

## SOUTH DOWNS NATIONAL PARK - LOCAL PLAN EXAMINATION

### THE NATIONAL PARK AUTHORITY'S RESPONSE TO THE PRELIMINARY NOTE FROM THE APPOINTED INSPECTOR

#### Purpose of Note

1. The purpose of this note is to respond to the questions and comments set out in the preliminary note from the Inspector (INSP.2). This note also seeks guidance on a number of matters raised by the Inspector. It addresses issues in the same order as they were raised by the Inspector in his note.

#### Main Issues, Hearings and Responses to Representations

2. With reference to potential attendees at the hearings, I will send the Inspector a list of all the representors who requested to attend and the policies which they commented on. I can confirm that a total of 128 individuals/organisations have asked to speak. I will send you the full list by Friday 6<sup>th</sup> July.
3. In answer to **Question 1**, we are happy to provide a short focussed statement of main issues. We will get this to you by Friday 20<sup>th</sup> July further to the list referred to in paragraph 2.
4. Furthermore on **Question 1** and in regard to the duration of hearing, I would estimate that three weeks with hearings taking place Tuesday to Thursday will be adequate. This estimate is based on past experience of local plan examinations, the issues arising on this Plan and the list of potential attendees.
5. In answer to **Question 2**, we would appreciate further guidance on how you would like this work to be done and presented. I would suggest two possible options. Firstly, we could build on the short focussed statement of main issues (ref. Question 1) by providing the Authority's response on each of these issues. Alternatively, we could provide you with an extended version of appendix 4 of the Consultation Statement by including a new section for each policy; this would provide our response on a policy-by-policy basis. In terms of timelines we could provide the first option by 20<sup>th</sup> July and the second option by 27<sup>th</sup> July.

#### Pre-Submission Changes to the Plan

6. The NPA followed the advice of PINS in the preparation of its Schedule of Changes. First and respectfully, we intended that our Schedule of Changes to the Pre-Submission Local Plan was in effect the relevant 'addendum submitted with the plan to address matters arising from the public consultation on the plan at regulation 19 stage' (paragraph 5.20 of the Procedural Practice Guidance of the Planning Inspectorate (PP)). We apologise for any confusion and we accept we could have titled it 'Addendum' to be clearer. To confirm, therefore, in answer to **Question 3**, this document has not been the subject of public consultation.

7. We are of the opinion that none of the proposed changes go to the heart of soundness for the Plan. However, we do understand that some of the proposed changes are more substantial than others. We are happy to split the changes into minor and main modifications as outlined in paragraph 17 of your note and would be grateful for your confirmation that this is what you would like us to do. I can confirm that we can complete that work by Friday 20<sup>th</sup> July. In line with the PP we would anticipate that the main modifications made at this stage and throughout the examination would be consulted on prior to the Inspector completing his report.

### **Main Modifications**

8. In answer to **Question 4**, I can confirm that the SDNPA made a formal request in its submission letter to the Planning Inspectorate under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 to make Main Modifications to the Local Plan if considered necessary. This letter has now been added to the Core Document Library as SDLP 03.2.
9. In answer to **Question 5**, I can confirm that SDNPA officers will be authorised to discuss Main Modifications to the Local Plan in open session.

### **Omission Sites and the Draft Amended National Planning Policy Framework**

10. Thank you for confirming your approach on omission sites and the draft amended NPPF.

### **Development Briefs**

11. In answer to **Question 6**, I can confirm that the development briefs are not supplementary planning documents or modifications to the submitted plan. Once approved by Planning Committee in September this year, they will form material considerations in the determination of planning applications for the sites. I would also like to point out that following consultation on the four development briefs it is likely that the quantum of development on one of the site allocations may alter, albeit remain as an allocation. We will advise of this and if appropriate use the process outlined in paragraph 8 to formally request any changes to the numbers / quantum.

### **Hearing Venues**

12. In answer to **Question 7**, I can confirm that the SDNPA are happy to hold hearings in other parts of the National Park. We are in discussion with East Sussex County Council about holding hearings at their offices in Lewes. This is now stated on our examination website.

Lucy Howard  
Planning Policy Manager  
South Downs National Park Authority  
28 June 2018