

7 TOWARDS A SUSTAINABLE FUTURE

INTRODUCTION

7.1 The theme for this chapter, Towards a Sustainable Future, is taken from the *PMP*⁶⁷. It is primarily based on the duty of the National Park Authority, namely, to seek to foster the economic and social well-being of the local communities within the National Park. The chapter begins with the development strategy for the National Park and is followed by the strategic and development management policies relating to homes, employment, town centres and retail, agriculture and forestry, infrastructure, GI, climate change, advertisements and pollution.

7.2 The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople, the development of the local economy and GI are all key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the *Duty to Cooperate*.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 4: To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing

Objective 6: To adapt well to and mitigate against the impacts of climate change and other pressures

Objective 7: To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses

Objective 8: To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities

Objective 9: To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park

⁶⁷ Partnership Management Plan: Shaping the future of your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

7A. DEVELOPMENT

INTRODUCTION

7.3 This sub-section of the Local Plan contains strategic Policy SD25: Development Strategy. This responds to the spatial strategy, set out in Chapter 3, to plan for a medium level of growth dispersed across the towns and villages of the National Park. The development strategy reflects the vision and objectives of the Local Plan and promotes sustainable development. It should be read in conjunction with the spatial portrait relating to the five broad areas that characterise the National Park: the Western Downs, the Western Weald, the Scarp Slope, the Dip Slope, the Coastal Plain and the four river corridors formed by the Rivers Arun, Adur, Ouse and Cuckmere.

7.4 There are 53 settlements that are well-placed to accommodate some level of growth as set out in Policy SD25. This sets a clear framework for accommodating the local housing, employment and other development needs of communities. In particular, it provides a starting point for positively identifying settlements that can help meet the Plan objectives, as set out in Policy SD26: Supply of Homes, Policy SD35: Employment Land and Policy SD36: Town and Village Centres. Figure 7.1 is a map of the 53 settlements distributed across the broad areas and river corridors.

7.5 The development strategy recognises that Neighbourhood Development Plans (NDPs) constitute an important element of the statutory development plan. A number of settlements listed in Policy SD25 are within parishes or town council areas that are developing or have made NDPs. These reflect the vision and objectives of the local community, and should help to deliver the objectives and strategy of this Local Plan by making positive provision for development in line with Policy SD25. It is important that NDPs meet Local Plan as well as local objectives, as they provide the principal framework for determining planning applications within the parish.

7.6 As shown in Figure 7.2, the Local Plan only seeks to allocate sites where an NDP has not done so. This is usually because there is no made NDP, nor one being developed. An important exception to this is that the Local Plan allocates strategic sites and strategic housing allocations across the National Park.

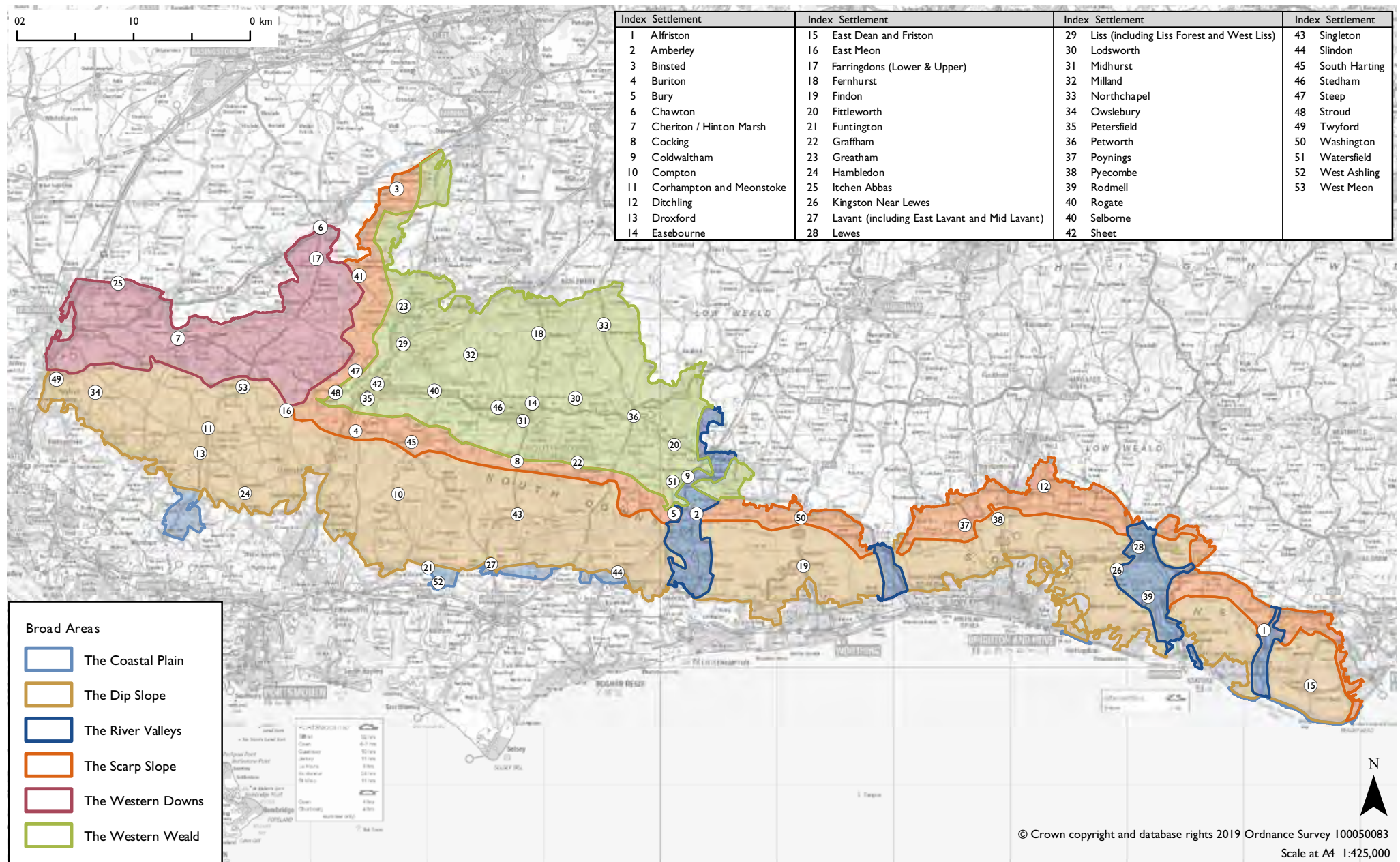
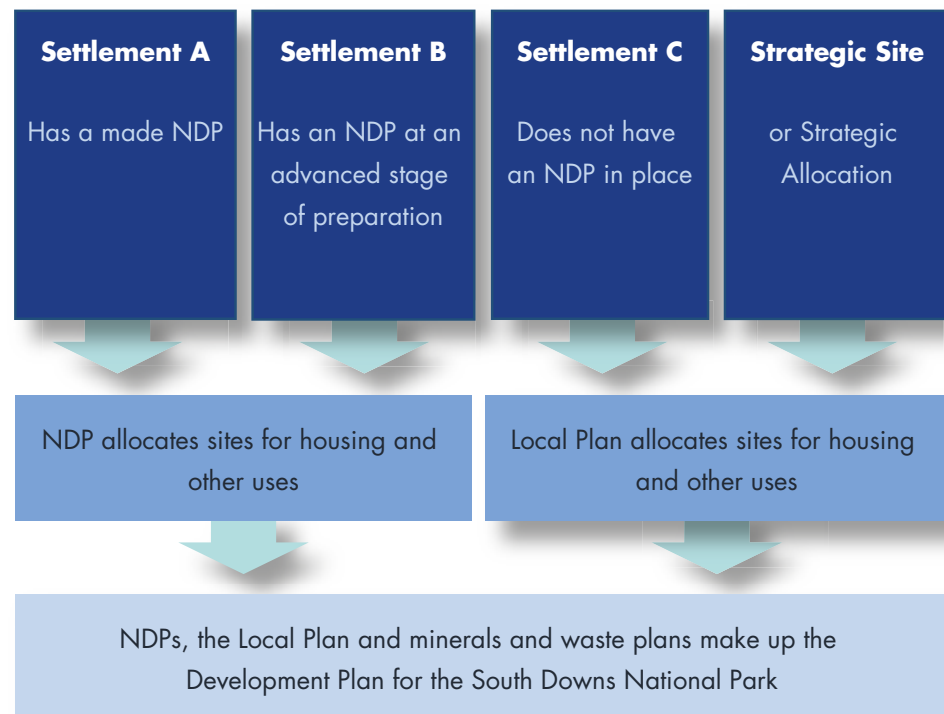
FIGURE 7.1: SETTLEMENTS IDENTIFIED IN POLICY SD25: DEVELOPMENT STRATEGY

FIGURE 7.2: NEIGHBOURHOOD DEVELOPMENT PLANS AS PART OF THE DEVELOPMENT PLAN



Strategic Policy SD25: Development Strategy

1. The principle of development within the following settlements, as defined on the Policies Map*, will be supported, provided that development:
 - a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context;
 - b) Makes best use of suitable and available previously developed land in the settlement; and
 - c) Makes efficient and appropriate use of land.

Western Downs

- Chawton
- Cheriton/Hinton Marsh
- Itchen Abbas
- Farrington (Lower and Upper)
- Stroud

Western Weald

- Binsted
- Easebourne
- Fernhurst
- Fittleworth
- Greatham
- Liss (including Liss Forest and West Liss)
- Lodsworth
- Midhurst
- Milland
- Northchapel
- Petersfield
- Petworth
- Rogate
- Sheet
- South Harting
- Stedham

Scarp Slope

- Buriton
- Bury
- Cocking
- Ditchling
- East Meon
- Graffham
- Poynings
- Selborne
- Steep
- Washington
- West Meon

Dip Slope

- Compton
- Corhampton and Meonstoke
- Droxford
- East Dean and Friston
- Findon
- Hambledon
- Owslebury
- Pyecombe
- Singleton
- Slindon
- Twyford

Coastal Plain

- Funtington
- Lavant (including Mid Lavant and East Lavant)
- West Ashling

River Arun Corridor

- Amberley
- Coldwaltham
- Watersfield

River Ouse Corridor

- Kingston near Lewes
- Rodmell
- Lewes

River Cuckmere Corridor

- Alfriston

2. Exceptionally, development will be permitted outside of settlement boundaries, where it complies with relevant policies in this Local Plan, responds to the context of the relevant broad area or river corridor, and:
 - a) It is allocated for development or safeguarded for the use proposed as part of the Development Plan; or
 - b) There is an essential need for a countryside location; or
 - c) In the case of community infrastructure, there is a proven need for the development that demonstrably cannot be met elsewhere; or
 - d) It is an appropriate reuse of a previously developed site, excepting residential gardens, and conserves and enhances the special qualities of the National Park.
3. In considering development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to the following:
 - a) The development proposals are part of a Whole Estate Plan that has been endorsed by the National Park Authority; and
 - b) The development proposals deliver multiple benefits in line with the purposes and the special qualities of the National Park and in regard to ecosystem services.

*Additionally, a portion of the Arundel settlement boundary is shown on the Policies Map. Other settlements not listed in Policy SD25 may also be shown on the Policies Map if an NDP has allocated, designated or safeguarded sites or areas within the National Park.

PRINCIPLES OF DEVELOPMENT

7.7 The purpose of Policy SD25 is to identify towns and villages across the broad areas and river corridors of the National Park that are able to accommodate growth of a scale and nature appropriate to their character and function. These have been identified in line with two principle criteria:

- The future sustainability of the settlement, in terms of its facilities and services; and
- The form and character of the settlement within its landscape context.

7.8 Evidence to support the inclusion of these settlements includes the *SDILCA*⁶⁸, and the *Settlement Facilities Assessment*⁶⁹, which form part of the Local Plan evidence base.

SETTLEMENT BOUNDARIES

7.9 Settlement boundaries are defined on the Policies Map. They have all been comprehensively reviewed as part of the Local Plan process unless this was done through an NDP. The methodology for determining the boundaries is set out in the *Settlement Boundary Review: Methodology Paper*⁷⁰, which forms part of the Local Plan evidence base. Policy SD25 sets a clear distinction between land within a settlement boundary and open countryside. Within the settlement boundary, the principle of further development is established subject to other policies in this Plan. Outside of settlement boundaries, land will be treated as open countryside. Settlements that are more scattered or diffuse in their form have not been given settlement boundaries, and will be treated as open countryside for the purposes of Policy SD25.

⁶⁸ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

⁶⁹ Settlement Facilities Assessment (South Downs National Park Authority, 2015)

⁷⁰ Settlement Boundary Review: Methodology Paper (South Downs National Park Authority, 2015 and updated 2017)

EXCEPTIONAL DEVELOPMENT OUTSIDE SETTLEMENTS

7.10 Policy SD25 acknowledges exceptional circumstances whereby development outside settlements may be acceptable. For example, particular uses of land relating to agriculture or countryside recreation may only be able to function successfully in fully rural locations. Community uses that are crucial for sustaining thriving communities, such as extensions to schools or health centres, may only be achievable through minor incursion into the countryside. Other exceptions to the development strategy are set out in other policies in this Local Plan, for example Policies SD23: Sustainable Tourism and SD29: Rural Exception Sites. Robust evidence will need to be provided to support applications for such developments to demonstrate that an exceptional approach is fully justified.

DEVELOPMENT ON PREVIOUSLY DEVELOPED LAND

7.11 In order to conserve wider landscape character and minimise the footprint of development, it is important to focus development on previously developed land (PDL), which is often referred to as 'brownfield' land. Therefore the Authority will expect developers to make best use of PDL within settlement boundaries, subject to other locational and physical constraints. Policy SD25 also provides some limited flexibility, in exceptional circumstances, to allow 'brownfield' development outside settlement boundaries, where demonstrably necessary to meet the wider objectives of this Local Plan. An example would be where development necessary to uphold the purposes of the National Park can be provided on previously developed land as an alternative to encroaching on undeveloped countryside.

7.12 However all development on PDL must always be within the context of a 'landscape first' approach whereby previously developed sites will not automatically be the best in landscape terms. Any proposal for re-use of PDL outside settlement boundaries must have full regard to Purpose 1 and the special quality of an environment shaped by centuries of farming. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.

EFFICIENT USE OF LAND

7.13 Throughout the National Park, development pressures are great, whilst availability of land suitable for development is scarce. Furthermore, many of its villages and towns are characterised by relatively densely clustered, small buildings. Therefore it is important to make efficient use of land that does become available and is suitable for development. This approach is likely to encourage a design of new development that respects traditional patterns of built form, whilst reducing demand for additional land supply to meet local communities' needs.

7.14 It is equally important to recognise that efficient use of land does not translate to overdevelopment of sites in the context of the surrounding area and setting. In some contexts, a more diffuse built form may be more appropriate. Principles and criteria relating to design and mix of housing are set out elsewhere in this Local Plan.

WHOLE ESTATE PLANS AND LARGE FARM PLANS

7.15 Estates, institutions and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD25 recognises that Whole Estate Plans may be able to demonstrate particular material considerations, relating to the purposes and special qualities of the National Park that justify development outside of settlement boundaries. The Authority will only give weight to such plans where they have been endorsed by the National Park Authority, in line with the *Whole Estate Plans Guidelines*⁷¹.

7.16 Where new dwellings are proposed as part of a Whole Estate Plan, these should meet the priority housing needs of the local area, hence should be affordable homes, or accommodate full-time, rural workers as defined by Policy SD32 and its supporting text. An exception may be made where to do so would make the delivery of multiple benefits to ecosystem services and the special qualities of the park unviable, provided clear evidence is provided in the endorsed Estate or Farm Plan.

⁷¹ Whole Estate Plans Guidelines (South Downs National Park Authority, 2015 and updated 2016), available on the SDNPA website

7B. HOMES (STRATEGIC POLICIES)

INTRODUCTION

7.17 This sub-section of the Local Plan includes two strategic policies namely SD26: Supply of Homes and SD27: Mix of Homes.

7.18 Provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to conserve and enhance the villages and market towns as thriving centres for residents, visitors and businesses, whilst conserving and enhancing the landscape of the National Park. Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise by providing homes for local workers. However, the provision of housing should not be at the expense of a nationally protected landscape. The *NPPF* cites national parks as areas where development should be restricted and objectively assessed need not met.

7.19 The Local Plan determines the level of housing provision and types of homes to be delivered. To inform this, the National Park Authority commissioned a Housing and Economic Development Needs Assessment (*HEDNA*)⁷² which forms part of the evidence base for this Local Plan. This updated the *Strategic Housing Market Assessment (SHMA)* to incorporate new national population projections and new household projections. Over the 19 year period 2014 – 2033, the *HEDNA* identifies an objectively assessed need of 447 homes per year and separately identifies a need for 293 affordable homes per year. Policy SD25: Development Strategy provides the starting point with regards to settlements considered. Policy SD26 sets out the overall housing provision for the National Park along with specific figures for the market towns and a number of villages.

7.20 The Local Plan incorporates the overall levels of housing proposed within the adopted Joint Core Strategies, updated where relevant by made

NDPs. For example, the housing figure for Petersfield is based on the *East Hampshire Joint Core Strategy* and the *Petersfield Plan*. This Local Plan meets the commitment in the *East Hampshire Joint Core Strategy* to deliver a total of 1,694 dwellings in that part of East Hampshire within the National Park. This equates to approximately 100 dwellings per annum until the *East Hampshire Joint Core Strategy* end date of 2028.

7.21 National policy states that the Local Plan should plan for a mix of housing based on current and future demographic trends, market trends, and the need for different groups in the community. The *HEDNA* and *SHMA* identify a need for a mix of dwelling sizes across the National Park, with a much greater level of need for small and medium-sizes homes, and limited need for larger houses of 4 or more bedrooms. Consultation on this Local Plan has indicated that local communities favour a policy that ensures a good mix of dwelling sizes to meet local needs.

Strategic Policy SD26: Supply of Homes

1. The National Park Authority will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033.
2. These will be delivered through:
 - i) The development of strategic sites and the allocation of land for housing in the Local Plan and NDPs;
 - ii) The implementation of planning permissions; and
 - iii) The development of land previously unallocated or identified (windfall).
3. Approximately the following levels of housing are provided for, in addition to extant planning permissions granted prior to 1st April 2015 and windfalls, through sites either:
 - Allocated in this Local Plan or in Neighbourhood Development Plans, or
 - Substantially completed at the time of Local Plan submission:

⁷² Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Settlement	Housing provision
Alfriston	15
Amberley	6
Binsted	11
Buriton	10
Bury	6
Cheriton/Hinton Marsh	14
Coldwaltham	28
Corhampton and Meonstoke†	18
Ditchling	15
Droxford	26
Easebourne	50
East Dean and Friston (East Sussex)†	11
East Meon	17
Fernhurst (including Syngenta*)	220 (*200)
Findon	28
Fittleworth	6
Greatham (Hampshire)	38
Itchen Abbas	9
Kingston near Lewes	11
Lavant (including Mid Lavant and East Lavant)	20
Lewes (including North Street Quarter*)	875 (*415)
Liss (including West Liss and Liss Forest)	150
Midhurst	175
Petersfield	805
Petworth	150

Settlement	Housing provision
Pyecombe†	8
Rogate	11
Selborne	6
Sheet	16
South Harting	13
Stedham	16
Steep	10
Stroud	28
Twyford	20
West Ashling	16
West Meon	11

4. Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan.

† At the time of Local Plan submission, the housing provision figures for Corhampton and Meonstoke, East Dean and Friston (East Sussex) and Pyecombe have been met through sites allocated in the *Pre-Submission South Downs Local Plan* having been subsequently built out. These sites therefore no longer require an allocation policy.

THE AMOUNT OF HOUSING

7.22 The purpose of this policy is to set out figures for how many new homes will be provided in town and villages across the National Park in line with the spatial strategy for the Local Plan.

7.23 The process for determining the amount of housing to be delivered starts with the identification of the 'objectively assessed need' for housing. This is followed by consideration of the extent to which meeting need within the National Park can be reasonably met. The Local Plan must first and foremost reflect the purposes of the National Park, and is therefore capacity-based. Pursuant to the purposes, the Local Plan must also reflect the duty of the National Park Authority, and therefore should seek to foster the economic and social wellbeing of local communities.

7.24 Policy SD26 sets a level of new housing provision which totals 4,750 over the Plan period, representing a net increase of 250 homes per year. This is informed by the evidence from the *HEDNA*⁷³, including the great need for affordable housing to meet locally generated housing needs. It is equally informed by a robust body of evidence on constraints and opportunities, which includes the *SHLAA*⁷⁴ (incorporating site-specific landscape assessments), and the *Settlement Facilities Assessment*. These evidence based studies form part of the Local Plan evidence base.

THE LOCATION OF HOUSING

7.25 Policy SD26 sets out set out figures for how many new homes will be provided in individual settlements. This approach provides clarity to local communities on the amount of development to be provided, which will be of particular importance in designated neighbourhood plan areas. The starting point for the housing provision figures is the spatial strategy for a medium level of dispersed growth across the National Park. A further key driver is the estimated capacity of each settlement to provide for growth, whilst

safeguarding Purpose 1. Key evidence includes the *SHLAA* incorporating site-specific landscape assessments and the *Settlement Facilities Assessment*, which form part of the Local Plan evidence base. Levels of local growth have additionally been informed by consultation with local communities, in particular with parish and town Councils.

7.26 The housing provision figures have been calculated firstly taking account of opportunities and constraints, primarily landscape context, then settlement facilities, and secondly the estimated supply of suitable and available housing land. The figures are approximate, and actual delivery in individual settlements may vary should the land supply position change. Nevertheless, it is expected that the National Park Authority, parish and town councils and other partners will work together to deliver at least these numbers.

ALLOCATION OF STRATEGIC SITES AND HOUSING SITES

7.27 An important element of housing delivery in the National Park is the allocation in the Local Plan of strategic sites to include provision of housing, and a number of smaller sites in settlements across the National Park.

7.28 There are two previously developed strategic sites allocated in chapter 8 of this Local Plan: North Street Quarter in Lewes, and the former Shoreham Cement Works in Upper Beeding. The former Syngenta site is allocated as a strategic site in the *Fernhurst NDP*. North Street Quarter and Syngenta will deliver a considerable number of homes as part of mixed use development schemes. There are two strategic housing allocations in Chapter 9 namely Old Mall Farm, Lewes and the former Brickworks and West Sussex County Council Depot in Midhurst.

7.29 Non-strategic Local Plan housing site allocations are being made in areas of the National Park where there is currently no emerging NDP, or where the NDP does not allocate land for housing in line with Policy SD26. In areas where NDPs are emerging or have been made, these are expected to allocate sites sufficient to meet the settlement level housing provision figures set out in Policy SD26.

⁷³ Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

⁷⁴ Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

7.30 The allocation of land in an NDP which will deliver a greater number of homes than is specified in Policy SD26 will be supported, where it meets an identified local housing need in that settlement or locality and is supported locally.

7.31 A list of made and emerging NDPs can be viewed on the National Park Authority's website.

WINDFALL ALLOWANCE

7.32 The development of previously unallocated or unidentified land, known as 'windfall sites', will count towards the Local Plan housing provision figure. This is known as a 'windfall allowance', and is not attributable to particular settlements. Therefore windfall sites will not count towards settlement-specific housing provision figures. A review of past planning permission implementation, using dwelling completion records, has provided strong evidence that there has been consistent delivery on windfall sites as a proportion of total dwellings built; therefore allowance of a modest element of windfall housing supply is justified. However, in the context of a national park, it is appropriate to adopt a conservative allowance. The windfall allowance is calculated as 51 dwellings per year for the National Park area, based on an analysis of past trends, whilst taking into account the emphasis on future growth taking place primarily within tightly drawn settlement boundaries, generally in the form of infill development.

Strategic Policy SD27: Mix of Homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.
 - a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:

1 bedroom dwellings:	35%*
2 bedroom dwellings:	35%
3 bedroom dwellings:	25%
4 bedroom dwellings:	5%
 - b) Proposals for market housing should provide the following mix of units:

1 bedroom dwellings:	at least 10%
2 bedroom dwellings:	at least 40%
3 bedroom dwellings:	at least 40%
4+ bedroom dwellings:	up to 10%
 2. Planning permission will be granted for an alternative mix provided that:
 - a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or
 - b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.
 3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.
- * 1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

MEETING THE NEEDS OF LOCAL HOUSEHOLDS

7.33 The purpose of this policy is to ensure that development proposals provide a mix of homes that reflects the need and community aspiration for small and medium-sized homes.

7.34 The precise mix of homes within each proposal should be informed by the latest evidence of strategic and local needs, including the currently published *HEDNA* or future reviews as relevant. However, given clear evidence in the *HEDNA* of future household needs, it is important that new housing development focuses on providing smaller and medium size dwellings, to reflect the National Park duty to foster the well-being of the local communities.

7.35 The mix of dwellings set out in Policy SD27 is in line with the recommendations of the *SHMA* (and confirmed by the *HEDNA*), which is based on detailed modelling of housing market trends up until 2033. The *SHMA* and *HEDNA* recommend that market housing, in particular, should be explicitly focused on delivering smaller family housing for younger households. This approach also complements Policies SD30: Replacement Dwellings and SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings, which similarly seek to retain smaller dwellings.

7.36 It is recognised that many housing sites are small and in such instances it may not be possible to achieve the exact proportions set out in Policy SD27. Nevertheless the requirements should be broadly met. For all proposals for standard occupancy housing, the onus will be on providing smaller homes, some of which should be suitable for families with children.

7.37 Affordable 1 bedroom dwellings may be substituted with 2 bedroom dwellings, in recognition that 2 bedroom dwellings are more adaptable to changing needs, for example, where a couple have children whilst living there.

7.38 For avoidance of doubt, any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

ALTERNATIVE MIX OF HOMES

7.39 The Authority recognises that future development will need to respond appropriately to local needs. Policy SD27 therefore allows for regard to be had to bespoke local housing need evidence relating to the parish. This would normally be in the form of a local (parish) housing needs assessment. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development. Where a made NDP proposes an alternative housing mix based on robust local evidence, this should be used in place of the mix proposed in Policy SD27.

7.40 Exceptionally, the effect of unit types and sizes on a scheme's financial viability may be a material consideration, where this has been clearly evidenced through independent viability appraisal. For avoidance of doubt, the overall proportion of affordable housing with tenure mix to reflect Policy SD28: Affordable Homes will be prioritised, if exceptionally necessary, over the normal mix of market housing.

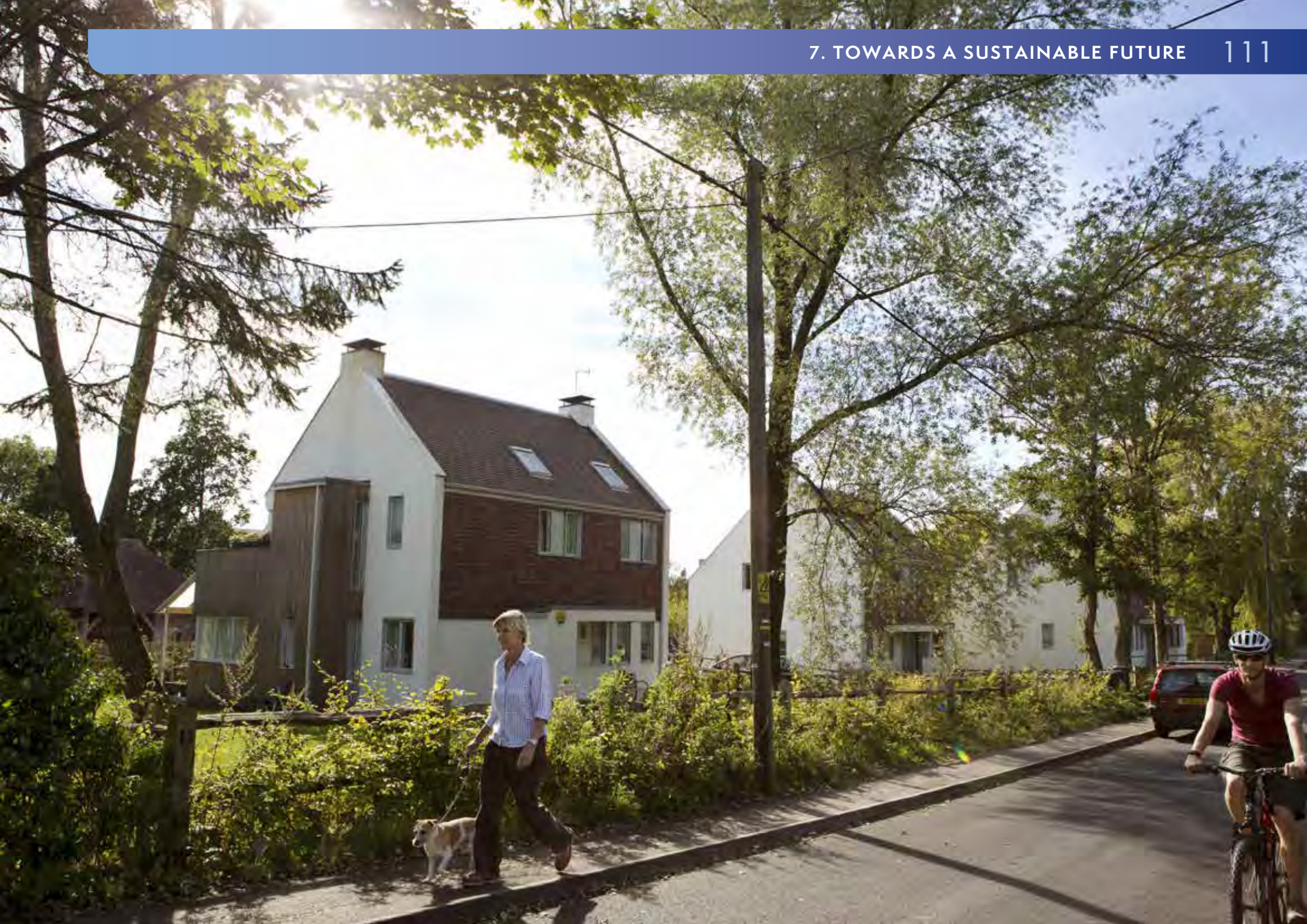
7.41 The delivery of each element of supply will be subject to ongoing monitoring.

OLDER PEOPLE'S HOUSING

7.42 The evidence from the *SHMA*, and confirmed by the *HEDNA*, demonstrates the importance of making provision for older people's housing. Furthermore, providing smaller homes suitable for older people encourages 'downsizing' which in turn frees up larger dwellings more suited to larger households.

7.43 The National Park has a higher than average proportion of its population within the 'older person' category of 55 years old or over, with further growth in this age demographic predicted. In particular, there is predicted to be strong growth in the 85+ age category.

7.44 The *HEDNA* identifies an indicative demand for some 90 homes per annum suitable to meet the needs of older people. This represents some 20% of the total objectively assessed housing need. Figure 7.3 indicates the different



types of older people's housing need. There is a particular need for more sheltered housing in future.

FIGURE 7.3: ESTIMATED NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE, 2014 – 33

	Affordable		Market		Total	
	2014-33	Per annum	2014-33	Per annum	2014-33	Per annum*
Sheltered	506	27	758	40	1,264	67
Enhanced sheltered	81	4	121	6	202	11
Extra-care	101	5	152	8	253	13
Total	688	36	1,031	54	1,719	90

*Note total differs from sum of rows due to rounding

Source: South Downs Housing & Economic Development Needs Assessment (GL Hearne, Sep 2017)

7.45 All proposals for new residential development should include smaller homes that are designed to meet the living requirements of older people, for example, allowing step-free access to and within the home. Proposals of 5 or more dwellings are considered most likely to provide opportunity to achieve this. Sites that can reasonably accommodate a comprehensive mix of housing types should demonstrate that opportunities for specialist older people's accommodation have been fully investigated and, where appropriate, incorporated into the development. This should be of a type which reflects local or strategic needs, including affordability.

OTHER HOUSING NEEDS

7.46 The National Park Authority recognises that there are other specialist housing needs that exist in local communities. People with disabilities may have particular requirements in respect of how their homes are designed to function, that is, the need for 'accessible and adaptable homes'.

7.47 The national requirements and advice in respect of addressing such needs are set out in *statutory building regulations (Approved Document Part M)*. The Authority is supportive of proposals that go beyond meeting the statutory minimum standards.

7C. AFFORDABLE HOMES

INTRODUCTION

7.48 This sub-section of the Local Plan includes two strategic policies namely SD28: Affordable Homes and SD29: Rural Exception Sites.

7.49 Policy SD28: Affordable Homes, relates to the proportion of affordable housing to be delivered from development schemes. Provision should be on-site as required by the *NPPF* unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.

7.50 The National Park Authority supports the principle of rural exception sites, which provide 100 per cent affordable housing delivery on sites which may not be suitable for market housing. Policy SD29 sets out the basis for this type of development which is particularly relevant to a national park.

7.51 The affordability of housing is a major barrier to sustainable communities in the National Park. In 2016, the average house price was 13.6 times average earnings, making it the second least affordable National Park in the UK. House prices in the National Park increased by 45% from 2006 to 2016. With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of affordable homes, it can be difficult for people working in the National Park to afford to live within it. Young people and young families, in particular, struggle to find low-cost housing which creates a significant local housing need. The *HEDNA* concluded that there is strong justification for policies seeking to maximise delivery of affordable housing, given that 293 affordable homes per year are needed to meet the full need for affordable housing.

7.52 The Local Plan must balance meeting these local housing needs with upholding the purposes of the National Park. It responds to the challenge posed by a large proportion of housing in the National Park being delivered on small sites of 10 or fewer homes – especially in the National Park's smaller settlements, where the long-term impacts of housing unaffordability are most

keenly felt. The National Park Authority has prepared a robust evidence base to demonstrate the deliverability of the Local Plan, including those policies that seek to deliver affordable housing on the majority of housing sites. This evidence also takes into account the adoption of the Community Infrastructure Levy (CIL) which came into force on 1st April 2017.

7.53 Community Land Trusts (CLT) are supported as one mechanism for delivering affordable housing. They facilitate community ownership of land, homes and other assets to deliver long-term community benefits such as affordable housing, low cost workspace and local services. Partnership working between Housing Authorities, CLTs and other community-led and legally constituted organisations is essential to maximise the delivery of affordable homes.

7.54 It is crucial for the Local Plan to deliver affordable housing that truly meets the needs of those on low incomes, such as affordable rented tenures. The National Park Authority also recognises the complementary role of housing provided for rural workers by large-scale landowners, as part of their historic stewardship role and commitment to local communities. Opportunities for these less formal types of arrangement will be encouraged through Whole Estate Plans.

Strategic Policy SD28: Affordable Homes

1. Development proposals for new residential development will be permitted that maximise the delivery of affordable housing to meet local need, and provided that, as a minimum, the following are met:
 - a) On sites with gross capacity to provide 11 or more homes, a minimum of 50% of new homes created will be provided as affordable homes on-site, of which a minimum 75% will provide a rented affordable tenure.
 - b) On sites with gross capacity to provide between 3 and 10 homes, a proportion of affordable homes will be provided in accordance with the following sliding scale, applied to new homes created:

3 homes	Meaningful financial contribution, to be negotiated case-by-case
4 – 5 homes	1 affordable home
6 – 7 homes	2 affordable homes, at least 1 of which is a rented affordable tenure
8 homes	3 affordable homes, at least 1 of which is a rented affordable tenure
9 homes	3 affordable homes, at least 2 of which is a rented affordable tenure
10 homes	4 affordable homes, at least 2 of which is a rented affordable tenure

Development proposals of 4 to 10 net dwellings will provide affordable housing on-site. Exceptionally, at the discretion of the Authority, financial contributions in lieu will be accepted.

2. Where, exceptionally, provision of affordable housing which complies with Part 1 of this policy is robustly shown to be financially unviable, priority will be given to achieving the target number of on-site affordable homes over other requirements set out in this policy.
3. Development proposals will be permitted provided that affordable housing units are integrated throughout the development, are indistinguishable in design and materials from the market housing on the site, and, where feasible, will remain affordable in perpetuity.
4. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.
5. Developers may not circumvent this policy by artificially subdividing sites.

APPLYING POLICY SD28 TO RESIDENTIAL DEVELOPMENT

7.55 The purpose of Policy SD28 is to maximise the delivery of affordable homes across the National Park as part of market-led housing schemes.

7.56 All development falling within Use Class C3 is subject to Policy SD28, including any retirement or assisted living accommodation within this use class. The policy applies to all developments of 3 or more new homes, and applies to all residential units on the site that have been created by building new structures or converting existing structures.

AMOUNT OF AFFORDABLE HOUSING

7.57 Policy SD28 sets out a sliding scale of requirement for developments to provide affordable housing. This recognises the greater challenges that exist for small site developers in making such provision. These requirements have been tested for viability, taking account of the different market circumstances across the National Park. Where the calculation of the on-site affordable housing requirement results in a fraction of a unit, the requirement will be rounded up to the nearest whole number. Applications proposing a lower proportion of affordable home provision should present robust evidence to demonstrate constrained viability or other exceptional circumstances.

MIX OF AFFORDABLE HOUSING TENURES

7.58 The *SHMA*, as confirmed by the *HEDNA* recommends that 75% of new affordable homes should be either social rented or affordable rented tenure to reflect evidence of need, with the remaining 25% being provided as intermediate forms of housing, such as shared or low-cost ownership. However the *SHMA* also recognises that different communities within the National Park have different needs and aspirations.

7.59 Policy SD28 reflects the *SHMA* strategic tenure mix (as confirmed by the *HEDNA*) as a requirement for new housing development, whilst allowing flexibility to reflect local need. Evidence of local need can include, but is not limited to: local (parish) housing needs assessment, relevant housing market assessment published by a local authority, and housing registers (waiting lists). If a tenure mix is proposed which departs from the strategic tenure mix set out in Policy SD28, robust evidence must be provided, which is supported by the relevant housing enabler.

7.60 The National Park Authority considers that social rent tenures are the most affordable to those in greatest need, and should be prioritised over other forms of rented tenure. Levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.

LOCAL CONNECTIONS

7.61 Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. Rural local connection criteria, which is linked to parishes, will take precedent over other needs.

7.62 Local connections will be determined by the Authority, parish council and relevant housing authority, having primary regard to the relevant housing register allocations policy. Where a CLT is to be the managing body for the homes provided, regard will be given to the CLT's objectives and strategy. The Authority will also have regard to evidence of local need which is specific to a rural estate or large farm, particularly where this is set out in a Whole Estate Plan that has been endorsed by the National Park Authority.

VIABILITY

7.63 The *South Downs Whole Plan and Affordable Housing Viability Study*⁷⁵ demonstrates that for the great majority of sites, the requirements of Policy SD28 can be achieved. The *Vision and Circular on English National Parks and the Broads*⁷⁶ states that new housing should be focused on affordable housing requirements, and support local employment opportunities and key services. Insufficient affordable housing provision which runs contrary to Policy SD28 will be a significant factor weighing against approval, irrespective of any viability barriers.

7.64 In exceptional cases where viability is a genuine barrier to delivery, the Authority will require the applicant to demonstrate this by submitting a robust viability appraisal. This should show that the cost of land reflects the existing value of land in its current use, plus a reasonable, but not excessive, uplift which provides an incentive for the land to be sold. The Authority will not accept a land cost assumption that factors in 'hope' value. It will expect

⁷⁵ South Downs Whole Plan and Affordable Housing Viability Study (BNP Paribas, 2017)

⁷⁶ Vision and Circular on English National Parks and the Broads (DEFRA, 2010)

also that land purchase/sale negotiations have ensured due diligence, and have fully taken into account the whole cost of development, including all adopted and emerging development plan policies, CIL, and any abnormal costs reasonably identifiable ahead of development, as a prerequisite for development potential. Affordable housing provision and other planning obligations should therefore result in reduced residential land values which reflect these factors.

7.65 In cases where viability is, having had regard to the above, still an issue, developers will be expected to contribute as fully as possible to mixed and balanced communities, by assessing development options in accordance with the following cascade:

- i) Firstly, reduce the proportion of rented affordable tenure homes in favour of intermediate housing that best reflect local need;
- ii) Secondly, reduce the overall percentage of housing provided as affordable units; and
- iii) Thirdly, provide a financial contribution for affordable housing to be delivered off-site.

7.66 The viability appraisal must be done on an independent and open-book basis, and must be undertaken by a professionally qualified member of the Royal Institution of Chartered Surveyors (RICS) to establish the appropriate form and level of contribution. Where the Authority does not agree that the appraisal has been undertaken robustly and fairly, it must be independently audited at the cost of the developer and subsequently reviewed if necessary.

7.67 Where a lower proportion of affordable housing is accepted by the Authority as an exception, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions, up to the requirement in Policy SD28, if market conditions improve before the completion of development.

7.68 The National Park Authority will publish guidance on viability matters in due course.

PROVIDING FOR AFFORDABLE HOUSING ON-SITE

7.69 Affordable homes should be provided on-site. The options for achieving this should be discussed in full with both the Authority and the relevant housing enabler.

7.70 Exceptionally, off-site provision or a financial contribution of broadly equivalent value to the normal on-site provision may be justified. Only when all options for on-site provision are shown to have been reasonably explored, without success, will a financial contribution to provide affordable housing off-site be accepted. On larger sites of 11 or more homes, this will usually be due to a lack of financial viability, ascertained by working through the cascade set out under 'Viability' above. On smaller sites of 10 or fewer homes, there may on occasion be other site-specific practical constraints that make on-site provision of a policy-compliant mix of housing tenures unfeasible.

7.71 Financial contributions secured in lieu of affordable housing must directly address local needs within the National Park, and support achievement of mixed and balanced communities. In such cases, a legal agreement will be required that sets out the terms of payment, and that limits its spending to relate only to schemes that address local needs. The calculation of financial contributions will be based on the most up-to-date policy or guidance published or used by the local housing authority within which the site is located. The National Park Authority will publish its own guidance on this matter in due course, which will supersede other guidance.

7.72 In some cases, the Authority may be willing to accept serviced plots as payment-in-kind, either on the application site, or on an equivalent site that equally addresses local need and is in other respects suitable and deliverable. This, together with any additional payment necessary, should represent a value equivalent to the financial contribution which would otherwise be calculated and paid to the Authority in the absence of acceptance of the serviced plot.

DESIGN AND MIX

7.73 Affordable homes must be integrated throughout the development and be of visually indistinguishable design. They should be located throughout the site in a manner that supports integration but can also be managed efficiently by the relevant housing association. The mix of dwelling types and standards of design for affordable housing are considered under other development management policies alongside all other types of housing.

ARTIFICIAL SUBDIVISION OF SITES

7.74 The Authority will not accept the artificial subdivision of sites where an obvious consequence of doing so would be to fall under the relevant policy threshold requiring either on-site provision of affordable housing, or a financial contribution proportionate to the total sum of development. For the purposes of housing provision, the Authority will consider a site to be a single site if the current arrangements, in either functional and/or legal land ownership terms, can be considered part of a wider whole.

AFFORDABLE HOUSING DELIVERY

7.75 Affordable housing provision will be secured at the granting of planning permission by a Section 106 legal agreement. The National Park Authority will work in close partnership with the relevant Local Housing Authority to ensure that affordable housing is delivered effectively. Affordable housing should remain as such in perpetuity.

7.76 CLTs provide an opportunity for local community ownership of land for long-term affordable housing provision. Affordable housing provided by CLTs and most housing associations are exempt from the "Right to Buy", allowing affordable housing to remain affordable in perpetuity.

Strategic Policy SD29: Rural Exception Sites

1. Proposals for new residential development of 100 per cent affordable housing outside of settlement boundaries as shown on the Policies Map will be permitted, provided that the following are met:
 - a) Affordable housing is provided in perpetuity;
 - b) The site selection process has considered all reasonable options, and the most suitable available site in terms of landscape, ecosystem services and overall sustainability has been chosen;
 - c) The scale and location relates well to the existing settlement and landscape character; and
 - d) It is shown that effective community engagement has fed into the design, layout and types of dwellings proposed.
2. The size (number of bedrooms), type and tenure, (for example, social and affordable rented, intermediate, shared ownership or older people's housing) of affordable homes for each proposal will be based on robust and up-to-date evidence of local community need.
3. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.

7.77 The purpose of Policy SD29 is to encourage the delivery of rural exception sites. These sites provide a critical source of affordable housing in perpetuity to meet local needs, which are not served by the market, on land that would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

MIX OF TENURES

7.78 The National Park Authority believes that a policy of allowing market housing would reduce the number of affordable homes coming forward and may reduce the willingness of communities to support the principle of rural exception sites. The emphasis on rural exception sites in national parks should be on 100 per cent affordable housing. If a viability appraisal has robustly demonstrated that viability genuinely risks preventing a rural exception site from coming forward, and there are no alternative, more viable, sites, the Authority will work with the landowner, community and other stakeholders to establish the optimum alternative option which best meets the local need.

SITE SELECTION, SCALE AND LOCATION

7.79 Policy SD29 (1) (b) requires the most sustainable, available site to be chosen. It is important to ensure that locations which have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, work best within the landscape and settlement form, allow better access to local services, and are most suitable in other respects, are preferred.

COMMUNITY AND STAKEHOLDER ENGAGEMENT

7.80 “Effective community engagement” should be demonstrated by the applicant in both the site selection and application design processes. This can include liaison with the relevant parish council(s), community groups and neighbours. It is also essential that the advice of the relevant Rural Housing Enabler feeds into these processes, so that any practical difficulties regarding management issues are identified and overcome at an early stage of design.

LOCAL NEED AND LOCAL CONNECTION

7.81 Occupation of affordable housing brought forward on both rural exception sites and market-led sites is subject to conditions to ensure the needs of local people are being met. The meanings of “local need” and “local connection” are set out in the supporting text to Policy SD28: Affordable Homes. Rural exception sites should also take into account the aspirations of the local community, for example, as expressed in the relevant NDP, Parish Plan or Village Design Statement. The type and tenure of dwellings on rural exception sites will need to balance the provision of local needs with the character of the existing settlement and the landscape within which it is located.

DELIVERY OF RURAL EXCEPTION SITES

7.82 The Authority will expect all rural exception sites to reflect local needs and aspirations. An effective way to achieve this is through establishing CLTs to drive the delivery of sites. Local partnership arrangements will generally be appropriate for delivering on sites, for example, between CLTs, Parish or Town Councils, Specialist Housing Associations and/or Rural Housing Enablers (RHEs). Whichever delivery model is used, the Authority will seek to ensure that affordable housing remains affordable in perpetuity.

7D. HOMES (DEVELOPMENT MANAGEMENT POLICIES)

7.83 This sub-section of the Local Plan includes three development management policies relating to housing namely: SD30: Replacement Dwellings, SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings and SD32: New Agricultural and Forestry Workers' Dwellings.

Development Management Policy SD30: Replacement Dwellings

1. Development proposals for replacement residential dwellings outside settlement boundaries, as defined on the Policies Map, will be permitted where:
 - a) The structure, constituting all new and existing development, does not result in a net increase of more than approximately 30% compared with the gross internal area of the existing dwelling; and
 - b) The replacement dwelling is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and/or privacy.
2. Development proposals for the replacement of one residential dwelling with two or more separate residential dwellings will be permitted where:
 - a) Criteria 1 (a) and (b) are satisfied;
 - b) The replacement dwellings are 'small' and designed with appropriate layouts and internal arrangements; and
 - c) There is sufficient scope within the existing dwelling and its curtilage to provide satisfactory private amenity space, landscaping, boundary treatments, external storage and vehicular parking for each dwelling.
3. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.84 The purpose of this policy is to reduce the loss of small homes in the National Park through replacement by substantially larger homes. A key consideration is demonstrating that there is no increase in the overall visual impact of the replacement dwelling(s) on the landscape of the National Park.

APPLYING POLICY SD30 TO DEVELOPMENT PROPOSALS FOR REPLACEMENT DWELLINGS

7.85 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 18 December 2002 or, if built after that date, as originally built. This is the date that the National Park was first designated.

7.86 Where outbuildings were utilised for ancillary domestic purposes on 18 December 2002, and where the number of outbuildings would be rationalised to improve the appearance of the site, the Gross Internal Area (GIA) of the outbuildings may be considered in the assessment of whether the proposed replacement dwelling is materially larger than the existing dwelling.

7.87 It is expected that the residential curtilage (domestic garden area) of a replacement dwelling would be no larger than that of the existing dwelling. The Authority will need to be satisfied that the dwelling to be replaced has a lawful use for residential purposes. The policy relates to a dwelling as it existed on 18 December 2002, or as the dwelling was originally built or legally established, if the residential use post-dates 18 December 2002. Where residential use may have been abandoned, used for some other purpose or is in an uninhabitable condition, the advice of the Authority should be sought at an early stage.

7.88 Within the broad principles set out in the policy, proposals for replacement dwellings will be expected to be of a high standard of design in accordance with Policy SD4: Landscape Character and Policy SD5: Design. Proposals should take account of local and traditional elements of design and

should not introduce discordant or intrusive features in the landscape. It will be appropriate to maintain existing gaps between dwellings to ensure that the existing rural character is not prejudiced. It is particularly important that the cumulative impact of increasing the overall number of homes is not detrimental to local or wider landscape character. Any replacement dwelling will normally be expected to be located on the site of the existing dwelling it is to replace. However, where a re-siting within the residential unit is proposed it must be demonstrated that there would be no harmful impact on the landscape of the National Park.

INCREASE IN NUMBER OF DWELLINGS

7.89 Where proposals include a net increase in the number of dwellings on the site, a 'small' dwelling is defined as having a total GIA of 120m² or less. Proposals must not result in cramped, impractical and/or contrived layouts and internal arrangements. Such proposals must ensure that each dwelling has suitable vehicular parking, bin and cycle storage and private amenity space. Features such as fencing, entrance gates, lighting, new driveways and additional hardstanding can have a considerable urbanising effect on rural areas and as such proposals which do not respect, or are not in keeping with, the rural character of the area will not be permitted.

PERMITTED DEVELOPMENT RIGHTS

7.90 In determining planning applications for replacement dwellings, consideration will be given to the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings

1. Development proposals for extensions to existing dwellings, and the provision of annexes and outbuildings will be permitted where:
 - a) The proposal does not increase the floorspace of the existing dwelling by more than approximately 30% unless there are exceptional circumstances;
 - b) The proposal respects the established character of the local area; and
 - c) The proposal is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and/or privacy.
2. Proposals for annexes should demonstrate the functional and physical dependency on the host dwelling.
3. Proposals for outbuildings should demonstrate that they are required for purposes incidental to the use of the host dwelling.
4. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.91 The purpose of this policy is to avoid the over-extension of existing dwellings and the adverse impact that this has on the character and appearance of both settlements and the countryside. This policy is consistent with Policy SD27: Mix of Homes and seeks to protect the limited supply of small and medium-sized homes in the National Park. This policy relates to the extension of existing houses and the provision of new annexes and outbuildings across the National Park. Within the broad principles set out in Policy SD31, proposals will be expected to be of a high standard of design and compliance with any size limits will not alone be sufficient in itself to secure planning permission. Proposals should respect local character and complement the scale, height, massing, appearance and character of the existing dwelling. All applications for extensions, annexes and outbuildings will therefore need to comply with SD4: Landscape Character and SD5: Design.

APPLYING POLICY SD31 TO DEVELOPMENT PROPOSALS FOR EXTENSIONS

7.92 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 18 December 2002 or, if built after that date, as originally built. Where outbuildings were utilised for ancillary domestic purposes on 18 December 2002, and where the number of outbuildings would be rationalised to improve the appearance of the site, the GIA of the outbuildings may be considered in the assessment of any increase in floorspace.

7.93 With respect to the size of extensions and annexes the Authority will generally seek modest proposals which increase the Gross Internal Area (GIA) of the existing dwelling by no more than approximately 30%. A larger proposal may be permitted where it can be clearly demonstrated that there will be no harmful intrusive impact in the landscape and that there is an enhancement in the appearance of the host dwelling. The Authority will consider larger extensions that are needed to accommodate exceptional family needs, for example, arising from a disabled or elderly member of the family; robust evidence will be required to support such applications.

7.94 Proposals for outbuildings should be sensitively sited to the side or rear of the host dwelling. Single or double detached garages of appropriate dimensions and design may be permitted if they are not intrusive upon the local area, remain subordinate to and do not detract from the character and appearance of the main dwelling.

7.95 Proposals for annexes to provide additional ancillary accommodation must demonstrate a functional link between it and the host dwelling. The annexe must be in the same ownership as the main dwelling and share utility services, access, vehicular parking and private amenity space. An annexe should usually be incorporated within or physically attached to the host dwelling. Where an extension to provide an annexe is not practical, consideration will also be given to the size of the detached annexe and sub-ordinance to the host dwelling.

7.96 For the purposes of applying this policy, the use of outbuildings to support home working and home-based businesses will generally be supported where this does not involve a change of use of the main dwelling or have

an adverse impact on the residential amenities of adjoining residents or the landscape of the National Park.

PERMITTED DEVELOPMENT RIGHTS

7.97 In determining planning applications for extensions, annexes and outbuildings, the impact of cumulative additions will be taken into consideration as well as the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD32: New Agricultural and Forestry Workers' Dwellings

1. Development proposals for agricultural and forestry workers' dwellings will be permitted where it has been demonstrated that the nature and demand of the work concerned make it essential for one or more people engaged in agricultural and forestry enterprises to live at, or very close to, the site of their work.
2. Applications for new agricultural and forestry workers' dwellings will need to demonstrate that:
 - a) The agricultural or forestry enterprise is established, extensive, viable and contributes to the special qualities of the National Park;
 - b) There is an essential functional need for the agricultural and forestry dwelling that could not be fulfilled either by another residential dwelling on the enterprise or existing residential accommodation in the local area which is suitable and available for occupation by the workers concerned;
 - c) No other residential dwellings either on or closely connected to the enterprise have been sold off separately or alienated from it in the past five years unless the reason for separation is justified through robust evidence;
 - d) Full consideration has first been given to the conversion of an existing building within the enterprise; and
 - e) The proposed agricultural or forestry dwelling should be well-related in terms of siting to existing buildings or dwellings within the enterprise, result in and remain as a total habitable floor space not exceeding 120m² (gross internal area) and be sensitively designed.

3. Applications for the removal of occupancy conditions will not be permitted unless it can be demonstrated through robust evidence that there is no longer a current or possible renewed need for the dwelling for the authorised use for the foreseeable future, and will only be made available on the open market when it has been robustly demonstrated that its use as an affordable dwelling would be unviable or unsuitable or unnecessary.
4. Temporary dwellings for agricultural and forestry workers will be permitted where they are essential to support the agricultural or forestry enterprise, whether new or established, provided that it is demonstrated that:
 - a) There is a firm intention and ability to develop the enterprise;
 - b) There is a clear functional need to support the enterprise;
 - c) The enterprise has been planned on a sound financial basis;
 - d) The location would be suitable for a permanent agricultural or forestry workers' dwelling; and
 - e) It is easily dismantled and/or taken away.
5. Where permission is granted for new dwellings under this policy, future extensions may be controlled by the removal of permitted development rights.

7.98 The purpose of this policy is to address an essential need for agricultural or forestry workers to live either permanently or temporarily at, or closely sited to, their place of work. The Authority wishes to ensure that any proposal for a dwelling is not an abuse of the concession that the planning system makes for such dwellings and as such will be subject to strict criteria and conditions to ensure that they are only used for the purpose intended.

DEMONSTRATION OF NEED

7.99 Permanent dwellings will only be permitted to house full-time, rural workers and their immediate family on established (at least 3 years old) and extensive (at least 5 hectares) agricultural or forestry enterprises in line with the criteria set out in the policy. The functional test is necessary to establish whether it is essential for proper functioning of the enterprise for one or workers to be readily available at most times. Occupiers will need to be engaged in

actual operational work, actively contributing to the management of the land. This is because non-operational work, although it may be associated with the business, can be achieved away from the enterprise and as such these cases will not meet the exception test needed to justify new dwellings in the open countryside.

7.100 Applicants should provide suitable information which clearly sets out the economic viability of the enterprise.

7.101 Applicants should also provide an independently corroborated statement from an appropriately qualified individual which suitably demonstrates that the functional requirement cannot be accommodated by either another dwelling on the enterprise or other available and suitable accommodation in the local area, and that no dwellings on or closely connected with the enterprise have recently (at least the last five years) been disposed of, for example, by sale or by removal of restrictive conditions so that the dwelling can be let out on the open rental market.

7.102 Where there is an essential need for accommodation, and a new dwelling is proposed, the applicant should first demonstrate through structural surveys undertaken by a suitably qualified individual that redundant buildings, both agricultural and non-agricultural, within the enterprise are not capable of, or suitable for, being converted to residential use under Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings.

7.103 The Authority will seek appropriately sited dwellings to avoid isolated dwellings in remote locations. Proposals should respect the local vernacular and provide appropriate boundary treatments to reduce the potential impact on the rural landscape. Proposals which include disproportionately large private amenity spaces will not be permitted.

OCCUPANCY CONDITIONS

7.104 The use of agricultural and forestry workers' dwellings will be secured through occupancy conditions, which will not be removed while there is a need for such dwellings in the local area. The implementation of new agricultural or forestry workers' dwellings submitted as part of a larger development proposal shall be controlled through suitable planning obligations and conditions to

ensure appropriate phasing of development. If the need on a given enterprise disappears, there may still be a need for agricultural and forestry workers to live close to other holdings in the local area and as such their continued use for such purposes would contribute towards maintaining a sustainable rural economy.

7.105 Applications seeking the removal of occupancy conditions will only be permitted where the enterprise has been marketed unsuccessfully for a minimum of 12 months. The scope of the marketing exercise required to demonstrate the lack of need for agricultural and forestry workers' housing will comprise an independently corroborated statement from a suitably qualified individual demonstrating that there is no longer the immediate requirement for a unit of this type within a suitable catchment, and the marketing of the property at no more than 70% of deemed open market value, through advertisements in the local press, internet and other publications including at least one agricultural publication, for at least 12 months. The unit will then be made available as an affordable dwelling in the first instance. Only if it can be robustly demonstrated that such use would be unviable, unsuitable or unnecessary at the location, will release on to the open market be deemed acceptable.

TEMPORARY DWELLINGS

7.106 The need for a temporary dwelling for an agricultural or forestry worker to live on or in close proximity to the enterprise in order to be readily available at most times, will also be subject to a functional test demonstrated by robust evidence. The Authority will specify the period for which the temporary permission is granted and the date by which the temporary dwelling will have to be removed or reverted to agricultural use. Successive extensions to a temporary permission will not normally be granted unless material considerations indicate otherwise.

7E. GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

INTRODUCTION

7.107 This sub-section contains Policy SD33: Gypsies, Travellers and Travelling Showpeople. It safeguards permanent lawful sites, establishes the need for new sites and sets the criteria against which applications will be considered. Site allocations for Gypsies, Travellers and Travelling Showpeople are set out in Chapter 9.

7.108 It is important to try to address the housing needs of all people within our community. This includes the needs of Gypsies, Travellers and Travelling Showpeople. The National Park has small resident and transient communities of each group. There are currently around 45 permanent pitches for gypsies and travellers, 30 transit pitches and 4 permanent plots for travelling showpeople.

7.109 The need for all types of sites is identified through Gypsy and Traveller Accommodation Assessments (GTAA). Recognising the cross boundary nature of these assessments, the National Park Authority has worked in partnership with all local authorities across the National Park to identify the need for further accommodation. This has resulted in six studies which together combine to cover the National Park. There are inherent difficulties in obtaining accurate data given the transient activities of some groups and the level of statistical information available at a national park level. Notwithstanding this, a proportionate approach has been taken in the various assessments, the results of which have been collated and are set out in the *Gypsy, Traveller and Travelling Showpeople Background Paper*⁷⁷.

7.110 Work to identify suitable sites has been undertaken jointly with those groups of districts and boroughs where a need has been identified. The methodology used and the list of all sites considered is set out in the *Gypsy, Traveller and Travelling Showpeople Background Paper*. The results of this work are:

- The allocation of a small number of sites within the National Park for permanent pitches in chapter 9 of this Local Plan;
- The intensification of the usage of some sites; and
- The safeguarding of existing authorised sites from other uses under Policy SD33.

7.111 The outcome of this work is that the National Park Authority is not able to identify sufficient sites to meet the entire identified need for Gypsies, Travellers and Travelling Showpeople within the National Park. Very limited opportunities have been put forward by land owners or other interested parties for consideration and the National Park Authority does not own any land on which sites might be provided. All local authorities with land within the National Park have reviewed their land holdings as part of these studies.

7.112 As local authorities review their Gypsy & Traveller Needs Assessments the outcomes will be shared with the National Park Authority and will also be a consideration in determining planning applications.

⁷⁷ *Gypsy, Traveller and Travelling Showpeople Background Paper* (South Downs National Park Authority, 2016)

Strategic Policy SD33: Gypsies, Travellers and Travelling Showpeople

1. Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.
2. The National Park Authority will seek to meet the need of Gypsies, Travellers and Travelling Showpeople, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately:
 - a) 13 pitches in that part of the National Park located in Brighton & Hove;
 - b) 6 pitches in that part of the National Park located in Lewes District;
 - c) 6 pitches in that part of the National Park located in East Hampshire District.
3. Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in *Planning Policy for Traveller Sites (2015)* or any subsequent policy) on unidentified sites will be permitted where they:
 - a) Meet a need as identified in Figure 7.4 below;
 - b) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;
 - c) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park;
 - d) Provide sufficient amenity space for residents;
 - e) Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers;

- f) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
 - g) Restrict any permanent built structures in rural locations to essential facilities.
4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.

7.113 Considerable joint working with neighbouring local authorities has taken place to come to this current position. The provision of sites for Gypsies and Travellers is rarely a static matter that can be concluded in its entirety through a Local Plan, therefore this joint working will continue through the plan period. In response to the limited allocations that have been possible, the policy includes criteria that will be used to determine applications on unallocated sites.

7.114 The purpose of this policy is to safeguard permanent lawful sites, establish the need for new sites and set the criteria against which applications will be considered.

SAFEGUARDING

7.115 Given the limited availability of suitable and available sites it is important to safeguard all existing, lawful permanent and transit sites. Existing sites are identified in Appendix A of the *Gypsy, Traveller and Travelling Showpeople Background Paper*. Where proposals involve the loss of a pitch or plot, applicants will need to identify a suitable alternative site or establish that the existing site is no longer required. This should be assessed against the relevant GTAA and any subsequent update or assessment. Alternative sites should not be any less suitable than the existing pitch or plot proposed to be lost.

MEETING THE NEED FOR SITES

7.116 A summary of the need for permanent and transit pitches within the National Park as of the 1st December 2016, together with a summary of the allocations and remaining need, is presented in Figure 7.4. The slight variation in the periods covered reflects the different dates of the studies. In addition, there is a need for around 8 transit pitches within the East Sussex area. The assessment of need is undertaken by the relevant Local Authority and any subsequent updates will need to be taken into account as appropriate. The Local Plan allocates 10 pitches within the National Park for Gypsies & Travellers.

NEW SITES FOR GYPSIES AND TRAVELLERS

7.117 National policy makes clear that, as with any other form of development, planning permission for sites should only be granted in the National Park where it is demonstrated that the objectives of the designation will not be compromised by the development. As a result the National Park

Authority will only permit a development, in addition to those sites allocated within the Local Plan, when there is an identified need. The current identified local need as established through various GTAA's is set out in SD33. However, this will be subject to change as Local Housing Authorities update respective studies. The SDNPA will input as required into these pieces of work.

7.118 New sites should respect the scale of, and not dominate, the nearest settled community. Observing this principle can help with community cohesion. Sites should be well related to settlements with services and facilities, but it is recognised that throughout the National Park sites are often in very rural locations.

7.119 Any planning permission will include a planning condition or obligation to ensure that occupancy of the site is limited to persons as defined in *Planning Policy for Traveller Sites (2015)* or any subsequent policy. Applicants should also consider the *Caravan Sites and Control of Development Act 1960* which specifies a separation distance of 6m or more between each caravan.

FIGURE 7.4: SUMMARY OF LOCAL PLAN ALLOCATIONS AND PERMANENT NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE AS OF 1 OCTOBER 2018

Area (within National Park)	Permanent Gypsies & Travellers pitch need	Permanent Showpersons' plot need	Allocations in the Local Plan	Remaining unmet need
Brighton & Hove*	13	0	0	13 Gypsy & Traveller
West Sussex				
Coastal West Sussex (Arun, Adur, Chichester, Worthing)*	0	0	0	0
Horsham	0	0	0	0
Mid Sussex	0	0	0	0
East Sussex				
(Lewes, Eastbourne, Wealden)*	6	0	5	1 Gypsy & Traveller
Hampshire				
East Hampshire	4	9	5 (Gypsy & Traveller)	9 Travelling Showpeople
Winchester	0	0	0	0
Total	23	9	10	14 Gypsy & Traveller, 9 Travelling Showpeople

*This requirement is based upon a GTAA undertaken before the change in definition introduced in the Planning Policy for Traveller Sites (2015).

7F. EMPLOYMENT

INTRODUCTION

7.120 This sub-section includes two strategic policies relating to employment. The first policy is about sustaining the local economy. The second policy sets employment land provision figures for the National Park and safeguards existing employment sites.

7.121 Within the National Park the challenge is to encourage sustainable development within the limits of the environment and to ensure purpose 1 and 2 are not compromised by meeting the socio-economic duty, given that the duty is pursuant to the purposes. A Local Plan objective derived from the Vision is to protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park.

7.122 The National Park is home to about 10,000 businesses and generates £19,450 GVA per head. The business base is focused on small and micro businesses and there is a high level of self-employment. Although the main centres of employment are within the market towns, the economy is mainly rural.

7.123 The *Employment Land Review (ELR)*⁷⁸ is the main evidence based study supporting the Local Plan policies on employment. A site focused update of the ELR was published in 2017 (ELR Update)⁷⁹ to support the allocation and safeguarding of employment sites in the Local Plan. An updated calculation of employment land need is set out in the HEDNA⁸⁰ published in 2017.

⁷⁸ South Downs National Park Employment Land Review: 2015 (G.L. Hearn, 2015)

⁷⁹ South Downs National Park Authority Employment Land Review: 2017 Update (South Downs National Park Authority, 2017)

⁸⁰ South Downs National Park Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Strategic Policy SD34: Sustaining the Local Economy

1. Development proposals that foster the economic and social well-being of local communities within the National Park will be permitted provided that they meet one or more of the following:
 - a) Promote and protect businesses linked to the National Park's key sectors of farming, forestry and tourism;
 - b) Promote and protect green businesses linked to ecosystem services;
 - c) Support rural supply chains across the National Park and its environs and encourage closer ties between rural businesses;
 - d) Provide for and support small and micro businesses through the provision of small, flexible, start-up and move-on business units including incubator uses;
 - e) Provide flexibility for established businesses to secure future resilience and protect local jobs;
 - f) Intensify the commercial use of an employment site and make a more efficient use of brownfield land; and
 - g) Promote smart economic growth and advances in information and communications technologies, particularly superfast broadband.

7.123 The purpose of this policy is to promote and protect local businesses without compromising the purposes of the National Park. The policy is consistent with the spatial strategy of a medium level of development dispersed across the National Park. It should be read in conjunction with the development strategy set out in Policy SD25, which identifies settlements where the principle of development is accepted.

KEY SECTORS

7.125 Following on from the *State of the Park Report*, the Local Plan identifies three key sectors or clusters of economic activity, namely farming, forestry and tourism. These sectors are all rooted in the National Park purposes and are linked to ecosystem services, particularly provisioning and cultural services. This Local Plan supports the expansion of these existing business sectors where to do so is compatible with the landscape and special qualities.

7.126 Food and beverages form an important economic sector. Vineyards and wineries are an expanding part of this sector, with the soils and weather patterns on the south facing dip slopes being ideal for grape production. The provision of ancillary facilities such as bottling plants should support local production, and be compatible with, and not harm, the special qualities of the National Park. Climate change and market forces will continue to influence the landscape leading to new enterprises, and increasing opportunities for producing alternative energy, for example, wood fuel.

7.127 The South Downs is England's most wooded national park, and wood-related activities are located primarily in the Western Weald. The specific development requirements for agriculture and forestry are set out in Policy SD39: Agriculture and Forestry.

7.128 Policies on tourism and the visitor economy are set out in the Local Plan section on Understanding and Enjoying the National Park.

GREEN BUSINESSES

7.129 The National Park Authority will encourage green business proposals particularly when they are linked to the special qualities. A green business is defined as an enterprise that has a positive impact on the local and/or global environment. Green businesses are linked to ecosystem services, for example, a coppicing business provides 'provisioning' services with a renewable source of wood.

RURAL SUPPLY CHAINS

7.130 Rural supply chains link products, services, finance and information from the producer to the customer. Policy SD34 seeks to encourage rural supply chains within and across the National Park in order to nurture and grow rural businesses. This is particularly important for the local food network. Rural supply chains are not, however, linked exclusively to food and drink, for example, the use of local building materials contributes positively to sustainable landscape management and local employment. The market towns have both a traditional and future role as hubs for rural supply chains including traditional markets, networking, training and services.

SMALL AND MICRO BUSINESSES

7.131 There are thousands of small and micro businesses in the National Park. A small business employs less than 10 people and a micro business employs less than 5. Although the main centres of employment are within the market towns, there are a significant number of rural business units. The ELR found that 88 per cent of workplaces employ fewer than 10 people and 98 per cent of enterprises employ fewer than 50 people. These proportions are significantly higher than national and regional levels. It indicates a strong entrepreneurial employment base reliant on small companies and start-ups.

7.132 Policy SD34 seeks to promote and protect small businesses. This could be through the provision of affordable 'move on space' for expanding home-based businesses and flexible 'move in/move on' accommodation for start-up companies. Policy SD40 deals with small businesses as part of farm diversification.

7.133 Many micro businesses are home based and collectively they make a significant contribution to the local economy. Home working provides a cost-effective solution to finding accommodation for new and micro businesses, and reduces the need to travel from home to the workplace. It is important that home based businesses do not cause unacceptable harm to the amenity of neighbours in terms of traffic, smell, loss of privacy, outlook, noise and overlooking.

RESILIENCE

7.134 Provision of workspace is only one part of encouraging new business start-ups and developing existing businesses. It is also important that businesses are resilient to changes in the local and international economy, for example, having the ability to adapt or expand premises to respond to a changing market. The planning process also has a role in supporting the availability of advice and training, and on-going business support. These types of services help to ensure the survival and development of small businesses and thus improve their resilience.

INTENSIFICATION

7.135 The development strategy set out in Policy SD25 prioritises the development of previously developed land. Commercial development on existing employment sites should make an efficient use of existing buildings and previously developed land through intensifying uses, provided that this does not compromise the special qualities of the National Park.

SMART ECONOMIC GROWTH

7.136 Smart economic growth seeks to achieve economic growth at a lower environmental cost and with a more positive impact on quality of life. Superfast broadband is key ingredient for achieving it, but significant areas of the National Park are currently severely disadvantaged by slow and unreliable internet connections. The proliferation of ‘not-spots’ is a major barrier to sustainable economic growth particularly for home-based businesses. Policy SD44 deals with telecommunications and other utilities.

Strategic Policy SD35: Employment Land

1. The SDNPA will make overall provision for the following amounts of new employment land between 2014 and 2033:
 - Office (B1a/b): approximately 5.3 hectares
 - Industrial (B1c/B2): 1.8 hectares
 - Small-scale warehousing (B8): 3.2 hectares

2. Development proposals for the change of use of redundant B2 premises and land to accommodate the need for new offices and/or warehousing will be permitted provided that there would not be a potentially adverse impact on the landscape and other special qualities of the National Park including by reason of traffic, noise or pollution.
3. The Authority will safeguard all existing employment sites and allocations that are fit for purpose from development proposals for non-employment uses. Change of use applications that would result in a loss of employment land will only be permitted provided that evidence of a robust marketing campaign of at least 12 months clearly demonstrates that there is no market demand for the business premises.
4. The principal and local employment sites are shown on the Policies Map, to which further protection applies as follows:
 - a) On principal employment sites: B Class employment uses will be safeguarded from development proposals for Non-B Class Uses and evidence of a robust marketing campaign of at least 18 months will be required.
 - b) On local employment sites: commercial uses will be safeguarded from development proposals for non-commercial uses and evidence of a robust marketing campaign of at least 18 months will be required.

Details of marketing requirements are set out in Appendix 3.

7.137 The purpose of this policy is to set out employment land provision figures for the National Park and safeguard existing employment sites. For the purpose of this policy ‘employment’ is defined as a type of economic development relating to the B uses as defined by the Use Class Order (UCO) namely B1 business, B2 general industrial and B8 storage and distribution.

EMPLOYMENT LAND REQUIREMENTS

7.138 Policy SD35 sets out the employment land provision figures, which meet the objectively assessed need for employment land identified in the ELR and HEDNA. Evidence indicates that this amount of development is deliverable

on sites across the National Park, particularly in the market towns, without harming the special qualities.

7.139 The methodologies for calculating the employment land provision figures are explained in full in the ELR and HEDNA. The provision figures build upon the evidence supporting the employment policies in the East Hampshire, Winchester and Lewes Joint Core Strategies. Due to the difficulties of undertaking economic forecasts in a national park, the employment need figures should be treated with caution and will be kept under review. It is important to take a flexible approach to the allocation and designation of employment land to ensure that the purposes are not compromised in order to meet its socioeconomic duty.

7.140 A sufficient supply of employment sites is available to meet the provision figures set out in Policy SD35 whilst taking into account that there will be some losses of existing employment land. The new employment provision is focused in Petersfield, Lewes and the smaller market towns of Midhurst and Petworth. These sites fall within the Functional Economic Market Areas (FEMA) of Central Hampshire, Brighton and Chichester/Bognor respectively. There are three tranches of future employment land supply, which make up the core supply. These are set out in Figure 7.5. The first tranche of sites is made up of sites with planning permission that are not allocated in this Plan or an NDP. The second tranche is NDP allocations, most significantly the Petersfield NDP, which allocates approximately 3 hectares of land for employment, and the Petworth NDP which allocates about a hectare of land as an extension to an existing employment site. There is one Local Plan allocation in Lewes, which is set out in Chapter 9 of this Plan.

7.141 In addition, there is limited additional potential supply on the strategic sites of Shoreham Cement Works and the former Syngenta site. The redevelopment of North Street Quarter in Lewes will deliver higher-quality business premises. All these sites are allocated for exceptional mixed-use redevelopment in this Local Plan. The detailed policy for Syngenta is set out in the Fernhurst NDP. The strategic policy for Shoreham Cement Works is set out in Policy SD56 and detailed policies will be contained in the Area Action Plan. Policy SD57 forms the detailed policy for North Street Quarter.

FIGURE 7.5: EMPLOYMENT LAND SUPPLY IN THE SOUTH DOWNS NATIONAL PARK

Source of employment land	Amount (hectares)
Sites with extant planning permission for employment development (excluding Local Plan and NDP allocations)	5.35
NDP allocations	4.69
Local Plan allocations	1.72
Total	11.76

FLEXIBLE APPROACH TO CHANGE-OF-USE APPLICATIONS

7.142 The ELR forecasts a growth in demand for both office (Use Class B1⁸¹) and small-scale warehouse accommodation (Use Class B8). Business support services, head office and management consultancy and other professional services are the major growth sectors underpinning the demand for office floorspace. A growth in warehousing and the postal sector, along with a smaller growth in wholesale trade, underlies the forecast need for warehouse floorspace.

7.143 In contrast, the ELR forecasts that there will be a continued and significant decline in employment in manufacturing, although manufacturing may contribute to growth in economic output linked to productivity improvements. This, in turn, will lead to a decline in demand for B2 floorspace although some manufacturing businesses may see a decline in jobs which does not translate directly through to floorspace.

7.144 The Authority will take a flexible and pragmatic approach to change of use applications in order to maximise the opportunities to re-use existing but vacant manufacturing premises for other forms of employment for which there is a demand. This will make an efficient use of previously developed land, and

81 The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories known as 'Use Classes'

will reduce the impact of new development on the landscape. It may also offer opportunities to remediate land contamination. Some of the predicted losses in B2 accommodation could be converted into meeting the need for small-scale B8 uses. Both uses broadly require similar premises in locational terms; out of centre with strategic road access.

7.145 Robust evidence will need to be submitted and approved by the Authority that there will be no adverse effect on the landscape and other special qualities through traffic, noise or pollution. Advice on these matters will be sought from other statutory bodies, particularly the county councils and Highways England on the amount and type of traffic generation and the impact on the National Park's rural roads.

SAFEGUARDING

7.146 It is important to safeguard premises for local businesses that are fit for purpose both within towns and the wider rural area. In order to be considered fit for purpose, the business premises need to be of a necessary standard for the intended use as defined by the UCO. This will help to support the long-term future of communities, by providing local employment opportunities for local residents, and by reducing out commuting to employment centres outside the National Park. The ELR and ELR Update provide robust information on existing employment sites across the National Park.

7.147 Change of use applications that would result in the loss of employment land need to be supported by robust evidence. Guidance on the evidence required to prove that a robust marketing exercise has been carried out to support relevant applications is set out in Appendix 3. Advice should be sought from the local planning authority at the earliest opportunity to agree the details of the exercise.

7.148 There are a small number of principal employment sites in Petersfield, Midhurst and Lewes, which are large-scale, good-quality employment sites providing jobs and services across a wide area. The National Park Authority supports the continued use of these sites for B Class employment and will resist development proposals for alternative commercial uses and housing. The

following principal employment sites are identified on the Policies Map and safeguarded for employment uses:

- Bedford Road, Petersfield
- Holmbush Industrial Estate, Midhurst
- Central Lewes
- Cliffe Industrial Estate, Lewes

7.149 There are a number of local employment sites located in towns and villages identified in Policy SD25. It is important to protect these sites as they contribute to the sustainability of the settlements in which they are located, by providing jobs and services to the local community. Many of these local employment sites are protected in NDPs. The Local Plan will safeguard those local employment sites outside designated neighbourhood planning areas that are identified on the Policies Map:

- Abbas Business Centre, Itchen Abbas
- Farringdon Business Park, Lower Farringdon
- Farringdon Industrial Estate, Lower Farringdon
- The Old Piggery, South Harting
- The Wharf, Midhurst
- Midhurst Business Centre, Midhurst
- Hampers Common Industrial Estate, Petworth

7.150 The Authority will take a more flexible approach to change of use applications on these sites by allowing other forms of economic development that provide jobs, generate wealth or produce an economic output. Proposals for alternative uses will need to provide evidence that the proposed uses will not adversely impact on the existing and future B Class Uses. Any proposals for main town centre uses will need to comply with Policy SD37 on town and village centres.

7.151 Because the National Park's economic base is focused on small businesses it is not practicable to identify all these sites on the Policies Map. It is important to protect all existing small business premises, extending beyond identified principal and local employment sites, unless it can be proved that the site and the premises are not fit for purpose. Proposals that would result in a loss of employment floorspace will need to provide evidence in line with Appendix 3.

7G. TOWN CENTRES AND RETAIL

INTRODUCTION

7.152 This sub-section contains the strategic policy on town and village centres. It also includes a development management policy that sets out more detailed criteria for development in these centres. There is a further development management policy on shops outside centres, which sets out requirements for retail impact assessments.

7.153 The market towns of Petersfield, Midhurst, Petworth and Lewes are the principal town centres within the South Downs National Park and provide services to the surrounding rural communities. A brief description of each town centre, along with the village centre of Liss, is set out below. The main findings of the recent retail evidence study for Liss, Midhurst and Petworth is also set out.

LEWES

7.154 The county town of Lewes offers a special shopping environment, with many shops and services occupying listed buildings and lying in the Lewes Conservation Area. The historic retail units have facilitated small, independent and niche retailers. There are also a range of larger multiple chain stores in the town, and two supermarkets. The independent shops are intrinsic to the town's character. However, the evidence shows that there is also a need for additional purpose built retail units in order to claw back expenditure that is currently being leaked to bigger centres outside the district, such as Brighton and Eastbourne. This is primarily for comparison goods, but there is also a limited, largely qualitative, need for convenience floorspace. In order to address this, Strategic Site Policy SD57: North Street Quarter and Adjacent Eastgate Area, Lewes allocates land for this use. The strategic site, and the town centre boundary, primary and secondary shopping frontages are shown on the Policies Map.

LISS

7.155 Liss village centre contains a mix of Victorian and modern premises. The modern development in the centre of the village has not been sympathetic to the character of the village. Liss has a small number of national multiples, and the centre provides adequately for the day-to-day retail needs of the community. However it lacks a bank, and residents depend heavily on Petersfield for most retail need. The village centre of Liss has a vacancy rate that is higher than the national average, and the profile of the centre has been impacted by the loss of several small convenience stores.

7.156 Further planning policies including the village centre boundary are contained within the Liss NDP. No primary or secondary frontages are identified.

MIDHURST

7.157 Midhurst has a very traditional, attractive, linear shopping street, with the addition of a beautiful market square, which is somewhat separate from the main shopping area. The town has low vacancy rates overall.

7.158 The shopping offer includes ladies outfitters, equestrian goods and clothing, several coffee shops and eateries, both multiples and independents. There are also two pharmacies, and a florist. There is some provision for everyday small electrical items and hardware, and this is complemented by independent retailers including a delicatessen, book shop, and jewellers. The town has a number of banks, and there are a number of well-presented charity shops.

7.159 The convenience goods sector is dominated by two supermarkets (one medium and one small), with a range of supporting smaller independent stores. The centre performs a healthy top-up function for local residents.

7.160 A town centre boundary for Midhurst is shown on the Policies Map. It incorporates land at the Grange, adjacent to the public car park, in order to encourage a new medium sized supermarket. Should permission be sought, the National Park Authority would expect the development to be accompanied by a range of measures to ensure there is improved connectivity between the site and the historic town centre. There will also be a need to address car and cycle parking provision; the impact on traffic and air quality particularly on Rumbolds Hill; landscaping (particularly incorporating the South Pond improvements); day-to-day development management issues such as design, noise, drainage (ensuring there is no increase in pollution of the pond), and amenity. Primary and secondary frontages for Midhurst are also shown on the Policies Map.

PETERSFIELD

7.161 Petersfield's historic centre attracts visitors to enjoy food and drink in attractive and pleasant surroundings. The demand for retail space is buoyant with very low vacancy rates. The town is well supplied with supermarkets with the main competition being from Chichester, Portsmouth/Southsea and Southampton. The town centre is well equipped with pubs, restaurants and cafes which have increasingly boosted the night-time economy. The profile of the shops has changed over the years. Petersfield has weathered this well, by offering increased numbers of specialist shops that appeal to leisure shoppers at weekends, and leisure-based services such as beauty, hairdressing and cafés. At the same time it has retained the larger chains. Planning policies for Petersfield town centre are contained within the made Petersfield NDP, which designates a town centre boundary along with primary and secondary frontages.

PETWORTH

7.162 Petworth is an attractive, historic market town, which is heavily oriented towards the antique sector. This appeals to visitors to Petworth House and is a draw for visitors to the town centre itself. The centre contains a small convenience store, DIY store, pharmacy, bank and a range of restaurants, pubs and community buildings. There are also a large number of independent shops

including delicatessens, florist, top of the range ladies clothing and homeware retailers and a fine wine shop. The centre has low vacancy rates but there is a lack of diversity in its comparison goods offer. The convenience goods offer is limited, with one convenience store providing only for top-up shopping. Petworth also benefits from a successful and popular monthly farmers market, held in the town square.

7.163 Further planning policies, including the town centre boundary and primary shopping frontage for Petworth town centre, are contained within the Petworth NDP. No secondary frontage is identified.

2016 RETAIL EVIDENCE STUDY

7.164 The 2016 Retail Evidence Study⁸² considered the Midhurst, Petworth and Liss centres. It concluded that there was capacity for up to 1,200 sqm net of new convenience goods floorspace in the Midhurst/Petworth area within the plan period. This would equate to a single store of approximately 2,500 sqm gross or two smaller food stores. Although the development of a main food store within the Midhurst/Petworth area would be highly desirable, there have been no deliverable sites identified at this point in time. Therefore the Local Plan identifies a town centre boundary for Midhurst which is sufficiently broad to facilitate this type of development within the town centre should market forces become more favourable later in the plan period. This includes the inclusion of land next to The Grange within the Midhurst town centre, which may have potential for a new medium sized supermarket development. A similar approach is taken to the boundary of Petworth Town Centre in the Petworth NDP.

7.165 In terms of comparison goods, the assessment shows that there is capacity for between 2,700 and 4,300 sqm net of new floorspace in the plan period in the Midhurst/Petworth area. However, meeting this capacity would require building a development tantamount to a small retail park, which is inappropriate within a National Park.

⁸² Retail Evidence Study (Nexus Planning, 2016)

7.166 The potential for town centre floorspace development is highly constrained, with all centres containing significant numbers of listed buildings and an already tightly packed street scene. There are few areas of derelict land of any significant size, nor are there opportunities for larger-scale redevelopment, with the exception of land at North Street Quarter and adjacent Eastgate area in Lewes. Suitable edge-of-centre or out-of-centre opportunities are not currently available. Proposals for large-scale out of centre retail parks/supermarkets would not be appropriate in the context of a National Park.

Strategic Policy SD36: Town and Village Centres

1. Development proposals for town centre development will be permitted where they promote or protect the following hierarchy of identified centres as defined on the Policies Map:
 - a) Market Town Centres: Petersfield, Midhurst, Petworth and Lewes
 - b) Larger Village Centre: Liss
 - c) Smaller Village Centres: Alfriston, Ditchling, Fernhurst and Findon

7.167 The purpose of this strategic policy is to identify a hierarchy of existing town and village centres across the National Park. This is based on evidence of the current state of the market town centres and village centres, their realistic role and function, and how they relate to those centres outside of the National Park. The establishment of a hierarchy of centres allows their relative positions to be monitored, and if a centre is in decline it enables strategies to be put in place to either rejuvenate or manage that decline positively. Policy SD37 sets the more detailed criteria against which development in these centres will be judged.

Development Management Policy SD37: Development in Town and Village Centres

1. Within the town and larger village centres as shown on the Policies Map, development proposals for main town centre uses, in particular those that promote or protect local markets and retailers linked to supply chains across the National Park will be permitted providing they do not harm the retail function of the centre, and are compatible with its scale and historic nature.
2. Within the defined primary shopping frontages as shown on the Policies Map, the loss of units in Use Class A will not be permitted.
3. Planning permission will be granted for retail uses and for non-retail main town centre uses within the secondary shopping frontage as shown on the Policies Map.
4. Development that supports the evening economy within the defined town and larger village centre, particularly for visitors/tourists, will be permitted provided the use would not result in adverse impacts on the amenity of residents and businesses.
5. Within the smaller village centres, development proposals for retail purposes will be permitted where they are compatible with its historic nature and of a scale appropriate to the community they sit within. Such development should be well related to any existing shops and services within the village unless it can be demonstrated that this is not feasible or practicable.
6. The loss of units in Use Class A that are fit for purpose will not be permitted within smaller village centres unless evidence of a marketing campaign of at least 24 months demonstrates that there is no market demand for the premises, and that its continued use for retail purposes is not viable. Details of marketing requirements are set out in Appendix 3.

7.168 The purpose of this policy is to recognise and support the vitality and viability of the retail function of the market town and village centres. It is important that all residents within the National Park have access to a range of essential services and facilities, where possible, and the smaller village centres have a vital role to play. Proposals that would result in the loss of these services and facilities will not be supported unless there is evidence of marketing

and that alternative uses have been sought in the first instance as set out in Appendix 3.

TOWNS AND LARGER VILLAGE CENTRES

7.169 The town centres of Lewes, Petersfield, Midhurst and Petworth, and the large village centre of Liss, provide a range of comparison and convenience goods, and community services and facilities, as described in the introduction to this chapter. These centres are therefore crucially important to meet the needs of communities across the National Park.

7.170 Non-retail town centre uses relate to a range of leisure, entertainment and sports uses as defined in the Glossary. Uses relating to the evening economy include pubs, bars, restaurants and late-opening cafes; where such uses are proposed, regard should be had to the amenity of existing neighbouring uses, including residents.

SMALLER VILLAGE CENTRES

7.171 There are a number of smaller village centres. These centres offer vital rural services and contain small collections of shops, but are not generally sufficient to meet the day-to-day needs of the community.

7.172 Communities preparing NDPs with small centres not identified in Policy SD36 are able to define boundaries and prepare policies for these areas in order to seek to meet the future needs if supported by evidence.

Development Management Policy SD38: Shops Outside Centres

1. Development proposals for small convenience stores will be permitted where they:
 - a) Have a net sales area less than 150m²; and
 - b) Are to meet the everyday shopping needs of the local community.
2. The loss of units in Use Class A that are fit for purpose will not be permitted unless evidence of a marketing campaign for at least 18 months demonstrates that there is no market demand for the premises, and that its continued use for retail purposes is not viable. Details of marketing requirements are set out in Appendix 3.
3. Development proposals for new farm shops or extensions to existing farm shops will be permitted provided that:
 - a) The scale and scope would not harm the retail offer in the immediate area. Such shops should aim to sell:
 - i. At least 40 per cent of goods that are own produce plus local foods;
 - ii. 40 per cent of goods that are regional; and
 - iii. 20 per cent are from elsewhere.
 - b) The proposal has re-used or replaced existing buildings, unless it is demonstrated that this is not feasible.

4. Development proposals for new garden centres, or extensions to existing garden centres, will be permitted where:
 - a) It is demonstrated that the primary use of the centre is, and will remain, the sale of plants and horticultural products;
 - b) The scale of operations is appropriate to the location;
 - c) It is demonstrated that the use proposed is directly related to the supply chain of local horticultural businesses; and
 - d) The proposal has re-used or replaced existing buildings, unless it is demonstrated that this is not feasible, in which case it should be related physically and functionally to existing buildings associated with the business.
5. A retail impact assessment will be required for retail development outside of the defined Market Town and Larger Village Centre boundaries but within the settlement policy boundaries, where the proposal exceeds the following thresholds for retail floorspace:
 - a) Market Town: 750 m²
 - b) Larger Village: 500 m²
6. A retail impact assessment will be required for retail development outside of Market Town and Larger Village settlement policy boundaries where the proposal exceeds 150m².
7. All retail development outside centres should consider and take opportunities to increase people's awareness, understanding and enjoyment of the special qualities of the National Park.

7.173 The purpose of this policy is to support the development and expansion of small-scale shops that meet day-to-day shopping needs. The National Park is home to many individual shops, which are sometimes run by the local community. Their development for alternative uses needs to be carefully considered in order not to put at risk an existing shop that might be the only service within a small village.

FARM SHOPS

7.174 Farm shops can support farm diversification, which in turn supports farm income. To be considered a farm shop, a premises should aim to sell fresh produce and/or local foods that are grown, picked, reared or produced on the farm or on land close to where the shop is located. However, the percentages given in the policy are a guideline and it is acknowledged that seasonal variation does occur. Whether the percentage is measured by volume or floor area will have to be considered on a case by case basis due to the varying nature of the goods sold. For the purposes of this policy local food is considered to be that which has come from no further than 30 miles away⁸³ and regional is considered to be that which has come from Hampshire, Surrey, West Sussex and East Sussex i.e. counties with land within or that abuts the National Park.

7.175 Wherever possible, development proposals for farm shops should utilise disused or obsolete agricultural buildings in accordance with Policy SD40 on Farm Diversification.

⁸³ CPRE definition of local food

GARDEN CENTRES

7.176 Diversification in relation to garden centres can help to even out the seasonal fluctuations and meet customer expectations. These types of retail can be of value to local communities and visitors alike, but can also lead to increases in traffic and activity in previously tranquil areas. In some cases they detract from the primary purpose of a garden centre, which is to sell plants and gardening related products, and become intrusive urbanisation in an otherwise rural landscape.

7.177 The expansion or diversification of a garden centre should be part of a long term strategy for the business. The preparation of a business plan or similar document identifying how the development supports the long term viability of the business and local horticultural suppliers, complies with the relevant parts of SD38 and justifies development outside of the settlement boundary will assist in the consideration of an application.

RETAIL IMPACT ASSESSMENTS

7.178 The purpose of this test is to assess whether the impact of a proposal for retail development outside the defined market town and village centres would

have an adverse impact on an existing retail centre. Due to the nature of the town and village centre, and the limited opportunities for retail development in these locations, any significant retail development outside of these centres is likely to divert trade from them. As a result, it is appropriate to set lower thresholds than the NPPF default position, as developments considerably smaller than those defined in the NPPF could have a substantial effect on the role and function of the centres. In addition, any assessment should also consider the impact on nearby essential rural services.

UNDERSTANDING AND ENJOYMENT OF THE NATIONAL PARK

7.179 In all retail development outside centres the Authority would encourage applicants to consider and take opportunities to increase people's awareness, understanding and enjoyment of the special qualities of the National Park. This might range from leaflet distribution to cycle hire or facilities for walkers and horse riders.

7H. AGRICULTURE AND FORESTRY

INTRODUCTION

7.180 This section of the Local Plan includes three development management policies on agriculture and forestry. Firstly, there is a policy on the construction of new agricultural and forestry buildings. The second policy is on farm diversification, which is intended to increase the long-term viability of farming and forestry in the National Park by enabling farmers and forest managers to set up additional income streams to their core business. The third policy is on the conversion of redundant agricultural buildings, which seeks to ensure that farmers can re-use redundant assets in a way that safeguards their agricultural character and contributes to the economic and social wellbeing of the National Park's communities.

7.181 Land used for agriculture and forestry covers most of the National Park, and is the most important provider of its ecosystem services. These range from the provisioning of food, biomass and other materials such as timber to the regulation of water and soil quality. It provides habitats for many of the National Park's most distinctive species, and the cultural benefits arising from the protection of beautiful and centuries old landscapes that attract visitors. This Local Plan aims to protect and enhance the delivery of multiple ecosystem services which arise from farmland and woodland, and the buildings associated with them, in line with Core Policy SD2: Ecosystem Services.

7.182 Agriculture and forestry are also a crucial part of the National Park's economy. The fourth special quality is an environment shaped by centuries of farming and embracing new enterprise. The existing agricultural buildings make an important contribution to this special quality, and any new development or conversion should conserve and where possible enhance the agricultural character of such buildings and their setting.

7.183 There are a wide range of permitted development rights available to farms, both for agricultural development and for the change of use of agricultural buildings, without the need for planning permission. There are

several differences between the permitted development rights in National Parks and those elsewhere. Most agricultural developments and changes of use which do come under the category of permitted development will still be required to go through the prior notification system.

★ Development Management Policy SD39: Agriculture and Forestry

1. Development proposals for new buildings or structures for the purposes of agriculture or forestry will be permitted where:
 - a) There is an agricultural or forestry need for the development within the National Park and its scale is commensurate with that need;
 - b) The development occupies the site best suited to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park. Wherever possible, development should re-use or be on the footprint of an existing agricultural building, otherwise it should be related physically and functionally to existing buildings associated with the enterprise, unless there are exceptional circumstances relating to agricultural or forestry necessity for a more isolated location;
 - c) The buildings are in keeping with local character and of a design that reflects the proposed agricultural or forestry use;
 - d) The proposals include structure planting to integrate the development into the existing local landscape framework;
 - e) A building has not been disposed of or converted to an alternative use at the holding in the past three years, which could have met the need of the development proposed; and
 - f) Existing redundant buildings within the application site which have a negative impact on landscape character are removed where appropriate.

2. Development proposals for new or improved access tracks for forestry or agriculture will be permitted where:
 - a) The proposal is essential for the sustainable management of the land;
 - b) It has been demonstrated that it is not feasible to accommodate the proposed traffic using existing accesses;
 - c) The layout and design conserves and enhances local landscape character and the special qualities; and
 - d) Where appropriate, the track is opened as a path for permissive public usage.

7.184 The purpose of this policy is to enable farm and forestry enterprises to grow in a way that conserves and enhances the special qualities of the National Park.

AGRICULTURAL OR FORESTRY NEED

7.185 The construction of new or extended buildings for agriculture and forestry must meet an identified operational need within the context of the National Park purposes and duty. As they will normally be outside settlement boundaries, they should be built at the minimum scale required to meet that need.

DESIGN, LOCATION AND LANDSCAPE

7.186 Appropriately sized and located agricultural and forestry buildings are part of the rural character of the National Park, and their generally functional and minimal design is related to their integral relationship with the management of the surrounding land. New agricultural and forestry development should follow the same principle, and not be disguised as any other type of development. The Authority may require a thorough analysis of reasonable alternative sites, in particular on larger projects, to ensure the optimal location is selected with regard to impact on the National Park's special qualities.

7.187 The use of the Historic England Farmstead Assessment Framework⁸⁴ is encouraged at the earliest possible stage to ensure changes are guided by evidence and minimise negative impacts. Once the best location is identified, the scale, massing and colour of agricultural buildings is particularly important. Different parts of the National Park also have different traditions in the design and layout of agricultural buildings. Advice should be sought from the Authority on these matters at an early stage in the design process.

REPLACEMENT BUILDINGS

7.188 Unnecessary proliferation of buildings in rural locations will be resisted. The loss of existing fit-for-purpose buildings that may be needed for future operations is discouraged, therefore new buildings to replace those recently disposed of will not normally be permitted. Exceptions may be made to this where the applicant can provide strong evidence that a need could not previously have been anticipated or planned for. Where the opportunity arises to enhance the landscape through appropriate replacement of a building, this must be taken.

FORESTRY DEVELOPMENT

7.189 Any forestry related development of buildings or structures within woodland should have particular reference to Policies SD9: Biodiversity and Geodiversity and SD11: Trees, Woodland and Hedgerows. Consideration should also be given to the protection of the mycology and health of forest soils, mitigating the negative effects of development, where possible.

TRACKS AND INFRASTRUCTURE

7.190 Proposals for new, or alterations to, agricultural and forest tracks and roads should be in keeping with the local geology and landscape character. Proposals should consider all relevant agricultural or forestry activity including turning circles at track junctions, timber stacking and loading areas and access to trunk roads. The design and layout of tracks should fit in with the pattern of existing contours and vegetation, and should deliver ecosystem

⁸⁴ Farmstead Assessment Framework (Historic England, 2015)

services by protecting and enhancing drainage patterns, protecting heritage assets (including archaeology) and incorporating features of biodiversity value wherever possible.

7.191 New access tracks should, wherever feasible and compatible with the needs of agriculture, forestry, landscape and biodiversity, provide a meaningful connection with the road and PRow network. These should be designated as permitted paths or PRow. Such designation may be secured through a planning condition or legal agreement.

EXCEPTIONAL USE OF REMOVAL CONDITION

7.192 In exceptional circumstances, it may be considered appropriate for reasons of supporting the National Park purposes to grant permission for an agricultural or forestry building which does not comply with one or more of the criteria in Policy SD39. In such circumstances a condition will be attached to the planning permission requiring the demolition of the relevant building should it fall out of use and remain so for a period of ten years or more.

Development Management Policy SD40: Farm and Forestry Diversification

1. Development proposals relating to farm and forestry diversification will be permitted where:
 - a) A diversification plan is submitted, which demonstrates that:
 - i. The proposed development(s) would contribute to the first purpose of the National Park by providing long-term benefit to the farming or forestry business as an agricultural/forestry operation;
 - ii. Diversification activities remain subsidiary to the agricultural or forestry operation, in terms of physical scale and environmental impact; and
 - iii. The proposed development does not cause severance or disruption to the agricultural holding.

and

- b) The development re-uses or replaces existing buildings where feasible. Where this is not feasible, the development should be related physically and functionally to existing buildings, be of an appropriate scale, and retain agricultural character; and
- c) Any outdoor storage is provided as a minor ancillary element of other uses.

7.193 The purpose of this policy is to support the long term viability of the National Park's farm and forestry enterprises, which contribute to the first purpose of the National Park by their land management activities. This will be achieved by facilitating farm diversification projects, which will also deliver multiple benefits for the National Park purposes and duty. The PMP states that farm diversification that supports the appropriate re-use of redundant or neglected traditional buildings presents a particular opportunity for delivering multiple benefits.

SUBSIDIARY NATURE

7.194 The principle aim of a diversification proposal should be to supplement the core agricultural or forestry operation and not to replace it. This need not mean that income from the diversified business be less than from the farm, but the diversified elements of the business should contribute a long-term sustainable income stream to the farm which allows the main business to withstand periods of sustained low returns. The Authority will therefore resist proposals which could harm the long-term viability of farm holdings, i.e. those proposals that lead to the piecemeal loss of assets from farms.

7.195 A diversification plan will show how the development proposal(s) will contribute to the viability of the agricultural/forestry operation over the long term. The preparation of this Plan should be proportionate to the scale of the diversification project.

7.196 The Authority may use a planning condition or legal agreement to ensure that the diversification proposal supports the viability of the agricultural/

forestry operation. The physical scale of the diversified business uses should not overwhelm that of the agricultural or forestry activities on the site or disrupt them. The cumulative impacts of diversification developments, including on traffic generation, will be taken into account in assessing applications against this criterion.

EXISTING AND NEW BUILDINGS

7.197 Farm diversification should make the best possible use of existing, appropriate buildings while supporting landscape character. In instances where no such buildings are available, the opportunities for new development will be far more limited.

7.198 If, in exceptional circumstances, new buildings are deemed necessary to support the agricultural or forestry operation, they should generally be in close proximity to existing buildings and respond to the context of an agricultural farmstead in accordance with Historic England's Farmstead Assessment Framework⁸⁵.

SPECIFIC USES

7.199 Examples of possible farm diversification may include:

- Farm shops selling local produce;
- Educational facilities directly related to the farm/countryside location;
- Leisure facilities promoting the quiet enjoyment and understanding of the special qualities, including increased access to the countryside;
- Tourist accommodation;
- Small-scale generation of electricity or heat from local renewable sources of energy, primarily for use on site or in the local area;
- Appropriately scaled processing facilities for the outputs of the unit or of other agriculture/forestry businesses in the local area; or
- Services to the agriculture or forestry sectors that contribute to the sustainable maintenance of the landscape of the National Park.

Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings

1. The conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries to an alternative use will be permitted where:
 - a) The location is sufficiently well related to existing infrastructure, amenities and services;
 - b) The existing vehicular access is suitable in landscape terms for the use proposed;
 - c) The original building is worthy of conversion with regard to its current character, scale and condition, without the need for substantial reconstruction, significant extensions or ancillary buildings;
 - d) Conversion will not result in the need for another agricultural or forestry building on the holding;
 - e) If the building proposed for conversion is not a traditional one, there are no redundant traditional buildings within the holding capable of being re-used in the first instance;
 - f) There is no adverse impact on the character of the building and its setting, in particular its agricultural/forestry character, and
 - g) The building is converted to the most appropriate viable use according to the following cascade:
 - i. Firstly, housing for essential agricultural or forestry workers, or succession housing for former agricultural or forestry workers
 - ii. Farm/forestry diversification for employment use
 - iii. Affordable housing
 - iv. Farm/forestry diversification for visitor accommodation or facilities
 - v. Open market housing

⁸⁵ Farmstead Assessment Framework (Historic England, 2015)

2. The conversion of redundant agricultural or forestry buildings outside of defined settlement boundaries identified as heritage assets will be permitted where:
 - a) Part 1 of this policy is complied with;
 - b) The optimal viable use is proposed to conserve and enhance the architectural and historic significance and setting of the heritage asset;
 - c) Essential utilities and other functional requirements do not harm significant internal or external fabric; and
 - d) Existing historic fabric and features of architectural or historic significance are retained and respected.

7.200 The purpose of the policy is to enable the conservation of agricultural or forestry buildings, some of which are heritage assets. This will in turn support the rural economy, tourism and local communities whilst protecting and enhancing the character of the countryside.

SUITABILITY OF AGRICULTURAL OR FORESTRY BUILDINGS FOR CONVERSION

7.201 Many but not all agricultural or forestry buildings will be suitable for conversion. Buildings which are generally not suitable for conversion include those in isolated locations, or with poor access arrangements; buildings which would require substantial reconstruction or structural works to accommodate the new use; buildings which are subject to a planning condition or condition of prior approval which requires their removal on cessation of agricultural use; or buildings which have a negative landscape impact only justified in a National Park setting by their agricultural or forestry usage.

FUTURE NEEDS

7.202 Conversion of agricultural or forestry buildings should not result in the need for another building on the holding. An assessment will be made as to what extent the building has been designed and used for agricultural purposes,

its age, how long it has been unused and the potential for it to be used for agriculture again in future.

NON-TRADITIONAL FARM BUILDINGS

7.203 The use of non-traditional farm buildings for alternative uses should only be considered after considering the conversion of traditional buildings on the holding, as these are likely to be more worthy of being retained. The removal of disused buildings that have a negative landscape impact will be encouraged.

DESIGN CONSIDERATIONS

7.204 Conversion should be achieved through minimal changes and retention of the existing structure and its characteristics. Small-scale localised rebuilding may be acceptable, but any significant rebuilding would be considered new-build rather than a conversion, which would instead be subject to Policy SD25 and other relevant Local Plan policies as applicable. It will be necessary to assess which features are original, and which are newer alterations, and which of these is worthy of being retained.

BIODIVERSITY

7.205 Given their location, low intensity of human use and other characteristics, redundant agricultural or forestry buildings have special potential to support protected species (in particular, bats and barn owls). Any proposal for conversion must therefore be accompanied by a protected species survey.

EXTENSIONS AND ANCILLARY BUILDINGS

7.206 Minor extensions as part of conversion may be acceptable only where they can safeguard the character of the main buildings and farmstead. Where unavoidable, they should be subordinate in scale and should not compromise the setting of the building or farmstead, and, where relevant and practical, relate to any lost traditional structures.

7.207 New ancillary buildings can detract from the agricultural character of farm buildings and adversely impact on surrounding views. Re-using existing ancillary structures is encouraged, and any new structures will be carefully scrutinised. Where relevant and practical, these should relate to any lost traditional structures.

SETTING

7.208 A sensitive conversion respects the relationship the buildings have with each other and with the surrounding landscape. It is the buildings in their setting and not just the buildings themselves which contribute to landscape character and to the special qualities of the National Park. Existing boundaries, spaces and routes around and within a farmstead are likely to be of value and should be respected from the start of the design process.

7.209 Where a farmstead is proposed for conversion, care must be taken in the subdivision of surrounding land, and the potential for introduction of accoutrements and paraphernalia. For example, new separate gardens can greatly affect the setting of the group by eroding the scale and proportion of the existing building. There is a risk that the subdivision of shared spaces can also create problems between the new use and any continuing agricultural use.

USE

7.210 When a farm or forestry building is converted, the use should reflect as closely as possible the cascade set out in the policy Part 1(g). The clear expectation is for such conversions to provide for essential agricultural or forestry workers' accommodation, or succession accommodation as defined below. If this is not viable or demonstrably unachievable, other uses may be considered in the order of preference shown. Where all other potential uses have been assessed sequentially and are shown to be unviable or unachievable, or in conflict with other policies in this Local Plan, the suitability of conversion to open market housing may be considered. Residential conversion is more likely than other uses to require a high degree of change and intervention to the detriment of agricultural character, and there are often conflicts with the potential desire for a more domestic character by occupiers

and the likelihood of outdoor paraphernalia, so conversion to open market housing is often likely to be inappropriate.

SUCCESSION HOUSING

7.211 Criterion 1 (g) i. of Policy SD41 identifies succession housing in the cascade of suitable uses for converted agricultural and forestry buildings. The dual purposes of succession housing are to firstly support new entrants into farming and forestry by releasing existing on-site housing for those new entrants. Secondly, it ensures that a former essential worker on the holding already occupying a tied dwelling can remain in tied accommodation. This facilitates the efficient handover of the business to the new essential worker(s). Succession housing and its occupants will need to meet all of the following criteria:

- The farm/forestry business is established and viable in accordance with Policy SD32;
- One or more of the former essential workers is currently living on-site; and
- One or more of the new essential workers will do substantially the same type and scale of work as the former essential worker.

7.212 Restrictive conditions and/or legal agreements will be applied to ensure that succession housing does not become a route to allowing open market housing.

HERITAGE ASSETS

7.213 Where a traditional agricultural or forestry building is considered a heritage asset, the optimal viable use should be sought to secure its future. This may include a mix of uses which are sympathetic to the historic fabric. Further information on optimal viable use is set out under Policy SD12: Historic Environment.

7I. INFRASTRUCTURE

INTRODUCTION

7.214 This section of the Local Plan includes three policies relating to infrastructure development. The first, a strategic policy, sets out an overarching approach for infrastructure development in the National Park. This is followed by two development management policies relating to new and existing community facilities, and telecommunications & utilities. Many types of infrastructure are also addressed by other Local Plan policies such as Policy SD19: Transport and Accessibility and Policy SD45: Green Infrastructure.

7.215 Infrastructure is the services and systems that communities need to function. It includes both 'grey' and 'green' infrastructure and is interlinked with multiple ecosystem services such as water flow and flood. The impact of new infrastructure and the expansion of existing infrastructure on the special qualities are a particular concern for the National Park Authority. Under Section 62 of the 1995 Environment Act there is a duty for all relevant bodies, including statutory infrastructure providers, to have regard to National Park purposes. As such, all infrastructure development proposals should reflect the nationally protected landscape, be appropriately designed and consider carefully the impact upon the natural beauty, wildlife and cultural heritage of the area.

7.216 Some infrastructure development proposals will be deemed to constitute major development by the National Park Authority. In line with national policy there is a presumption against major infrastructure development in the National Park and, as such, proposals will be subject to the tests set out in Policy SD3 of this Plan.

7.217 All proposals relating to strategic roads will be dealt with in accordance with the National Park Authority's Position Statement⁸⁶ on the

A27, or any successor guidance. This also applies to other major infrastructure proposals.

Strategic Policy SD42: Infrastructure

1. Development proposals for new, improved or supporting infrastructure will only be permitted where:
 - a) It represents the least environmentally harmful option reasonably available, also having regard to the operational requirements and technical limitations of the proposed infrastructure; and
 - b) The design minimises the impact on the natural beauty, wildlife and cultural heritage of the National Park and the general amenity of local communities.
2. Development proposals will only be permitted where appropriate, necessary and reasonable infrastructure investment has been secured either in the form of suitable on-site or off-site works, and/or financial contributions to mitigate its impact.
3. Infrastructure delivery should be integrated with development phasing to ensure timely provision. Financial contributions towards future infrastructure maintenance will, where necessary, be secured by means of a legal agreement.

7.218 The purpose of this policy is to support the development of appropriate new infrastructure, while seeking to conserve and enhance the National Park. It relates to all applications for infrastructure development within the National Park.

IMPACT ON THE NATIONAL PARK

7.219 All planning applications for new or improved infrastructure will need to provide evidence that the works proposed are the least environmentally harmful option. The preparation of this evidence should be proportionate to the impact of the development on the special qualities of the National Park.

⁸⁶ Position Statement on A27 Route Corridor (South Downs National Park Authority, 2014)

INFRASTRUCTURE INVESTMENT

7.220 New development should be adequately supported by existing infrastructure, or make sufficient provision for any new infrastructure that is required to make the development acceptable in planning terms. As such, the Authority will negotiate, where appropriate, a suitable package of supporting infrastructure to mitigate the impact of development to make it acceptable in planning terms. Necessary infrastructure will be secured through a suitable combination of planning obligations, for example, Section 106 Agreements, and tariffs, for example Community Infrastructure Levy (CIL), contributions.

7.221 A live document known as the Infrastructure Delivery Plan (IDP) sets out existing infrastructure deficiencies and what is required to support sustainable development in the plan period. Given the limited level and scale of development in the National Park, and that most of the local infrastructure is owned and/or managed by other local authorities or service providers, the National Park Authority will need to work with partners and review the IDP periodically to inform its position on the CIL. For example, the National Park Authority will publish an up-to-date list to clearly define what infrastructure is to be provided through either planning obligations or CIL (known as the 'Regulation 123 list').

PHASING

7.222 The final phasing, timing, funding and construction details of infrastructure is complex and should be worked up during pre-application discussions. Where appropriate, infrastructure will be co-ordinated and delivered in partnership with site promoters, public agencies, the relevant county council and other relevant authorities.

7.223 Infrastructure is often considered to be essential, and necessary to be delivered within the early phase of a development or prior to occupation. In these instances, the Authority will work closely with site promoters to source early funding or innovative means to enable delivery. In such circumstances, the Authority will require a proactive approach from site promoters and land owners.

7.224 Financial contributions may also be sought when future maintenance of infrastructure is required to ensure that the development proposal is acceptable in planning terms, and the body carrying out the maintenance would not be the developer.

Development Management Policy SD43: New and Existing Community Facilities

1. Development proposals for new and/or expanded community facility infrastructure will be permitted where:
 - a) They demonstrate a local need;
 - b) The scale of the proposed infrastructure is proportionate to the local area;
 - c) There has been prior local community engagement;
 - d) They are accessible and inclusive to the local communities they serve; and
 - e) Appropriate consideration has been given to the shared use, re-use and/or redevelopment of existing buildings in the host community.
2. Development proposals that would result in the loss of, or have an unacceptable adverse impact upon, an existing community facility, will not be permitted unless:
 - a) For commercially run community facilities, evidence is provided of a robust marketing campaign of at least 24 months that clearly demonstrates there is no market demand for the existing use or an equivalent community use; or
 - b) For community- or publicly-owned or managed facilities, it can be robustly demonstrated that there is a lack of need for the existing facility, or an equivalent community use; or
 - c) Alternative community facilities are provided that are accessible, inclusive and available, and of an equivalent or better quality to those lost, without causing unreasonable reduction or shortfall in the local service provision.

Details of the marketing requirements are set out in Appendix 3.

7.225 The purpose of this policy is to support new facilities and protect existing community facilities that serve the local communities of the National Park.

7.226 There is a wide range of community infrastructure facilities that are vital in maintaining the sustainability of both larger settlements and rural communities. Community infrastructure facilities enable essential public services to be provided as locally as possible and, as such, there is a presumption that they should be retained or replaced with proposals of at least an equivalent standard. Appropriately sized proposals, which would provide inclusive shared services through the joint use of facilities in accessible locations, will be supported in principle.

7.227 For the purposes of Policy SD43, community infrastructure facilities include:

- Cultural facilities
- Education
- Healthcare
- Libraries
- Public houses
- Recreational open space
- Sports pitches, pavilions and leisure centres
- Town and village halls

NEW COMMUNITY FACILITIES

7.228 It is important that local people are involved in decisions about their community facilities. All planning applications for new community facilities will need to provide evidence of a community engagement exercise to gauge the need for the current and proposed community uses. The preparation of this evidence should be proportionate to the scale of the development.

7.229 The Authority will not look favourably at development proposals for new community facilities located outside settlement boundaries that would replace more sustainably located community facilities within settlement boundaries.

EXISTING COMMUNITY FACILITIES

7.230 The Authority will safeguard all existing community facilities that are fit for purpose from development proposals for non-community uses. Where a development proposal could lead to the loss of a community facility or reduce its scope and/or viability, the Authority will expect applicants to provide very strong justification for this loss or diminishment. Policy SD43 particularly seeks to guard against short-termism, since loss is often irreversible.

7.231 Proposals for losing a community facility must not be based solely on the needs of the current owner/tenant or their chosen business model. Where the loss of a commercially run facility, such as a pub or village shop, is proposed, robust evidence of an appropriate marketing campaign of at least 24 months will be required to demonstrate that there is no market demand for the existing use. The loss of a community facility owned or managed by the community, or run as a non-commercial public service, should be supported by an assessment of local need. This should show that there is no longer a need for the facility, or that there is no opportunity for an equivalent use to move into the premises. Proposals to provide an alternative facility in line with Part 2(c) of the policy will also be considered.

ASSETS OF COMMUNITY VALUE

7.232 The National Park Authority encourages communities to register important community infrastructure facilities as 'Assets of Community Value' under the 2011 Localism Act. This could ensure an added layer of statutory protection against possible harmful losses of these facilities, and could offer communities the opportunity to formulate their own proposals to safeguard the future of that facility. However, the absence of an entry on the register will not be taken as meaning a facility does not have intrinsic value to the local community. Where the exercise of a permitted development right for a change of use could threaten a valued local community infrastructure facility, the Authority will consider whether an immediate Article 4 Direction should be made to protect the sustainability of local communities.

Development Management Policy SD44: Telecommunications and Utilities Infrastructure

1. Development proposals for new telecommunications and/or utilities infrastructure will be permitted where:
 - a) The identified need cannot be met using existing infrastructure or other appropriate structures;
 - b) They are of an appropriate design that would not have an adverse impact on the special qualities;
 - c) They make use of all available technologies and suitable mitigation designed to minimise the impact on the landscape and general amenity;
 - d) They minimise other relevant environmental impacts; and
 - e) They remove, reduce in prominence, or move underground related existing infrastructure, where feasible.
2. All new residential dwellings should be served by a superfast broadband connection, or an equivalent alternative technology, installed on an open access basis. All other non-residential buildings proposed to be regularly occupied must also be provided with this standard of connection when available, unless it can be demonstrated through consultation with relevant service providers that this would not be deliverable.

7.233 The purpose of Policy SD44 is to provide appropriate new telecommunications and utilities infrastructure without harm to the special qualities. Telecommunications and other utilities infrastructure often constitutes development in its own right, and Policy SD44 relates to such development. Access to superfast broadband is an issue within the National Park, which currently has more 'not-spots' than 'hot spots' and as such the key sectors of farming, forestry and tourism are notably disadvantaged by slow and unreliable internet connections.

7.234 Telecommunications infrastructure includes development proposals related to the supply and management of broadband, mobile services and telephone land lines. Utility infrastructure includes development proposals

related to the supply and management of water, waste water, gas and electricity.

SITING, MITIGATION AND DESIGN

7.235 Telecommunications and utilities infrastructure development proposals should be supported by a suitable survey setting out the potential deployment options and justification for the selected option. Applications must also be accompanied by full details of all new landscaping, screening of any trees or vegetation to be retained on the site, and also of associated developments, including access roads and other ancillary buildings to service the development, and their likely impact upon the environment. All cabling should be undergrounded. New development proposals should make maximum possible use of technologies with lower landscape impact, before technologies with greater landscape impact are considered.

7.236 Proponents of new telecommunications masts must demonstrate that they have exhausted all the opportunities for use of existing masts and other structures. This should include, where appropriate, siting apparatus on buildings, where this means that the impact of the use of a roof for telecommunications infrastructure would not be as detrimental in landscape terms as the erection of a new mast.

7.237 The visual impact of telecommunications infrastructure will generally be lower when it can be located in close proximity to existing buildings, where this would not damage the setting of buildings that contribute to the special qualities.

MITIGATING IMPACTS OF EXISTING INFRASTRUCTURE

7.238 Before the establishment of the National Park, infrastructure, in particular telecommunications masts and electricity pylons, were erected that have a negative impact on the landscape. Opportunities will sometimes arise from proposals for new telecommunications or utilities development to mitigate these impacts. Examples of how new development may achieve this include removal or undergrounding of such facilities, screening with appropriate

landscaping in compliance with Policy SD4 (Landscape Character), or replacing them with facilities that are less prominent or otherwise have a less negative impact. Policy SD44 requires that such opportunities should be taken. Undergrounding and/or landscape screening will be supported provided that this is compatible with relevant policies, for example biodiversity and archaeology.

IMPROVING TELECOMMUNICATIONS THROUGH NEW DEVELOPMENT

7.239 Given the critical importance of internet access to communities in the National Park, all new residential dwellings, irrespective of their location, should be provided with suitable superfast broadband connectivity as an essential utility. Non-residential buildings, particularly those for commercial or community use, should also have superfast broadband connectivity unless it can be clearly demonstrated that this is not viable. If technological advancements are made within the plan period, all relevant proposals should provide suitable up-to-date alternatives. The broadband connectivity will be secured through suitable planning conditions and/or obligations.

7J. GREEN INFRASTRUCTURE

INTRODUCTION

7.240 This sub-section includes policies related to GI provision. It includes one strategic policy providing the overarching requirements for GI (Policy SD45). It also includes two development management policies on specific requirements for open space, sports and recreation facilities or other amenity space and burial grounds (Policy SD46) and on Local Green Space designation (Policy SD47).

7.241 GI is the multifunctional network of natural and semi natural features, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. GI is a vital tool for the delivery of ecosystem services benefits, for resilience to climate change, and for health and wellbeing. The National Park as a whole is a nationally significant GI asset through its role as the green heart of the South East, and its GI network is recognised to extend beyond its boundaries. Accordingly, GI is identified as one of the six key strategic cross boundary issues (see Chapter 4 of the Local Plan).

7.242 The emerging South Downs Green Infrastructure Framework sets out a roadmap for GI planning for the National Park and the wider sub-region. It aims to “create, protect and enhance a connected network of multifunctional assets; which sustainably meet the needs of local communities and supports the special qualities of the South Downs; by achieving a consensus about the strategic principles for planning, delivery and management of green infrastructure”.

7.243 National Parks have traditionally been places for informal recreation and this is widely recognised in the National Parks Vision and Circular. As the local planning authority, the National Park Authority has an additional responsibility to plan for the provision of formal sports and recreational facilities for the health and wellbeing of its population. Such provision needs to

be based on robust and up-to-date assessments of the needs for facilities and opportunities for new provision.

7.244 The NPPF introduces the concept of Local Green Space designation as a way to provide special protection for green areas that are demonstrably special and holds a particular local significance for local communities. The designation would rule out development other than in very special circumstances. The Local Plan designates and protects Local Green Spaces which were nominated by local communities.

Strategic Policy SD45: Green Infrastructure

1. Development proposals will be permitted where they demonstrate that they:
 - a) Maintain or enhance GI assets, GI links and the overall GI network; and
 - b) Provide new GI, or improvements to existing green assets and green linkages, which are integrated into the development design, that meets the needs of communities both within and beyond the site's boundaries.
2. GI proposals must contribute to multifunctional landscapes which:
 - a) Strengthen connectivity and resilience of ecological networks;
 - b) Incorporate GI measures that are appropriate to the type and context of the development proposal as part of an overall landscape design;
 - c) Maximise opportunities to mitigate, adapt and improve resilience to climate change;
 - d) Maximise opportunities for cycling and walking, including multi user routes and, where possible, facilitate circular routes; and
 - e) Support health and wellbeing and improve opportunities for understanding and enjoyment of the National Park and its special qualities.
3. Development proposals that will harm the GI network must incorporate measures that sufficiently mitigate or offset their effects.
4. Where appropriate, the Authority will seek to secure via planning condition or legal agreement provision for the future management and/or maintenance of GI.

7.245 The purpose of this policy is to promote the provision of new GI whilst protecting existing assets and the integrity of the GI network as a whole. This network extends well beyond the boundaries of the National Park.

ENHANCING EXISTING AND PROVISION OF NEW GREEN INFRASTRUCTURE

7.246 Both GI assets and the GI network as a whole are important considerations in determining planning applications. GI assets in this context may relate to a wide range of natural or semi-natural features. For example,

a development may undermine the viability of a larger habitat through fragmentation.

7.247 New development should be designed in a way that enhances GI and avoids harm. The National Park Authority will seek contributions as appropriate for the future management and maintenance of the new infrastructure.

7.248 Improvements to existing or provision of new infrastructure should be an integral part of the design of development proposals, and should be landscape led, planned around existing GI assets, and should be multifunctional. Opportunities should be identified and taken for improving and creating new connections between habitats.

7.249 It is acknowledged that GI assets serve not only residents within the immediate locale, but also the wider community both locally and further afield. Wherever possible both new and enhanced GI will be planned to deliver benefits to as wide a cross-section of National Park users as possible.

MULTIFUNCTIONAL AND CONNECTED GREEN INFRASTRUCTURE

7.250 GI that is multifunctional and connected provides multiple benefits for people and wildlife. There are many ways in which GI can be multifunctional. In order to maximise opportunities for multifunctional GI, proposals must be informed by the context and address potential conflicts between users, for example between recreational uses and also between people and wildlife.

7.251 The multifunctional role of GI can strengthen climate change resilience through sustainable drainage and flood storage provision, and mitigate against climate change through carbon storage and providing sustainable transport options. Where appropriate, GI should be integrated into the built form of development proposals, for example, through green roofs and swales.

7.252 Green linkages can include green areas of land which connect habitat, green corridors which support movement of wildlife (for example, hedgerows), and PRoW. PRoW provide linkages between GI assets and also between villages and towns and can be multifunctional for the movement of

both people and wildlife. Where appropriate, proposals for PRow should take opportunities for multi user and inclusive access.

Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries

1. Residential development will be required to provide open space on site or within proximity to the site, in line with the National Park Authority's adopted standards as set out in Figure 7.6, or their replacements. Development proposals for open space should demonstrate how they:
 - a) Are of a type determined by the scale and type of development and the needs of the area;
 - b) Are of high quality design which reflects the landscape character and setting;
 - c) Are safe and accessible for all members of the community; and
 - d) Include provision for the long-term management and maintenance of any recreation or open space facilities provided.
2. Development proposals for new buildings that provide local sport and recreational facilities should be located within settlement boundaries as defined on the Policies Map. Outside of settlement boundaries new buildings for local sport and recreational facilities will be limited to those ancillary to and essential for the use of the land for outdoor sport and recreation. Robust evidence of a sequential search for sites and the ancillary nature of the building will need to be provided and agreed with the Authority. Development proposals for new or improved playing surfaces should be located within or close to settlement boundaries as defined on the Policies Map.
3. Development proposals will be refused where they would result in the loss of open space unless provision of equal or better quantity, quality and accessibility is made in close proximity to the existing open space. Robust evidence must be provided to demonstrate the following:
 - a) Alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need;

- b) It has been demonstrated that the land cannot reasonably be converted to another form of open space provision for which there is an identified deficit; and
 - c) The development will provide alternative, sports, recreation or open space facilities, the need for which clearly outweighs the loss of the open space.
4. Development proposals for new cemeteries and burial grounds will be permitted where they are:
 - a) Appropriately sited with regard to impact on local amenity;
 - b) Designed to make the most of opportunities to improve and/or create new biodiversity, habitats and GI; and
 - c) Will have no adverse impact on groundwater and surface water.

7.253 The purpose of Policy SD46 is to ensure provision is made for open space, sports and recreational facilities commensurate with assessed need and protects existing facilities that are valued by the communities they serve.

ADOPTED OPEN SPACE STANDARDS

7.254 The National Park Authority, as the local planning authority, works with the twelve local authorities that are responsible for the delivery of sports and recreation facilities within their district, borough or city both in and outside of the National Park. The South Downs National Park Open Space, Sports and Recreation - Evidence Study⁸⁷ reviewed the open space standards in operation throughout the National Park. The standards set out in Figure 7.6 are taken from this report and represents the standards that the National Park Authority will adopt. These are based on standards set out in adopted Local Plans or in local needs-based evidence. Residential development proposals will be required to provide open space on site or within a set proximity in accordance with the appropriate standard in Figure 7.6 or any updated standards adopted in the course of the plan period.

⁸⁷ South Downs National Park Open Space, Sports and Recreation – Evidence Study (South Downs National Park Authority, 2014)

FIGURE 7.6: STANDARDS FOR OPEN SPACE, SPORTS AND RECREATIONAL FACILITIES FOR THE NATIONAL PARK BY LOCAL AUTHORITY AREA

Local Authority	Amenity greenspace		Parks and gardens		Outdoor sports		Children/teen play	
	ha per 1000 ^{†88}	Prox. within ^{*89}	ha per 1000 [†]	Prox. within [*]	ha per 1000 [†]	Prox. within [*]	ha per 1000 [†]	Prox. within [*]
Adur	0.72	400m	0.22	1200m	-	-	0.04	1200m
Worthing	0.78	400m	0.20	1200m	-	-	0.05	1200m
Arun	0.82	400m	0.02	1200m	-	-	0.06	1200m
Brighton & Hove	0.582	480m	0.92	720m	0.47	960m	0.055	720m
Chichester	0.50	480m	1.60	600m	1.60	600m	0.15	480m/ 600m
East Hants	1.0	700m	1.0	650m	0.5	650m	0.25	480m/ 650m
Lewes	-	-	-	-	1.7	-	0.7	-
Horsham	1.7	-	-	-	-	-	0.5	-
Eastbourne	0.6	1200m	0.75	1000m	1.5	1200m	0.1	800m
Mid Sussex	-	-	-	-	1.6-1.8	-	0.6-0.8	400m – 1000m
Wealden	1.0	600m	1.4	600m	-	-	0.03/0.02	480m/600m
Winchester	0.8	700m	0.75	650m	0.75	650m	0.5	480/650m

⁸⁸ † hectares per 1,000 of population

⁸⁹ * The accessibility standards provide the maximum distance a person would normally walk from their home and/or work to get to the respective type of open space. They help to show open space catchment areas and thus help in the assessment of locational deficiencies. They also help in the assessment of open space priorities when considering development proposals

7.255 The requirements set out in Figure 7.8 will apply to all qualifying developments that meet the threshold set for respective district areas. The Authority will be alert to proposals that seek to artificially subdivide sites, in which cases the threshold will be applied to the combined sites' gross areas.

7.256 Provision should be calculated on a pro-rata basis proportionate to the gross site area, using a guideline population density of 60 people per hectare. All types of public open space should be provided on-site where reasonable and proportionate to do so. Open space may form part of the requirement to deliver sustainable drainage, if the space is useable and fit-for-purpose. Where insufficient space exists on site to meet local needs then off-site provision in the locality may be sought in line with Strategic Policy SD45: Green Infrastructure.

7.257 Private open space that is not available for public use will not be accepted in lieu of requirements for public open space provisions or contributions.

NEW BUILDINGS PROVIDING LOCAL SPORT AND RECREATIONAL FACILITIES

7.258 Pavilions and other buildings provide facilities for changing and taking refreshment at cricket and other sports grounds. These buildings should if possible be located within settlement boundaries as defined on the Policies Map. Development proposals to locate such buildings outside settlement boundaries need to provide evidence of a sequential approach to site selection. The search should focus first on sites within a settlement boundary. If buildings are to be located outside a settlement boundary evidence is also required that the building is both ancillary to and essential for the use of the land for outdoor sport and recreation. New or improved playing surfaces should also be located within or close to settlements. It is important that the impact of the new surface on the landscape is fully considered in line with Policy SD4: Landscape Character. Applications also need to comply with Policy SD43: New and Existing Community Facilities.

SAFEGUARDING

7.259 Criterion 3 of Policy SD46 safeguards against the loss of existing open space and associated sports and recreational facilities. This policy will apply not only to public facilities but also privately owned facilities such as school playing fields and sports clubs. The latter are equally important to national park purposes in terms of shaping the form, character, and appearance of settlements and their place in the wider landscape.

Cemeteries and burial grounds

7.260 Cemeteries and burial grounds are a much valued and sensitive type of GI asset. Development proposals should have due regard to the character of the surrounding area especially those relating to the special qualities and retain any existing landscape features such as hedges and trees. Any opportunities to improve and/or create new biodiversity, habitats and GI should also be taken. It will be necessary to demonstrate that the proposed cemetery will not have an adverse impact on ground or surface water.

Development Management Policy SD47: Local Green Spaces

The following green areas, as defined on the Policies Map, are designated and protected as Local Green Spaces, in line with the *NPPF*:

Brighton & Hove

- Green Ridge

Buriton

- The Links
- Buriton Recreation Ground
- Village Pond/War Memorial
- Sheep Dip and Pond Green
- Sumner Road Green Spaces

Cheriton

- Open space at Top of Freemands Yard Lane

Corhampton and Meonstoke

- Church Green, Meonstoke

Droxford

- Droxford Parish Green

East Chiltington

- Hollycroft Field

East Dean, East Sussex

- The Horsefield
- Went Way Allotments

East Worldham

- East Worldham Playground

Fulking

- North Town Field

Hambledon

- Speltham Down (1) and (2)
- The Glebe Land

- Midhurst

- South Pond and associated green space

- Half Moon Covert

- Carron Lane Recreation Area

- Holmbush Recreation Area

- St Margaret's development community garden

- Jubilee Path and associated green space

Poynings

- Poynings Playing Field

- Poynings Allotments

Selborne

- Burlands Field or Culverscroft

- Dowlings Little Mead and Church Meadow

- Selborne Recreation ground

Slindon

- Slindon Common Recreation Ground

- Top Playing Field

- Meadsway

- The Forge Field

- Jubilee Orchard

- The Allotments

- The Copse

Wannock, Polegate

- Wannock Coppice

7.261 The purpose of Policy SD47 is to designate Local Green Spaces, which have been promoted to the National Park Authority as demonstrably special to the local community. The methodology and the results of the Local Green Space assessment is set out in an evidence based study Local Green Spaces in the South Downs National Park⁹⁰. Many other Local Green Spaces have been designated in NDPs.

7.262 National policy sets out how Local Green Spaces are protected. Development proposals should not conflict with the reasons that the local green space has been demonstrated to be special to the local community, or prejudice its role as a Local Green Space.

⁹⁰ Local Green Spaces in the South Downs National Park, (South Downs National Park Authority, 2017)

7K. CLIMATE CHANGE

INTRODUCTION

7.263 This section of the Local Plan includes two strategic and two development management policies linked to the subject of climate change. These policies are SD48: Climate Change and Sustainable Use of Resources, SD49: Flood Risk Management, SD50: Sustainable Drainage Systems and SD51: Renewable Energy.

7.264 Mitigating against and adapting to climate change is an international and national priority. In response to anticipated long-term changes in our planet's average temperatures, weather and seasonal patterns and sea level rises, the UK has committed to reducing carbon dioxide emissions by 80 per cent of 1990 levels by 2050⁹¹. Currently, the built environment nationally is responsible for approximately 50 per cent of carbon dioxide emissions.

7.265 The Vision and Circular for English National Parks states that national parks should lead the way in adapting to and mitigating climate change. Development should therefore minimise the National Park's vulnerability to climate change through reducing and mitigating the factors which are causing it, and become more resilient by being able to adapt to its effects. The South Downs National Park Climate Change Adaptation Plan (CCAP)⁹² is the main evidence based study on climate change and states that the South Downs is

particularly vulnerable to the impacts of present and future climate change. It sets out a range of responses to the risks and opportunities from climate change, including flood and coastal erosion management, building ecological resilience to the impacts of climate change and effective water management.

7.266 Our use of resources is not sustainable, and the design and construction of new development with improved environmental performance is a critical part of delivering sustainable development. Even without climate change, there is still an imperative to promote development which meets the highest possible environmental design standards which minimises the use of finite resources.

7.267 The likelihood of flooding is predicted to increase as a result of climate change causing more extreme weather events, such as prolonged periods of intense rainfall. Reducing the National Park's vulnerability to the impacts of climate change, and particularly flooding to residential properties, is therefore a key objective of the Local Plan. The National Park's extensive chalk geology makes groundwater flooding a key issue with a number of areas at risk. A Strategic Flood Risk Assessment (SFRA)⁹³ has been undertaken for the National Park. Areas at risk of surface water flooding typically follow the main water courses and dry valleys in chalk downland areas.

7.268 The SFRA also identifies that groundwater influence on fluvial flooding is a problem along the Findon Valley and Rivers Itchen, Meon, Lavant, as well as some of the smaller tributaries. A Level 1 Update and a Level 2 SFRA has also been produced which assesses all allocated sites that are at risk from fluvial and tidal flooding; surface water flooding and groundwater flooding in both the Local Plan and the Lewes NDP⁹⁴. This study has helped

⁹¹ The Climate Change Act 2008 commits the UK to set a long-term binding framework to cut our emissions by at least 80 per cent by 2050 and by at least 35 per cent by 2020 against 1990 levels. It also places a duty on authorities to report to Government on the current and future predicted impacts of climate change on their organisation; proposals and policies for adapting to climate change; and an assessment of progress towards implementing the policies and proposals set out in previous reports. This is in the context of the national climate change risk assessment and adaptation programme that has been devised to address the Act's requirements

⁹² South Downs National Park Climate Change Adaptation Plan (South Downs National Park Authority, 2016)

⁹³ South Downs National Park Authority Water Cycle Study and SFRA Level 1 Scoping and Outline Report (Amec, 2015)

⁹⁴ South Downs National Park Authority Level 1 Update and Level 2 SFRA Report (Amec, 2017)

to facilitate the application of the Sequential and Exception Test, where necessary, the formulation of site specific flood risk management policies and recommendations on the suitability and design of Sustainable Drainage Systems (SuDS) for allocated sites.

7.269 SuDS can help to mitigate the risk of flooding. Development can lead to increased surface water run-off and as such all proposals should ensure that as a minimum there is no net increase in surface water run-off taking account of climate change. SuDS are designed to replicate, as closely as possible, the natural drainage from a site before development and treat run off to remove pollutants, reducing the impact on groundwater and receiving water courses. Therefore, development should incorporate mitigation techniques in its design such as permeable surfaces and SuDS. However, there are locations in which elements of SuDS are either unfeasible or inappropriate; for example, infiltration mechanisms may not be appropriate on floodplains, areas of high groundwater or in areas with known soil contamination. Similarly they will not be a feasible option in areas with impermeable soils.

7.270 The use of renewable energy rather than fossil fuels will help to reduce carbon emissions and thus reduce climate change. Renewable energy offers a more sustainable use of natural capital and therefore is an important ecosystem service. However, the landscape character of the National Park is a finite and precious resource that the National Park Authority is charged with conserving and enhancing. Development of renewable energy, therefore needs to be suitably constrained so as not to compromise the special qualities.

7.271 It should be noted that there are restrictions on designated landscapes including national parks, which mean that permitted development rights do not apply to solar photo voltaics and solar thermal technologies in the same way as non-designated areas⁹⁵. Similarly there are more specific restrictions that apply to the installation of renewable technologies in listed buildings or conservation areas. Potential applicants should seek guidance from the Authority on the nature of these restrictions.

⁹⁵ Part 40 of The Town and Country Planning (General Permitted Development) (Amendment) (England) order 2008

Strategic Policy SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.
2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013)⁹⁶ through the energy efficiency of the building and;
- ii. Water: Total mains consumption of no more than 110 litres per person per day⁹⁷.

Non-residential and Multi-residential⁹⁷:

- i. Major: Building Research Establishment Environmental Assessment Method (BREEAM) Excellent⁹⁸
3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.
4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

⁹⁶ This standard is equivalent to CO2 emissions allowed under Ene 1 of the former Code for Sustainable Homes Level 4

⁹⁷ The optional enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency', March 2015, pp.15 G2(3)

⁹⁸ Multi-Residential as defined by the Building Research Establishment (BRE). These developments can include: student halls of residence; key worker accommodation; care homes; sheltered housing; and other multi-residential buildings that have communal areas making up more than 10% of the total net internal floor area

⁹⁸ Major non-residential development is defined as Development over 1,000 sq/m; or development on a site of 0.5ha or more. Major residential is defined as Development of 10 houses or more; or development on a site of 0.5ha or more

7.272 The purpose of this policy is to encourage high standards of sustainable building design and construction in new and existing buildings, as an essential part of the National Park's response to the challenges of climate change.

7.273 The way in which buildings are designed, constructed, operated and decommissioned have significant impacts on the built and natural environment and require major resource inputs such as energy, water and materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce resource inputs and the National Park's carbon footprint, and also costs for developers and occupants. These aspects should be integral to development from the start, rather than improvements 'bolted on' at the end of this process, and should work alongside relevant elements of the Local Plan design policies. This applies equally to development which is allowed under Permitted Development Rights. Developers, other businesses and homeowners are encouraged to consider these aspects to achieve the highest possible environmental standards in their proposals.

SUSTAINABLE CONSTRUCTION AND TECHNOLOGIES

7.274 Applicants are strongly encouraged to consider what measures could be incorporated into their proposals. For example, it can be the case that the most sustainable building materials to use are those sourced locally.

7.275 The Authority will consider site constraints, technical restrictions, financial viability and the delivery of additional benefits to the National Park where requirements of the policy cannot be met. However, all development proposals should minimise the impact on landscape character, features of natural beauty, wildlife, cultural heritage and the general amenity of communities.

ON-SITE ENERGY

7.276 A Renewable and Low Carbon Energy Study (RLCES) was prepared as part of the evidence for the Local Plan¹⁰⁰. This has fed into the requirements set out in Policy SD48.

7.277 The BREEAM is a widely recognised, accredited, independent method for assessing environmental performance of non-residential buildings. Until superseded by nationally prescribed standards, the BREEAM standards for non-residential and multi-residential buildings by nationally recognised certification bodies may also be accepted.

RETROFITTING

7.278 The existing building stock also makes a large contribution to carbon emissions. Measures should be implemented which lower the environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.

MAJOR DEVELOPMENT⁹⁹

7.279 A detailed assessment of the energy demand and carbon dioxide emissions will be expected from all proposed major developments in order to ensure that climate change is fully addressed.

ON-SITE WATER USE

7.280 The EA has identified that all of South East England, including the National Park, is an area of serious water stress. It is therefore imperative that water resources are managed efficiently. Accordingly, all new homes in the National Park will be required to achieve total mains water consumption of no more than 110 litres per person per day. This target is equivalent to that proposed as an optional requirement of the Housing Standards Review which corresponds with Code Level 4 in relation to water efficiency. The Whole Plan and Affordable Housing Viability Assessment¹⁰⁰ sets out that viability analysis

⁹⁹ South Downs National Park Renewable and Low Carbon Energy Study – Main Report (AECOM, 2013) As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015

¹⁰⁰ South Downs Local Plan and Affordable Housing Viability Assessment (BNP Paribas, 2017)

factored in Code 4 as a minimum and as such this requirement will not impact residential development viability in the National Park.

Strategic Policy SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:
 - a) Steering development away from areas of flood risk as identified by the EA and the SFRA and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception Tests;
 - b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;
 - c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and
 - d) Ensuring that the integrity of coastal and river flood defences are not undermined.
2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).
3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.

7.281 The purpose of Policy SD49 is to reduce the National Park's vulnerability to flood risk and the impacts of flooding associated with climate change. The Authority will seek to manage flood risk through avoidance of risk wherever possible. The National Park Authority will work with others to implement relevant flood and coastal protection strategies and plans.

SEQUENTIAL AND EXCEPTION TESTS

7.282 Proposed development within a flood zone will be assessed using the sequential and exception tests in national policy. The sequential test aims to steer different types of new development away from areas with the highest risks of flooding, which includes considering reasonably available alternative sites where it is proposed in areas at highest risk of flooding.

7.283 The exception test is used to demonstrate whether flood risk to people and property will be managed satisfactorily, while allowing necessary development to be permitted in circumstances where suitable sites in areas with a lower risk of flooding are not available. It must be demonstrated that there are wider sustainability benefits which outweigh the flood risk, it will be safe for its lifetime, does not increase flood risk elsewhere and that any residual risk can be safely managed.

RISK OF FLOODING

7.284 Development proposals should not increase the risk of flooding elsewhere. A site-specific FRA is required for proposals of one hectare or greater in Flood Zone 1; all proposals for new development in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the EA); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding. If there is any potential for tidal or fluvial flood risk issues, advice from the EA should be sought before submitting an application. Advice from the Lead Local Flood Authority (LLFA), Local Authority and relevant water company should be sought on local sources of flooding.

7.285 Requirements for a site specific FRA are set out in Box 5.1 page 43 of the South Downs National Park Authority's Level 1 Update and Level 2 SFRA Report.

FLOOD PROTECTION, MITIGATION AND ADAPTATION

7.286 Flood risk management opportunities should be sought to reduce the overall level of flood risk in the application site and beyond. This can be achieved through suitable design, appropriate GI, the application of SuDS, off-site works and through safeguarding land for flood risk management.

7.287 The Authority, as appropriate, will secure ongoing maintenance and operation of approved flood mitigation and adaptation systems through planning obligations or suitable conditions.

7.288 Where surface water flooding is identified as a relevant issue for a development, a detailed assessment will need to be made on a site-by-site basis. The assessment should identify the suitable management and mitigation necessary to ensure that there is no increase in surface water run-off from the proposal on both the development site and elsewhere. Proposals incorporating SuDS should address Local Plan Policy SD50: Sustainable Drainage Systems.

7.289 Where development is proposed in areas of groundwater flooding risk, proposals must take account of any relevant existing plans or strategies, including those produced by the LLFAs¹⁰¹. For example, Hampshire County Council has prepared a Groundwater Management Plan, which includes specific flood risk management plans for the Finchdean, Hambledon, West Meon and Rowlands Castle areas.

7.290 Where coastal and/or tidal flood protection, mitigation and adaptation is proposed, proposals must take account of any relevant existing plans or strategies, including the SFRA, and engage constructively with relevant authorities at the pre-application stage.

¹⁰¹ In the National Park there are four (4) LLFAs – Hampshire County Council, West Sussex County Council, Brighton and Hove City Council and East Sussex County Council

WORKING WITH OTHERS

Development Management Policy SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.
2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must give priority to the use of suitable sustainable drainage systems where required by the LLFA.
3. SuDS, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.
4. Where SuDS are provided, arrangements must be put in place for their whole life management and maintenance.

* . Major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

7.291 There are a number of organisations involved in flooding matters, including the EA and the LLFAs, which the National Park will work with closely to reduce the risk of flooding through relevant strategies and plans. This includes Shoreline Management Plans (SMP)¹⁰², Flood Risk Management

¹⁰² SMPs are developed by Coastal Groups with members mainly from local councils and the EA. They identify the most sustainable approach to managing the flood and coastal erosion risks to the coastline in the short (0-20 years), medium (20 to 50) and long (50-100 years) terms

Plans (FRMP)¹⁰³, River Basin Management Plans (RBMP)¹⁰⁴, Surface Water Management Plans and Local Flood Risk Management Strategies.

7.292 The purpose of Policy SD50 is to reduce the National Park's vulnerability to surface water flooding through appropriate management and ensuring there is no net increase in surface water run-off from new development.

7.293 In considering a development that includes SuDS, the Authority will need to be satisfied that the proposed standards of operation are appropriate, taking into account the specific site and local area characteristics, and relevant national guidance such as the Technical Standards and Supporting Practice Guidance¹⁰⁵. Where infiltration is proposed, this should be supported by suitable evidence which demonstrates that annual high groundwater levels are below the base of infiltration. Development proposals for the construction and installation of deep borehole soakways should be accompanied by an adequate risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design. Further guidance on the appropriate design of SuDS can also be found in the SDNPA's Level 1 Update and Level 2 SFRA Report¹⁰⁶.

103 FRMPs have been published by the EA for all River Basin Districts in England to provide an overview of the risk of flooding from rivers, the sea, surface water groundwater and reservoirs, as well as measures and objectives for managing flood risk for the period 2015-2021. There are five catchments across the SDNP study area (Test and Itchen, East Hampshire, Arun and Western streams, Adur and Ouse and the Cuckmere and Pevensey Levels)

104 The RBMPs describe the river basin district, and the pressures that the water environment faces. It shows what this means for the current state of the water environment in the river basin district, and what actions will be taken to address the pressures in line with the requirements of the Water Framework Directive

105 Sustainable Drainage Systems: Non-statutory technical standards (DEFRA, 2015)

106 South Downs National Park Authority Level 1 Update and Level 2 SFRA Report (Amec, 2017)

7.294 When considering major development, as defined in the Town and Country Planning (Development Procedure) (England) Order 2015, the LPA will consult the LLFA. For other developments the LPA will seek advice from the LLFA on a site-by-site basis taking into account the site characteristics and type of development proposal. The LPA will also consult other relevant bodies, such as the EA, as appropriate.

PROVISION OF OPEN SPACE

7.295 Where appropriate, SuDS should be used as part of the linked GI network to provide multiple functions and benefits to landscape quality, recreation and biodiversity. This can be achieved through habitat creation, new open spaces and good design. SuDS should be designed to help cope with intense rainfall events and to overcome any deterioration in water quality status. In determining the suitability of SuDS for individual development sites, developers should seek advice from the relevant LLFA.

WHOLE LIFE MANAGEMENT AND MAINTENANCE

7.296 Site promoters need to ensure that their design takes account of the construction, operation and maintenance requirements of both surface and sub-surface components. Suitable whole life management and maintenance will be secured through planning obligations and/or conditions.

Development Management Policy SD51: Renewable Energy

1. Development proposals for renewable energy schemes, except those specifically addressed in Criterion 2, that contribute towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park will be permitted where it is demonstrated through suitable site specific analysis that the proposal:
 - a) Makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
 - b) Ensures existing public access is not impeded; and
 - c) Does not result in the loss in use of Grades 1, 2 or 3a agricultural land.
2. Development proposals for small-scale individual wind turbines and freestanding solar arrays serving individual properties or small groups of properties will be permitted where:
 - a) They are suitably sited and screened and clearly associated with the buildings or properties that they are intended to serve;
 - b) They are appropriate in scale to the property being served; and
 - c) There is no unacceptable adverse impact on local amenity or conflict with public safety.

7.297 The purpose of Policy SD51 is to support the development of appropriate new renewable energy that will improve the quality of life for those living in, working in or visiting the National Park, while seeking to conserve and enhance the special qualities.

7.298 All renewable energy development proposals should address the criteria of Policy SD42: Infrastructure. Applicants should also note that major development is subject to Policy SD3: Major Development. Impacts on landscape, cultural heritage, wildlife habitats, tranquillity, access and recreation, air and water quality and highways should be considered against the relevant policies in this Local Plan.

7.299 In addition, when considering the appropriateness of local schemes potential applicants are referred to the SDILCA¹⁰⁷ and to the Viewshed Characterisation Study¹⁰⁸. In view of the sensitivity of the landscape to renewable energy schemes, potential applicants are advised to consult the Authority at the earliest opportunity when considering schemes.

7.300 A Renewable Energy & Low Carbon Study¹⁰⁹ was prepared as part of the evidence for the Local Plan. The Study sets out some of the key issues in assessing the appropriateness of the following different technologies within the National Park, which are reflected in Policy SD51.

WIND ENERGY

7.301 The majority of the South Downs National Park has sufficient average annual wind speed for commercial scale wind energy generation. Large scale wind presents by far the greatest opportunity for renewable energy generation in the Local Plan area. However, such schemes are unlikely to be granted planning permission in this nationally protected landscape as this would be contrary to the first purpose of the National Park and numerous Local Plan policies. There are likely to be additional ecological and historic constraints, such as bat fly lines and the setting of conservation areas, which may also exclude deployment of wind energy technologies.

7.302 Small scale wind turbines are defined as having capacity of less than 100 kW and typically comprise single turbines. It may be appropriate in some areas of the National Park for individual small scale wind turbines to come forward. These should be similar in scale to existing buildings and trees, set against a backdrop or suitably screened, in an appropriate colour, and be assimilated into the landscape.

¹⁰⁷ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

¹⁰⁸ South Downs National Park: View Characterisation and Analysis (LUC, 2015)

¹⁰⁹ South Downs National Park Renewable and Low Carbon Energy Study (AECOM, 2013)

7.303 The potential for exploiting the wind resource in the National Park from small scale wind turbines is limited by the need to ensure that small-scale wind turbines do not detract from the statutory purposes to conserve the natural beauty, wildlife and cultural heritage of the National Park. Some landscapes, such as heath and downland, including in coastal locations, are particularly sensitive to intrusive development from vertical structures due to their open vistas and wild character.

7.304 In order to judge whether the potential impacts of a small scale wind turbine proposal are likely to be acceptable, applicants should consider the impacts of the wind turbine along with any required infrastructure, such as road access, on site-tracks, turbine foundations, hard standings, anemometer masts, a construction compound, electrical cabling and an electrical sub-station and control building. Applications should include any necessary supporting information regarding the assessment of impacts on landscape, wildlife, cultural heritage and other resources.

SOLAR ENERGY

7.305 Proposals for multiple ground-mounted solar arrays – or ‘solar farms’ that are sited in isolation away from existing built forms are likely to have significant impacts on landscape character and visual amenity, and are unlikely to be appropriate within the National Park.

7.306 Small-scale freestanding solar arrays that are well screened in enclosed gardens or closely linked to existing buildings with no or minimal visual impact may be acceptable. There may also be some circumstances where ground mounted solar arrays to serve groups of properties, community buildings, such as village halls, agricultural properties or other businesses are acceptable, where these are well screened within existing building complexes or by other landscape features such as hedgerows, walls or trees, and do not detract from any architectural or historic interest. However, freestanding arrays should be sensitively sited to avoid impacts on wildlife and land of high ecological interest.

HYDROPOWER

7.307 The Renewable Energy & Low Carbon Study confirms that significant hydropower development is not envisaged for the National Park. Notwithstanding this, advice on environmental protection for new hydropower schemes has been published by the **Environment Agency**¹¹⁰.

BIOMASS

7.308 The Study highlights the opportunities from biomass due to the availability of woodfuel and other crops within the National Park. The Study recommends that the development of the biomass/woodfuel market should be supported in principle. Forestry is one of the key sectors of the National Park’s economy.

HEAT NETWORKS & COMBINED HEAT AND POWER

7.309 The Study identifies that only larger settlements such as Lewes and Petersfield are suitable propositions for combined heat and power schemes.

GEOTHERMAL

7.310 Outside the Study, the former Department for Energy and Climate Change (DECC) assessed the potential for deep geothermal power generation in the UK. The South Downs National Park was not identified in the DECC Assessment as having potential for geothermal energy use.

¹¹⁰ www.gov.uk/guidance/new-hydropower-scheme-apply-to-build-one

7L. ADVERTISEMENTS & SHOP FRONTS

INTRODUCTION

7.311 This section includes two policies. The first relates to shop fronts both within and outside identified town and village centres. The second policy relates to adverts.

7.312 Shop fronts can make a significant contribution to the character of town and village centres particularly where they incorporate traditional features.

7.313 Adverts like shop fronts have an important role to play in making people aware of a business. By their very nature, permanent and temporary adverts are conspicuous and prominently displayed. Individually and cumulatively, they can affect the character and appearance of buildings, settlements, the landscape and views. Illuminated advertisements can also affect the tranquillity of an area at night. Because of the volume of traffic, the most prevalent areas for adverts are on the A roads, such as the A27 and A272, and the main roads which link them. Temporary adverts for events are also a regular occurrence throughout the National Park.

Development Management Policy SD52: Shop Fronts

1. Development proposals for new, or changes to, existing shop fronts will be permitted where they:
 - a) Relate well to the building in which they are situated, giving regard to upper floors, in terms of scale, proportion, vertical alignment, architectural style and materials;
 - b) Retain and restore where possible significant historic features of any original shop front;
 - c) Are based upon a traditional approach to shop front design;
 - d) Take account of good architectural features of neighbouring shop fronts so that the development will fit in well with the street scene particularly if located within a conservation area or on a listed building; and
 - e) Use materials which respect the street scene.
2. If a single shop front is to be created by joining two or more units, it should reflect and show the original divisions that existed, particularly in the case of historic properties.
3. There will be a presumption against internally illuminated signage/logos as well as solid shutters or any other feature which obscures window displays, unless this is a traditional feature of a historic premises.
4. External lighting is only normally appropriate for businesses operating in the evening. If it can not be avoided, it should be kept to a minimum, be discreetly positioned and incorporated into the design.

7.314 The purpose of this policy is to ensure that shop fronts contribute to the generally traditional character of the town and village centres, are considered as part of the whole building, and are sympathetic with neighbouring buildings. Particular attention should be paid to materials, style, proportion and size of windows and fascias. Traditional shop fronts incorporate a number of components including vertical glazing bars, recessed entrance doors, stall risers, fascias and pilasters topped with sometimes decorative corbels. Colours, too, are important both for the shop front itself and for any lettering. In many situations, a corporate company style may have to be modified, especially if a brightly coloured and/or internally illuminated signage/logos are proposed.

7.315 Traditional blinds/canopies will normally be canvas or other natural material, of retractable roller or fan type. The use of solid shutters, which can create unattractive street frontages, will not be supported unless it is a traditional feature of the property or in exceptional circumstances where evidence supported by the police has shown that security poses a particular problem.

Development Management Policy SD53: Advertisements

1. Advertisement consent will be granted where:
 - a) The location, size, scale, proportions, design and materials of the advert respects the character and appearance of the host building (including any historic significance), site and area;
 - b) The number of adverts is kept to a minimum to ensure that there is no harmful cumulative impact on the host building and/or the amenity of the area; and
 - c) There is no harmful impact to public safety.
2. There will be a presumption against internally illuminated advertisements.
3. Externally lit advertisements are normally only appropriate for businesses operating in the evening. If it cannot be avoided, they should be kept to a minimum, be discreetly positioned and incorporated into the design of the building.

7.316 The purpose of this policy is to ensure that advertisements do not adversely detract from the location in which they are placed. This policy relates to outdoor advertisements and excludes road traffic signage, which is covered by separate legislation. Depending on a number of factors including location, overall size, height, content and lettering, some advertisements do not require the submission of an application. This is subject to criteria within the Advertisement Regulations and is referred to as a deemed consent.

7.317 Some areas within the National Park are identified as areas of special advertisement control, where stricter limitations are applicable. It is therefore recommended that advice is sought from the Authority before erecting an advertisement.

7.318 'A' boards may require advertisement consent. When business are not open to the public, 'A' boards should be stored away to prevent clutter.

7.319 Relevant conditions will be applied to consents, to ensure that the advertisement does not endanger the public or harm the character or appearance of the area.

7M. POLLUTION AND CONTAMINATION

INTRODUCTION

7.320 This section of the Local Plan includes two development management policies. The first policy on pollution and air quality deals with a wide range of pollutants. The second policy focuses on contaminated land.

7.321 The natural environment of the National Park provides many regulating ecosystem services, for example, vegetation cover helps to remove vehicle emissions from the air. In general, air quality in the National Park is good. However, there are concerns about the levels of nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes Town Centre for nitrogen dioxide¹¹¹, mainly due to traffic emissions. Ground level concentrations of ozone have also frequently exceeded the UK air quality standards at Lodsworth where Chichester District Council measure this pollutant.

7.322 Contaminated land exists in pockets throughout the National Park, the sources of which include old petrol filling stations, land used for industrial processes involving hazardous substances, landfill sites and sewage works.

7.323 The purpose of the policy is to ensure that the National Park Authority, working with local authority partners and other relevant agencies, manages the impact of pollutants and in particular improves air quality throughout the National Park. In line with other policies in the Local Plan development proposals should promote opportunities for walking, cycling, public transport and congestion management to reduce traffic levels in areas of reduced air quality.

Development Management Policy SD54: Pollution and Air Quality

1. Development proposals will be permitted provided that levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation.
2. Development proposals that by virtue of their location, nature or scale could impact on an existing AQMA, as shown on the Policies Map, will be required to:
 - a) Have regard to any relevant Air Quality Action Plan (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP; and
 - b) Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.
3. Development proposals will be required to provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.
4. Development proposals will be permitted where they follow best practice methods to reduce levels of dust and other pollutants arising during a development from demolition through to completion.

7.324 The effects of air pollution can be felt far beyond the original source of the pollution and impact other areas. Therefore all proposals, not just those for development within or adjacent to AQMAs, need to consider the potential impact on air quality. This includes not just those matters covered by statutory legislation but also more general amenity issues such as dust and odour. For example, developments adjacent to existing wastewater treatment works or smaller wastewater facilities, such as pumping stations will only be permitted if the proposal demonstrates that there is adequate mitigation. Pollution takes

¹¹¹ Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached

many forms and the impact of litter resulting from a development such as a takeaway will be considered and management will be required.

7.325 Development proposals that may lead to a deterioration in air quality resulting in unacceptable effects on human health, the natural environment or local amenity, will require the submission of an air quality assessment. Where this effects internationally designated nature conservation sites an HRA will be required in line with Policy SD9: Biodiversity and Geodiversity. Should an air quality assessment or HRA be required it should address but is not restricted to:

- The existing background levels of air quality;
- The cumulative impact of development levels of air quality; and
- The feasibility of any measures of mitigation.

7.326 An AQAP has been produced for the Lewes Town Centre AQMA and includes a number of measures that aim to improve air quality. It is expected that developments within the vicinity will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development's potential negative impacts.

7.327 Applicants for development within or adjacent to an AQMA, be it inside or outside of the National Park, should discuss any requirements with the Authority at the earliest opportunity and certainly before a planning application is submitted. This will help to determine whether a proposed development could impact upon the AQMA and therefore require mitigation measures.

Development Management Policy SD55: Contaminated Land

1. Development proposals for sites with either known or suspected contamination or the potential to contaminate land either on site or in the vicinity, will require the submission of robust evidence regarding investigations and remedial measures sufficient to ensure that any unacceptable risk to human health or the health of the environment is removed prior to development proceeding.

7.328 The purpose of the policy is to ensure that when considering the development of land known or suspected of being contaminated, the principle is one of ensuring the land is "suitable for use". This requires that the owner, occupier or developer of a site should undertake those measures necessary to deal with any unacceptable risks to health or the environment, taking into account the intended use of the land. Consideration must be given to the potential impact on neighbouring developments, residents, the environment and the road network of any decontamination process. This includes groundwater which is a significant risk if decontamination is not carried out correctly.

7.329 It is for the owner or developer to determine the existence and extent of any contamination. The Authority will follow national guidance in regard to the need for pre-application investigation into contamination issues but such an assessment may include some or all of the following;

- A desk top study;
- Site investigation;
- Risk assessment,
- Remediation; and
- Post remediation certification of the work completed.

7.330 Where there is no evidence to the contrary, the possibility of contamination will be assumed when concerning applications in relation to land on or adjacent to previous industrial use or where proposed uses are considered that are particularly sensitive to contamination for example housing, schools, allotments, children's playing areas.

7.331 If there is only a suspicion of contamination or the contamination is slight, planning permission may be granted subject to conditions requiring site investigation and any necessary remedial measures.