

South Downs National Park Authority

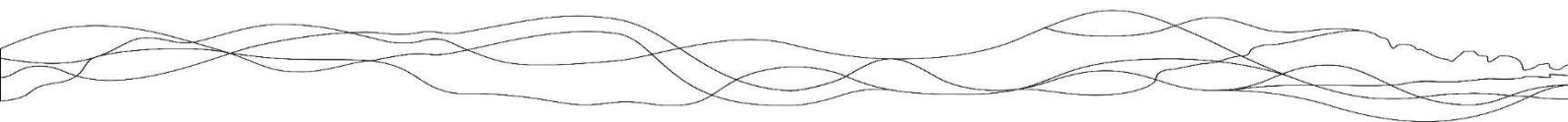
South Downs Local Plan

Submission Consultation Statement

ADDENDUM

Statement in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) (as amended) Regulations 2012

Dated 20 June 2018



Contents

	Page
Introduction – What is this addendum?	3
Erratum A – Overall number of representations made and number of comments by policy	4
Erratum B – Corrections to policy titles	10
Erratum C – revised summaries of issues:	11
• Introduction to the Local Plan	11
• Chapter 3 - Spatial Portrait and Spatial Strategy	11
• Policy SD1: Sustainable Development	12
• Policy SD3: Major Development	12
• Policy SD4: Landscape Character	12
• Policy SD6: Safeguarding Views	13
• Policy SD7: Relative Tranquillity	13
• Policy SD12: Historic Environment	13
• Policy SD19: Transport and Accessibility	13
• Policy SD25: Development Strategy	13
• Policy SD26: Supply of Homes	13
• Policy SD27: Mix of Homes	15
• Policy SD28: Affordable Homes	15
• Policy SD30: Replacement Dwellings	15
• Policy SD31 Extensions to Existing Dwellings	16
• Policy SD34: Sustaining the Local Economy	16
• Policy SD35: Employment Land	16
• Policy SD39: Agriculture and Forestry	17
• Policy SD40: Farm and Forestry Diversification	17
• Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings	17
• Policy SD72: Soldiers Field House, Findon	18
Erratum D – Summary of representations for Chapter 9 – Introduction (Sites and Settlements)	19
• General comments	19
• Revised summary for omission sites	21
Erratum E – Summary of representations for Habitat Regulations Assessment	28

Introduction – What is this document?

1. The South Downs Local Plan was submitted to the Secretary of State on 27 April 2018, and is now in its Examination phase. The Submission Local Plan was accompanied by a Consultation Statement, which met the requirements of Regulation 22 of the Town and Country Planning (Local Planning) (England) (as amended) Regulations 2012.
2. It has recently come to light that there were some minor errors and omission of content that should have been included in the Consultation Statement. These are addressed in the errata that follow in this addendum to the submission Consultation Statement.
3. **Any person considering the Consultation Statement produced at Local Plan submission should additionally refer to this addendum.**

Erratum A – Overall number of representations made and number of comments by policy

4. Following submission, it has come to light that a set of duly made representations submitted by The Goodwood Estate were not taken account of in the Consultation Statement. There were a total of 20 representations submitted by this respondent. Also, it was realised that a representation by Findon Parish Council concerning Policy SD72: Soldiers Field House, Findon had not been logged.
5. As a result, **the total number of representations has** changed. Therefore the relevant wording of paragraphs 27 and 31 of the original submission Consultation Statement should be amended as follows:

In response to the Pre-submission consultation, a total of ~~2,520~~ **2,541 individual representations** were made pursuant to regulation 20, by a total of ~~568~~ **569** organisations and individuals.

6. As a result of this, some additions have been made to the relevant ‘summaries of issues’. These are set out in Erratum C below.
7. In addition, it has also come to light that the number of comments cited against many of the summaries of issues for specific parts or policies of the Local Plan were not entirely accurate, albeit the figures were approximately correct. This is due to updates to the consultation database occurring following final drafting of the summaries of issues. The table below shows the correct number of comments for each summary, listed by policy. Only the policies or parts of the Plan that have had comments made against them are included in the table.

Summary of issues by Policy / part of Plan	Number of reps cited in submission Consultation Statement	Correct number of reps
Key Messages	23	23
Introduction	75	76
Vision and Objectives	27	27
Spatial Portrait & Spatial Strategy	34	35
Core Policies		
Introduction	8	8
Managing Development in the National Park		
Core Policy SD1: Sustainable Development	44	45
Ecosystem Services		
Core Policy SD2: Ecosystem Services	35	35
Major Development		
SD3: Major Development	41	42
A Thriving Living Landscape		
Introduction	2	2

Landscape		
Introduction	5	5
Strategic Policy SD4: Landscape Character	40	40
Strategic Policy SD5: Design	29	32
Strategic Policy SD6: Safeguarding Views	29	28
Strategic Policy SD7: Relative Tranquillity	33	35
Strategic Policy SD8: Dark Night Skies	39	36
Biodiversity		
Introduction	2	2
Strategic Policy SD9: Biodiversity and Geodiversity	41	35
Strategic Policy SD10: International Sites	18	19
Development Management Policy SD11: Trees, Woodland and Hedgerows	23	24
Historic Environment		
Introduction	4	4
Strategic Policy SD12: Historic Environment	29	30
Development Management Policy SD13: Listed Buildings	20	20
Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings	13	13
Development Management Policy SD15: Conservation Areas	16	16
Development Management Policy SD16: Archaeology	14	14
Water		
Introduction	2	2
Strategic Policy SD17: Protection of the Water Environment	35	35
Strategic Policy SD18: The Open Coast	15	15
People Connected to Places		
Introduction	1	1
Sustainable Transport		
Introduction	2	2
Strategic Policy SD19: Transport and Accessibility	46	44
Strategic Policy SD20: Walking, Cycling and Equestrian Routes	52	53
Development Management Policy SD21: Public Realm, Highway Design and Public Art	26	23
Development Management Policy SD22: Parking Provision	21	18
Understanding And Enjoyment Of The National Park		
Introduction	1	1
Strategic Policy SD23: Sustainable Tourism	43	43
Development Management Policy SD24: Equestrian Uses	12	12
Towards a Sustainable Future		
Introduction	5	5
Development		
Introduction	6	6
Strategic Policy SD25: Development Strategy	146	147
Homes (Strategic Policies)		
Introduction	4	4
Strategic Policy SD26: Supply of Homes	99	100

Strategic Policy SD27: Mix of homes	36	37
Affordable Homes		
Introduction		
Strategic Policy SD28: Affordable Homes	65	66
Strategic Policy SD29: Rural Exception Sites	27	27
Homes (Development Management Policies)		
Development Management Policy SD30: Replacement Dwellings	28	29
Development Management Policy SD31: Extensions to existing dwellings, and provision of annexes and outbuildings	23	24
Development Management Policy SD32: New Agricultural and Forestry Workers' Dwellings	57	56
Gypsies, Travellers And Travelling Show People		
Introduction		
Strategic Policy SD33: Gypsies and Travellers and Travelling Showpeople	21	21
Employment		
Introduction		
Strategic Policy SD34: Sustaining the Local Economy	26	27
Strategic Policy SD35: Employment Land	18	19
Town Centres and Retail		
Introduction	1	1
Strategic Policy SD36: Town and Village Centres	12	12
Development Management Policy SD37: Development in Town and Village Centres	12	12
Development Management Policy SD38: Shops outside Centres	9	9
Agriculture and Forestry		
Introduction	<i>(previously omitted)</i>	2
Development Management Policy SD39: Agriculture and Forestry	24	26
Development Management Policy SD40: Farm and Forestry Diversification	17	20
Development Management Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings	36	39
Infrastructure		
Strategic Policy SD42: Infrastructure	18	18
Development Management Policy SD43: New and Existing Community Facilities	17	18
Development Management Policy SD44: Telecommunications and Utilities Infrastructure	15	16
Green Infrastructure		
Strategic Policy SD45: Green Infrastructure	19	29
Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries	<i>(previously omitted)</i>	14
Development Management Policy SD47: Local Green Spaces	63	64
Climate Change		
Introduction	4	4
Strategic Policy SD48: Climate Change and Sustainable Use of Resources	24	24
Strategic Policy SD49: Flood Risk Management	11	11

Development Management Policy SD50: Sustainable Drainage Systems	12	12
Development Management Policy SD51: Renewable Energy	21	21
Advertisements and Signage		
Development Management Policy SD52: Shop Fronts	8	8
Development Management Policy SD53: Adverts	10	10
Pollution and Contamination		
Introduction		
Development Management Policy SD54: Pollution and Air Quality	16	16
Development Management Policy SD55: Contaminated Land	5	5
Strategic Sites		
Introduction	2	3
Strategic Site Policy SD56: Shoreham Cement Works	15	17
Strategic Site Policy SD57: North Street Quarter and adjacent Eastgate area, Lewes	9	10
Sites and Settlements		
Introduction (excluding those on specific sites or settlements and on omission sites)	<i>(previously omitted)</i>	24
Introduction (Omission sites)	<i>(previously omitted)</i>	32
Alfriston		
Allocation Policy SD58: Former Allotments, Alfriston	4	4
Allocation Policy SD59: Kings Ride, Alfriston	5	5
Binsted		
Allocation Policy SD60: Land at Clements Close, Binsted	4	4
Allocation Policy SD61: New Barn Stables, The Street, Binsted	1	1
Buriton		
Allocation Policy SD62: Land at Greenway Lane, Buriton	7	7
Cheriton / Hinton Marsh		
Allocation Policy SD63: Land South of the A272 at Hinton Marsh, Cheriton	7	8
Coldwaltham		
Allocation Policy SD64: Land South of London Road, Coldwaltham	60	60
Corhampton		
Allocation Policy SD65: Land East of Warnford Road, Corhampton	2	2
Droxford		
SD66: Land at Park Lane, Droxford	10	10
Easebourne		
Allocation Policy SD67: Cowdray Works Yard, Easebourne	10	10
Allocation Policy SD68: Land at Egmont Road, Easebourne	10	10
Allocation Policy SD69: Former Easebourne School, Easebourne	13	13
East Dean (East Sussex)		
Allocation Policy SD70: Land Behind the Fridays, East Dean (East Sussex)	2	2
Findon		
Allocation Policy SD71: Land at Elm Rise, Findon	8	8
Allocation Policy SD72: Soldiers Field House, Findon	6	7
Greatham		

Allocation Policy SD73: Land at Petersfield Road, Greatham	24	24
Allocation Policy SD74: Land at Fern Farm, Greatham	11	11
Hawkley		
Allocation Policy SD75: Half Acre, Hawkley	4	4
Itchen Abbas		
Allocation Policy SD76: Land at Itchen Abbas House, Itchen Abbas	9	9
Kingston Near Lewes		
Allocation Policy SD77: Castelmer Fruit Farm, Kingston near Lewes	15	15
Allocation Policy SD78: The Pump House, Kingston	10	10
Lewes		
Allocation Policy SD79: Land at Old Malling Farm, Lewes	12	13
Allocation Policy SD80 Malling Brooks, Lewes	3	4
Midhurst		
Strategic Allocation Policy SD81: West Sussex County Council Depot and former Brickworks site, Midhurst	15	15
Strategic Allocation Policy SD82: Holmbush Caravan Park, Midhurst	6	6
Allocation Policy SD83: Land at the Fairway, Midhurst	4	4
Allocation Policy SD84: Land at Lamberts Lane, Midhurst	7	7
Allocation Policy SD85: Land at Park Crescent, Midhurst	3	3
Offham (East Sussex)		
Allocations Policy Sd 86: Offham Barns, North Of Offham Filling Station, The Street, Offham	2	2
Pyecombe		
Allocation Policy SD87: Land at Church Lane, Pyecombe	2	2
Selborne		
Allocation Policy SD88: Land at Ketchers Field, Selborne	19	19
Sheet		
Allocation Policy SD89: Land at Pulens Lane, Sheet	78	78
South Harting		
Allocation Policy SD90: Land at Loppers Ash, South Harting	47	56
Allocation Policy SD91: Land North of the Forge, South Harting	28	29
Stedham		
Allocation Policy SD92: Stedham Sawmill, Stedham	15	15
Steep		
Allocation Policy SD93: Land South of Church Road, Steep	7	7
Stroud		
Allocation Policy SD94: Land at Ramsdean Road, Stroud	7	7
West Ashling		
Allocation Policy SD95: Land South of Heather Close, West Ashling	4	4
West Meon		
Allocation Policy SD96: Land at Long Priors, West Meon	15	15
Monitoring and Implementation Framework		
Introduction text	3	3
Appendix 2: Local Plan Policies Superseded by the South Downs Local Plan		
East Hampshire District Council - Saved Policies from Joint Core Strategy (2014)		

Content	1	1
Lewes District Council - Saved Policies from Lewes District Council Local Plan (2003)	2	2
Wealden District Council - Saved policies from Wealden District Local Plan (1998)	1	1
Winchester City Council - Saved policies from Winchester District Local Plan (2006)	1	1
Glossary	1	1
Supporting Documents		
Sustainability Appraisal	22	24
Habitats Regulations Assessment	<i>(previously omitted)</i>	11
Policy Map		47
Totals		2541

Erratum B – Corrections to policy titles

8. In the submission Consultation Statement, there were three ‘summaries of representations’ that were headed up with an incorrect policy reference. These are identified and corrected below.

Submission Consultation Statement page ref	Wording in title bar of Summary of Representation	Corrected wording (change <u>underlined</u>)
456	Policy SD 94 : Agriculture and Forestry	Policy SD <u>39</u> : Agriculture and Forestry
538	Policy SD 89 : Land at The Fairway, Midhurst	Policy SD <u>83</u> : Land at The Fairway, Midhurst
543	Policy SD 99 : Development Principles	Policy SD <u>88</u> : <u>Land at Ketchers Field, Selborne</u>

Erratum C – revised summaries of issues

9. As a result of the oversight explained under Erratum A above, a total of 21 ‘summaries of issues’ have needed to be supplemented, to ensure fairness to the representor whose comments were not initially taken account of in preparing the submission consultation statement. The following pages show the additional text to these summaries. As the previously published full summary is not reproduced here, this additional text should be read alongside the original submission Consultation Statement. For ease of cross-reference, the relevant page numbers from the submission Consultation Statement are cited for each summary erratum. The amended number of representations reflect both the addition of previously omitted comments, and updates to the consultation database occurring following final drafting of the summaries of issues.

Submission Consultation Statement page 350-352 - Erratum

Introduction

There were a total of ~~75~~ 76 representations on this section. A summary of the main issues raised is set out below.

Other organisations

- It is recognised that the plan’s objectives indicate a need to adapt and allow for ‘broadly compatible’ developments and businesses, but this is not spelt out through the plan, which is drafted to restrict inappropriate developments but does not go far to offer a positive planning framework for appropriate and sustainable development as envisaged by the NPPE. Inconsistent with national policy; fails to meet legal and procedural requirements; not positively prepared nor justified; will not be effective in sustaining land-owning estates. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 355-357 - Erratum

Chapter 3 – Spatial Portrait and Spatial Strategy

There were a total of ~~34~~ 35 representations on this section. A summary of the main issues raised is set out below.

Other organisations

- While the National Park must fulfil its purpose and protect its very special character, it must also meet the needs of its resident communities, now and into the future. There are sites that could have been additionally brought forward; the authority could be setting aside a considerable sustainable development potential without good reason and this must go to the heart of the soundness of the local plan. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 359-361 - Erratum

Policy SD1: Sustainable Development

There were a total of ~~44~~ 45 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- While the National Park has a duty to place a greater weight on considerations such as landscape protection, the Estate is concerned that the local plan as currently drafted could place too great a weight on this element in development decisions, to the detriment of economic and social interests. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 365 - Erratum

Policy SD3: Major Development

There were a total of ~~44~~ 42 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Core Policy SD3: Major Development is not compliant with Government guidance. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 369 - Erratum

Policy SD4: Landscape Character

There were a total of 40 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- The local plan should spell out the importance of local landed estates in the stewardship of the landscape, to the protection of environmental sensitivity, social well-being and economic sustainability. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 373 - Erratum

Policy SD6: Safeguarding Views

There were a total of ~~29~~ 28 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- The local plan should spell out the importance of local landed estates in the stewardship of the landscape, to the protection of environmental sensitivity, social well-being and economic sustainability. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 375 - Erratum

Policy SD7: Relative Tranquillity

There were a total of ~~33~~ 35 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Relative tranquillity to be applied equally to National Park boundary and buffer areas. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 387 - Erratum

Policy SD12: Historic Environment

There were a total of ~~29~~ 30 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Historic Environment to be applied equally to National Park boundary and buffer areas. In appropriate circumstances, small to medium size sites could be released where there is demonstration that the development is 'enabling development' for other estate-based projects that protect its building or landscape heritage, and thereby contribute positively to the National Park. Whole Estate Plans would be a means by which such development could be regulated. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement page 402 - Erratum

Policy SD19: Transport and Accessibility

There were a total of ~~46~~ 44 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Policy SD19 is a backward looking policy; should look to future changes in public movement and improving existing settlement locations to be more sustainable. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 419-424 - Erratum

Policy SD25: Development Strategy

There were a total of ~~146~~ 147 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- The list of settlements should not be finite and the policy applied flexibly to all settlements where appropriate development can be justified. Criteria 2 and 3 require refinement in respect of Whole Estate Plans. The local plan must place a greater emphasis on the individual merit of sites and proposals in line with NPPF advice. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 426-429 - Erratum

Policy SD26: Supply of Homes

There were a total of ~~99~~ 100 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- The Estate believes that while the principles behind development site selection may be reasonable, the manner in which this has been applied lacks rigour and therefore the soundness of the local plan must be in question. The Estate fears that the soundness of the local plan is potentially open to challenge, but it is in a position to assist the authority in providing a limited number of additional sites in response. The authority's preferred housing target is set unnecessarily low, in our view for political rather than sound planning reasons. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 430-431 - Erratum

Policy SD27: Mix of Homes

There were a total of ~~36~~ 37 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- The plan does not contain sufficient flexibility to accommodate localised changes or to respond to precise local or individual needs. It should contain policies that are more responsive to individual merit as promoted by the NPPF. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 432-435 - Erratum

Policy SD28: Affordable Homes

There were a total of ~~65~~ 66 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Reduced housing supply presents ‘easy pickings’ for housebuilders who will pay lip-service to sustainability, with locations and designs that place a high dependence on the individual car and with provision of a minimum of affordable housing for reasons of “viability”. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 438-439 - Erratum

Policy SD30: Replacement Dwellings

There were a total of ~~28~~ 29 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Provision should be made for policy exceptions in appropriate circumstances. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 440-441 - Erratum

Policy SD31: Extensions to existing dwellings

There were a total of ~~23~~ 24 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Provision should be made for policy exceptions in appropriate circumstances. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 448-449 - Erratum

Policy SD34: Sustaining the Local Economy

There were a total of ~~26~~ 27 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Should acknowledge that estates must be allowed to evolve as businesses and generate funds to reinvest in maintaining the National Park. The policy should contain sufficient flexibility to enable estates to plan and undertake appropriate developments with confidence, and recognise that a divergence from policy may be acceptable from time to time, where wider benefits to the National Park will arise. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 450-451 - Erratum

Policy SD35: Employment Land

There were a total of ~~18~~ 19 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Needs to reflect role and importance of landed estates. Should acknowledge that estates must be allowed to evolve as businesses and generate funds to reinvest in maintaining the National Park. The policy should contain sufficient flexibility to enable estates to plan and undertake appropriate developments with confidence, and recognise that a divergence from policy may be acceptable from time to time, where wider benefits to the National Park will arise. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 456-457 - Erratum

Policy ~~SD9~~SD39: Agriculture and Forestry

There were a total of ~~24~~ 26 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Some opportunities for appropriate re-use or redevelopment of agricultural buildings and land will be precluded by unduly restrictive local plan (one size fits all) policies, tightly drawn settlement boundaries and the introduction of Neighbourhood Plans, which have the sole purpose of precluding change. Formal Whole Estate Plans proposed by the authority, if included as part of the local plan, would be a means by which such development could be regulated. It could also set the justification and circumstances where exceptions to general restrictive policies would be permitted, according to individual estate need. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 458-459 - Erratum

Policy SD40: Farm and Forestry Diversification

There were a total of ~~17~~ 20 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Some opportunities for appropriate re-use or redevelopment of agricultural buildings and land will be precluded by unduly restrictive local plan (one size fits all) policies, tightly drawn settlement boundaries and the introduction of Neighbourhood Plans, which have the sole purpose of precluding change. Formal Whole Estate Plans proposed by the authority, if included as part of the local plan, would be a means by which such development could be regulated. It could also set the justification and circumstances where exceptions to general restrictive policies would be permitted, according to individual estate need. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 460-463 - Erratum

Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings

There were a total of ~~36~~ 39 representations on this policy. A summary of the main issues raised is set out below.

Other organisations

- Some opportunities for appropriate re-use or redevelopment of agricultural buildings and land will be precluded by unduly restrictive local plan (one size fits all) policies, tightly drawn settlement boundaries and the introduction of Neighbourhood Plans, which have the sole purpose of precluding change. Formal Whole Estate Plans proposed by the authority, if included as part of the local plan, would be a means by which such development could be regulated. It could also set the justification and circumstances where exceptions to general restrictive policies would be permitted, according to individual estate need. (The Goodwood Estate Company Ltd.)

Submission Consultation Statement pages 519-520 - Erratum

Policy SD72 Soldiers Field House, Findon

There were a total of ~~6~~ 7 representations on this policy. A summary of the main issues raised is set out below.

Parish and Town Councils

- Object to allocation. The Parish Council has set up a working party to review the current made Neighbourhood Plan which will include alternative and more landscape sensitive site allocations to meet the required 30 dwellings for Findon. (Findon PC)

Erratum D – Summary of representations for Chapter 9 – Introduction (Sites and Settlements)

10. The following summaries of issues were erroneously omitted from the originally submitted Consultation Statement.

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

Chapter 9 – Sites and Settlements Introduction

There were a total of 24 representations on this section excluding those on specific sites or settlements and on omission sites. A summary of the main issues raised on matters relevant to the whole chapter or introduction text only is set out below.

National Agencies

Historic England: Disappointed that there is no reference to cultural heritage in Figure 9.1 (cultural ecosystem services). NPPF paragraph 7 states that protecting and enhancing the historic environment is an integral part of sustainable development.

Borough, City, County and District Councils

- The TA has not provided an assessment of individual development sites and HCC would encourage the NPA or individual site promoters to make use of the County Council development planning pre-application service that is designed specifically for this purpose. (Hampshire County Council)
- Note that level of detail across allocations varies across sites. Other than highlighting that some of these sites are close to sensitive designated areas, the City Council makes no comment on the individual allocations. (Winchester City Council)

Parish and Town Councils

- The approach of the Local Plan and SDNPA to Neighbourhood Development Plans stifles the ability of Easebourne Parish Council to make a long-term plan for the Parish, despite there being clear Central Government support for Neighbourhood Development Plans. On this basis, we seek the removal of the proposed allocations for Easebourne that are contained in the Pre- Submission Local Plan. There is a lack of consideration given to 402 dwellings expected to be delivered at King Edward VII, with the majority to be delivered in the first 5 year period; the cumulative impact of thios along with development in Midhurst and Easebourne has not been properly assessed. (Easebourne Parish Council)

Other organisations

- The Plan fails to take into account the development of sites where there is an extant planning permission where better use could be made thereof and an increased number of dwellings achieved to contribute to the overall housing provision figure. (Deansmoor Properties Ltd.)
- Additional sites at more sustainable locations (land adjacent to existing settlements, in adjoining borough boundaries) should be considered appropriate highly sustainable development locations which can accommodate large scale growth than can bring beneficial infrastructure improvements. (EPV (East Sussex) Ltd.)
- Another Call for Sites assessment is required to ensure that all possible sites for development are objectively assessed and to ensure that the Authority are not dismissing suitable sites for development under the guise of complying with the Framework, and heavily relying on cross boundary development. (EPV (East Sussex) Ltd.)
- The SDNPA has been unable to allocate any new traveller pitches as part of housing land allocations or within settlement boundaries. The allocations proposed will help address the need of those already occupying the area. However no new provision is made for those unable to so far secure permission to live in the SDNP or displaced from the area. (Heine Planning Consultancy)
- Not "positively prepared", as there are further sites that can and should be allocated to contribute to the requirement in the NPPF to boost significantly the housing supply of the South Downs National Park Authority. Not "Justified" as the plan's strategy, by not allocating further sites, is missing a clear opportunity to include sites that are deliverable, developable and viable. (Reside Developments Ltd.)
- Concerned about the evidence base supporting the site allocations within this chapter. NPPF paragraph 165 is clear that planning policies should be based on up-to-date information about the natural environment. The SDNPA is not adhering to the purposes if no on the ground ecological surveys were undertaken to inform the plan - noting that many of the allocations do not specify the need for an ecological assessment, even in the supporting text; particularly puzzling for those site allocations that contain ecosystem services symbol. Request that list of evidence studies that applicants are required to produce should be in the policy rather than the supporting text. Inconsistent approach to requiring development to deliver biodiversity enhancements / improvements. (Sussex & Hampshire and Isle of Wight Wildlife Trusts)
- Many of the sites entered as part of the SHLAA process were discounted on the basis of adverse impact on landscape or heritage assets; the assessment appears to be generic, as opposed to site specific, and not therefore robust. the landscape assessment is not published anywhere so it is difficult to understand the rationale for excluding certain sites. (The Angmering Park Estate, The Edward James Foundation – West Dean)

Individuals

- How will ecosystem services be quantified? (Hampshire County Council – Cllr Jackie Porter)
- The plan fails to provide adequately for the housing needs of the part of the National Park falling within the Horsham District.
- Paragraph 9.3 should state categorically that the Plan incorporates all adopted Neighbourhood Plan policies and allocations. To do otherwise would be counter to the Localism Act 2011 and would thus make the Plan unsound.

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

Omission Sites

Representations were received on 32 omission sites. The representations are summarised below.

OM Site 1: Bohunt Manor, Liphook

One representation - Green Village Investments

- Potential for bypass will aid development of this site
- Keen to work with Northcote Estate on a revised scheme for this site if the bypass goes ahead
- Bohunt Manor presents a unique opportunity as a sustainable gateway to the park and should be allocated as a strategic site within the plan
- Site is sustainably located, contributes to unmet housing need and provides the opportunity to strengthen the local economy and sustainable tourism
- Liphook has a number of consented community facilities in the pipeline
- SDNPA Pre-submission Plan puts undue emphasis on the natural environment at the expense of social and economic sustainability
- DtC has not been met as it is unclear how neighbouring housing markets and unmet need have been addressed
- The Plan is silent on Liphook and this site which provides a uniquely sustainable option for large scale housing development

OM Site 2: Barlavington Way, Midhurst

One representation - ICS Estates Ltd (landowner/site promoter)

- The Lewes North Street Quarter site should be deleted and the Barlavington Site in Midhurst should be allocated for development as the site is in the ownership of one developer with a track record of housing delivery in Midhurst.

OM Site 3: Hoddern Farm, Peacehaven/ Land at Telscombe Road, Peacehaven

One representation - EPV(East Sussex)Ltd, Mr Andrew Dutton

- Site allocation strategy should be revisited as not robust. Additional call for sites is necessary to identify most suitable locations for development.
- No sites identified adjacent to Newhaven which functions as a gateway to the park.
- SDNPA should consider allocating sites within the national park that are adjacent to urban areas outside the national park to make the most sustainable use of land. Site at Telscombe Road, Peacehaven is suitable, viable and available and should be allocated on that basis following an additional call for sites exercise.

OM Site 4: Land South of Alresford Road, Cheriton

One representation - WYG for site promoter (Mr Paul Cole)

- Site was put assessed but rejected in the SHLAA in favour of Land South of the A272 in New Cheriton. The New Cheriton site is less sustainable and undeliverable. The Site at Alresford Road could deliver 6 dwellings towards the housing need and is well screened by existing boundary vegetation.

OM Site 5: Land under the Hill, Selbourne (Aka Barnfield)

One representation - Village Green Plc

- Support the identification of Selborne for future development
- Consider a revised proposal could overcome previous refusal on this site to deliver 6 units
- Proposal would remove unsightly garage block, provide a new PRow and 1.5ha of open space
- Site is better located, more sustainable, and meets the purposes and duties of the SDNP as opposed to Land at Ketchers Field.

OM Site 6: Land at Union Lane, Droxford

One representation – Murray Planning Associates for Bargate Homes

- Support for the overall strategy in the Plan. Representation is made in relation to the site at Park Lane being allocated in preference to the site at Union Lane.
- The SHLAA is flawed in its scoring of Union Lane and Bargate Homes believes that the Park Lane site is more detrimental in terms of landscape as it would require significant road widening which would remove trees that are essential for screening.

OM Site 7: Longmoor Depot, Greatham

Main representation from GVA on behalf of the Whitehill and Bordon Regeneration Company

- Promote Longmoor Depot for B1/B2/B8 employment uses.
- The site area is 8.4 ha of which 7.4 ha is brownfield and becomes available in 2019. It could accommodate approximately 10 buildings with a floorspace of up to 9,450 m².

Supporting representation from the EHDC Cabinet Portfolio Holder for Whitehill and Bordon.

OM Site 8: Land at North of Hill Brow Lane, Liss

One representation - Boyer Planning for Wates

- Site allocation process is not robust, does not meet the requirements of the NPPF and the plan fails in the DtC in relation to OAN

- Site proposed would provide additional housing in a sustainable location contrary to the assessments for the SDNPA Local Plan and the Liss NDP.

OM Site 9: Kiln Lane, Buriton

Two representations – WYG, Buriton Parish Council

- Two sites within a single field are promoted. One of the sites was a draft allocation at Preferred Options. No clear reason for this site to not be considered in the Plan as it provides a more sustainable option than other sites and would contribute to meeting the OAN. (WYG)
- Against the allocation in principle but request number of amendments if allocation goes ahead. Submitted reps at earlier stage - concerns about localised flooding, traffic and wildlife (Barn Owls). Request for high design quality and sympathetic placement in the landscape (Buriton PC)

OM Site 10: Burlands Field / Culverscroft, Selborne

One representation – Newton Valance Farm

- Site could be developed in conjunction with land to the rear of Goslings Croft for 8-12 affordable housing units and still maintain a large proportion of greenspace.
- The site is more suitable and sustainable than others put forward (including Ketchers Field) and is adjacent to existing development.

OM Site 11: Land at Crossbush

One representation - Angmering Estate/Savills

- Site appraisals within the SHLAA is generic and not robust. The Arundel bypass will provide new opportunities for housing sites and so the Angmering Estate submits Land at Crossbush for allocation to provide additional housing supply to meet the currently unmet OAN.

OM Site 12: Land at Sweetland Steyning

One representation - CALA Homes Ltd

- Object to omission of the site from allocations as the site broadly met the requirements of all the criteria in the SHLAA scoring poorly only as a greenfield site which does not meet the objectives of the SDNP.
- Site is adjacent to the Steyning built up location and therefore in a sustainable location
- Although within a Neighbourhood Plan Area the site should be revisited for inclusion in the Plan.
- Discussions with the neighbourhood plan group have been positive and the site could enhance the setting of Steyning within the SDNP.

OM Site 13: Land at Dodds Lane

One representation - Consentium (alternative site name – Cobbett Close, Swanmore)

- Disagree with SDNPA landscape assessment – further assessment submitted. Site would contribute to OAN for SDNP in a sustainable location and should be considered as part of a wider site allocations assessment. The smaller site being proposed at this time scores positively using the SDNPA's own criteria and the indicative layout demonstrates the potential for this site

OM Site 14: Intensification of SCU Leydene East Meon

One representation - Deansmoor Properties Ltd

- Put forward the site for 24 dwellings to replace the current 14 dwellings
- SDNPA has not fully tested the housing market area, OAN figures and the Duty to Cooperate has not agreed how the shortfalls will be delivered in the wider area

OM Site 15: Land at Eight Bells Public House Jevington

One representation - DMH Stallard on behalf of Richard Green

- This is a small, sustainably located infill site that should be allocated for 3 to 5 houses

OM Site 16: Lodge Hill Activity Centre Coldwaltham

One representation - Henry Adams (Chris Locke) for the Activity Centre

- Proposed alternative site to SD64. This site is larger, available and deliverable with no adverse impact on the SDNPA. Believe the PC is supportive of this site.
- Residential development will support the ongoing activities of the activity centre and much needed housing for the community

OM Site 17: Lewes Racecourse Lewes

One representation - Individual

- Concerned about lack of opportunity for community and parish council to comment. SDNP should provide more protection to all sites. Development should be maintained within the existing built up boundary. The racecourse is an environmental asset and community resource as well as a designated battlefield.

OM Site 18: Coldwaltham Land West of Kings Lane

One representation – Individual

- 'Site 2' as proposed by the developers is not more sustainable than 'Site 1' and the information provided in support of the sites is inaccurate. The allocation SD64 is preferable in terms of sustainable development and meeting the purposed and duties of the SDNPA.

OM Site 19: Land South of Wellgreen Lane, Kingston nr Lewes

One representation – Strutt and Parker for the landowner

- Site at Wellgreen Lane was positively received at earlier stages by the policy team and it is unclear why the site the Plan favours the Castelmer site instead
- Wellgreen Lane site can deliver more housing, affordable housing, safer highway access and better positioning within the landscape, within the timeframe required in the Plan
- The Parish Council and local community have not had adequate opportunity to comment on the proposals for Kingston

OM Site 20: Land at Homes of Rest, The Street, Graffam

One representation - Reside Developments Ltd

- Plan is not positively prepared as it does not include those sites with planning permission. Sites with planning permission including Land at Homes of Rest, The Street, Graffham should be allocated.
- The plan does not meet the requirements of the NPPF (particularly paras 151, 152 and 157), should allocate sites with existing planning permission particularly where those sites would help meet the OAN.
- Land at Homes of Rest should be allocated for five dwellings

OM Site 21: Land at Beechwood Lane Cooksbridge

One representation - Rydon Homes

- This site should be allocated within the plan for a total of 23 units. Supporting information has been submitted in support of the allocation and the site has been subject to pre-application discussion with Lewes District Council

OM Site 22: 84a and 86 Petersfield Road

One representation – individual

- Although not available at present, the sites are now likely to be available for redevelopment before the end of the Plan period and should be included as site allocations

OM Site 23: Warren Barn, Priors Dean

One representation – individual

- This site should be allocated for Travelling Show People as the Plan does not address this need in East Hampshire (see also comments relating to SD33)

OM Site 24: Land at Steepdown Road Sompting

One representation - Thakeham

- SDNPA has not met the duty to cooperate in relation to housing delivery and therefore Thakeham wish to propose the site at Steepdown Road, Sompting in order to meet the OAN. The DtC should be met prior to submission of the Plan. Thakeham do not believe that all housing sites should be required to meet criteria 1(b) of Policy SD 27.

OM Site 25: Various small sites, East Dean

One representation – Gilbert Estate

- The SHLAA is incorrect in its consideration of these sites. The Wealden SHLAA considered the sites more positively. The reinstatement of the settlement boundary implies that East Dean can provide further development within that boundary.
- The NPPF requires authorities to consider how constraints can be overcome and the Plan fails to do this in regards to these housing sites (WE001, WE002, WE003).

OM Site 26: West of Nephote, Findon

One representation - Strutt and Parker on behalf of the landowner

- The Plan notes that housing figures for each settlement are approximate and subject to revision with land availability
- The site is adjacent to, and a logical extension of, Findon village. It is within a Local Gap site that was struck out by the Examiner of the Findon NDP as it would constrain the supply of housing
- The site is well located without significant constraints and could accommodate 15-20 the provision of a comprehensive landscaping scheme

OM Site 27: Three Cornered Piece, Harting

One representation – Heine Planning (additional comments on other G&T sites)

- The Plan does not properly account for the need of Gypsies, Travellers or Travelling Show People.
- This Plan should take account of the current application and the site should be allocated to meet the need of the landowners who have been unable to find a site for 7 years.

OM Site 28: Northfields Farm and adjacent land, Twyford

One representation - Twyford Parish Council 895

- Site is included within the Twyford Neighbourhood Plan but requires the support of an allocation within the Local Plan. The site has a long history of different uses and has lacked a coordinated approach from the relevant planning authorities. The site should be allocated to allow for proper planning control.

OM Site 29: Various site on West Dean Estate

One representation – Savills on behalf of The Edward James Foundation

- Support for the work the SDNPA has done to pull together a plan across such a complex geographical area
- It is unclear how the landscape assessment has been undertaken for the whole plan and the assessment made for each site
- The sites at West Dean put forward for the SHLAA should be included to provide for the unmet housing need and have formed part of the discussions with the SDNPA on the draft Whole Estate Plan.

OM Site 30: Various sites on Glynde Estate (around St Mary’s Church and Wharf) and site near Tarring Nevill

One representation - Lewes District Green Party (Cllr Joanna Carter)

- Potential for development of affordable homes in Glynde at disused buildings and land to the south of St Mary’s Church, Glynde, and disused buildings and land at the Wharf, Glynde.
- Potential development of a Village Hall replacing buildings between the Recreation Ground and The Wharf Car Park, The Street Glynde
- Development of affordable housing and related public transport infrastructure at Chalk Pit on A26 between Tarring Nevill and South Heighton

OM Site 31: Land to east of London Road, Coldwaltham

One representation - Batchelor Monkhouse for Cooper and Spofforth

- The site is well located and available for delivery. Although not submitted as part of the SHLAA, it is in a sustainable location and could deliver at least 10 units with 50% affordable housing. There is good access to the village and the impact on the landscape would be minimal. The SDNPA are not planning for the full housing need in Coldwaltham and this site would contribute to the OAN.

OM Site 32: Land to west of London Road, Coldwaltham

One representation - Batchelor Monkhouse for Cooper and Spofforth

- The site is well located and available for delivery. Although not submitted as part of the SHLAA, it is in a sustainable location and could deliver at least 25 units with 50% affordable housing. There is good access to the village and the impact on the landscape would be minimal. The SDNPA are not planning for the full housing need in Coldwaltham and this site would contribute to the OAN.

Erratum E – Summary of representations for Habitat Regulations Assessment

11. The following summary of issues were erroneously omitted from the originally submitted Consultation Statement.

South Downs Local Plan: Pre-Submission Consultation (Sept – Nov 2017)

Summary of Issues

Habitat Regulations Assessment

There were a total of 11 representations on this on this supporting document. A summary of the main issues raised is set out below.

Natural England: Comments as follows-

- In-combination Assessment: note that this list does not include Minerals and Waste Plans.
- Recreational Impacts: There may be a possible Ashdown Forest SPA outer zone (beyond 7km) set for strategic access management and monitoring measures (SAMM) only.
- Singleton and Cocking Tunnels SAC: This is afforded international protection due to the variety of bat species which hibernate in these tunnels. We are concerned about Policy SD20: Walking, Cycling and Equestrian Routes which provides a recreational route in the vicinity of a sensitive site but support wording in supporting text relating to this. Note that a project-level HRA captures this.
- Wealden Heaths Phase II SPA: NE will work with SDNPA to provide policy advice related to Heathland Bird Species.
- Ashdown Forest Air Quality: Natural England concurs with the conclusions of the Ashdown Forest air quality assessment within the HRA. AECOM has undertaken a full Appropriate Assessment and has provided suitable evidence taking into account research reports and technical knowledge to confirm that the low levels would not have an adverse effect on the integrity of the Ashdown Forest SAC. Natural England concur with this conclusion. Paragraph 5.3.38 is particularly helpful as to the expected “in practice” impacts of any increases at these small levels even notwithstanding the background decreases expected to come forward due to technological advances in vehicle technology.
- Water Quantity: On issue of increased nutrients entering the River Itchen SAC, Natural England is satisfied that for those allocations that may impact upon the SAC and SSSI, the allocation policies require a drainage strategy and a project- level Habitats Regulations Assessment, along with other evidence documents.
- Water Quality: HRA conclusions on Arun Valley SPA, SAC and Ramsar Site noted. Strongly advise that Policy SD64: Land South of London Road, Coldwaltham includes confirmation that development can be accommodated within the sewerage treatment works serving this area.
- Functionally-Linked Habitat: strongly support SD11 which includes bespoke protection for Functionally-Linked Habitat pertaining to The Mens SAC and Ebernoe SAC. Advise that Policy SD11 includes link to Bat Protocol for these SACs which is in preparation. Support other aspects of Policy SD11.

Borough, City, County and District Councils

- HRA makes unsuitable assumptions on the reduction of NO_x, and role of ammonia, in future and therefore does not follow the precautionary principle. In-combination assessment is limited, e.g. does not identify permissions granted in Wealden District above adopted Core Strategy target. Limitations of using a generic and standard approach is not discussed and accounted for. The appropriate assessment lacks analysis and reasoned arguments against the conservation objectives and consideration of impact upon site integrity considering cumulative effects. It should provide further information as to why there is not considered to be a likely significant effect with regards Pevensey Levels SAC and Ashdown Forest SPA. Overall the HRA is incomplete and therefore any conclusions drawn are incorrect with regards to the requirements of the Conservation of Species and Habitats Regulations 2010 as amended. (Wealden District Council)
- The HRA appears to be a detailed and thorough assessment. MSDC is satisfied that the HRA provides proportionate evidence to support the proposed level of growth in the Plan. (Mid Sussex District Council)

Parish and Town Councils

- The Appropriate Assessment accompanying the Local Plan does not meet the requirements of the Habitats Directive and Habitat Regulations because it does not identify all the aspects of the Local Plan that can, by themselves or in combination with other proposals, affect the conservation objectives of European Sites. The Reports assessment of the River Itchen SAC is incorrect. It incorrectly assesses the effects of the implementation of Allocation Policy S63 on the SAC and takes no account of the additional development that will follow as a result of the imposition of settlements boundaries. If correct, it would have identified likely significant effects, which would have led to the deletion of the allocation policy SD63. (Cheriton Parish Council)

Other organisations

- The evidence base regarding recreational impacts on the Arun Valley SPA is not sufficient to screen out the impact from HRA assessment. The only assessment of recreational disturbance is a visitor survey conducted in 2012, and this should not continue to hold weight. The HRA does not seem to consider the impact of recreation in the Arun Valley in terms of affecting management choices. Although the number of dwellings suggested for Coldwaltham is relatively small, we do not think the evidence supplied in the HRA is sufficient to scope out a potential impact. (Sussex & Hampshire and Isle of Wight Wildlife Trusts)
- The HRA is deeply flawed, having regard to impact pathways, precautionary principle, out-of-date evidence on recreational pressure, the Sandford Principle, selective reporting, unjustified assertions regarding the Arun Valley SAC/SPA/Ramsar site, urbanisation/proximity of dwellings to the SPA/SAC/Ramsar site, policies for mitigating impacts being ineffective. It is unrealistic to view the site allocated by Policy SD64 as capable of being a Supporting Habitat for barbastelle bats. The HRA is of such a low standard that it must be properly redone, and the implications of the new HRA should be reflected in the policies and allocations within the Local Plan. (Coldwaltham Meadow Conservation Group)

Individuals

- The Appropriate Assessment does not comply with the Habitats Directive and Regulations in that it does not identify all the aspects of the draft Local Plan that can, by themselves or in combination with other proposals, affect the Conservation Objectives of European Sites.
- The HRA is deeply flawed [see summary of Coldwaltham Meadow Conservation Group above].