



South Downs National Park Authority

South Downs Local Plan

Submission Consultation Statement

MAIN ISSUES REPORT

20 July 2018

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. On 19 June 2018, the examination Inspector, Brian Simms, issued a Preliminary Note to the National Park Authority (INSP.2). He posed a question to the SDNPA as follows:

Q1 *The NPA is requested to provide a shorter, focussed statement of overall main issues and likely extent and scale of hearings, as indicated above.*

3. This report provides a response to the Inspector's Q1. It consists of a table which provides a distilled and focussed impression of the main issues arising from representations to the Local Plan. In particular, it highlights issues raised by representors referring to soundness or legal compliance of the Plan, including with respect to the Duty to Co-operate, other legal matters and the Sustainability Appraisal.

Summary of main issues raised by representations to the Pre-submission Local Plan

Main issue	People or bodies who made representations ¹	Relevant policies / parts of Plan
Sustainable Development		
Overall there is support for SD1, but there is some criticism of criterion 4. Some think it is too permissive due to the use of 'unless exceptionally'. Others think it should be worded more positively in line with the tests of soundness.	R45, R241, R302, R529, R244	SD1(4)
Ecosystem Services		
Overall there is support for this innovative policy. However, two of our host authorities, East Hampshire and Winchester District Councils, have said that it is not reasonable to require a statement on ecosystem services to accompany all planning applications.	R162, R184	SD2
Major Development		
There is a full spectrum of responses on this policy from full support for providing clear local interpretation of national policy to objection for either repeating national policy or being ultra vires. The point is made that the major development test only applies at the development management stage rather than plan making.	R55, R160, R162, R169, R184, R346, R354	SD3
Landscape, Design and the Special Qualities		
There should be a separate policy on large scale events such as music festivals in accordance with paragraph 27 of the DEFRA National Parks Circular 2010 in order to protect the special qualities of the National Park.	R95, R159, R189, R243, R362, R372	Chapter 5 Chapter 6
Biodiversity and Habitats Regulations Assessment (HRA)		
Objection to various parts of the methodology and the conclusions of the HRA report in regard to air quality and the Ashdown Forest Special Area of Conservation (SAC), Pevensey Levels SAC and Lewes Downs SAC from Wealden District Council. Natural England stated in their representation that they were content with the approach taken in our HRA.	R266, R333	Pre-Submission HRA Report and Addendum

¹ There may be many further representations making or touching on this point; reference should be made to the Consultation Statement (Appendix 4) and original representations.

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Development Strategy and Supply of Homes		
Allowing the re-use of previously developed land outside settlement boundaries is contrary to other Plan objectives.	R551	SD25
The Settlement Facilities Assessment is flawed e.g. facilities omitted or limited access to facilities is not reflected in score.	R169, R212, R224, R233, R234, R267, R308, R558	SD25
Various representations stated that there are settlements that have been omitted from SD25 which should have been include or settlements included that should have been excluded. Also there are comments that where settlement boundaries exist, these have not been drawn fairly in that they either unduly limit infill/windfall development, or permit unsuitable development within settlement boundaries.	R30, R50, R131, R157, R166, R169, R188, R224,R233, R234, R235, R243, R251, R267, R283, R308, R309, R316, R325, R406, R418, R486, R513, R518, R558,	SD25
The SDLP has not given proper consideration to allocating sites for housing on the edge of sustainable settlements that lie just outside the National Park boundary. These sites are sustainable locations for providing further housing to meet the unmet housing needs of the wider area.	R320, R397	SD25 SD26 Chapter 9
There should be more emphasis on building new homes in the South Downs National Park to address the objectively assessed housing need within the National Park and to reduce developments pressures on neighbouring authorities. Many consider that the SDNPA has not gone far enough in terms of leaving 'no stone unturned' with regards to allocating sites or broad areas for housing, or has relied too much on neighbourhood plans to deliver development.	R67, R73, R126, R160, R165, R173, R215, R226, R228, R230, R232, R234, R235, R241, R252, R255, R257, R267, R283, R315, R320, R329, R336, R337, R338, R397, R513, R569	Chapter 3 SD25 SD26 Chapter 9
It is essential that the issue of unmet housing need in the SDNP is adequately addressed through the Duty to Cooperate, and in particular through the signing of memoranda of understanding / statements of common ground. The HEDNA / SHMA is flawed / does not adequately recognise interaction with wider housing market areas.	R154, R224, R226	Chapter 1 Chapter 3 SD25 SD26
Affordable Homes		

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The affordable housing target is too high and will dis-incentivise development. Particular concerns raised over the viability of the target on previously developed sites and the cumulative burden with other policy requirements such as a prescriptive housing mix and low carbon homes.	R33, R45, R126, R154, R160, R226, R274, R228, R252, R258, R293, R320, R341 R357, R397	SD28
The threshold below which the policy seeks affordable housing provision is not consistent with national planning guidance (Written Ministerial Statement 28/11/2014) and should be changed to reduce the burden on small sites.	R154, R214, R238, R257, R315, R336, R338, R357, R376, R377, R379, R535	SD28
Concern that it may be difficult to find a registered housing provider to deliver or manage very small numbers of affordable homes.	R181, R286, R340, R341, R349	SD28, SD29
The supporting text of Policy SD29: Rural Exception Sites should refer to registered providers and other housing deliverers, and not just rely on community land trusts to deliver exception sites.	R162, R405	SD29
An element of open market housing should be in some cases allowed on rural exception sites, as indicated in national policy.	R45, R162, R224, R234, R241, R402, R416, R551, R559	SD29
Extensions to existing dwellings		
Concern that the restriction of extensions to 30% of existing floorspace is unduly restrictive	R45, R73, R137, R241, R258, R261, R283, R447	SD31 (1) (b)
Gypsies, Travellers and Travelling Showpeople		
The assessment of need is flawed / based on out-of-date evidence, and as it relates to district-wide studies rather than the whole National Park; there is no apparent cross-boundary cooperation.	R308, R409, R410	SD33
Gypsy and traveller sites are not evenly distributed across settlements within districts.	R273, R529	SD33
Comments relating to specific sites that are considered suitable for allocation but have not been allocated.	R410, R437	SD33 Chapter 9
Employment land		
A representation from the Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation (DIO) contends that the ELR employment land need is miscalculated and should be 67 hectares rather than 10.3 ha. Longmoor Depot, Greatham should be allocated	R263, R288	SD35

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to meet this need. The SDNPA has met with the DIO and their agent at Longmoor; work is underway on a statement of common ground that would include the retraction of the objection.		
Agriculture and Forestry		
Representations from the National Farmers' Union (NFU), Country Land and Business Association (CLA) and South Downs Land Managers (SDLM) state that the requirement to remove existing redundant buildings is both unclear and disproportionate. They also state that the requirement to open new and improved access track for permissive public usage is unfair as the tracks are needed for commercial purposes.	R195, R249, R270	SD39 (1) (g) and SD39 (2) (d)
Representations from the NFU, CLA and SDLM object to the requirement for diversification activities to be subsidiary to the farm or forestry operation. They consider this to be unduly restrictive, impossible to enforce, contrary to the NPPF and not supporting the NPA's socio-economic duty. They also object to the severance/disruption element of the policy, which they consider to be unduly onerous and that some flexibility should be encouraged.	R195, R249, R270	SD40 (1) (a) and SD40 (1) (b)
The NFU and SDLM object to restricting occupancy to local workers which they consider to be unduly restrictive, contrary to the NPPF and not supporting the NPA's socio-economic duty.	R195, R249	SD41 (1) (g)
Policy SD56: Shoreham Cement Works		
The policy supporting the redevelopment of the site should explicitly state that residential uses would be acceptable.	R6, R208, R217, R225, R475, R516	SD56 (2) (c)
Policy SD64: Land South of London Road, Coldwaltham		
The principle issues raised are the coalescence of Coldwaltham with the neighbouring settlement of Watersfield, the loss of a biodiverse flower-rich hay meadow, adverse landscape impact, adverse impact on adjacent nature conservation sites through increased recreational activity, disproportionately large housing allocation for a small village which is not needed to meet local housing need, increased traffic on the A29 and adverse impact on dark night skies. Some letters of support were also received. Alternative sites were proposed for development in and around the village.	R68, R137, R307, R312, R333, R368	SD64
Policies SD71: Land at Elm Rise, Findon & SD72: Soldiers Field House, Findon		

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An updated neighbourhood plan for Findon is being prepared that allocates deliverable, alternative sites with capacity to provide for the housing provision figure for Findon set out in Policy SD26. The Local Plan allocation policies SD71: Land at Elm Rise and SD72: Soldiers Field House should be deleted.	R127, R334	SD71 SD72
Policy SD89: Land at Pulens Lane, Sheet		
The site was deleted from the draft EHDC Local Plan (1995) at examination by the Inspector	R52, R136, R209, R246, R251, R332, R396	SD89
Detrimental impact on landscape and river corridor environment.	R52, R136, R209, R246, R251, R332, R396	SD89
The existing track is of an insufficient width to accommodate refuse waggons. The purchase of third party land is required to provide adequate access to Pulens Lane	R52, R136, R209, R246, R251, R332, R396	SD89
Policy SD92: Stedham Sawmill, Stedham		
Concern that the site is in close proximity to Iping Common SSSI, an area susceptible to disturbance from recreational pressures to ground nesting birds.	R333, R423	SD92
Lack of demand for employment uses on this site; should be allocated for solely residential development, at a scale that makes efficient use of the land parcel and provides more affordable housing.	R242, R255, R329	SD92
Other housing / mixed use allocation policies		
Concern from some bodies that development management requirements for site allocations are not complete. The Wildlife Trusts consider that ecological surveys on the ground may not have been undertaken to inform the Plan, and many of the allocations do not specify the need for an ecological assessment. Historic England considers that a number of site allocation policies should include requirements for a Heritage Impact Statement, Archaeological Assessment, or both. Southern Water considers that allocation policies should require provision of connection to the water and sewerage networks.	R136, R307, R534	Various
Gypsy & Traveller and Travelling Showpeople Omission Sites OM26: Warren Barn and OM30: Three Cornered Piece		

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These two sites are considered by representors to be suitable for helping to meet travelling Showpeople and Gypsy and Traveller accommodation needs respectively.	R410, R437	Omission sites
Employment Omission Site OMI: Bohunt Manor, Liphook		
Promotion of the site for housing on the grounds that it is highly sustainable gateway location on the edge of the National Park that will help to boost housing supply.	R160	Omission site
Housing Omission Site OM3: Hoddern Farm / Land at Telscombe Road, Peacehaven		
Site provides for the shortfall in meeting housing need in Lewes District. The developer considers that the landscape impact would be minimal and that the traffic impacts could be overcome.	R397	Omission site
Other omission sites		
A number of other omission sites have been submitted either as alternatives to the site allocations within the plan or as additional sites to help meet the OAN. Most of the sites are offered on the basis of more limited landscape impact and improved deliverability.	Various	Omission sites
Sustainability Appraisal (SA)		
No fundamental issues questioning the robustness of the SA.	n/a	SA