall Vision for the National Park and are linked to its special qualities
- **Development Management Policies**, which are listed alongside the relevant strategic policies. They provide more detail on specific issues such as shopfronts and advertisements
- **Strategic Site Allocations** relate to Shoreham Cement Works in Upper Beeding and the North Street Quarter and Eastgate Area of Lewes
- **Allocation Policies** allocate sites for development across the National Park

■ **The Implementation and Monitoring Chapter** explains the mechanisms for delivering the Local Plan objectives, and how the policies will be monitored. In addition, the Local Plan includes:

- **Appendices** to set out further technical details and guidance to support policy implementation
- A **Glossary** explains technical terms used in the Local Plan
- The **Policies Map** is a spatial interpretation of the development plan policies covering the National Park

HOW HAVE THE LOCAL PLAN POLICIES BEEN PREPARED?

LANDSCAPE AND ECOSYSTEM SERVICES

1.16 All the Local Plan policies have been formulated putting landscape first and then peoples' interaction with it. This is in line with the purposes of national parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and promote opportunities for the understanding and enjoyment of the special qualities. The Local Plan and its policies seek to ensure that the benefits and services people and wider society get from the natural environment are recognised and enhanced. Many Local Plan policies require development proposals to conserve and enhance various aspects of natural beauty, wildlife and cultural heritage. The extent to which development proposals will be expected to both conserve and enhance is proportionate to the scale and impact of the development.

EVIDENCE

1.17 All of the Local Plan policies are supported by adequate, up-to-date, relevant and proportionate evidence. A *Whole Plan Viability Assessment*⁵ has been carried out, which tests the ability of a range of types of development to viably meet the emerging Local Plan requirements and adopted *Community Infrastructure Levy*. All the supporting documents that the Authority consider

⁵ Whole Plan Viability Assessment and Affordable Housing Update (BNP Paribas, 2017)

to be relevant to the preparation of this Local Plan from the Core Document Library.

1.18 Figure 1.4 illustrates the statutory framework, planning policy documents and evidence based studies that are linked to the Local Plan.

PUBLIC CONSULTATION AND ENGAGEMENT WITH PARISHES

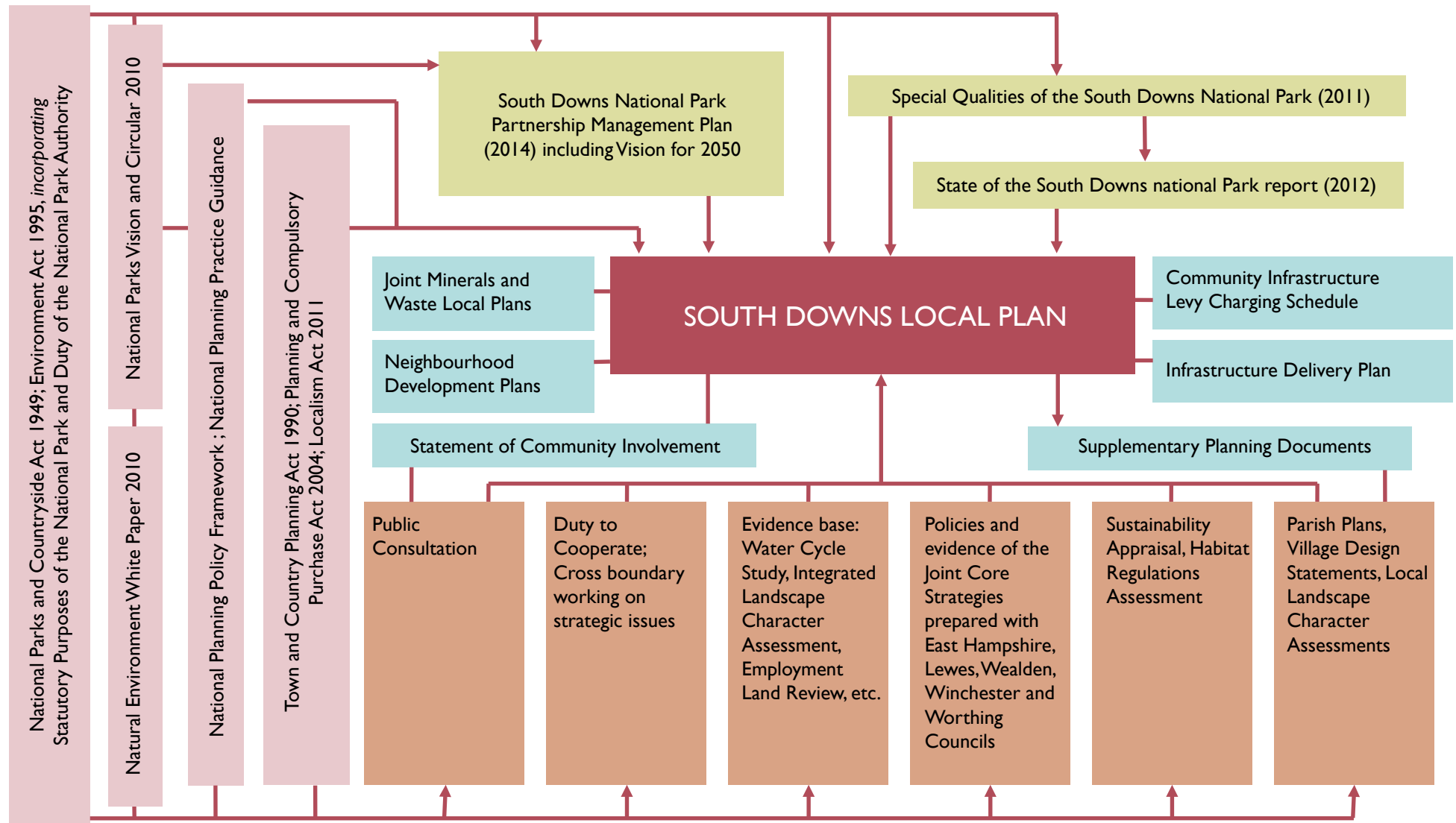
1.19 Local Plan policies have been formulated in consultation with local communities, building on extensive engagement on the *PMP* and the *State of the Park Report*. The views and input of the local community are vital to us and we have undertaken a considerable amount of public engagement, particularly with the town and parish councils. The Authority also benefits from active engagement with a number of groups including the South Downs Partnership and the South Downs Land Managers' Group, who give us a wide range of expert views from people who work and invest in the National Park.

1.20 The first formal round of public consultation on the Local Plan was on the *Options Consultation Document* in spring 2014. The *Progress from Options to Preferred Options*⁶ report sets out all the issues and options consulted on, the main issues raised and how these main issues were addressed in the formulation of the preferred options. The second public consultation was on the *Preferred Options Local Plan*⁷ in autumn 2015. Approximately 400 individuals and organisations made approximately 2,640 individual representations on the Local Plan. 77% of people who expressed an opinion supported or, supported with changes, Local Plan policies and/or chapters. An informal round of consultation took place in autumn 2016 with all the town and parish councils of the National Park. This focused on Sites & Settlements and asked for the expert opinions of the town and parish councils on emerging Local Plan allocations and designations. The third public consultation was on the *Pre-Submission South Downs Local Plan* in autumn 2017. Approximately 570 individuals and organisations made approximately 2,460 individual representations.

⁶ South Downs Local Plan – Progress from Issues and Options to Preferred Options (South Downs National Park Authority, 2015)

⁷ South Downs Local Plan: Preferred Options (South Downs National Park Authority, 2015)

FIGURE 1.4: POLICIES AND PLANS LINKED TO THE SOUTH DOWNS LOCAL PLAN



SUSTAINABILITY APPRAISAL

1.21 The purpose of a Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of the Local Plan. Both the Local Plan and its accompanying SA meet the requirements of the Strategic Environmental Assessment Directive. The Authority considers that this plan sets out the most appropriate strategy for development in the National Park when considered against the reasonable alternatives. The policies and sites identified in the Local Plan have been appraised against sustainability objectives on an iterative basis. These iterations identify how emerging policies help to achieve the relevant social, environmental and economic objectives, and recommend how sustainability could be improved. These recommendations have been taken into account in the drafting of this Local Plan.

DUTY TO COOPERATE

1.22 The National Park Authority has worked collaboratively with many other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in this Local Plan. The key cross-boundary strategic issues identified by the Authority for the purpose of fulfilling the duty to cooperate are:

- Conserving and enhancing the **natural beauty** of the area
- Conserving and enhancing the region's **biodiversity** including green infrastructure (GI) issues
- The delivery of new **homes**, including affordable homes and pitches for Gypsies and Travellers and Travelling Showpeople
- The promotion of sustainable **tourism**
- Development of the local **economy**
- Improving the efficiency of **transport** networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel

1.23 The size of the National Park, and the numerous local authority and other boundaries, has made the duty to cooperate vital to the formulation of

this Local Plan. Evidence of this is provided in the *National Park Authority Duty to Cooperate Statement*⁸ published at the same time as this plan.

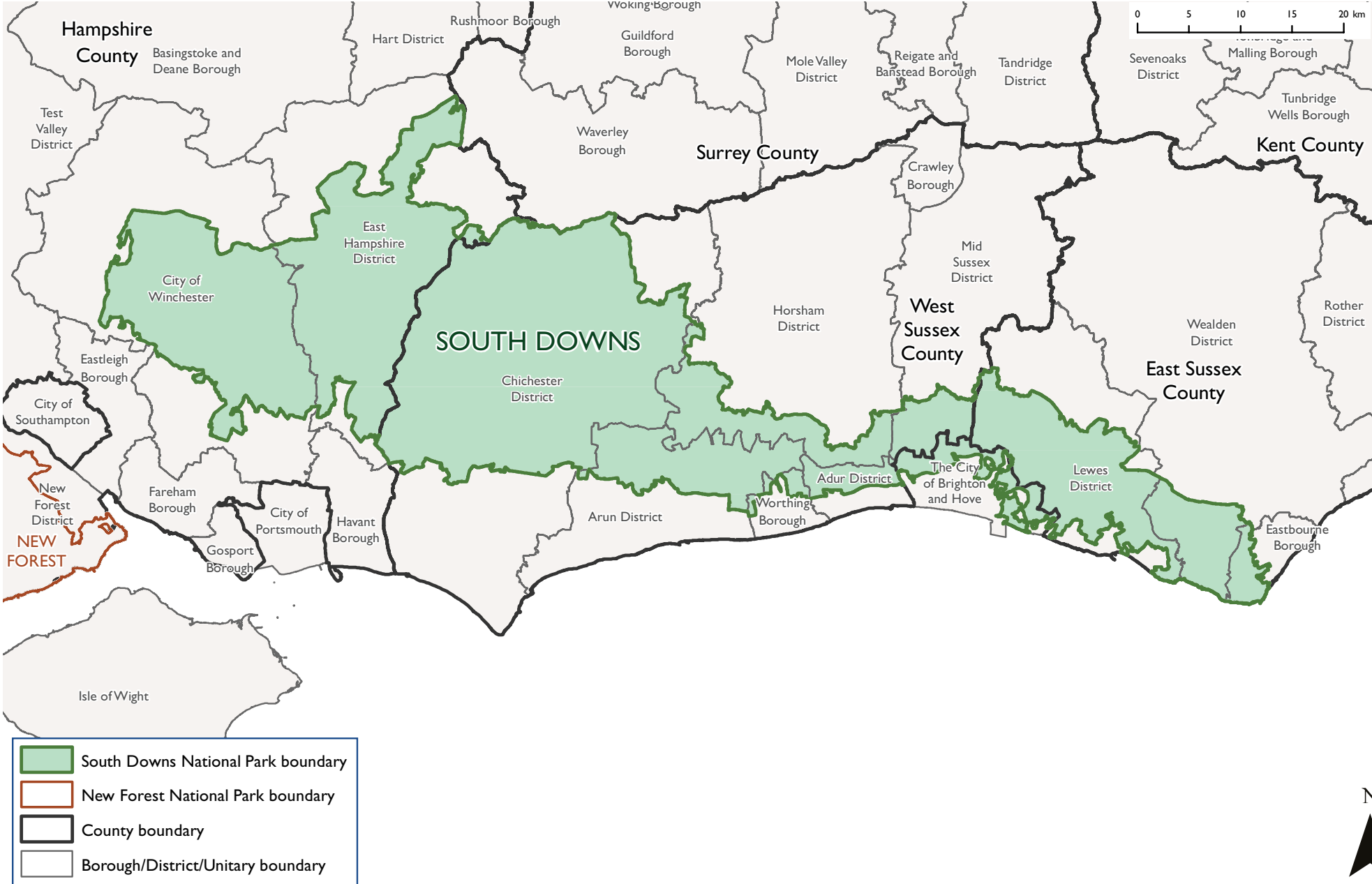
1.24 The positive engagement on cross-boundary issues has involved all the districts, boroughs, city and one unitary authority that fall partly within the National Park. The National Park Authority has engaged positively with all the strategic planning groupings both at an officer and member level that work across administrative boundaries. Figure 1.5 shows all of the local authorities within and adjoining the National Park.

1.25 The South Downs National Park Authority has also engaged constructively with all the relevant 'specific' bodies, who are responsible for advising on statutory and key infrastructure requirements. They include Natural England, Historic England, the Environment Agency (EA), Highways England and the Marine Management Organisation.

1.26 There has been collaborative working with the three Local Enterprise Partnerships (LEPs) that cover the National Park – Coast to Capital (C2C), Enterprise M3 (EM3) and South East (SELEP). The National Park Authority is more involved with C2C than the other LEPs as it covers around two thirds of the National Park's area.

1.27 The National Park incorporates 17.5km of open coastline; as such, it has a duty under the *Marine and Coastal Access Act Section 58 (3)* to consider relevant marine planning documents for any decision that might affect the marine area. Preparation of the Local Plan has been integrated with the preparation of the *South Marine Plan* insofar as it affects the marine environment.

FIGURE 1.5: ADMINISTRATIVE BOUNDARIES AND THE SOUTH DOWNS NATIONAL PARK



WHAT ARE THE STATUTORY REQUIREMENTS OF THE LOCAL PLAN?

1.28 The statutory requirements for the preparation of local plans are set out in the *Planning and Compulsory Purchase Act 2004*⁹, and guidance is contained in the *NPPF* and the *National Planning Practice Guidance*. The Local Plan was examined by an independent inspector whose role is to assess whether it has been prepared in accordance with the duty to cooperate, legal and procedural requirements, and whether it is sound. The tests of soundness are that it is positively prepared, justified, effective and consistent with national policy. The *Soundness Self-Assessment Checklist*¹⁰ and the *Legal Compliance Checklist*¹¹ demonstrate how the tests of soundness have been met and prove that all legal requirements have been met.

HOW WILL THIS LOCAL PLAN BE IMPLEMENTED?

1.29 The National Park Authority delivers its planning function uniquely through a partnership with local authorities with land inside the National Park boundary. In 2016 – 17, some 87% of the 4,953 planning and related applications that were determined were dealt with by host authorities acting on behalf of the National Park Authority.

1.30 Any reference in this Plan to ‘the Authority’ relates to the South Downs National Park Authority or the host Authority determining applications on its behalf. Where the National Park Authority is specifically referred to, this means the South Downs National Park Authority itself and not any host authority.

⁹ Planning and Compulsory Purchase Act (2004)

¹⁰ Soundness Self-Assessment Checklist for South Downs Local Plan (South Downs National Park Authority, 2017)

¹¹ Legal Compliance Checklist for South Downs Local Plan (South Downs National Park Authority, 2017)

WHAT DOES THIS LOCAL PLAN REPLACE?

1.31 On adoption, the policies of this Local Plan replaced all the saved local plan and core strategy policies inherited by the South Downs National Park Authority when it became the local planning authority for the National Park in April 2011 other than those policies relating to minerals and waste. It also replaced all joint core strategies relating to the National Park adopted since April 2011 other than those plans relating to minerals and waste. The superseded policies are listed in Appendix 2 along with the specific policies they are replaced by.

WHAT IS THE RELATIONSHIP BETWEEN THE LOCAL PLAN AND NEIGHBOURHOOD DEVELOPMENT PLANS?

1.32 The Local Plan establishes the strategic planning policy framework. However at a local level, neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. When a NDP is ‘made’ (adopted), it becomes part of the development plan for the National Park, and its policies will be used to determine planning applications within the relevant parish alongside the Local Plan and mineral and waste plans.

1.33 NDPs are being prepared by many communities across the National Park. The National Park Authority is fully supportive of all parish and town councils that have expressed an interest in preparing an NDP for their community. The National Park Authority’s website lists all made and emerging NDPs.

1.34 All NDPs, both partly and wholly within the National Park, need to be in general conformity with the strategic policies contained in the adopted Local Plan. NDPs can allocate land for development in line with the strategic policies set out in this Local Plan. They can also formulate development management policies specific to their parish or town. It is important to note that the focus of NDPs is on guiding development rather than stopping it. The Authority is working proactively with all neighbourhood planning groups to ensure that emerging NDPs are consistent with the Local Plan. Any ‘made’ NDP that

deviates significantly from this Local Plan when it is adopted will require a review.

1.35 It is important that all of the National Park is planned for. This Local Plan does not generally allocate any development in parishes with an NDP. Exceptions to this are strategic sites/strategic allocations, or where a NDP itself does not allocate sites to meet Local Plan provisions. It does allocate sites in areas without an NDP. It is necessary for NDPs to proceed in a timely fashion in order to avoid there being any policy gaps. Nearly all NDPs that are allocating development sites have progressed to a pre-submission stage. This is a significant and important achievement for all the volunteers who have contributed to these plans.

1.36 In order to provide some flexibility should unexpected delays occur to NDPs, further Development Plan Documents (DPD) may be programmed. These

will allocate sites as necessary to accommodate the levels of growth set out in this plan. Additional DPDs may be taken forward if NDPs have not progressed in a timely fashion. This will be monitored and reported in the yearly *Authority Monitoring Report*.

1.37 Other forms of community-led plans, such as parish plans and village design statements may be more appropriate for some towns and villages than NDPs. Although these other plans would not be made part of the development plan for the National Park, they may form material considerations in the determination of planning applications. These types of community plans can become Supplementary Planning Documents, thereby assuming greater weight in the decision-making process, if they undergo the statutory periods of consultation set out in the regulations.