

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

Summary of Issues and Responses

This page is intended to be a guide to assist the reader in understanding the document. The original representations can be read in full on the SDNPA Local Plan webpages.

Chapter X: Policy reference

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

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>This text summarises the representations received from National Agencies</p> <p><u>Borough, City, County and District Councils</u></p> <p>This text summarises the representations received from Borough, City, County and District Councils</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none">• This text summarises the representations from Parish and Town Councils <p><u>Other organisations</u></p> <ul style="list-style-type: none">• This text summarises the representations from other organisations <p><u>Individuals</u></p> <ul style="list-style-type: none">• This text summarises the representations from individuals	<p>This column highlights the issues that have been identified through the representations and then provides the Authority's response.</p> <p><i>I: The bold italic text summarises the issues raised in the representations</i></p> <p>R: The plain text sets out the response of the SDNPA</p>

Chapter X: Policy Reference

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Summary of Issues and Responses

Key Messages

There were a total of 23 representations on the Key Messages. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> It is a difficult document to read and should be sub-divided into local authority areas (Cheriton PC) The Local Plan should address the impact of development outside the National Park (Cheriton PC and Steyning PC) Highlighted various concerns in Tichborne Village (Tichborne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The Local Plan is well supported by evidence and provides a sound basis for cooperation with neighbouring authorities (University College London) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Support for the key messages and excellent policies (various) No mention is made of Bramshott and Liphook and future potential for growth (various) No mention is made of Nyewood and emerging opportunities in the parish No plastic grass or artificial turf should be allowed Allocations are based on what has been submitted to the NPA rather than landscape led. 	<p><i>I: No mention is made of various settlements and parishes in and around the National Park in the Local Plan</i> R: The National Park covers 1,600 km² and it is not possible to mention every parish and settlement. No mention is made of settlements located just outside the boundary other than in the spatial portrait as they are not in the local plan area.</p> <p><i>I: Greater emphasis should be given to the importance of good design</i> R: An additional sentence on the quality of new build is included in the Schedule of Changes (p2)</p> <p><i>I: Various requests for new policies and new policy requirements</i> R: These are addressed under the relevant policies</p>

Key Messages

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• The conversion of redundant agricultural buildings should not be restricted to occupation by local workers• Concern over access to Loppers Ash allocated under Policy SD90• Place names should be added to the conceptual spatial diagram• The key messages should stress that developing in a National Park is a privilege and so the standards for design should be higher.• There has been insufficient consultation on the Local Plan.• The document is not landscape-led as 78% of allocated sites are assessed in the Sustainability Appraisal as having an uncertain or negative landscape effect• Allocations outside existing settlement boundaries should provide 100% affordable housing.• Various objections to housing allocations in South Harting due to access and landscape impact.• Objection to national parks being subject to the presumption in favour of sustainable development.• The Local Plan should include a policy on major events such as music festivals and vehicle rallies• The interests of Selborne have been well reflected and encapsulated within the Plan (various)	

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Summary of Issues and Responses

Chapter I: Introduction

There were a total of 76 representations on this section.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <p>Historic England: Welcome and support references to cultural heritage in this section. Confirm HE have been positively engaged in the preparation of the SDLP.</p> <p>Natural England: Welcomes the Vision and Objectives of the Local Plan. Also support the inclusion of ecosystem services at the heart of the Local Plan.</p> <p>Highways England: No concerns with the potential impacts of planned development on the Strategic Road Network.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • General support for the South Downs Local Plan (Eastleigh BC, Hampshire CC, Horsham DC, Lewes DC, West Sussex CC) • Greater clarification could be given in the Plan on the control of noise in the National Park, including standards to be achieved and when a noise report will be required. A clearer position on development for outdoor entertainment should also be included (Chichester DC). • Note and welcome recognition of importance of the adopted Hampshire Minerals and Waste Plan (2013) • Confirmation of Duty to Cooperate regarding housing need arising in Mid Sussex area of the National Park (Mid Sussex DC) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • General support for the Local Plan (Lancing PC, Stedham with Iping PC, Steyning PC, Twyford PC, Woodmancote PC) 	<p>I: No consideration given to potential development sites linked to settlements just outside the National Park boundary R: The development strategy for this plan is based on the towns and villages within the National Park. All sites that were submitted for consideration through the Call for Sites were assessed in the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>I: Greater clarity required on objectively assessed housing need and statements of common ground required on all the HMAs R: Greater Clarity is provided in the Duty to Cooperate Statement and there are signed statements of common ground with all the local authorities that are partially within the National Park.</p> <p>I: Question the use of terminology ‘conserve and enhance’ R: The phrase ‘conserve <u>and</u> enhance’ is used in a number of Local Plan policies and is consistent with the National Park purposes set out in the 1949 and 1995 Acts.</p> <p>I: Concern that the Regulation 19 consultation was restricted to matters of soundness.</p>

Chapter I: Introduction

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Support for the landscape-led approach of the Local Plan (Corhampton & Meonstoke PC, Hawkley PC, Owslebury PC, Elsted and Treyford PC) • Welcome the high level engagement with Parish Councils in the process so far (Corhampton & Meonstoke PC) • The Local Plan remains lengthy and difficult to access. A glossary and compact final version would be helpful to the general public (Liss PC) • Concerns raised that the right balance for the future of the whole National Park will be achieved or provide the highest protection for niche areas such as Madehurst (Madehurst PC) • Distinctiveness of the SDLP could be improved (Parish of Colemore & Priors Dean) • Greater emphasis could be made of the landscape-led approach in this section (Parish of Colemore & Priors Dean) • Key messages, third para. should refer to ‘meetings with parish representative’ (Parish of Colemore & Priors Dean) • Para.1.41 is inconsistent with the glossary definition of parish plans • Concerns raised with accessibility of online version of the Local Plan and accompanying maps (Pulborough PC) • Fig 1.1 should provide greater clarification regarding the Sandford Principle (Rogate PC) • Para 1.36-38 concern that insufficient weight is given to individual NDPs (Rogate PC) • As the SDLP will replace saved policies of the Lewes Local Plan – additional protection should be given to Bishopston Village and the Tidemills area (Seaford TC) • Introductory text should be corrected regarding designation of the National Park and establishment of the SDNPA (Selborne PC) <p><u>Other organisations</u></p>	<p>R: The focus of the Regulation 19 consultation was the tests of soundness in line with the Local Plan Regulations, however, the ‘Have Your Say’ section of the Local Plan states that people may comment on any aspect of the Local Plan although ideally comments should focus on the test of soundness.</p> <p>I: The Plan does not give consideration to potential development sites on its boundaries with adjoining adjacent Local Authority areas and existing settlements.</p> <p>R: All potential housing sites that were submitted thorough the Call for Sites were considered in the SHLAA. Two draft allocations on the edge of settlements outside the National Park were actually allocated in the Preferred Options but due to deliverability issues were not carried forward to the Pre-Submission Plan.</p> <p>I: The ‘Spatial Strategy’ does not provide a strategy for the plan and is not carried forward into the Core Policies</p> <p>R: Policy SD25: Development Strategy responds to the spatial strategy and the allocation of development sites is in line with the strategy.</p> <p>I: The evidence-base is insufficient (except relating to landscape)</p> <p>R: The SDNPA considers that the evidence base supporting the Local Plan is both robust and proportionate.</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • General support for the Local Plan (Cowdray Estate, Folkington Estate, Houndean Residents Association, Murray Planning Associates, SOS Bohunt Manor Community Action Group, South Downs Society, South Downs Volunteer Ranger Service, Sussex Wildlife Trust, Midhurst Society) • Support for the landscape-led approach of the Local Plan (CPRE Sussex, Friends of Lewes Society, RSPB, South Downs Society, Chichester Society) • Support for the ecosystem services led approach (Sussex Wildlife Trust) • Support and congratulate the SDNPA on preparing a consolidated plan for the whole of the SDNP. Acknowledgement should be made in the plan of the potential implications of Brexit, allowing sufficient flexibility to landowners and farmers and support the rural economy (Angmering Estate, Brighton & Hove CC Downland Estate, Leconfield Estate, West Dean Estate). • The Plan should address the disputed public rights of navigation on the River Rother to develop recreational opportunities within the SDNP (British Canoeing). • The Plan has internal conflicts which it is hoped the Inspector will modify to provide clarity and certainty for future development (CALA Homes) • The landscape-led approach should be applied in balance with the need to deliver sustainable development (Cowdray Estate) • Clarification sought regarding SDNPA position on meeting objectively assessed housing need and duty to cooperate. Clear MoUs with relevant HMAs should be provided (House Builders Federation) • Concern raised that lengthy criteria are set for many policies and these may be either irrelevant or an unnecessary burden on minor applications. Also concern over the level of supporting information required for relatively simple planning applications (Sompting Estate, South Downs Land Managers Group) • Question the use of terminology 'conserve <u>and</u> enhance' (Sompting Estate) • Concern raised over the consultation process and comments being limited to matters of legal compliance and soundness (Sussex Wildlife Trust) • The SDLP fails the tests of soundness in respect to its duty to cooperation (Thakeham Homes) 	<p>I: No explanation is given of how Local Plan policies will replace existing policies and the difference between them R: Full details on policy replacement is set out in paragraph 1.35 and appendix 2 of the Local Plan.</p> <p>I: Concerns raised on consultation process for settlement boundary changes R: The changes to the settlement boundaries were consulted on at both Preferred Options and Pre-Submission stages. The document 'Settlement Boundary Review Methodology' was published as part of the Core Document Library (TSF03).</p>

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> 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 NPPF. 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.) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Support for the Plan (multiple individuals) In light of the allocation SD63, paragraph 1.24 regarding Sustainability Appraisal is inaccurate and unjustified (Cheriton PC Cllr Line) The Plan does not give consideration to potential development sites on its boundaries with adjoining adjacent Local Authority areas and existing settlements. Greater flexibility within the Local Plan would allow communities to meet their needs and the objectives of the SDNP A Duty to Cooperate issue needs to be addressed regarding Alfriston, as the emerging Wealden Local Plan also refers to housing figures in Alfriston Concerns raised about parish council and community engagement in preparation of the Local Plan (Lewes District Councillor Victor Ient & various individuals) Insufficient policies addressing the SDNP statutory purposes (Lewes District Councillor Victor Ient) Duty to Cooperate issue raised regarding whether parishes partially outside the National Park been adequately consulted regarding planned development within the National Park Question raised as to whether the Ministry of Defence have been consulted by the SDNPA on their future land use intentions Frequent requirement to 'conserve and enhance' within policy is unrealistic and will hinder housing targets from being met 	

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• Multiple references to biomass as an alternative to fossil fuels are not supported by analysis of local supply availability or the impact on transport infrastructure• Local Plan needs to be more succinct and accessible to be effective. Tighter policy wording is needed to provide protection fitting to a nationally protected area• Concern raised about accessibility of online consultation system• NPPF requires a key diagram and proposals map, neither are included• Para. 1.10 should also refer to the use of land which is not included in the Local Plan• Fig.1.1 should provide greater explanation with reference to sustainable development• Paragraphs 1.11-12 should refer to the NPPF• Insufficient weight is given to the conservation of wildlife and cultural heritage throughout the Local Plan• Too much emphasis is given to ecosystem services• The 'Spatial Strategy' does not provide a strategy for the plan and is not carried forward into the Core Policies• The evidence-base is insufficient (except relating to landscape)• No explanation is given of how Local Plan policies will replace existing policies and the difference between them• Concerns raised on consultation process for settlement boundary changes	

Summary of Issues and Responses

Chapter 2: Vision & Objectives

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England supported the reference to a conserved and greatly enhance heritage in the Vision and the second Local Plan objective to conserve and enhance the cultural heritage of the National Park.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Chichester District Council commented that the objectives were broadly defined by the national park purposes. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The Local Plan should conserve, enhance and protect the natural beauty, wildlife, cultural and archaeological heritage of the SDNP and promote understanding of its special qualities, to the benefit of both residents and the wider general public (Bramshott and Liphook PC) Supports the Vision but concerned that it is unattainable and unrealistic (Cheriton Parish Council) Amend the objectives to define sustainable development and acknowledge the external pressures from development (Cheriton PC) Object to the phrase 'broadly compatible' in regard to objective 9 on local businesses (Parish of Colemore and Priors Dean) Insufficient reference made to enforcement (Rogate PC) Strong support for the introduction (Selborne PC) The vision should reference new technology (Stedham with Iping PC) <p><u>Other organisations</u></p>	<p><i>I: Supports the Vision but concerned that it is unattainable, unrealistic and not focused on the requirements of plan making</i> R: The vision is taken form the Partnership Management Plan. It is purposefully aspirational, but is in the opinion of the Authority and its partners realistic. The objectives outline the direction that the Local Plan will take in order to achieve the vision. All policies are linked to specific Local Plan objectives throughout the Plan.</p> <p><i>I: Supports the vision and objectives, but disappointed that there is no objective about net gains in biodiversity</i> R: The third objective deals with biodiversity, but does not explicitly mention net biodiversity gain. This addressed in Policy SD9: Biodiversity and Geodiversity.</p> <p><i>I: Amend the objectives to define sustainable development and acknowledge the external pressures from development</i> R: Sustainable development is addressed in Policy SD1: Sustainable Development and is defined in the Glossary. External pressure on the National Park is addressed in the Introduction. The Local Plan objectives relate specifically to the direction that the Local Plan will take in order to achieve the vision.</p>

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Agrees with the vision and objectives particularly in regard to ecosystem services (British Canoeing and Lewes District Green Party) • Welcomes the draft Local Plan in its entirety (Fittleworth and District Association) • The chapter should include resilience as well as sustainability in order to address climate change and other issues (Lewes District Green Party) • There should be increased interface between the National Park and its surrounding areas, for example, the Manhood Peninsula (Manhood Peninsula Partnership) • Supports the vision and objectives particularly the third objective on habitats (RSPB) • Endorses the vision and objectives (South Downs Society) • Supports the vision and objectives, but disappointed that there is no objective about net gains in biodiversity (Sussex Wildlife Trust) • Strongly supports the aims and objectives of the Local Plan (University College London) • Supports the vision and objectives which are well conceived and reflect the consultation process and the purposes and duty of the National Park (Sompting Estate) <p>Individuals</p> <ul style="list-style-type: none"> • The vision should reference new technology • There is no objective relating to additional residential development • The NPA should consider allocating sites for housing on the edge of the National Park, for example, at Peace Haven • Supports the first two objectives, but thinks that they should be used conservatively and negatively • Supports the first four objectives and thinks the Local Plan should seek to restore and recreate as well as conserve and enhance the landscape • The vision and objectives should reference major events such as music festivals and vehicle rallies 	<p>I: There should be increased interface between the National Park and its surrounding areas, for example, the Manhood Peninsula R: This interface is addressed in the spatial portrait in chapter 3. This acknowledges that the spatial portrait extends beyond the National Park's boundary and acknowledges the many interdependences and connections that exist across the boundary.</p> <p>I: There is no objective relating to additional residential development The eighth objective relates to housing.</p> <p>I: The NPA should consider allocating sites for housing on the edge of the National Park, for example, at Peacehaven. R: Housing growth in the National Park is not intended to address wider strategic housing need. Also, a key reason for the National Park boundary being drawn as it is, is to prevent further urban development on settlement edges intruding into the National Park. The approach suggested in these representations is therefore not appropriate. All potential housing sites that were submitted to the NPA through the Call for Sites were considered through the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>I: The vision and objectives should reference major events such as music festivals and vehicle rallies R: The vision is very high level and so does not mention specific types of development. The sentence of the vision 'Opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities' can be applied to major events. Paragraph 27 of the DEFRA</p>

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• The vision and objectives are unrealistic and are not focused on the requirements of plan making• No mention of restricting hunting and shooting	<p>National Park Vision & Circular says that events with the potential to harm the special qualities of a Park will need to be controlled. The SDLP contains a number of policies which work together so that large-scale events will contribute to conserving and enhancing the special qualities. Examples of these policies include SD4: Landscape, SD5: Design, SD8: Dark Night Skies, and SD23: Sustainable Tourism.</p> <p><i>I: No mention of restricting hunting and shooting</i> R: The vision is very high level and so does not mention specific types of development. The sentence of the vision 'The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly' can be applied to hunting and shooting.</p>

Summary of Issues and Responses

Chapter 3: Spatial Portrait and Spatial Strategy

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <p>Historic England: Welcomes and supports the spatial strategy as being the most appropriate of the options in terms of protecting the historic environment. Also welcome the identification of the cultural heritage and historic features in the broad areas.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Request that greater recognition is given in the text to Stanmer Park as a gateway to the National Park. Reference to the promotion and enhancement of walking and cycling links to and from the City would also be welcomed. (Brighton and Hove City Council) Support the landscape led approach which reflects National Park purposes. (Chichester District Council) The proposed development strategy is considered to be consistent with national policy. Disappointed that the level of provision being made in the Local Plan represents an annual shortfall of 197 homes per annum against the OAN. (Mid Sussex District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Advise that the Local Plan should contain a set of Core policies that apply across the National Park and separate sections dealing with the issues that affect each area by County, such as pressure for major transport infrastructure. The strategy for medium level of growth dispersed across the National Park, safeguarding the importance of the habitats and species of the Itchen and protecting the SAC is inconsistent with Allocation Policy SD63 (Cheriton Parish Council) 	<p><i>I: Request that greater recognition is given in the text to Stanmer Park as a gateway to the National Park.</i> R: Additional text relating to Stanmer is set out on p6 of the Schedule of Changes.</p> <p><i>I: Disappointed that the level of provision being made in the Local Plan represents an annual shortfall of 197 homes per annum against the OAN. (Mid Sussex District Council)</i> R: Footnote 9 of the NPPF identifies national parks as an area where development should be restricted and OAN does not need to be met. Paragraph 34 of the DEFRA Vision & Circular states that the Government recognises that national parks are not suitable locations for unrestricted housing. The National Park Authority has tested all known possible housing sites for development potential through the SHLAA (Core Document TSF10), and made provision for housing within a limited landscape capacity. The SA has confirmed that the National Park Authority would not be meeting its statutory purpose if it were to seek to fully meet the OAN within the National Park boundaries.</p> <p><i>I: Advise that the Local Plan should contain a set of Core policies that apply across the National Park and separate sections dealing with the issues that affect each area by County, such as pressure for major transport infrastructure.</i></p>

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Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Support the dispersed medium spatial strategy, however consider that this approach does not adequately take account of the need to protect the identity and intrinsic character of smaller villages and towns, especially where these are located close to larger neighbouring settlements. This is particularly the case with the settlements of Easebourne and Midhurst, where there is particular risk of coalescence between the two places. (Easebourne Parish Council) The SNDPA has not worked hard enough to meet its own housing needs or Gypsy and Traveller needs and all SHLAA sites should be re-assessed so as not to transfer the problem to EHDC. (Four Marks Parish Council) Para 3.38 has a number of errors as Ashford Hangers is a NNR (it is not in itself an SAC, only part of the East Hampshire Hangers SAC); Duncton to Bignor Escarpment SAC (not 'and'); Lewes Downs (Mount Caburn) NNR and Lewes Downs SAC. Para 3.45 should refer to the ancient woodland areas of the Scarp Slope. The Wealden Edge Hangers, part of the East Hampshire SAC is arguably one of the ecologically most interesting and diverse series of Chalk woodlands in Britain. (Colemore & Priors Dean Parish Council) Support the approach to OAN. (Selbourne Parish Council) No mention is made in para 3.31 of the negative impact of aircraft noise from Farnham airport and from a possible second runway at Gatwick (Stedham with Iping Parish Council) Gateways sections paras 3.43 and 3.56 and the Hubs sections paras 3.44 and 5.57 should reference Steyning as being an attractive historic market town. (Steyning Parish Council) Request that para 3.14 is amended to say that Twyford Village occupies a key position on the western boundary and has good facilities both for visitors and for a wider population. (Twyford Parish Council) <p>Other organisations</p> <ul style="list-style-type: none"> There should be more emphasis on building houses in the National Park to: relieve pressure from neighbouring authorities and adjacent settlements; and 	<p>R: This is the first Local Plan for the whole National Park. It purposefully introduces a new way of looking at the National Park as a single entity rather than sub-divided into counties or districts.</p> <p>I: The spatial strategy does not adequately take account of the need to protect the identity and intrinsic character of smaller villages and towns, especially where these are located close to larger neighbouring settlements.</p> <p>R: It is a park-wide plan and does not attempt to drill down to that level of detail. All parish councils were given the opportunity by the Authority to prepare a locally distinctive neighbourhood development plan that could provide that level of detail. There are also other types of community-led plan such as parish plans and village design statements that may be more appropriate for the smaller towns and villages.</p> <p>I: Para 3.38 has a number of errors</p> <p>R: The corrections are set out on p6 of the Schedule of Changes.</p> <p>I: Various comments that not all the challenges and opportunities for the broad areas have been identified.</p> <p>R: It has not been possible to address all the challenges and opportunities, but changes have been made as appropriate in the Schedule of Changes.</p> <p>I: There should be more emphasis on building houses in the National Park to and a further call for SHLAA (Core Document TSF10) sites should be carried out and sites re-tested against more realistic criteria.</p> <p>R: As stated above national policy states that NPAs are exempted from meeting their OAN and that national parks are not suitable locations for unrestricted housing. Two calls for sites have been</p>

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<p>to recognise the important contribution that increasing the supply of housing can make to affordability, the rural economy and to support thriving places. A further call for SHLAA sites should be carried out and sites re-tested against more realistic criteria. (Various organisations)</p> <ul style="list-style-type: none"> • Sites such as land at Lower Hoddern Farm to the north east of Peacehaven can provide a long-term growth location that can contribute towards the National Park housing requirement whilst contributing toward the sustainability of Peacehaven. (EPV (East sussex)Ltd) • Welcome the reference in the text to the Brighton & Lewes Downs Biosphere Reserve designated by UNESCO, but this should also be referenced in one of the policies (Brighton & Lewes Downs Biosphere Partnership) • Support mention of the challenges around flooding and opportunities for recreation on the Rivers Arun, Adur, Cuckmere and Ouse river corridors. (British Canoeing) • The dispersed medium option development strategy is considered by SDNPA to do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park. However, option 4 would contribute more to maintaining existing rural services in smaller settlements. Greater recognition should be given to the role and character of the settlements. The approach to managing growth as set out in paragraph 3.115 is unrefined and therefore unable to conserve and enhance the qualities of individual towns and villages. The spatial strategy is not justified against objective 7 of the Pre-Submission Local Plan. (Greatham Voice) • The Spatial Portrait should include mention of the river corridors of the Itchen and Meon River Valleys. (Hampshire CPRE) • Lewes as a key settlement and hub should be mentioned in para 3.57 (Houndean Residents Association) 	<p>carried by this NPA out that have fed into this Local Plan. The SHLAA (TSFI0) followed a robust methodology in assessing these sites.</p> <p>I: Sites such as land at Lower Hoddern Farm can provide a long-term growth location that can contribute towards the National Park housing requirement. R: The development of Hoddern Farm would constitute major development in terms of paragraph 116 of the NPPF and its sensitive location high up on the Downs would result in a severe adverse impact on the landscape. There are alternative sites in and around Lewes District that are outside the National Park that are suitable for development.</p> <p>I: The approach to managing growth as set out in paragraph 3.115 is unrefined and therefore unable to conserve and enhance the qualities of individual towns and villages. R: The spatial strategy is purposefully broad brush. The policies of the Local Plan will when implemented through the determination of planning applications conserve and enhance the individual towns and villages.</p> <p>I: The Spatial Portrait should include mention of the river corridors of the Itchen and Meon River Valleys. R: Although the Itchen and Meon are important rivers they do not bisect the National Park from north to south in the same way as the identified river corridors.</p> <p>I: Object to this Chapter as does not provide the coherent evidence base and strategy that is needed to conform to the requirements of NPPF paras 156 and 157.</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> The Vision, Objectives and Spatial Portrait Strategy are well conceived, reflect the extensive consultation process through which they were developed, and reflect the Purposes and Duty of the Park. (Sompting Estate) The potential 6000 new houses at Bishopstoke close to the National Park western boundary at Colden Common should be mentioned on the Spatial map. (South Downs Land Managers Group) Para 3.88, the River Adur Corridor should include additional wording to explain that the Downs Link is available for use by walkers, cyclists and equestrians and not just cyclists. (The British Horse Society) 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.) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Object to the Local Plan as this Chapter does not provide the coherent evidence base and strategy that is needed to conform to the requirements of NPPF paras 156 and 157. The Spatial Portrait does not identify or objectively assess the planning needs of the area (required by NPPF 14). The National Park is not a single entity for local planning purposes as it is diverse and dominated by neighbouring large urban areas which exert specific pressures on the National Park and require a policy response. (Various individuals) Consider that parts of Liphook, particularly the Bohunt Manor Estate should not be within the National Park boundary. There are policy errors and omissions. Figure 3.2 The South Downs National Park contains a number of errors as the A31 is labelled A3, watercress line is shown as a working line, there is an inaccurate western boundary around Winchester and the course of the River Itchen is 	<p>R: The spatial portrait analyses the broad areas and river corridors of the national park. The strategic and development management policies address all the issues identified in paragraph 156 of the NPPF. The Local Plan does plan positively within the legislative and policy framework for national parks. It covers a 15 year period up to 2033 and has been based on cooperation with our neighbours as set out in our Duty to Cooperate Statement.</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p>incorrect. Fig 3.3 is a selection of unco-ordinated and unlinked facts. There is a general lack of understanding of the complexity of planning policy issues and of the requirement for clear and precise policies to be directed at resolving real strategic and local issues, rather than a reliance on generic statements. The pressures that the downland and the Itchen valley face are both related to the fact that they are part of a wider vibrant economic region. The identification of Cheriton for development and the allocation of major development at Hinton Marsh is counter productive in terms of effects on hydrology and designated nature conservation sites.</p> <ul style="list-style-type: none">• Support paras 3.18 and 3.19. The impacts of the watercress industry in terms of heavy lorries and pollution of watercourses needs to be addressed. (Cllr Jackie Porter, Hampshire County Council)• Para 3.31 fails to mention the negative impact of aircraft noise from Farnham airport and possible impacts if the second runway at Gatwick goes ahead.	

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Summary of Issues and Responses

Chapter 4: Core Policies Introduction

There were a total of 8 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u> Natural England welcomed the inclusion of sustainable development and ecosystem services as core policies within the plan.</p> <p><u>Borough, City, County and District Councils</u> No comments were made by any Borough, City, County and District Councils</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The core policies do not set out clearly what is unacceptable development in the National Park and what will be encouraged (Cheriton Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Impracticable to apply core policies across the whole National Park. Instead it is suggested that policies should relate to identified character areas and their respective landscapes. <p><u>Individuals</u></p> <ul style="list-style-type: none"> The definition of sustainable development should include embedded carbon, life cycle and financial sustainability. Support core policies particularly ecosystem services. The Core Policies are inadequate and insufficient to provide the basis for a Local Plan in accordance with NPPF. 	<p><i>I: The core policies do not set out clearly what is unacceptable development in the National Park and what will be encouraged.</i> R: Policy SDI: Sustainable Development sets out clearly in line with the NPPF how the Authority will take a positive approach that reflects the presumption in favour of sustainable development. Criterion 4 sets out overarching reasons for which planning permission will be refused.</p> <p><i>I: Impracticable to apply core policies across the whole National Park. Instead it is suggested that policies should relate to identified character areas and their respective landscapes.</i> R: This is the first Local Plan for the whole National Park and the core policies apply to all planning applications throughout the National Park.</p>

Chapter 4: Core Policies Introduction

Summary of Issues and Responses

Policy SD1: Sustainable Development

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> Historic England suggests that in order to comply with paragraph 133-4 of the NPPF that criterion 4(b) of SD1 should refer to 'public' benefits. Historic England welcomes the approach of giving great weight to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park in the determination of planning applications. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The approach in the Local Plan is consistent with the priorities in the City Council set out in the City Plan. However, greater reference should be made to the Brighton & Lewes Downs Biosphere Reserve (Brighton & Hove City Council) Paragraph 4.7 on cumulative development should also reference development outside the National Park (Brighton & Hove City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Particularly welcome the detailed wording of policy SD1 (Buriton PC) Strongly supports Policy SD1 (Fernhurst PC) Policies SD1 to SD18 are supported, but makes the Local Plan relatively weak in relation to town and village centres (Liss PC) Strongly support the principle of considering cumulative development, concerned that criterion 4 of Policy SD1 is too permissive and suggests re-ordering the guiding principles of the Local Plan set out in paragraph 4.4 (Parish of Colemore and Priors Dean) 	<p><i>I: Historic England suggests that in order to comply with paragraph 133-4 of the NPPF that criterion 4(b) of SD1 should refer to 'public' benefits.</i> R: The reference to public benefit in the NPPF is strictly to do with the historic environment and cannot be applied more widely to the purposes of the National Park.</p> <p><i>I: Paragraph 4.7 on cumulative development should also reference development outside the National Park.</i> R: The paragraph refers to the impact of cumulative development in the National Park. The development could be located inside or outside the National Park, but it is the impact in the National Park that the Authority is concerned about.</p> <p><i>I: Concerned that criterion 4 of Policy SD1 is too permissive and suggests re-ordering the guiding principles of the Local Plan set out in paragraph 4.4.</i> R: The purpose of criterion 4 is to provide clarity on overarching reasons whereby planning permission may be refused in the National Park. The bullet points in paragraph 4.4 are not listed by priority.</p> <p><i>I: Policy SD1 requires a clear strategy for implementation to be effective and there should be explicit mention of traffic impacts on the roads and lanes of the National park, tranquillity and dark skies.</i> R: Policy SD1 provides an overarching framework for evaluating all development proposals in the National Park. It does not refer to detailed</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Policy SDI requires a clear strategy for implementation to be effective and there should be explicit mention of traffic impacts on the roads and lanes of the National park, tranquillity and dark skies (Upham PC) Criterion 4 of Policy SDI is unsound, because the use of the words 'unless exceptionally' weakens the statutory purposes, there is no statutory provision for it and the wording would invite developers to exploit that weakness (Selborne PC) <p>Other organisations</p> <ul style="list-style-type: none"> Supports Policy SDI and paragraph 4.5, but thinks that the management of commercial shooting and the sensitive balancing of conflicting priorities requires a specific policy in the Local Plan (Iford Parish Meeting) Supports Policy SDI, but thinks more detail is required on what constitute material considerations (Madehurst Parish Meeting) Reference should be made to community food growing projects as an element of green infrastructure and of sustainable development otherwise it may be overlooked (Brighton & Hove Food Partnership) Reference should be made to the Brighton & Lewes Downs Biosphere Reserve (Brighton & Hove Biosphere Partnership) Supports Policy SDI particularly criterion 2 (British Canoeing) Object to the fourth criterion of policy SDI which would allow development that does not conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park (CPRE Hampshire and CPRE Sussex) Supports Policy SDI and suggests paragraph 4.11 is extended to encourage development outside the National Park (DMH Stallard LLP) Support policy SDI but thinks it could be amended to apply to more than planning applications (Eastbourne Downland Group) 	<p>planning issues such as traffic and impacts on tranquility. Instead these matters are addressed in the Local Plan strategic and development management policies.</p> <p>I: Criterion 4 of Policy SDI is unsound, because the use of the words 'unless exceptionally' weakens the statutory purposes, there is no statutory provision for it and the wording would invite developers to exploit that weakness.</p> <p>R: The term 'unless exceptionally' is used to emphasise that in line with national policy, there is a presumption in favour of sustainable development. Therefore planning permission will only be refused in exceptional circumstances.</p> <p>I: More detail is required on what constitute material considerations.</p> <p>R: Material considerations are explained in the Glossary.</p> <p>I: Object to the fourth criterion of policy SDI which would allow development that does not conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park.</p> <p>R: Criterion 4 states that planning permission will be refused when development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park.</p> <p>I: Suggests paragraph 4.11 is extended to encourage development outside the National Park.</p> <p>R: Chapter 3 explains how work is ongoing with adjoining local authorities to fully test all reasonable options to meeting unmet housing need in suitable locations outside the National Park.</p> <p>I: Policy SDI should be amended to apply to more than planning applications.</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Too little consideration has been given to the overall development needs of the National Park and a medium growth strategy will not deliver an adequate provision of growth. Suggests that the development of Hoddern Farm will help to meet the housing needs of the National Park and Peacehaven (EPV) • The Local Plan places far too much emphasis on the preservation of the natural environment to the detriment of economic and social issues particularly with respect to housing. It also ignores the functional relationship between the National Park's population and settlements adjacent to the Park's boundary such as Liphook (Green Village Investments) • The social and economic aspects of sustainable development should be weighed in the balance with environmental matters. Also suggests the deletion of the word 'exceptionally' from criterion 4 of Policy SD1 (Cowdray Estate) • Largely supports the policy thinks that further detail should be given on what impacts are being referred to how the assessment of cumulative impacts will be assessed. Also favours a more positive wording of criterion 4 of the policy (Leconfield Estate) • The concept of 'resilience' should be added to the definition of sustainable development (Lewes District Green Party) • Paragraph 4.11 should be extended to reflect the national policy requirement to encourage sustainable development, which includes established employment areas outside the National Park (Hopegar Properties) • Suggests that the socio-economic duty of the National Park Authority should be included in the guiding principles of the Local Plan (South Downs Land Managers) • Support Policy SD1 (South Downs Society) • The definition of sustainable development should include embedded carbon, life cycle and financial sustainability. • Strongly supports Policy SD1 (Sussex Wildlife Trust) 	<p>R: The primary purpose of this Local Plan is its use in the determination of planning applications. The Local Plan builds on the Partnership Management Plan which has a much wider remit than planning.</p> <p><i>I: Too little consideration has been given to the overall development needs of the National Park and a medium growth strategy will not deliver an adequate provision of growth. Suggests that the development of Hoddern Farm will help to meet the housing needs of the National Park and Peacehaven.</i></p> <p>R: The National Park Authority's approach to meeting development need is set out in chapter 3 of the Plan. The spatial strategy seeks to deliver growth within the National Park without harming its special qualities. Lower Hoddern Farm was assessed as part of the SHLAA (Core Document TSF10). Its development would constitute major development and its sensitive location high up on the Downs would result in a severe adverse impact on the landscape. There are alternative sites in and around Peacehaven that are outside the National Park that are suitable for development.</p> <p><i>I: The Local Plan places far too much emphasis on the preservation of the natural environment to the detriment of economic and social issues particularly with respect to housing. It also ignores the functional relationship between the National Park's population and settlements adjacent to the Park's boundary such as Liphook.</i></p> <p>R: The Local Plan's emphasis on the natural environment comes from the purposes of the National Park that are set out in national legislation. The socio-economic duty of the National Park Authority is according to national legislation pursuant to the purposes. The functional relationship between the National Park and settlements just outside the boundary is acknowledged in chapter 3.</p>

Policy SD1: Sustainable Development

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> The definition of social and economic wellbeing should include health. The guiding principles set out in paragraph 4.4 should also refer to greenwaste collection and composting facilities (Midhurst Society) 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.) <p>Individuals</p> <ul style="list-style-type: none"> Support for policy SD I, which is entirely appropriate, justified, effective, consistent with NPPF and procedurally and legally correct. Inconsistency between the use of ‘will’ in policy SD I and ‘may’ in paragraph 4.8 and the recommendation that both should say ‘will.’ Suggest an alternative definition of cumulative impacts. Thinks that the Local Plan should define sustainable development and address the issue of plastic waste (Lewes District Councillor) The policy will be used to create inertia by preventing harm but not promoting good development. Support for Policy SD I providing that it is using the Brundtland definition of sustainable economic development and not ‘sustaining economic development.’ Taking a landscape-led approach and seeking the delivery of multiple ecosystem services are only material considerations that do not fully reflect either the wider purpose of the planning system. The plan therefore will provide less environmental protection than the policies it replaces and will result in more development than implied by the Vision. There is no implementation or monitoring framework for this policy, which is unacceptable. 	<p>R: <i>The social and economic aspects of sustainable development should be weighed in the balance with environmental matters.</i></p> <p>I: All three tenets of sustainable development are considered in the Local Plan. However, the socio-economic duty of the National Park Authority is according to national legislation pursuant to the purposes.</p> <p>I: <i>Favours a more positive wording of criterion 4 of the policy.</i></p> <p>R: The first three criteria of the policy are positively worded, however, it was considered appropriate to set out clearly the circumstances under which planning permission may be refused. It should be noted that the NPPF takes a similar approach and identifies certain circumstances under which planning permission may be refused. For example, paragraph 27 of the NPPF states that applications for town centre uses that fail the sequential test should be refused.</p> <p>I: <i>Suggests that the socio-economic duty of the National Park Authority should be included in the guiding principles of the Local Plan.</i></p> <p>R: The socio-economic duty is set out in chapter I of the Plan.</p> <p>I: <i>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.</i></p> <p>R: Conserving and enhancing the landscape is part of the National Park’s first purpose. The socio-economic duty of the National Park Authority is according to national legislation pursuant to the purposes.</p> <p>I: <i>Inconsistency between the use of ‘will’ in policy SD I and ‘may’ in paragraph 4.8 and the recommendation that both should say ‘will.’</i></p>

Policy SD I: Sustainable Development

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Welcomes the commitment to sustainability. • Supports the wording of paragraphs 4.4, 4.7 and 4.10. 	<p>All decisions on planning applications will be made on balance and will take into account all the development plan policies. It is therefore appropriate to use 'may' in the supporting text.</p> <p><i>I: Taking a landscape-led approach and seeking the delivery of multiple ecosystem services are only material considerations that do not fully reflect either the wider purpose of the planning system. The plan therefore will provide less environmental protection than the policies it replaces and will result in more development than implied by the Vision. There is no implementation or monitoring framework for this policy, which is unacceptable.</i></p> <p>R: The Local Plan policies in combination seek to deliver sustainable development in the National Park in a way that conserves and enhances its special qualities.</p>

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

Summary of Issues and Responses

Policy SD2: Ecosystem Services

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> The Environment Agency supports the overriding principles of this policy and in particular specific reference to criteria a, b,c,d,e and i. The Forestry Commission comments that more clarity is required on defining supporting services, provisioning services are marketable products produced from the landscape, regulating services often have a transboundary impact and cultural services relate to health and wellbeing benefits. Recommends that the Local Plan should demonstrate how natural capital benefits derived from both the rural and urban context will be achieved through the planning process. Historic England welcomes the recognition of cultural heritage as part of ecosystem services in Figure 4.2, but are disappointed that there is no specific reference to cultural heritage in Policy SD2. Natural England pointed out that the Local Plan does not contain policy protection of the best and most versatile agricultural land and soils. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The requirement for a statement on ecosystem services to accompany all planning applications is unreasonable particularly for householder application and so the policy is not justified (EHDC) 	<p><i>I: More clarity is required on the different types of ecosystem services.</i> R: More information is provided in the evidence based study 'Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool' (Core 04) and the Ecosystem Services Background Paper (Core 05) which are both published as part of the Core Document Library.</p> <p><i>I: No specific reference to cultural heritage in Policy SD2.</i> R: Cultural heritage is referenced in criterion k of Policy SD2 under 'cultural resources which contribute to the special qualities.'</p> <p><i>I: The Local Plan does not contain policy protection of the best and most versatile agricultural land and soils.</i> R: It is agreed by the Authority that the Policy SD2 should protect the most versatile agricultural land and soils. Therefore criterion (g) has been amended on page 1 of the Post-Submission Schedule of Changes to 'conserve and enhance soils, <u>use soils sustainably, and protect the best and most versatile agricultural land.</u>'</p> <p><i>I: The benefits of rural housing should be reflected in Policy SD2.</i> R: Notwithstanding the importance of housing, it is not an ecosystem service.</p> <p><i>I: Considers that there is too much emphasis on ecosystems and landscape rather than meeting OAN.</i></p>

Policy SD2: Ecosystem Services

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Policy SD2 appears very onerous in its requirements as it applies to all development including small and is difficult for applicants and decision makers to interpret (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Supports Policy SD2 (Fernhurst PC, Madehurst Parish Meeting and Selborne PC) Policy SD2 is supported but its enforceability is questioned (Liss PC) Objects to the policy requirement for all planning applications to be accompanied by an Ecosystem Services Statement (Stedham with Iping PC and Woolbeding with Redford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The benefits of rural housing should be reflected in Policy SD2 (Angmering Estate) Supports Policy SD2 (British Canoeing) The focus on ecosystems designed to maintain natural capital and value the The role of ecosystems services in providing important societal and environmental benefits is generally neglected in Local Plans, and so this is an important step forward (CPRE) Hampshire and CPRE Sussex) Supports the principle of Policy SD2 (CLA) Strongly supports the prominence given to the consideration of ecosystem services, but are concerned by potential conflicts between the various ecosystem services (Eastbourne Downland Group) Considers that there is too much emphasis on ecosystems and landscape which hinders residential development in appropriate locations at the time of a housing crisis. Recommends that more emphasis needs to be given to meeting OAN or at least getting closer to it and to ensuring that growth within the National Park Area is not stifled by landscape designations (EPV) 	<p>R: All the Local Plan policies have been formulated putting landscape first and then peoples' interaction with it. This is in line with the purposes of national parks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and promote opportunities for the understanding and enjoyment of the special qualities. The Local Plan and its policies seek to ensure that the benefits and services people and wider society get from the natural environment are recognised and enhanced. Many Local Plan policies require development proposals to conserve and enhance various aspects of natural beauty, wildlife and cultural heritage.</p> <p><i>I: The Local Plan fails to consider the unique opportunity at Bohunt Park, Liphook to deliver multiple ecosystem services.</i></p> <p>R: Bohunt Manor was assessed as part of the SHLAA (Core Document TSF10) and also as part of a planning application. Its development would constitute major development and there are alternative sites in the parish that are outside the National Park that are suitable for development. As the site is not allocated it is not necessary for the Plan to consider the ecosystem services it could deliver.</p> <p><i>I: Policy SD2 should also refer to the wind and sun as ecosystem services.</i></p> <p>R: The wind and the sun provide renewable energy that are listed as provisioning services in figure I.3.</p> <p><i>I: The Local Plan should also include the re-use of disused railway lines.</i></p> <p>R: Various disused railway lines are designated as non-motorised transport routes in Policy SD20.</p> <p><i>I: The requirement for a statement on ecosystem services to accompany all planning applications will add cost and bureaucracy, as well as slowing down the planning system.</i></p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> The Local Plan fails to consider the unique opportunity at Bohunt Park, Liphook to deliver multiple ecosystem services (Green Village Investments) The benefits of rural housing should be reflected in Policy SD2 (Leconfield Estate) Welcomes that all development proposals must be supported by a statement that sets out how the development proposal will impact on ecosystem services. Air quality should be added as an ecosystem service (Lewes District Green Party) Supports Policy SD2 (South Downs Society) Strongly supports Policy SD2 and the production of a technical advice note (Sussex Wildlife Trust) Policy SD2 should also refer to the wind and sun as ecosystem services (The Midhurst Society) The Local Plan should also include the re-use of disused railway lines (The Watercress Way) Strongly support Policy SD2 and suggests the addition of a new criterion on adaptation to climate change (University College London) The benefits of rural housing should be reflected in Policy SD2 (The Edward James Foundation) <p>Individuals</p> <ul style="list-style-type: none"> The requirement for a statement on ecosystem services to accompany all planning applications will add cost and bureaucracy, as well as slowing down the planning system. The policy is laudable in its ambition but it is questionable how it can be enforced (EHDC Councillor) Support Policy SD2 but think that it should be cross referenced throughout the other policies Policy SD2 is a list of objectives rather than a policy and so does not provide a clear framework for decision-making. There are no targets 	<p>R: Although all planning applications are required to be accompanied by a statement on ecosystem services, paragraph 4.16 states that their preparation should be proportionate to the impact. Therefore the ecosystem services statement for a single storey extension would be much shorter than one for a new factory or housing estate. In order to help applicants and agents with this new and probably unfamiliar requirement two technical advice notes have been produced and published by the Authority as part of the Core Document Library (Core 06 and Core 07). They are for householder and non-householder applications respectively.</p> <p>I: The policy is laudable in its ambition but it is questionable how it can be enforced.</p> <p>R: The technical advice notes will provide guidance for all applicants and agents. The policy will be enforced in the same way that all policies are enforced in the National Park.</p> <p>I: Policy SD2 is a list of objectives rather than a policy and so does not provide a clear framework for decision-making. There are no targets or implementation frameworks relating to the policy.</p> <p>R: The criteria of Policy SD2 list different ways in which development proposals can have an overall impact on the ability of the natural environment to contribute goods and services. The two technical advice notes provide practical guidance on how they can be implemented in a development proposal. The target for Policy SD2 set out in figure 10.2 is to ensure that all development has a net positive impact on the ability of the environment to deliver ecosystem services. The evidence for this will be gathered through Ecoserv mapping.</p> <p>I: The policy is imprecise and somewhat repetitive. It belongs in the Partnership Management Plan rather than the Local Plan.</p> <p>R: Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by recognising</p>

Policy SD2: Ecosystem Services

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p>or implementation frameworks relating to the policy. It is unrealistic that the policy should apply to all applications.</p> <ul style="list-style-type: none">• Supports Policy SD2 as it builds on the legacy of the late Colin Tingle, who worked on the Lewes Neighbourhood Plan.• The policy is imprecise and somewhat repetitive. It belongs in the Partnership Management Plan rather than the Local Plan.	<p>the wider benefits of ecosystem services. Policy SD2 is therefore consistent with national policy.</p>

Summary of Issues

Policy SD3: Major Development

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> Historic England omits the conservation and enhancement of the historic environment, which is an integral part of sustainable development. Portsmouth Water noted that the re-use and recycling of water in paragraph 4.28 can be a high carbon option. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Supports Policy SD3 and consider it important that the unique circumstances of the National Park and its wider relationship with surrounding areas is acknowledged (Brighton & Hove City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcomes and supports the robust wording of the policy (Buriton PC) Strong support (Fernhurst PC) Employment should be added to the principles of sustainable development in paragraph 4.28 (Midhurst Town Council) The ‘potential harm test’ should be applicable to all planning applications in the National Park and not just major development (Rogate PC) The word ‘serious’ should be omitted from the policy as no potentially adverse impact should be allowed in a national park (Selborne PC) 	<p><i>I: Policy SD3 omits the conservation and enhancement of the historic environment.</i> R: The historic environment is part of cultural heritage, which is addressed in criterion I.</p> <p><i>I: Employment should be added to the principles of sustainable development in paragraph 4.28.</i> R: Reference is made to employment and the economy under the principles of sustainable development.</p> <p><i>I: The ‘potential harm test’ should be applicable to all planning applications in the National Park and not just major development.</i> R: Policy SD3 is all about major development. Criterion 4 of Policy SD1 relates to all planning applications that fail to conserve and enhance the National Park.</p> <p><i>I: The word ‘serious’ should be omitted from the policy as no potentially adverse impact should be allowed in a national park.</i> R: The policy is referring to the ‘potential’ for a development proposal to have a serious adverse impact and not whether it actually does or not.</p> <p><i>I: Policy SD3 and its supporting text differs from the NPPF in a number of ways without adequate explanation.</i> R: Policy SD2 is consistent with the NPPF and simply provides a local context on how the Authority will determine what constitutes major development and, if an application is deemed to constitute major development, how that application will be considered.</p>

Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> The definition of sustainable development in paragraph 4.28 should include embedded carbon, life cycle and financial sustainability (Stedham with Iping PC) <p>Other organisations</p> <ul style="list-style-type: none"> Strong support providing that the potential impacts of proposals are actually strictly assessed in relation to each individual setting as indicated in the Maurici opinion (Madehurst Parish Meeting) Policy SD3 and its supporting text differs from the NPPF in a number of ways without adequate explanation. SD3 (I) should define ‘serious impact.’ Paragraph 4.25, first bullet fails to recognise ‘national considerations. Paragraph 4.25, second bullet point distinguishes between impact on the local economy and the general benefits of construction. Paragraph 4.25, third bullet introduces an assumption in regard to local need (Adam Hendry) Reference should be the Brighton and Lewes Downs Biosphere Reserve (Brighton & Lewes Downs Biosphere Partnership) Welcomes the clear local interpretation of national policy on major development and how it should be applied to the special qualities of specific national parks. What is considered small scale with little impact in one area of one National Park, could be considered to have major impacts on the special qualities in another part of the same park or in another national park. Having a locally defined policy provides greater clarity for developers and helps reinforce support and understanding among NPA Members (Campaign for National Parks) Support for SD3, which provides useful clarity (Eastbourne Downland Group) The GDPO definition of major development should be used in the Local Plan (EPV East Sussex) The definition of major development used in the Policy is not based on national planning policy, does not draw in directly comparable 	<p>I: SD3 (I) should define ‘serious impact.’ R: The Authority considers that the term ‘serious adverse impact’ is self-explanatory. The second bullet point of paragraph 4.22 states that an in-depth consideration of whether the development will in fact have such an impact is not necessary.</p> <p>I: Paragraph 4.25, first bullet fails to recognise ‘national considerations.’ Paragraph 4.25, second bullet point distinguishes between impact on the local economy and the general benefits of construction. Paragraph 4.25, third bullet introduces an assumption in regard to local need. R: As stated previously Policy SD2 and its supporting text is consistent with the NPPF and simply provides a local context on how the Authority will determine what constitutes major development and, if an application is deemed to constitute major development, how that application will be considered.</p> <p>I: The GDPO definition of major development should be used in the Local Plan. R: The National Planning Practice Guidance (NPPG) states that ‘Whether a proposed development in these designated areas should be treated as a major development, to which the policy in paragraph 116 of the Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context.’ This approach is supported by various legal opinions included in the Core Document Library</p> <p>I: The definition of major development used in the Policy relates incorrectly to plan making rather than development management. R: It is agreed by the National Park Authority that paragraph 116 of the NPPF relates primarily to the determination of planning applications.</p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>case law and relates incorrectly to plan making rather than development management. Parts of SD2 either repeat national policy or is ultra vires. The policy should be deleted. (Green Village Investments)</p> <ul style="list-style-type: none"> Criteria 1 and 2 simply repeat national policy. The policy fails to explain how the NPA will determine what constitutes major development. The requirements set out in criterion 3 are too high and will impact adversely on viability. (Hall & Woodhouse Ltd and Prince's Mead School Trust) Assessments of major development should examine incremental development (Houndean Residents Association) Clarification required on sites allocated in NDPs or granted planning permission before the Local Plan is adopted (JLL) Supports the policy particularly the need for exceptional circumstances, the consideration of cumulative development and the sustainability requirements in criterion 3 (Lewes District Green Party) Policy SD3 should not be applied to sites that are already allocated for development such as Old Mallig Farm. The sustainability principles set out in the third criterion of policy SD3 are not consistent with the three tenets of sustainable development set out in the NPPF (Luken Beck) Major development may be necessary to ameliorate the accumulation of iterative environmental damage (Manhood Peninsula Partnership) The policy should give clear guidance for determining whether a development proposal is major (Rydon Homes Ltd) Welcome the wording of SD3 on the definition of major development which reflects the Maurici opinion, the views of this organisation and the work carried out recently on behalf of CNP, CPRE and the National Trust into the workings of the "major development test" across the national parks. It is a fair reflection of 	<p>However, it is also necessary to consider the matter at plan making otherwise allocations could be made that cannot then be implemented by the grant of planning permission on the grounds that they constitute major development. If sites in a protected landscape were to be allocated in a draft plan without any consideration of major development then the plan could fail to be 'justified' as it would not be deliverable.</p> <p>I: Assessments of major development should examine incremental development. R: Criterion 1 of Policy SD3 requires the consideration of cumulative development.</p> <p>I: Clarification required on sites allocated in NDPs or granted planning permission before the Local Plan is adopted. R: The National Park Authority has been considering the matter of major development since it became the Local Planning Authority for the National Park.</p> <p>I: Policy SD3 should not be applied to sites that are already allocated for development such as Old Mallig Farm. R: The National Park Authority has taken a consistent approach to Old Mallig Farm, which is considered to constitute major development.</p> <p>I: The definition of major development is too subjective, overtly negative and should differentiate between urban areas and the countryside. R: Policy SD2 is consistent with the NPPF and simply provides a local context on how the Authority will determine what constitutes major development and, if an application is deemed to constitute major development, how that application will be considered.</p>

Policy SD3: Major Development

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>the necessity of judging the potential impact of developments in their own setting rather than on a “by numbers” basis (South Downs Society)</p> <ul style="list-style-type: none"> • The definition of major development is too subjective, overtly negative and should differentiate between urban areas and the countryside. (Springs Smoked Salmon) • Strongly supports SD3, but suggests that the word ‘serious’ is deleted as it has no planning context (Sussex Wildlife Trust) • All development will increase the amount of traffic on the roads that are also used by vulnerable users such as equestrians. Suggests amending the final bullet point of paragraph 4.25 to mention public rights of way (British Horse Society) • New developments should make a positive contribution to the generation of clean energy. Generating surplus of clean energy would be a more positive and ambitious target than zero carbon. (Midhurst Society) • Criterion 1 of SD3 should refer to ‘local’ context so that the scope for context is not interpreted too widely and beyond what is reasonable (National Trust) • Strongly support the strict conditions for the approval of major development (Wiggonholt Association) • Core Policy SD3: Major Development is not compliant with Government guidance. (The Goodwood Estate Company Ltd.) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • The policy and supporting text is overly legalistic. • Queries who makes the decision on what is in the public interest. No mention of fracking or mineral exploration. • There should also be a policy on major events. • The sustainability criteria should apply to all development and not just major development. 	<p><i>I: Suggests amending the final bullet point of paragraph 4.25 to mention public rights of way.</i> R: The change is not necessary as public rights of way are part of the National Park’s ‘recreational opportunities.’</p> <p><i>I: There should also be a policy on major events.</i> R: Paragraph 27 of the DEFRA National Park Vision & Circular says that events with the potential to harm the special qualities of a Park will need to be controlled. The SDLP contains a number of policies which work together so that large-scale events will contribute to conserving and enhancing the special qualities. Examples of these policies include SD4: Landscape, SD5: Design, SD8: Dark Night Skies and SD23: Sustainable Tourism.</p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• The test for major development in SD3 is much weaker than in the NPPF, and this will allow too much major development to occur.• Strongly support the inclusion of 'health' and wellbeing within the policy (University College London professor)	

Summary of Issues and Responses

Section 5 Introduction to the Thriving Living Landscape Chapter

There were a total of 2 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies and utility providers</u> Natural England – stated they have no specific comments to make.</p> <p><u>Specific consultation bodies – other local authorities</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Generally supports these policies but the landscape driven approach raises issues with the balance between the duties of the National Park to foster the economic well-being of communities and the purpose of conserving and enhancing the beauty wildlife and cultural heritage and promoting understanding and enjoyment (Liss PC) <p><u>Other organisations and individuals</u> No comments received.</p>	<p><i>I: Issues with the balance between the duties of the National Park to foster the economic well-being of communities and the purpose of conserving and enhancing the beauty wildlife and cultural heritage and promoting understanding and enjoyment</i> R: Conserving and enhancing the landscape is part of the National Park's first purpose. The socio-economic duty of the National Park Authority is according to national legislation pursuant to the purposes.</p>

Summary of Issues and Responses

Section 5a: Introduction to Landscape

There were a total of 5 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies and utility providers</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> There is considered to be an omission of a separate policy on large scale events such as music festivals in accordance with paragraph 27 of the DEFRA National Parks Circular 2010 (Cheriton PC) <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> Support for the subject matters such as views, tranquillity, and dark night skies) as upfront strategic policies alongside other more typical policies (South Downs Society, Individual). Support for the removal of the unnecessary qualification of 'adverse impacts' as 'unacceptable' as found in the Preferred Options Local Plan (South Downs Society). Objects to the Local Plan document as there is insufficient emphasis on enhancing, and not just conserving, the special qualities of the National Park, with particular regard to habitats, farm practices and economy, and design standards (Individual) Considers the Local Plan omits emphasis on the importance of protecting land for agricultural use, in addition to its visual qualities (South Downs Society). 	<p><i>I: A separate policy on large scale events such as music festivals as per paragraph 27 of the DEFRA National Parks Circular 2010</i> R: Paragraph 27 of the DEFRA National Park Vision & Circular says that events with the potential to harm the special qualities of a Park will need to be controlled. The SDLP contains a number of policies which work together so that large-scale events will contribute to conserving and enhancing the special qualities. Examples of these policies include SD4: Landscape, SD5: Design, SD8: Dark Night Skies and SD23: Sustainable Tourism. A separate policy is not considered necessary as it would unnecessarily duplicate policy from elsewhere in the Local Plan. Major events can also be diverse in timespans, numbers and nature and it would be difficult to have a policy to cover all.</p> <p><i>I: Insufficient emphasis on enhancing, and not just conserving, the special qualities of the National Park, with particular regard to habitats, farm practices and economy, and design standards</i> R: Policies which relate to the special qualities include a requirement to both conserve and enhance and include criteria which guides these requirements. With regard to design, Policy SD5: Design sets out criteria for a landscape-led approach to design to make a positive contribution to the character and appearance of the area. SDNPA considers due emphasis is given to enhancing the special qualities.</p> <p><i>I: Omission of emphasis on the importance of protecting land for agricultural use, in addition to its visual qualities</i> R: Policy SD2 Ecosystem Services includes criteria (g) conserve and enhance soils. Policy SD2 is a core policy and applies to all applications. Criteria (g) applies to all soils, including the best and most versatile soils important for agriculture.</p>

Section 5a: Introduction to Landscape

Summary of Issues and Responses

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.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <p>Historic England: Welcomes and supports clauses 2 and 5 of Policy SD4 as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing, the historic environment, although it is considered that these clauses would sit better within a specific historic landscapes policy within the section of the Plan on the Historic Environment. Welcomes the reference to local distinctiveness in paragraphs 5.8 and 5.11. Welcomes the reference to character assessments and Village Design Statements in paragraph 5.9. Welcomes and supports the sub-section on Designed Landscapes (para 5.13-5.16) although paragraph 5.15 could say “Proposals which may affect the significance of designed landscapes.....” and we consider that these paragraphs would sit better within the section of the Plan on the Historic Environment. Welcomes the reference to historic landscape features in paragraph 5.18</p> <p>Southern Water: Objects to the current wording of criteria 3 in Policy SD4. This is because it could create barriers to statutory utility providers, such as Southern Water, delivering essential infrastructure required to serve existing and planned development allocated in the Local Plan. Southern Water understand that SD4 should be read in conjunction with Policy SD44: Telecommunications and Utilities Infrastructure. However the current wording of criteria 3 of Policy SD4 could conflict with this, and the exceptions allowed through National Policy should be made explicit to avoid any such conflict. Requested that additional wording be added to criteria (c) to state that where exceptional circumstances exist, development must be demonstrated to be in the public interest.</p>	<p><i>I: Section on designed landscapes should sit within the historic environment section</i> R: The content of paragraphs is relevant for both the historic environment and landscape sections of the Local Plan. Officers considered on balance that, as these relate to landscape, they should be within the landscape section. The historic environment section cross refers to the landscape section on the role of landscape in historic character.</p> <p><i>I: Criteria 3 of SD4 could be in conflict with SD44 and be a barrier to utilities providers and should include caveats for works in the public interest</i> R: This matter would be a material consideration in a planning application. The Local Plan cannot include caveats to cover all scenarios. The policies are considered appropriate to inform decision making.</p> <p><i>I: Loss of reference to the need for development proposals to be informed by community-led or local landscape character assessments from policy wording of SD4</i> R: Moved to the supporting text of the policy.</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy is supported and considered sound (Winchester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General strong support for the policy (Colemore & Priors Dean PC, Fernhurst PC, Madehurst Parish meeting, Rowlands Castle PC, Selborne Parish PC, Slindon PC) Specific support for criteria (c) (Madehurst PC) Support for the Landscape Character assessment as set out in Figure 5.2 (Ringmer PC) Comment that this policy to be treated as a core policy (Colemore & Priors Dean PC). Objection to the removal of reference to the need for development proposals to be informed by community-led or local landscape character assessments from policy wording of SD4 (Buriton PC) Objection as it considered that the policy omits that the capacity of the landscape to accommodate development should take account of historic landscape character and the settlement pattern (Easebourne PC). Regrets the Local Plan does not specifically identify local gaps. Queries if criteria (c) is strong enough (Liss PC). Request that hedges should be specifically mentioned in this section (Upham PC). <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> General support for SD4 and its principles (Angmering Estate, Brighton and Hove Council's Downland Estate, Leconfield Estate, South Downs Society, Sussex and Hampshire Wildlife Trusts, The Chichester Society, The National Trust, The Wigganholt Association, Member Lewes District Council, various individuals). Supports reference to experiential and amenity quality of the landscape in Policy SD4, in addition to landscape character, is an important amplification (Individual). Support for criteria 3 and the value of open and undeveloped land (Eastbourne Downland Group). 	<p><i>I: Omission that the capacity of the landscape to accommodate development should take account of historic landscape character and the settlement pattern.</i> R: Requirements to protect the landscape are set out in this policy and the requirements for landscape-led design is set out as part of Policy SD5: Design. The Authority proposes a change to Policy SD4 with reference to settlement pattern added to criteria SD4 (3). The Authority also proposes a new paragraph following 5.6, which sets out a definition of landscape character includes the historic landscape as set out on p 8 of Schedule of Changes.)</p> <p><i>I: Strategic gaps not identified</i> R: The principle of the protection of individual settlements and the open and undeveloped land between is set out in criterion 3.</p> <p><i>I: Insufficient protection for gaps</i> R: Criterion 3 is considered to sufficiently set out the clear requirements for the protection of the individual identity of settlements and open and undeveloped land between settlements.</p> <p><i>I: Objects to protection of gaps</i> R: The land around and in between settlements can have an important role in the character and identify of settlements in the National Park.</p> <p><i>I: Omission of explanation of what circumstances a landscape appraisal would be required</i> R: It is not practical to set out all circumstances under which landscape appraisal is required. A Design SPD is being</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Support for criteria 4 and reference to green and blue corridors (Individual) • Commented that justifiable and necessary agricultural and rural business development should not be disadvantaged by this policy (CLA). • Commented that the policy is focused on development management issues and should be amended to also look more broadly at landscape character (Eastbourne Downland Group). • Objection to the policy due to omission of stress that development proposals which cause harm to a designed landscape will be refused (Folkington Estate). • Objection to the policy on the grounds it should be strengthened to deal with development other than buildings, such as the building of fences, removal of hedges and the construction of private trackways (Member, Lewes District Council) • Omission of criteria in the policy and elsewhere in the Local Plan on the impact of major changes to agriculture on predominantly open land including farm buildings (Member, Lewes District Council). • The supporting text at paragraph 5.10 is considered to omit explanation of what circumstances a landscape appraisal would be required (Angmering Estate, Brighton and Hove Council's Downland Estate, Leconfield Estate, West Dean – The Edward James Foundation). • Objection to criteria (c) as protection of gaps may lead to artificial separations (Individual). • Objection to criteria (c) on grounds it does not provide sufficient protection for strategic gaps. Requests additional wording to the policy to state that there is a clear presumption that preservation of landscape character will take precedence over other policies (Individual). • Objection to the policy on the grounds that wording is not clear. The policy requirement to safeguard the experiential and amenity qualities of the landscape is too vague. It is not clear that landscape is given a priority (Individual). • No definition of blue corridors, or blue infrastructure or policies for it (Individual) • Request for minor amendment to criteria 4 to add reference to blue corridors in the second sentence (Sussex and Hampshire Wildlife Trusts). 	<p>produced which will set out more detail about what is required for landscape-led design of schemes. Advice can also be sought through the pre-application process regarding the unique circumstances of a scheme.</p> <p>I: Policy requirement to safeguard the experiential and amenity qualities of the landscape is too vague R: The wording of the policy is considered appropriate to allow the individual circumstances and qualities of a site to be suitably appraised in the application process.</p> <p>I: Add reference to blue corridors R: The Authority proposes adding a reference to blue corridors to criterion 4 and a definition to be included in the glossary on page 8 of the Pre-Submission Schedule of Changes.</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• 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.)	

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Summary of Issues and Responses

Policy SD5: Design

There were a total of 32 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <p><u>Historic England:</u></p> <ul style="list-style-type: none"> • Welcomes and supports Policy SD5, particularly clauses c) and f), and supporting paragraph 5.19, although reference could perhaps be made to Conservation Area Character Appraisals as a reference source for appropriate and sympathetic architectural design. • Welcomes the list of considerations in paragraph 5.20 to inform a contextual analysis, but we would like to see a specific reference to historic landscape features as a consideration. • Welcomes and supports paragraph 5.24 <p><u>Specific consultation bodies – other local authorities</u></p> <ul style="list-style-type: none"> • Support for the policy and consider it sound. Minor wording change is suggested: reference to ‘visual amenity’ for consistency with the Landscape and Visual Amenity Checklist (Winchester City Council). <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support for the policy (Fernhurst PC, Madehurst Parish Meeting, Midhurst TC, Petersfield TC, Rowlands Castle PC, Selborne PC, Slindon PC) • Objection on grounds of omission in the policy of matters relating to privacy and amenity of existing neighbours and future occupiers explained in paragraph 5.33 (Buriton PC) 	<p><i>I: Specific reference to historic landscape features as a consideration</i> R: This policy requires development proposals to take a landscape-led approach, which includes historic features. Amendments are made to reflect this at criteria SD5 I (c) and 5.20 as shown on page 9 of the submitted Schedule of Changes.</p> <p><i>I: Reference to ‘visual amenity’ for consistency with the Landscape and Visual Amenity Checklist</i> R: It is considered that criteria 5 I (k) suitably covers all impacts on amenity, including visual.</p> <p><i>I: Omission in the policy of matters relating to privacy and amenity of existing neighbours and future occupiers</i> R: It is considered that criteria 5 I (k) suitably covers this issue.</p> <p><i>I: Loss reference to Village Design Statements in the policy</i> R: Village design statements are referenced in the supporting text.</p> <p><i>I: Request for the last part of line 4 in paragraph 5.33 to be deleted ‘unless outweighed by innovative design solutions that mitigate these impacts.’</i> R: This wording is considered a useful clear expression that design solutions to mitigate impacts will be considered.</p>

Policy SD5: Design

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Objection on grounds of loss reference to Village Design Statements in the policy as was previously included in the Preferred Options (Buriton PC). • Request for the last part of line 4 in paragraph 5.33 to be deleted 'unless outweighed by innovative design solutions that mitigate these impacts.' as it is unnecessary, confusing and could potentially allow conflict to arise' (Selborne PC) • Additional wording requested for the prevention of electric gates and gated communities (Stedham with Iping PC). • Objection on grounds of lack of guidelines on maximum density (Stedham with Iping PC) • Request for explicit note the need to avoid car dominated frontages and over dense development as part of criteria (d) (Upham PC) • Request for a draft of the streetscene should be provided for all proposals in para 5.22 (Upham PC) <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> • General support for policy SD5 (various organisations and individuals). • Support for reference to keep key landscape features such as trees and hedges (Lewes District Green Party) • Support for reference to maximising sustainable technologies. Request wording change to state that solar panels could be approved even if judged to have landscape or impact on views (Lewes District Green Party). • Commented that it would be helpful if the policy could look more broadly at design, not just planning applications (Eastbourne Downland Group). • Request for amendment to design principles to allow that buildings should be appropriate for their intended use (DMH Stallard LLP). 	<p><i>I: Wording requested for the prevention of electric gates and gated communities</i> R: It is considered that this matter is too detailed for this strategic policy to specifically address. The policy contains strategic criteria regarding landscape-led design and includes criteria (j) '... and be inclusive and accessible for all'</p> <p><i>I: Lack of guidelines on maximum density</i> R: The Local Plan requires a landscape-led approach to development. The South Downs National Park has a variety of landscape characters and as such it is considered that setting specific guidelines on maximum density would be overly prescriptive and hinder the appropriate landscape-led approach to design.</p> <p><i>I: Wording to avoid car dominated frontages and over dense development as part of criteria (d)</i> R: It is considered that this matter is too detailed for this strategic policy to specifically address. The policy contains strategic criteria requiring landscape-led design and the density of development and car parking provision is expected to be designed in accordance with this principle. <i>Request for a draft of the streetscene should be provided for all proposals</i> The Local Plan requires applicants to demonstrate a landscape-led approach to design. Drawings of the proposed street scene may be required, as could other forms of evidence. These specifics are considered too detailed for this strategic policy. A Design SPD is being prepared which will contain guidance for applicants on how a landscape-led approach to design can be undertaken and demonstrated.</p> <p><i>I: Suggest wording change to state that solar panels could be approved even if judged to have landscape or impact on views</i> All proposed applications should be considered against the policies of the R: Local Plan and other material planning considerations. It is considered</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Should include reference to Sport England's Active Design Principles (Sport England) • Care is needed on emphasis arising from the change from 'will be refused; to 'will only be permitted'. Suggested tighter wording is needed for a nationally protected area (Individual) • Does not disagree with the principles of the Policy but the policy cannot exist with all the other requirements of the Plan, says there should be some 'give' elsewhere in the plan (CALA Homes) 	<p>that proposals for solar panels should be decided on a case by case basis taking into account the unique characteristics of the proposed site.</p> <p><i>I: It would be helpful if the policy could look more broadly at design, not just planning applications</i></p> <p>R: The role of a Local Plan is to set the policy position of the relevant local planning authority for use in determining planning applications. Policy SD5 sets out the SDNPA position that design should be landscape-led and provides criteria for requirements with regard to planning applications. The SDNPA produces other policy documents which set the policy position for other aspects of its role e.g. the Partnership Management Plan.</p>

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Summary of Issues and Responses

Policy SD6: Safeguarding Views

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England: Welcomes and supports Policy SD6, particularly clause 2 d and paragraph 5.37.</p> <p><u>Specific consultation bodies – other local authorities</u></p> <ul style="list-style-type: none"> Support for Strategic Policy SD6. We would welcome the opportunity to work with your authority in relation to safeguarding key views to the Park (such as Chanctonbury Ring) from key locations within Horsham District (Horsham District). This policy is supported and considered to be sound (Winchester City Council). <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> General support for Policy SD6 (Buriton PC, Fernhurst PC, Madehurst Parish Meeting, Midhurst TC, Selborne PC, Slindon PC). Comment that this is a generic policy and doesn't specify actual views or viewpoints (Rogate PC). Request that reference is made to views and viewpoints defined in NDPs must be protected (Rogate PC) <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> General support for Policy SD6 (various individuals) 	<p><i>I: Reference of specific views or viewpoints</i> R: It is considered that it would not be proportionate or practical to identify each view or viewpoint in the National Park covered by this strategic policy. The policy describes the types of views covered and also references the Viewshed Characterisation Study which provides further detail and examples.</p> <p><i>I: Omission of reference to views from accessible water</i> R: It is considered that this point is suitably addressed by criteria 2 (c) which covers views from 'other publically accessible areas'.</p> <p><i>I: Amendment to policy to allow allocation sites and other potential sites may be in proximity of public rights of way to come forward and where it may not be possible to conserve and enhance that view</i> R: Allocations and other potential sites are expected to conserve and enhance the view types and patterns identified.</p> <p><i>I: Policy should apply to temporary and permanent development</i> R: The policy applies to all development requiring planning permission – temporary or permanent.</p> <p><i>I: Landscape and views outside the National Park</i></p>

Policy SD6: Safeguarding Views

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Objection to the policy on ground of omission of reference of views including from accessible water (British Canoeing). • Objection to the policy on the grounds that allocation sites and other potential sites may be in proximity of public rights of way. Request that the policy be amended to allow allocated sites which sit in proximity of a PRoW to come forward and it may not be possible to conserve and enhance that view (CALA Homes). • Commented that justifiable and necessary agricultural and rural business development should not be disadvantaged by this policy (CLA). • Objection to the policy on grounds it must state that it applies to temporary developments as well as permanent developments and there must be no exceptions in order to comply with SDNP Purpose number 1 (Individual). • The importance of neighbouring LPA's policies and the distance from the SDNP should be recognised in the consideration of developments in the vicinity of the Park (DMH Stallard LLP). • Objection to the policy on grounds wording should be included to state that landscape outside the National Park which lies within key views from the Park, or provides views of key landmarks within the Park will also be protected (Folkington Estate). • Request that 'only' be added to criteria 2 and 3 to read 'Development proposals will only...'. (Hampshire and Sussex Wildlife Trusts). • 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.) 	<p>R: The Local Plan cannot set development requirements to applications outside of the South Downs National Park boundary as this is outside the South Downs National Park Authority planning area. Section 62 of the Environmental Act 1995 requires all relevant authorities to have regard to the National Park purposes. This applies to planning authorities whose decision may impact the National Park.</p>

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Summary of Issues and Responses

Policy SD7: Relative Tranquillity

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Specific consultation bodies – other local authorities</u></p> <ul style="list-style-type: none"> This policy is supported and considered to be sound (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General support for SD7 (Buriton Parish Council, Fernhurst PC, Iford PC, Madehurst PC, Colemore & Priors Dean PC, Rowlands Castle PC, Selborne PC, Slindon PC, Stedham with Iping) Comment that paragraph 5.44 should add reference to the means of ascertaining the tranquillity status of a particular site (Colemore and Priors Dean PC). The Parish Council was concerned that its special interest in this provision should lead to the provision being significantly toughened (Rogate PC) Comment to include measures to protect against Farnborough airport expansion. Objection to point two on grounds it should refer to traffic impacts and call for a traffic impact assessment (Upham PC). <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> General support for SD7 (Friends of Lewes Society, HotelDesigns, On behalf of Hopegar Properties, South Downs Society, The Chichester 	<p><i>I: Reference to the means of ascertaining the tranquillity status of a particular site</i> R: Paragraphs 5.41 and 5.42 sets out the definition of tranquillity and reference the South Downs National Park Tranquillity Study 2017 which includes the methodology for assessing the tranquillity status of a site. It is considered that including this here would have resulted in excessive technical detail.</p> <p><i>I: Include measures to protect against Farnborough airport expansion</i> R: The Local Plan cannot set policy requirements for outside the South Downs National Park Authority planning area. Section 62 of the Environmental Act 1995 requires all relevant authorities to have regard to the National Park purposes. This applies to planning authorities whose decision may impact the National Park. The SDNPA will, wherever possible, work closely with relevant authorities.</p> <p><i>I: Reference to traffic impacts and call for a traffic impact assessment</i> R: Development requirements relating to transport is primarily addressed through Strategic Policy SD19: Transport and Accessibility. The Local Plan should be read as a whole and many of our policies work together to address certain issues including SD19 and this policy on tranquillity.</p>

Policy SD7: Relative Tranquillity

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p>Society, The City of Winchester Trust, The Wiggonholt Association, individuals)</p> <ul style="list-style-type: none"> • Comment that Figure 5.4 showing tranquillity scores in the National Park is small and does not magnify so cannot be checked (Houndean Residents Association). • Object to the policy on grounds that it is unclear as to who will make decisions relating to tranquillity, who will provide advice as part of the DM process, and that the planning concept is imprecise/unquantified. Also queries how robust evidence base is (Angmering Estate, Leconfield Estate, West Dean – The Edward James Foundation). • Object as it is not clear how the policy should be applied (individual) • Objection due to lack of clarity on the word ‘relative’ of the term ‘relative tranquillity’ and implications for farm operations (South Downs Land Managers Group). • Objects because the reference to the aural environment is insufficient and there should be a separate policy that should include noise standards (Individual) • Object on grounds that policy should be strengthened to control land uses and activities with potential to reduce tranquillity by residents and visitors such as drone flying and outdoor festivals (CPRE, South Downs Society). • Objection on grounds that the Local Plan should include a core policy for large scale events (Individual). • Object to the policy on grounds that a new criteria is required which sets noise curfew and zone (Individual). • Objection to the policy on grounds that an addition should be made to criteria (b) which says where these impacts are not commensurate with approved uses or neighbouring Local Plan allocations (DMH Stallard LLP). • Objection on grounds that it should include a requirement for planning applications to provide a tranquillity study including decibel 	<p>I: Challenges reading the tranquillity map R: Figure 5.4 shows the tranquillity scores across the National Park as identified through the South Downs National Park Tranquillity Study 2017 (TLL09). The map appears somewhat pixelated as the tranquillity assessment is not yet particularly fine grained in detail. The National Park will add further assessments and their scores to the map over time. An online version of the map will be made available upon adoption of the Local Plan.</p> <p>I: Concerns regarding implementation of the policy R: Applicants are required to demonstrate how the policy is being met and the SDNPA will determine planning applications received. The supporting text of the policy directs applicants to the South Downs National Park Tranquillity Study 2017 (TLL09) which sets out the methodology undertaken and baseline information. The pre-app process can be used to explore this matter more fully in the context of the individual circumstances of the application.</p> <p>I: The planning concept is imprecise/unquantified and query how robust the evidence base is. R: The relative tranquillity of the National Park is recognised as one of its special qualities. It is recognised that tranquillity is a perceptual quality of the landscape. The South Downs National Park Tranquillity Study 2017 (TLL09) sets out a clear and robust methodology developing on emerging best practice.</p> <p>I: Lack of clarity on the word ‘relative’ of the term ‘relative tranquillity’ and implications for farm operations R: The term ‘relative tranquillity’ is defined in the glossary on page 545 of the Local Plan: ‘tranquillity compared to other locations within the National Park. Tranquillity is a perceptual quality of the landscape and</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p>measurements and predicted decibel measurements (Lewes DC councillor).</p> <ul style="list-style-type: none"> • Objection on grounds the policy should have an additional paragraph about the negative impacts of certain types of business on tranquillity and that tranquillity of residents and visitors should be paramount, not the business benefits (Individual). • Relative tranquillity to be applied equally to National Park boundary and buffer areas. (The Goodwood Estate Company Ltd.) 	<p>some areas of the National Park are more tranquil than others, dependent on a wide number of influences. The tranquillity assessment criteria is set out in the South Downs National Park Tranquillity Study 2017. Farming operations and land management can both positively and negatively impact tranquillity.</p> <p>I: The policy should be strengthened to control land uses and activities with potential to reduce tranquillity by residents and visitors such as drone flying and outdoor festivals</p> <p>R: Doesn't go into specific land uses as in many cases the specific circumstances of the site and the land use should be considered on a case by case basis.</p> <p>I: The Local Plan should include a core policy for large scale events</p> <p>R: Paragraph 27 of the DEFRA National Park Vision & Circular says that events with the potential to harm the special qualities of a Park will need to be controlled. The Local Plan contains a number of policies which work together so that large scale events will contribute to conserving and enhancing the special qualities. Examples of these policies include SD4: Landscape, SD5: Design, SD8: Dark Night Skies and SD23: Sustainable Tourism. A separate policy is not considered necessary as it would unnecessarily duplicate policy from elsewhere in the Local Plan. Major events can also be diverse in timespans, numbers and nature and it would be difficult to have a policy to cover all.</p> <p>I: Aural impacts on tranquillity including suggestions of: new criteria/separate policy is required which sets noise standards, a noise curfew and zone and requirements for planning applications to provide a tranquillity study including decibel measurements and predicted decibel measurements</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
	<p>R: The Local Plan should be read as a whole and includes policies which work together to address certain issues, for example, with regard to noise pollution, policy SD54 criteria 1 is also relevant. Noise standards are covered elsewhere in Government guidance. Other matters raised are considered to be overly prescriptive and the individual circumstances of the application and its impacts should be considered in the context of these criteria based policies.</p> <p><i>I: Application of the policy outside the National Park</i> R: The Local Plan cannot set policy requirements for outside the South Downs National Park Authority planning area. Section 62 of the Environmental Act 1995 requires all relevant authorities to have regard to the National Park purposes. This applies to planning authorities whose decision may impact the National Park. The SDNPA will, wherever possible, work closely with relevant authorities.</p>

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

Summary of Issues and Responses

Policy SD8: Dark Night Skies

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> General support for the policy (Brighton & Hove City Council). Comment that criteria 2 should add the word ‘negatively’ to read ‘sky quality in the surrounding area is not negatively affected’ (Brighton & Hove City Council). Comment that this policy is very complex and will be difficult for applicants and decision makers to interpret. The Sky Quality Measurement Map referred to in the policy must be available and detailed enough to determine which Zone any given application site falls into (Winchester City Council). <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General support for the policy (Buriton PC, Cheriton PC, Fernhurst PC, Hawkley PC, Iford PC, Liss PC, Madehurst PC, Midhurst TC, Colemore & Priors Dean PC, Rowlands Castle PC, Selborne PC, Slindon PC) Support for paragraph 5.61 (Colemore & Priors Dean PC). Comment that internal lightspill from large glass windows should also be addressed through the policy (Buriton PC). Comment that the category ‘E3/4 Urban’ does not reflect the sky quality of Buriton and other villages in the National Park (Buriton PC). 	<p><i>I: Policy is very complex and will be difficult for applicants and decision makers to interpret</i> R: The policy follows a clear structure, setting a lighting avoidance and mitigation hierarchy in criterion 2 and, for any lighting to be installed, a table of requirements as part of criterion 3. The SDNPA has also produced a Dark Night Skies Lighting Technical Advice Note (TLL 10), referred to in paragraph 5.48 of supporting text of the policy, which sets out advice to applicants and decision makers alike.</p> <p><i>I: The Sky Quality Measurement Map referred to in the policy must be available and detailed enough to determine which Zone any given application site falls into</i> R: The map was published alongside the Pre-Submission Local Plan as part of the consultation. The map will be part of the online Policies Map which will be published at adoption of the Local Plan.</p> <p><i>I: Internal light spill from large glass windows should also be addressed through the policy</i> R: Light spill from windows is an important element of conserving and enhancing the intrinsic quality of dark night skies in the National Park as required by criteria 1 of this policy. Further detail on this is covered in paragraph 5.61 of the supporting text and also within the Dark Night Skies Lighting Technical Advice Note (TLL 10). The design of windows is important to this issue. Policies SD4 and SD5 require a landscape-led approach to design – as figure 5.3 recognises, dark night skies is an element of this.</p>

Policy SD8: Dark Night Skies

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • A clear Policy containing unambiguous criteria that allow for both measurement and monitoring of the Policy at all stages of development and into the future (Cheriton Parish Council) • Comment that lighting installed within a swimming pool can be visible from above and should be included within the policy (Fernhurst PC). • Objects, querying, in addition with the Dark Sky policy, how did 3H Motors at West Meon obtain permission for high spotlights? (Kilmeston PC). • Comment on paragraph 5.58 to add reference to means of identifying a specific sites Sky Quality Measurement (Colemore & Priors Dean PC). <p>Other organisations</p> <ul style="list-style-type: none"> • General support for this policy (Hampshire & Sussex Wildlife Trusts, South Downs Society, DMH Stallard LLP, Friends of Lewes Society, The Chichester Society, The City of Winchester Trust, Wiggonholt Association, Lewes District Green Party, On behalf of Hopegar Properties Ltd) • Specific support for paragraph 5.59 noted (Hampshire & Sussex Wildlife Trusts). • Object on grounds that policy wording should be amended to recognise that lighting assessments should be proportionate (Angmering Estate, Leconsfield Estate, West Dean- The Edward James Foundation). • Support the goal of the policy for developments not to cause unnecessary light pollution, but objection on grounds that many potential light sources are out of the control of the planning system and dark night skies is not a recognised planning consideration (Angmering Estate, Leconsfield Estate, West Dean – The Edward James Foundation). 	<p><i>I: Comment that the category ‘E3/4 Urban’ does not reflect the sky quality of Buriton and other villages in the National Park</i> R: The term urban applies to concentrated built form where light is generated from a number of sources including light spill from windows, security lighting and street lights. The evidence base will continue to be updated to improve resolution of the Dark Night Skies map and its categorisation.</p> <p><i>I: Add reference to means of identifying a specific sites Sky Quality Measurement</i> R: Paragraph 5.48 refers to the mapping work undertaken to identify Sky Quality Measurement across the National Park. As referenced the mapping is set out in the South Downs Dark Night Skies Lighting Technical Advice Note (TLL 10). This document also sets out the methodology for identifying Sky Quality Measurement at locations.</p> <p><i>I: Policy wording should be amended to recognise that lighting assessments should be proportionate</i> R: Paragraph 5.58 says ‘any statement should be proportionate to the size and likely impacts of the scheme’.</p> <p><i>I: Many potential light sources are out of the control of the planning system and dark night skies is not a recognised planning consideration</i> R: The dark night skies of the South Downs National Park is recognised as one of its special qualities for its important part in the beauty and character of the National Park. The NPPF paragraph 115 requires great weight to be given to conserving landscape and scenic beauty in National Park, which have the highest status of protection in relation to landscape. It is recognised that much of lighting is outside the control of the planning system, however, this policy seeks to set requirements for those elements which can be addressed.</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Object on grounds the policy is too rigid in particular that criterion 3 is applied irrespective of compliance with the hierarchy set out in criterion 2 and proposals for sports pitch lighting would breach the maximum Lux level set out in column 4 of the Policy (Highfield and Brookham Schools). <p>Individuals</p> <ul style="list-style-type: none"> General support for this policy (Councillor for Lewes District Council, Councillor for East Hampshire District Council, and 2 other individuals) Comments that the policy must be complied with and not ignored when decisions are being made on development proposals which are both permanent and temporary e.g. music festivals (Individual) Comment that the policy needs robust application at and across the border of the National Park to be effective (Individual) Comment concern regarding enforcement (Individual) 	<p>I: Criterion 3 is applied irrespective of compliance with the hierarchy set out in criterion 2 and proposals for sports pitch lighting would breach the maximum Lux level set out in column 4 of the Policy R: Criterion 2 sets out a hierarchy for lighting to be avoided. Where lighting cannot be avoided and is to be installed, the requirements of the criterion should be met. Sports pitch lighting can be very instructive into the landscape and should be carefully located to ensure that the dark night skies of the National Park are conserved and enhanced.</p> <p>I: Concern regarding enforcement R: Activity in breach of the planning permission granted will be enforced as any other planning matter would be.</p> <p>I: Application of the policy outside the National Park R: The Local Plan cannot set policy requirements for outside the South Downs National Park Authority planning area. Section 62 of the Environmental Act 1995 requires all relevant authorities to have regard to the National Park purposes. This applies to planning authorities whose decision may impact the National Park. The SDNPA will, wherever possible, work closely with relevant authorities.</p>

Summary of Issues and Responses

Chapter 5b Biodiversity - Introduction

There were a total of 2 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u> Support introduction. (Selborne PC)</p> <p><u>Other organisations</u> No comments received.</p> <p><u>Individuals</u> Welcome aspects of section, however it is potentially missing ambition to create more – i.e. all developments to aim for a net gain in biodiversity. (Lewes District Council, Cllr Joanna Carter – Green Party)</p>	<p><i>I: The section should require all developments to aim for a net gain in biodiversity</i> R: Policy SD9 criteria I (a) requires the following: ‘opportunities for net gains in biodiversity should be identified and incorporated.’</p>

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

Summary of Issues and Responses

Policy SD9: Biodiversity and Geodiversity

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Environment Agency: support this policy and the specific reference to the need to have regard for ecological networks. Furthermore, the need for development proposals to seek to both protect and enhance biodiversity is supported.</p> <p>Natural England: Overall comment – The landscape-scale approach to biodiversity in this section and the aim to reconnect habitat across the National Park is strongly supported.</p> <p>Introduction text –</p> <ul style="list-style-type: none"> Concern regarding loss of some introductory text from the Preferred Options Local Plan, which has resulted in some confusion and there are some areas, which require clarification and alternations. Concern regarding removal of table present in the Preferred Options Local Plan setting out the designated sites in the National Park <p>Criterion 1 –</p> <ul style="list-style-type: none"> Welcomes criterion 1 of the policy and the obligations outlined in parts a-d, including the requirement to secure long-term management of habitats requests that criterion 1 is linked to the GI Framework where possible requests reference is also made to the NPPF mitigation hierarchy here. <p>Criteria 2 –</p> <ul style="list-style-type: none"> advise the terms International Sites and National sites could be amended to Internationally protected sites and Nationally protected Sites object to 2b on grounds that phrase ‘at this site’ is omitted object to 2e on grounds different designations are not clearly differentiated, further clarification on terms used, that Protected Species 	<p><i>I: Loss of some introductory text from the Preferred Options Local Plan</i> R: Amendments have been made to paragraph 5.67 and immediately following to address this point as set out on page 11 and Appendix 1 of the Pre-Submission Schedule of Changes.</p> <p><i>I: Removal of table present in the Preferred Options Local Plan setting out the designated sites in the National Park</i> It was necessary to reduce the amount of text in the introductory section to improve legibility and clarity of the Local Plan. The table has been incorporated into the Biodiversity Background Paper (TLL 11).</p> <p><i>I: Criteria 1 should be linked to the GI Framework where possible</i> The GI Framework is currently being progressed but it is not yet sufficiently completed to refer to in policy in the manner requested.</p> <p><i>I: Reference should be made to the NPPF mitigation hierarchy</i> Agreed. Please see changes to criteria 1 and the addition of a new criteria (g) as set out in Appendix 1 of the submitted schedule of changes.</p> <p><i>I: The terms International Sites and National sites could be amended to internationally protected sites and Nationally protected Sites</i></p>

Policy SD9: Biodiversity and Geodiversity

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p>are afforded national and international statutory protection and this is not clarified here, reference should be made to the Biosphere, brownfield land should be included and priority habitats and species should be differentiated from protected species.</p> <ul style="list-style-type: none"> support reference to BOAs in 2e. <p>Supporting text –</p> <ul style="list-style-type: none"> Priority and protected species require further clarification. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support with minor changes: request stronger reference to the South Downs Way Ahead Nature Improvement Area (NIA) and the Brighton and Lewes Downs Biosphere Reserve in the policy. New criteria to I is suggested (Brighton & Hove City Council). Comments that it is not realistic to expect all developments to achieve a net gain in biodiversity – the NPPF requires this only ‘where possible’ (Winchester City Council) Comment that connectivity of woodland should be promoted and fragmentation resisted (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General support for this policy (Buriton PC, Fernhurst PC, Lewes TC, Madehurst Parish Meeting, Rowlands Castle PC) Request that local nature conservation designation areas in Upham Parish are explicitly mentioned in this policy (Upham PC) Request for clear definition under what circumstances the needs and benefits of development clearly outweigh the loss of ancient woodland as set out in criteria 2d (Madehurst PC). Clarification required between term ‘clearly outweigh’ in criteria 1d and ‘demonstrably outweigh’ in SDI (Colemore & Priors Dean PC). Comment to insert the word ‘against’ after the word ‘mitigated’ in criteria 2bii, 2cii and 2e (Selborne PC). 	<p>Amended text to address this point has been proposed in Appendix I of the Pre-Submission Schedule of changes.</p> <p><i>I: Key phrase ‘at this site’ is omitted from criteria 2b</i> Agreed. Please see change as set out in Appendix I of the submitted schedule of changes.</p> <p><i>I: Priority and protected species require further clarification</i> Added through paragraph 5.72b and 5.72c as set out in the submitted schedule of changes.</p> <p><i>I: Reference to the South Downs Way Ahead Nature Improvement Area (NIA) and the Brighton and Lewes Downs Biosphere Reserve in the policy</i> Added to paragraph 5.84 as set out in the submitted schedule of changes.</p> <p><i>I: Comments that it is not realistic to expect all developments to achieve a net gain in biodiversity – the NPPF requires this only ‘where possible’</i> There is considerable scope through innovative solutions on even the trickiest schemes to increase biodiversity of development proposals and for schemes to achieve net gains in biodiversity. The criteria of the policy requires development proposals to ‘identify and incorporate opportunities for net gains...’.</p> <p><i>I: Comment that connectivity of woodland should be promoted and fragmentation resisted</i> The policy requires development to conserve and enhance biodiversity. Criterion I (c) requires contribution to restorable and enhancement of existing habitats including creation of linkages. The</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> In paragraph 5.86 wording should be changed from “All wild birds are protected” to “Most wild birds are protected” (Selborne PC) Does not address how high pollution in streams and rivers should be tackled (St John Without PC) Rural road margins should be recognised as having potential biodiversity value (St John Without PC) Presence of elm trees should be recognised and promoted for biodiversity (St John Without PC) <p>Other organisations</p> <ul style="list-style-type: none"> General support for this policy (RSBP SE England, South Downs Society, On behalf of University College London, Hopegar Properties Ltd). Support for the policy but request the policy looks more broadly at biodiversity and not just planning applications (Eastbourne Downland Group). Specific support noted for criteria 2d (Forestry Commission, Lewes District Green Party). Specific support noted for criteria 1c (British Canoeing) Specific support noted for criteria 1b (RSPB SE England, The Watercress Way) Request for additional criteria after 1d which references the Brighton Lewes Downs Biosphere Reserve and the South Downs Way Ahead Nature Improvement Area (Brighton & Lewes Downs Biosphere Partnership). Request that criteria 2e follow biodiversity net gain principle (Lewes District Green Party). Objection due to no reference to the Biodiversity 2020 strategy, Section 41 of the NERC Act 2006, priority habitats and priority species (Eco21st). Objection to the policy on grounds it does not aim to minimise impacts on biodiversity in general or demonstrate that the mitigation hierarchy will apply, or reflect the need for up-to-date information and suggestion of wording changes to criteria 1 (Hampshire and Sussex Wildlife Trusts) 	<p>policy should be read alongside SD11: Trees, Woodland and Hedgerows.</p> <p>I: Reference to the Biodiversity 2020 strategy, Section 41 of the NERC Act 2006, priority habitats and priority species (Eco21st). Some of this text has been incorporated into the Biodiversity Background Paper (TLL 11) in order to keep the supporting text succinct. Amendments to include references to the Biodiversity 2020 strategy, NERC Act and clarification about priority habitats and species have been made to paragraphs 5.72b, 5.72c and 5.84a as set out in Appendix I of the submitted schedule of changes.</p> <p>I: Does not reflect the need for up-to-date information Paragraph 5.72 states that ‘all applications for development must ensure that sufficient and up to date information is provided...’.</p> <p>I: Protected sites and species are not the exclusive means of conserving biodiversity – the overall surrounding landscape is important Strategic Policy SD9 includes requirements for biodiversity enhancement of the wider landscape and the wider ecological network such as 1 (c) ‘contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks’.</p> <p>I: Objection to criterion 1 of the policy on grounds it is worded to apply to all development proposals regardless of impact and request that ‘where appropriate’ is inserted into the first The SDNPA requires development to conserve and enhance biodiversity and geodiversity of the National Park through a variety of ways. The phrase ‘as appropriate’ is considered to be implicit as</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Comment that the strong emphasis on protected sites and species is welcome but that these are not the exclusive means of conserving biodiversity – the overall surrounding landscape is important (The Watercress Way). • Objection to criteria I of the policy on grounds it is worded to apply to all development proposals regardless of impact and request that ‘where appropriate’ is inserted into the first line of the criteria I (NFU South East Region, South Downs Land Managers Group). • Add definition of Biodiversity Opportunity Areas to the glossary (South Downs Land Managers Group). • Commented that wording with regard to international, including European, wildlife designation will need updating in the event of UK exit from the EU (South Downs Society). <p>Individuals</p> <ul style="list-style-type: none"> • General support for this policy • Care is needed on emphasis arising from the difference in wording for internationally protected sites which say ‘development proposals will be permitted...’ compared with local sites • Objection on grounds that criteria for European sites and para 5.75 should be firmer and wider to protect surrounding areas that contribute to their value • Object on grounds there should be a separate policy on biodiversity enhancement • Object on grounds that BAP sites and other local designations should be protected by the policy and identified on the Policies Map 	<p>some opportunities may not be present, e.g. with regard to criterion (e) there may not be invasive non-native species on site.</p> <p>I: The criteria for European sites and para 5.75 should be firmer and wider to protect surrounding areas that contribute to their value All relevant policy criteria should be read together. Criteria I includes sub criteria which require conservation and enhancement of wider areas of biodiversity value.</p> <p>I: There should be a separate policy on biodiversity enhancement Strategic policy SD9 includes various requirements for biodiversity enhancement such as I (c) ‘contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks’. The policy is considered to be suitably robust without being overly detailed or prescriptive to allow unique characteristics and opportunities of a site and the development proposals to be fully considered.</p> <p>I: BAP sites and other local designations should be protected by the policy BAP habitats are addressed by the policy criteria 2(e) as clarified by supporting text paragraphs 5.72c and 5.84a as set out in the Proposed Submission Schedule of Changes.</p>

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

Summary of Issues and Responses

Policy SD10: International Sites

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u> Natural England: Supportive of the policy and comment with the following proposed changes:</p> <ul style="list-style-type: none"> Reference should be made to the emerging NE Bat Protocol, applicable to The Mens SAC, Ebernoe Common SAC and Singleton and Cocking Tunnels SAC. Links to the GI Framework Arun Valley SPA heading should also include its SAC and Ramsar designations. NE will work with SDNPA and provide advice on this policy and seek to ensure that it remains up to date and reflects the current position. NE will provide formal position following the January Wealden Heaths Phase II SPA officer working group meeting. <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support for the increase from 7km to 7km in respect of The Mens SAC (Horsham District Council). East Hampshire District Council welcomes opportunities for joint close monitoring of capacity in proximity of the Wealden Heaths Phase II SPA. It should be noted that this capacity is between EHDC and SDNPA. Therefore reference to Waverley Borough Council at Paragraph 5.95 should be removed (East Hampshire District Council) Recommend that the sixth column for Strategic Policy SD10: International sites should be amended as follows 'net new 	<p><i>I: Reference should be made to the emerging NE Bat Protocol, applicable to The Mens SAC, Ebernoe Common SAC and Singleton and Cocking Tunnels SAC</i> R: Paragraph 5.93 includes reference to the emerging work. As the work is much further progressed following the Pre-Submission consultation, criteria I has been amended to reflect the revised buffer zones as set out in appendix I of the submitted Schedule of Changes.</p> <p><i>I: Concern that the approach set out is inconsistent with the approach taken for SPAs elsewhere in southern England where an exclusion zone is applied up to 400m and strategic solutions are sought generally up to 5km.</i> R: HRA work has been undertaken for the East Hampshire Joint Core Strategy and the South Downs Local Plan on this matter. The details of this work and the conclusions are set out in the HRA Report for the South Downs Local Plan. The SPA is relatively rural in nature compared with other SPAs which are subject to much higher recreational pressures. Based on this and the relatively small scale of development expected, an exclusion zone and strategic mitigation solution was not determined to be necessary. 43 dwellings were expected to come forward within 400m and the evidence study indicates that these can come forward without harming the integrity of the SPA. Developments between 400m and 5km are to be treated on a case by case basis. An officer working group is in place which monitors and considers measures which may be required and paragraph 4b is added to the policy in Appendix I of the Pre-Submission Schedule of Changes which reflects the</p>

Policy SD10: International Sites

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p> dwellings allocated or permitted within 400 metres of the Wealden Heaths Phase II SPA. other than allocations.</p> <ul style="list-style-type: none"> Noted that policy is similar to that approach taken by Waverley Borough Council. WBC will continue to work with SDNPA and EHDC on this cross boundary issues (Waverley Borough Council). <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Supportive of the policy (Madehurst Parish Council). <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Supports policy and comments that wording will need to be updated to ensure identical or equivalent protections post exist from the European Union (South Downs Society). Objection to criteria 4 on grounds of concern that the approach set out is inconsistent with the approach taken for SPAs elsewhere in southern England. A consistent and strategic approach to mitigation is required (Hampshire and Sussex Wildlife Trusts). Proposed revised wording: ‘may be permitted where ‘in combination’ effects of recreation on the Solent Coastal Special Protection Areas are satisfactorily mitigated <u>avoided</u> through the provision of an appropriate financial contribution to the delivery of strategic mitigation’ (Hampshire and Sussex Wildlife Trusts). Generally supportive of the policy but objection to criteria 4 on the grounds it lacks sufficient protections. Advise wording should say: <i>All net new residential dwellings within 400m of the SPA should be avoided. A strategic approach to mitigating recreational disturbance from net new housing between 400m and 5km from the SPA should be put in place, comprising a twin track approach of SANGs and access management on the SPA (RSPB).</i> 	<p>role of the group and the need for development that responds to outputs of the group.</p> <p><i>I: Not all international sites have criteria in the policy</i> R: Paragraph 5.89 states ‘the purpose of Policy SD10 is to set specific requirements relating the Mens, Ebernoe and Singleton and Cocking Special Areas of Conservation (SAC), and the Arun Valley, Wealden Heaths Phase II, and Solent Coast Special Protection Areas (SPA), as recommended by the Habitats Regulations Assessment. General criteria relating to all international sites is set out in criterion 2 of policy SD9: Biodiversity and Geodiversity.</p> <p><i>I: Conflict with SD20 which includes a safeguarded route for Singleton and Cocking Tunnels SAC.</i> R: Policy SD20: Walking, Cycling and Equestrian Routes seeks to safeguard the Midhurst to Chichester railway for potential future development to a footpath. SDNPA would work closely with all stakeholders including NE on any proposals put forward and although in principle it is a safeguarded route, with an application, there may be modifications to the route along with an appropriate project HRA.</p>

Policy SD10: International Sites

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Objection on grounds that that the Arun Valley SAC has been omitted from consideration in SD10 (Coldwaltham Meadow Conservation Group) • Omission of Lewes Downs SAC from this policy (Lewes District Green Party) • Request that the apparently conflicting approach between Policy SD10 and supporting text to Policy SD20 is clarified with regard to development of Singleton and Cocking Tunnels SAC for recreation (National Trust). <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Supportive of the policy • Objection on grounds policy should be expanded to cover all international designations as SD9 is insufficient. • Supporting text paragraphs 5.88 to 5.95 should be expanded to cover all international sites setting out the steps required for maintenance, conservation and enhancement. • Objection on grounds that that the Arun Valley SAC has been omitted from consideration in SD10. 	

Summary of Issues and Responses

Policy SD11: Trees, Woodland and Hedgerows

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <p>Historic England: Welcomes Policy SD11, particularly the references to Ancient Woodland and veteran trees in clause 4, as part of the positive strategy for the conservation and enjoyment, and a clear strategy for enhancing the historic environment as required by paragraphs 126 and 157 of the National Planning Policy Framework.</p> <p>Natural England: Strongly supports the inclusion of the policy for bespoke protection of trees, woodland and hedgerows. Suggest including reference to SD10 International Sites, having a separate paragraph about ancient woodland, and change from ‘Arboricultural Impact Assessment’ to ‘Ecological Survey’ in criteria 1.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • In criteria 2, ‘protected trees’ should be replaced with ‘trees protected by a Tree Preservation Order or within a Conservation Area’ (East Hampshire District Council) • Further detail should be provided in the supporting text to clarify what SDNPA consider to be exceptional circumstances (East Hampshire District Council). • clarify how the 15m ‘buffer zone’ will be measured – from the edge of the canopy, the tree trunk, the woodland edge (Winchester District Council) • Hedges which are ‘important’ under the Hedgerow Regulations should be subject to criterion 3 (Winchester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Policy is generally supported (Buriton PC, Fernhurst PC, Madehurst Parish Meeting, Ringmer PC, Rowlands Castle PC) 	<p><i>I: Include reference to SD10 International Sites</i> R: Agreed. The addition is made to paragraph 5.96 as set out in Appendix 1 of the submitted Schedule of Changes.</p> <p><i>I: A separate paragraph about ancient woodland</i> R: Agreed. The amendment is made as shown in paragraph 5.102a set out in Appendix 1 of the submitted Schedule of Changes.</p> <p><i>I: Change from ‘Arboricultural Impact Assessment’ to ‘Ecological Survey’ in criteria 2</i> R: Agreed. The amendment is made as shown in criterion 2 set out in Appendix 1 of the submitted Schedule of Changes.</p> <p><i>I: In criterion 2, ‘protected trees’ should be replaced with ‘trees protected by a Tree Preservation Order or within a Conservation Area</i> R: The term ‘protected trees’ applies to all ways in which trees are protected.</p> <p><i>I: Further detail should be provided in the supporting text to clarify what SDNPA consider to be exceptional circumstances</i> R: Exceptional circumstances will depend on the characteristics of the site and wider area, and the nature of the proposals, it would not be possible to adequately cover sufficient instances of ‘exceptional circumstances’.</p> <p><i>I: How the 15m ‘buffer zone’ will be measured</i> There are many ways in which a buffer zone or other elements of the policy could be measured. The SDNPA is producing a technical advice</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> The buffer zone in criteria 4 should be increased to 20m (Bury PC) Buffer zones should be increased (Madehurst Parish Meeting) Spelling error noted by Selborne PC <p>Other organisations</p> <ul style="list-style-type: none"> Policy is supported (South Downs Society) The Trusts strongly support the inclusion of a policy to protect trees, woodland and hedgerows. This is consistent with the National Park's purposes and NPPF paragraphs 109 and 117 (Hampshire and Sussex Wildlife Trusts). The overall approach is welcomed and comments that the value of tree planting is in achieving enhanced networks and links (The Watercress Way Society) Support for new planting schemes and TPOs are noted (Lewes District Green Party). Proposals for buffer zones near woodland or veteran trees are welcomed (Lewes District Green Party) Concern that the policy will result in significant additional survey fees (CLA) Policy should recognise that clearance of scrub and woodland may in some cases be desirable (Eastbourne Downland Group) The policy would be enhanced if it made an explicit aim for net gain rather than no net loss (Lewes District Green Party) Buffer zone should be increased above the minimum of 15m (The Midhurst Society) Comments on how a proposed site will comply with the policy (on behalf of Hopegar Properties Ltd) <p>Individuals</p> <ul style="list-style-type: none"> Supportive of the policy 	<p>note to cover these detailed aspects as set out in paragraph 5.96 of the supporting text in appendix 1 of the submitted schedule of changes.</p> <p>I: Hedges which are 'important' under the Hedgerow Regulations should be subject to criterion 3</p> <p>R: Hedges which meet the criteria to be 'important' are protected by the Hedgerow Regulations 1997. A change is proposed to reflect this in the Post-submission Schedule of Changes.</p> <p>I: Buffer zones should be increased</p> <p>R: The minimum buffer zone is based on best practice guidance from Natural England and the Forestry Commission. Buffer zones have not been specifically set for other types of trees, woodland or hedgerows for reasons. This is explained in paragraph 5.101 of the supporting text to the policy set out in Appendix 1 of the submitted Schedule of Changes 'what is an appropriate buffer will depend on the local circumstances, the species and size of trees, the form and nature of the trees or woodland and the type of development'.</p> <p>I: Concern that the policy will result in significant additional survey fees</p> <p>R: The requirements of the policy are reflective of best practice which is appropriate in the National Park.</p> <p>I: Policy should recognise that clearance of scrub and woodland may in some cases be desirable</p> <p>R: Clearance of scrub or woodland can, in some circumstances, be of benefit, for example, as part of habitat management for biodiversity or as part of works to conserve and enhance landscape character. The Local Plan should be read as a whole, including, for the examples above, policies SD4 and SD5.</p> <p>I: Explicit aim for net gain rather than no net loss</p>

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Comments that there is no reason to differentiate between protected and unprotected and the criteria should apply to all trees in the National Park as trees are a fundamental feature of the National Park in the Western Weald. • There should be a group TPO over the Western Weald. • Supports wording of ‘conserving and enhancing’ 	<p>R: The Local Plan should be read as a whole including policy SD9: Biodiversity which includes criterion I which requires development proposals to ‘identify and incorporate opportunities for net gains in biodiversity’.</p> <p><i>I: No reason to differentiate between protected and unprotected and the criteria should apply to all trees in the National Park as trees are a fundamental feature of the National Park in the Western Weald</i></p> <p>R: The policy require conservation and enhancement of trees, hedgerows and woodlands in general. There are some specific requirements for protected trees woodland and hedgerows as these are afforded greater protection in legislation and national guidance. The Local Plan requires a landscape-led approach to development (SD4 and SD5) and as such any proposals in the Western Weald, and in other circumstances where trees are important landscape features, will be required to address this in their proposals.</p>

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

Summary of Issues and Responses

Historic Environment Chapter - Introduction

There were a total of 4 representations on this section. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Designated Battlefield sites should be added to the Proposal Map and Settlement Maps, and not simply marked by a symbol (Cheriton PC) Support reasoning in introduction to Policy SD12. Para. 5.105 should include reference to historic sunken lanes of East Hampshire and West Sussex (Selbourne PC). <p><u>Other organisations</u></p> <ul style="list-style-type: none"> This section should also highlight how ecosystem services derived from natural capital assets can enhance the historic built environment e.g. timber used in construction or enhance the vernacular of buildings (Forestry Commission) There should be greater reference to the preservation of historic parks and gardens in this section (Forestry Commission) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Refers to the local importance of New Lane in South Harting for its historic and wildlife value 	<p><i>I: Designated Battlefield sites should be added to the Proposal Map and Settlement Maps, and not simply marked by a symbol</i> R: The precise boundaries of the designated battlefield sites can be obtained from the Historic Environment Record and from Historic England's website. In the interests of not overcrowding the Policies Map with designations it is considered sufficient to identify these sites with a symbol.</p> <p><i>I: Paragraph 5.105 should include reference to historic sunken lanes</i> R: This issue is covered by Chapter 3: Spatial Portrait And Spatial Strategy special qualities sections e.g. para 3.21 "The Western Weald is made up of wooded hills, deep valleys and open heaths linked by sandy sunken lanes". In addition Local Plan policy SD21: Public Realm, Highway Design and Public Art, and supporting text para 6.29 seeks to protect historic rural roads and the integrity of banks, hedges, walls and roadside trees.</p> <p><i>I: Greater reference to the protection of Historic Parks and Gardens</i> R: Preservation of Historic Parks & Gardens is covered by Strategic Policy SD4: Landscape Character and paras 5.13 and 5.14.</p>

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Summary of Issues and Responses

Policy SD12 Historic Environment

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <p>Historic England: welcome and largely support positive strategy for conservation, enhancement and enjoyment of historic environment. Local Plan should be more proactive in responding to assets at risk. Caution against inclusion of criteria on enabling development. Greater reference should be made to the 'significance' of heritage assets.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Question the use of conserve rather than preserve, and rather than or. Heritage Statement should only be required where there is an impact on a heritage asset (East Hampshire DC & Winchester DC) • Reference should be made to statutory requirements of Planning (Listed Buildings and Conservation Areas) Act 1990. (East Hampshire DC) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support for Policy SD12 (Multiple parish councils) • Lessons from King Edward VII development should be incorporated into this policy (Midhurst TC). • Concern raised that Policy SD12 will prevent organic change of historic buildings to meet needs of today (Elsted & Treyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Support for Policy SD12 (Friends of Lewes Society, South Downs Society) 	<p><i>I: More proactive with regards to heritage at risk</i> R: Paras 5.106 and 5.122 of the Local Plan set out the SDNPA's approach to dealing with Heritage at Risk. This is through identifying heritage assets which are considered to be at risk of irreversible harm or loss, encouraging owners to maintain their heritage assets; and the use of Article 4 directions where the exercise of permitted development rights would undermine the aim to conserve and enhance the historic environment. Where listed structures are at risk of loss through decay or neglect, the Authority will use its statutory powers to serve Urgent Works or Repair Notices, where appropriate, to arrest decay of the asset.</p> <p><i>I: Caution against inclusion of criteria on enabling development</i> R: Criterion 6 of SD12 and para 5.117 makes it clear that Enabling development is defined as development proposals that would otherwise conflict with other planning policies and which would only ever be regarded in as a last resort in restoring heritage assets once all other options have been exhausted.</p> <p><i>I: Greater reference should be made to the 'significance' of heritage assets</i> R: The word "significance" is used throughout policy SD12 on numerous occasions, therefore it is considered that sufficient reference has been made to this term.</p> <p><i>I: Heritage assets should also include "buildings on a local list"</i></p>

Policy SD12 Historic Environment

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Concern that Policy SD12 places additional burden over and above Historic England Guidance contained within <i>Enabling Development and the Conservation of Significant Places</i> (Brighton & Hove Council's Downland Estate) Proposed allocation SD64 is not coherent with SD12 – the flower-rich hay meadow should be recognised as a cultural heritage asset (Coldwatham Meadow Conservation Group) Policy SD12 should require proposals to positively contribute to local character and distinctiveness and respond to the historic landscape character and settlement pattern (Easebourne PC) Policy and supporting text should acknowledge damage to historic environment beyond development e.g. intensive farming (Eastbourne Downland Group) Definition of viability is needed now rather than in due course (South Downs Land managers Group) The policy should be strictly applied and enforced (Wiggonholt Association) 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.) <p>Individuals</p> <ul style="list-style-type: none"> Support for Policy SD12 (various) Heritage assets should also include buildings on a local list Planning obligations / conditions should be used to restore vernacular buildings retained within a development Policy will prevent change and does not promote good design. 	<p>R: Para 5.105 – this is an omission and “<i>buildings on a local list</i>” is now included on page 11 of the Pre-Submission Schedule of Changes.</p> <p>I: Reference should be made to statutory requirements of Planning (Listed Buildings and Conservation Areas) Act 1990</p> <p>R: The SDLP does not need to repeat legislation or refer to this in policy.</p> <p>I: Concern raised that Policy SD12 will prevent organic change of historic buildings to meet needs of today</p> <p>R: Criteria 5 and 6 of Policy SD12 address this issue and SDNPA believes that these criteria are sufficiently flexible to allow historic buildings and their settings to adapt and remain viable.</p> <p>I: Policy and supporting text should acknowledge damage to historic environment beyond development e.g. intensive farming</p> <p>R: The Local Plan can only control issues that relate to development that requires planning permission. The SDNPA through its partnership work with Historic England seeks to encourage and educate farmers to maintain buildings and prevent damage to archaeological within their landownership.</p> <p>I: Proposed allocation SD64 is not coherent with SD12 – the flower-rich hay meadow should be recognised as a cultural heritage asset</p> <p>R: The term ‘cultural heritage’ encompasses the historic environment. The meadow is part of the wider landscape and biodiversity of the National Park, which is recognised for its own features.</p> <p>I: Policy SD12 should require proposals to positively contribute to local character and distinctiveness and respond to the historic landscape character and settlement pattern</p> <p>R: Strategic Policy SD5: Design – is designed to ensure that all proposals contribute:</p> <p>“1. Development proposals will only be permitted where they adopt a landscape-led approach and</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">Proposed site allocation at Loppers Ash, Harting will not fulfil the criteria of this policy and should be removed from the Plan.	<p>respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area”</p> <p>Further to this, para 5.19, refers to local character as part of the Policy SD5 on design:</p> <p>“... Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future. The definition of landscape encompasses all types and forms, including townscape. This refers to areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.”</p>

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Summary of Issues and Responses

Policy SD13 Listed Buildings

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England – welcome & supports SD13 in principle, however word ‘unnecessary’ should be removed from first criteria in line with NPPF guidance.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Question the use of terminology ‘preserve and enhance’ in this policy. (Winchester CC, East Hampshire DC) • Inclusion of Policy SD13 meets and responds to previous concerns raised at preferred options consultation (Chichester DC) • <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support for Policy SD13 (Buriton PC, Fernhurst PC, Madehurst Parish Meeting) • Addressing listed structures at risk will require strict enforcement (Fernhurst PC) • Experience of King Edward VII development should be avoided in future (Midhurst TC) • Concern raised that Policy SD13 will prevent organic change of historic buildings to meet needs of today (Elsted & Treyford PC) • Word ‘substantial’ should be removed from before ‘harm’ in criteria 2 (Selbourne PC) <p><u>Other organisations</u></p>	<p><i>I: The word ‘unnecessary’ should be removed from first criterion in line with NPPF guidance.</i> R: This change has been proposed on page 12 of the Pre-Submission Schedule of Changes.</p> <p><i>I: The word ‘substantial’ should be removed from before ‘harm’ in criterion 2</i> R: The wording is in line with the NPPF Page 31, para 132.</p> <p><i>I: Policy SD13 is not in line with NPPF guidance which recognises some limited exceptional circumstances outweigh substantial harm or loss to a listed building or its setting</i> R: The wording in the NPPF Page 31 para 132 is quite specific. “Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.” The South Downs Local Plan is therefore correct in its wording.</p> <p><i>I: The tests to assess enabling development should be clearly set out</i> R: Criterion 6 of Policy SD12 and para 5.117 set out the tests of enabling development. They makes it clear that “Enabling development should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted”.</p>

Policy SD13 Listed Buildings

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Policy SD13 provides insufficient protection for Listed Buildings. The word 'substantial' (harm) should be deleted from the policy if the policy is to be retained (CPRE Hampshire) • Support for Policy SD13 (Friends of Lewes Society) • Policy SD13 is not in line with NPPF guidance which recognises some limited exceptional circumstances outweigh substantial harm or loss to a listed building or its setting (The National Trust, Prince's Mead School Trust). • The tests to assess enabling development should be clearly set out (South Downs Society) • Policy SD13 should be strictly applied and enforced (Wiggonholt Association) • Replace wording 'will only be permitted' with 'will be permitted' to be consistent with the presumption in favour of sustainable development (Wiston Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support for Policy SD13. 	<p><i>I: Concern raised that Policy SD13 will prevent organic change of historic buildings to meet needs of today</i> R: Criteria 5 and 6 of Policy SD12 address this issue and SDNPA believe they are sufficiently flexible to allow historic buildings and their settings to adapt and remain viable.</p>

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Summary of Issues and Responses

Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings

There were a total of 13 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England – no objection although question whether the policy adds anything more to SD13.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Question the use of terminology ‘preserve and enhance’ within this policy (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcome policy (Buriton PC, Fernhurst PC, Madehurst Parish Meeting, Selborne PC) Concern raised that Policy SD14 will prevent organic change of historic buildings to meet needs of today (Elsted & Treyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support for Policy SD14 (Lewes District Green Party, South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Fully support Policy SD14 Climate change mitigation should not be limited to historic buildings (Mr Victor Ient, Lewes District Councillor) Local Plans can set requirements higher than building regulations and the policy could be strengthened accordingly. 	<p><i>I: Question the use of terminology ‘preserve and enhance’ within this policy</i> R: South Downs Local plan sets out the definition of both preserve and conserve within its glossary to clarify. The term ‘preserve’ is used in primary legislation in the context of listed buildings and conservation areas.</p> <p><i>I: Concern raised that Policy SD14 will prevent organic change of historic buildings to meet needs of today</i> R: Criteria 5 and 6 of Policy SD12 address this and SDNPA believe they are sufficiently flexible to allow historic buildings and their settings to adapt and remain viable.</p> <p><i>I: Climate change mitigation should not be limited to historic buildings</i> R: Policy SD48: Climate Change and Sustainable Use of Resources is the park-wide Local Plan policy that deals with this matter and is not limited to historic buildings.</p> <p><i>I: Local Plans can set requirements higher than building regulations and the policy could be strengthened accordingly</i> R: While this is correct for buildings in general, certain sensitivities need to be recognised with regards to historic buildings. Therefore para 5.124 explains the approach that should be adopted with regards to changes to historic buildings to mitigate the effects of climate change.</p>

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Summary of Issues and Responses

Policy SD15: Conservation Areas

There were a total of 16 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England: would prefer the use of ‘conserve’ rather than ‘preserve’, not considered to be an issue of soundness.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcome and support this policy (Buriton PC, Fernhurst PC, Madehurst Parish Meeting, Selborne PC) SD15 criteria 1(a) is supported, however there is no up-to-date Appraisal or Management Plan for Easebourne (Easebourne PC). Policy terminology should be to conserve and enhance in line with National Park purpose (Harting PC) Does the SDNPA intend to prepare a Conservation Area Appraisal for Upham? (Upham PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Welcome and support this policy (Fittleworth and District Association, Friends of Lewes Society) A resourced programme of Conservation Area Appraisals and Management plans is urgently needed (South Downs Society) Requirement to conserve and enhance the setting of a Conservation Area is not consistent with national policy. (Cowdray Estate) 	<p><i>I: Would prefer the use of ‘conserve’ rather than ‘preserve’, not considered to be an issue of soundness.</i> R: The Local Plan sets out the definitions of both preserve and conserve within its glossary to clarify. The term ‘preserve’ is used in primary legislation in the context of listed buildings and conservation areas.</p> <p><i>I: There is no up to date Conservation Area Appraisal for Easebourne</i> R: This is correct. However the SDNPA has embarked on a programme of appraisals. Page 358, Figure 10.2: Local Plan Monitoring And Implementation Framework sets out the target of this programme including “Six Conservation Area Appraisals and/or Management Plans produced per year” to address queries in regard to particular villages Conservation Area Appraisals.</p> <p><i>I: Requirement to conserve and enhance the setting of a Conservation Area is not consistent with national policy</i> R: Policy SD15 refers to ‘preserve or enhance’ and is consistent with primary legislation with regards to listed buildings and conservation areas.</p> <p><i>I: Replace wording ‘will only be permitted’ with ‘will be permitted’ to be consistent with the presumption in favour of sustainable development</i> R: This policy goes to the heart of the statutory first Purpose of national parks. Therefore the word ‘only’ is clear and appropriate in its context.</p> <p><i>I: Policy terminology should be to conserve <u>and</u> enhance in line with National Park purpose</i></p>

Policy SD15: Conservation Areas

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• Replace wording 'will only be permitted' with 'will be permitted' to be consistent with the presumption in favour of sustainable development (Wiston Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none">• Support Policy SD15• Requirement to conserve and enhance the setting of a Conservation Area is not consistent with national policy.• Policy does not recognise that positively designed change can enhance a Conservation Area or its setting.• Policy terminology should be to conserve and enhance in line with National Park purpose	<p>R: The term used in the policy is used in primary legislation in the context of listed buildings and conservation areas.</p>

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

Summary of Issues and Responses

Policy SD16: Archaeology

There were a total of 14 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> Historic England – welcome and support this policy.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy covers key issues however final sentence should be revised to “In these cases, preservation by record secured through an agreed <i>programme of archaeological work and</i> Written Schemes of Archaeological Investigation will be required.” Some minor amendments to the supporting text is also required. (East Sussex County Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcome and support this policy (Fernhurst PC, Madehurst Parish Meeting, Rowlands Castle PC) Word ‘unavoidable’ should be removed from before ‘harm’ in paragraph 3 (Selborne PC). Reference should be made to the Areas of Archaeological Potential (defined in Hampshire CC Historic Rural Settlements 2004). (Twyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Consultation with Historic England should be mandatory for all applications affecting historic battlefields (Houndean Residents Association, Lewes) Support for Policy SD16 (South Downs Society) 	<p><i>I: Policy covers key issues however final sentence should be revised to “In these cases, preservation by record secured through an agreed <u>programme of archaeological work and</u> Written Schemes of Archaeological Investigation will be required.” Some minor amendments to the supporting text is also required</i> R: The South Downs Local Plan sets out the requirements in para 5.137 and includes the necessity of a programme of archaeological work as part of the Written Scheme of Archaeological Investigation. This is considered to be appropriate wording and is conducive to a thorough approach.</p> <p><i>I: Word ‘unavoidable’ should be removed from before ‘harm’ in paragraph</i> R: Policy SD16 correctly sets out strict criteria to ensure a high level of protection for Archaeological heritage assets.</p> <p><i>I: Reference should be made to the Areas of Archaeological Potential</i> R: This is a term specific to Historic Rural Settlements 2004, whereas the Local Plan covers the whole National Park. The policy and supporting text ensure that appropriate evidence will be taken account of in considering heritage assets.</p> <p><i>I: Consultation with Historic England should be mandatory for all applications affecting historic battlefields</i> R: There is a statutory requirement to consult with Historic England regarding proposals that affect historic battlefields, therefore, there is no</p>

Policy SD16: Archaeology

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Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>Individuals</u></p> <ul style="list-style-type: none">• Policy may not achieve National Park goals as only requires development to ‘do not harm’ rather than ‘conserve and enhance’.• Designated Battlefield sites should be added to the Proposals Map and Settlement Maps, with boundaries not simply marked by a symbol.	<p>need to repeat this in the Local Plan. In addition, para 5.111 states: “In determining applications likely to have a bearing on the setting of heritage assets, guidance published by Historic England will be used to assess impact.” Consultation will be undertaken in line with this guidance and best practice.</p>

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Summary of Issues and Responses

5d - Introduction to Water

There were a total of 2 representations on this section. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Para 5.143 should contain explicit reference to important water flows. Consider that the origins of some water lavants/bournes is not clear in the mapping. Map 5.5 should be amended to show the Idsworth & Chalton lavant through Finchdean, Rowlands Castle, Havant and Emsworth. (Rowlands Castle Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> No comments received <p><u>Individuals</u></p> <ul style="list-style-type: none"> Consider that the right balance has been struck with this section between the competing needs of supporting the population, communities and agriculture 	<p><i>I: Greater detail of important water flows should be provided in the Local Plan</i> R: Given the very large area that the Local Plan covers, it is considered that it contains the right level of detail with regards to identifying the most important water courses.</p>

5d - Introduction to Water

Summary of Issues

Policy SD17: Protection of the Water Environment

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

Summary of Representations	Issue and SDNPA Response (I/R)
<p>National Agencies</p> <p>Environment Agency: Supports this policy and specifically the wording in the supporting text para 5.158 relating to foul drainage connections.</p> <p>Historic England: Welcomes and supports this policy.</p> <p>Natural England: In general, strongly support this policy. However, advise that as the region suffers from high water stress, which will be exacerbated by climate change, there is a need to work to reduce pressures on the freshwater environment. Water companies cover large areas and transfer water considerable distances, therefore a large scale strategic approach would be more effective in protecting water resources and managing demand rather than looking at developments on a case by case basis. Discharge, abstraction and dewatering from chalk rivers and winterbournes that are under pressure needs to be considered in relation to their potentially significant impacts on designated sites.</p> <p>Portsmouth Water: Welcome and support this policy. However, consider that agricultural reservoirs do not aid demand for water and are not resilient to drought. Recommend that paragraphs 5.154 and 5.157 are updated to include text recognising the presence of solution features (karst) in the chalk as potential preferential pathways for contaminants/pollutants to groundwater and underlying aquifers.</p> <p>Southern Water: Object to paragraph 5.159 if the intention of this is not to support water supply reservoirs in general. The objection is made on the grounds that that the Local Plan is not positively prepared as it does not reflect the need for new or improved water supply infrastructure; it is not effective as it does not support the delivery of necessary infrastructure; and is not consistent with national policy. Para 17 of the NPPF and para 005 of the PPG are cited in support of their objection. Suggest a change to this</p>	<p>I: There should be a strategic approach to protecting water resources and managing demand rather than looking at developments on a case by case basis. R: This is not within the remit of this Local Plan. The South Downs Partnership Plan sets a more strategic direction for the water environment across the National Park through working in partnership with stakeholders responsible for protecting water resources and managing demand.</p> <p>I: Discharge, abstraction and dewatering from chalk rivers and winterbournes that are under pressure needs to be considered in relation to their potentially significant impacts on designated sites. R: Criteria 1.a)-c) of Policy SD17 specifically address this issue.</p> <p>I: Reservoirs in general, not just agricultural reservoirs, should be supported in the National Park. R: Agricultural reservoirs are small in scale and support sustainable water management. As a result they have much less impact on the landscape than large scale supply reservoirs in general. The latter would normally constitute major development, where the tests of Local Plan Core Policy SD3: Major Development would apply, and the application would need to be considered against these. As set out on page of 12 the Pre-Submission Schedule of Changes, paragraph 5.159 of the supporting text now refers to large scale reservoirs would be subject to the requirements of Policy SD3: Major Development.</p>

Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>paragraph to specifically state that it is <u>agricultural</u> reservoirs that are not supported within the National Park due to their impact on the landscape.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome and support this policy (Brighton and Hove City Council) • Amendments are requested to the text and policy to cover private water supplies which provide potable water to a large number of domestic and commercial users. These supplies can be considered to have Source Protections Zones around them (for small supplies this will be a generic 50m buffer zone). This information is held by local authorities and it is suggested that this policy contains an additional criteria stating that Local Authorities with be consulted about applications that are in the vicinity of Private Supply SPZ's (Chichester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • This policy is supported and welcomed. (Buriton, Fernhurst, Madehurst Parish Council, Rowlands Castle and Selbourne Parish Councils) • Request amendments to the policy to make is clear that the conservation objectives for designated water courses are overriding considerations. The significance of the river corridor for the conservation and enhancement of the environmental quality of the watercourse, particularly a chalk stream should be mentioned in para 5.148 and the river corridor of major water courses should be identified on the policy map. Para 5.153 regarding development not being located within 8 metres of a water course is inconsistent with Allocation Policy SD 63: Land south of the A272 at Hinton Marsh, Cheriton. (Cheriton Parish Council) • Consider this policy sound. (Lewes Town Council) • Water companies must be consulted on planning applications, in addition to the Environment Agency. The Source Protection Zoning needs to be investigated more thoroughly in light of the issues surrounding the UKOG Markwells Wood oil drilling planning application. (Rowlands Castle Parish Council) 	<p><i>I: The supporting text should make reference to the presence of solution features (karst) in the chalk as potential preferential pathways for contaminates/pollutants to groundwater and underlying aquifers.</i> R: Page 12 of the Pre-Submission Schedule of Changes proposes that paragraph 5.155 includes reference to karst features.</p> <p><i>I: The text and policy should cover private water supplies and their Source Protections Zones</i> R: Page 12 of the Pre-Submission Schedule of Changes proposes to make changes to criteria SD17 (2) and para 5.155 to also cover private water supplies and their Source Protection Zones (SPZ's)</p> <p><i>I: Request amendments to the policy to make is clear that the conservation objectives for designated water courses are overriding considerations.</i> R: Criterion 1a) clearly sets out that that development proposal should not affect the ability of watercourses to function by natural processes.</p> <p><i>I: Consider that the policy does not recognise the threat to water supply from agriculture</i> R: It is considered that this issue is covered by para 5.157 which states that pollution to the water environment can arise from both urban and rural run-off.</p> <p><i>I: The pollution impacts of private sewerage systems should be prevented</i></p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Object to both this policy and Policy SD49 relating to Flood Risk as they do not address existing flood risk situations such from the Hazeley Bourne in Twyford. (Twyford Parish Council) • Water abstraction should be reduced perhaps by using desalination plants and also pollution to watercourses (St John without Parish) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Consider there needs to be more of a balance between the environmental benefits and maintaining river conditions for the passage of canoes, as river developments such as re-wilding schemes can physically change the riverscape and hydromorphology. (British Canoeing) • Greater reference should be made to protecting the capacity of the landscape to absorb and store water in areas prone to flooding. The planting of riparian and floodplain woodland can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management as well as meeting Biodiversity Action Plan targets for the restoration and expansion of wet woodland. (Forestry Commission) • Support this policy and consider the catchment based management approach to be excellent. There are concerns regarding the lack of focus on protecting the quantity of water in aquifers, given the expected increased use of water caused by new development in the South East. (CPRE Hampshire) • Consider that the policy does not recognise the threat to water supply from agriculture, especially fertilisers and pesticides. The supporting text or policy should also include reference to the importance of dew ponds as a characteristic feature of the downland landscape. (Eastbourne Downland Group) • Amendments are requested so that it is made a requirement that any development must demonstrate the adequacy of existing infrastructure such as sewage treatment. Object to the minimum buffer size of 8 metres between developments and water corridors mentioned in para 5.153 as this is considered totally inadequate, especially with climate change. (The Midhurst Society) • Welcome and support criteria 4 relating to the construction of agricultural reservoirs, however consider that there may be uncertainty over how proposals 	<p>R: This issue is referred to in paragraph 5.158 of the Local Plan</p> <p><i>I: The policy should cover water quantity as well as quality</i></p> <p>R: Criterion 1a) refers to conserving and enhancing both water quality and quantity.</p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>demonstrate compatibility with National Park Purposes. Suggest a SPD is prepared to guide assessment and design such as that produced by Kent and Suffolk County Councils. (NFU South East Region)</p> <ul style="list-style-type: none"> • Request that criteria 1 of the policy should include protection of private water supplies. Suggest that this could easily be remedied by the addition of ‘<u>and private</u>’ before water supply. (South Downs Land Managers Group) • Support this policy. (South Downs Society) • Strongly support this policy. However, some wording changes are suggested to ensure that public access is not mandatory where it may harm the special qualities of the National Park; that river corridors are included in the features that should be protected from pollution risks; and the pollution impacts of private sewerage systems are prevented by ensuring that foul drainage connects to mains systems or where this is not possible via a drainage field rather than directly to watercourses. (Sussex/Hampshire Wildlife Trusts) • Wording should better reflect NPPF and National Park Management Plan and be amended to say “will be permitted where they conserve.....” to be consistent with the presumption in favour of sustainable development. (Wiston Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support this policy and supporting text. • Amendments are requested so that the policy covers water quantity as well as quality and as such there should be a tougher stance on any water demanding proposals (e.g. water resource, heavy, agri/horticulture by not permitting new reservoirs etc.) • The policy should be amended to make it clear that the conservation objectives for designated water courses are overriding considerations. New developments can affect the hydrology of surrounding land and biodiversity. • Site allocation SD89 Land at Pulens Lane, Sheet does not comply with this policy as it will result in significant damage to the river that is part of a Site of Importance for Nature Conservation. • Question why the parish is not included in the Hampshire County Council Groundwater Management Plan. 	

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

Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none">• Policy should include an additional criterion that ensures that development proposals have given careful consideration to potential effects on water and how the approach represents the most appropriate solution.	

Summary of Issues

Policy SD18: The Open Coast

There were a total of 15 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <p>Marine Management Organisation: Supports this policy, but considers that additional information relating to marine licensing, and the emerging South Inshore and Offshore Marine Plans, should be included within the supporting text.</p> <p>Southern Water: Welcomes the amendments that have been made to the policy in order to encompass the operational needs of activities in support of the Heritage Coast. However, considers the operational needs of utility infrastructure need to be made more explicit in this policy and therefore object to this policy on the grounds that; it is not positively prepared as it does not reflect a potential need for new or improved water supply infrastructure, it is not effective as it does not support delivery of necessary infrastructure, and it is not consistent with national policy. The NPPF para 17 and Para 005 of the PPG are cited in support of this objection. Recommend changes are made to include additional wording to criteria 1a) ii <u>'which should also encompass the operational needs of statutory utility providers.'</u></p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Support this policy but suggest amendments to include reference to the Brighton and Lewes Downs Biosphere Reserve (also known as the Living Coast) given that the undeveloped coastline areas of the SDNP, outside the Heritage Coast, fall within the Biosphere Reserve designation. Some suggested wording is provided for criteria 1.b) to include reference to the objectives 	<p><i>I: Additional information relating to marine licensing, and the emerging South Inshore and Offshore Marine Plans, should be included within the supporting text.</i> R: Paragraph 5.160 makes reference to the South Marine Plan which covers this.</p> <p><i>I: The operational needs of utility infrastructure need to be reflected in this policy.</i> R: It is considered that this issue is addressed by criteria 1.ii) of this policy which allows for the operational needs of activities in support of the Heritage Coast.</p> <p><i>I: The policy should include reference to the Brighton and Lewes Downs Biosphere Reserve which covers part of the undeveloped coast.</i> R: The purpose of this policy is to protect the undeveloped character of this part of the coast. The supporting text needs to be concise and relevant to this purpose and cannot include reference to all designations and strategies. Chapter 1 of the Local Plan references the Brighton and Lewes Downs Biosphere Reserve.</p> <p><i>I: There is no mention that the sea cliffs are suffering from rapid coastal erosion and the impact this will have on the National Trust tourist facilities and offices. There should be a link between this policy and SD23 on Sustainable Tourism to allow for these facilities to be replaced.</i></p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>of the Brighton and Lewes Downs Biosphere Reserve. Also request that that the designated area of the Reserve is included on Map 5.6. (Brighton and Hove City Council)</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support this policy. (Fernhurst PC, Madehurst Parish Meeting) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support this policy (British Canoeing, Hampshire CPRE, South Downs Society and Sussex and Hampshire Wildlife Trusts) Consider that there is a significant omission from the Local Plan as there is no mention that the sea cliffs are suffering from rapid coastal erosion which will impact on coastal footpaths, housing, parking, visitor and recreational facilities and the important chalk grassland SSSI's. The policy should do more to guard against the loss of dwellings and recreational facilities. The National Trust's recent report 'Shifting Shores' is cited as giving valuable guidance on managing costal retreat. (Eastbourne Downland Group, The Gilbert Estate) Request amendments to the policy and supporting text as concerned that with current rates of erosion it is very likely, within the lifetime of this Local Plan, that the National Trust tourist facilities and the offices at Birling Gap will be unsafe to occupy. Consider that the Local Plan fails to recognise the importance of tourism to this area in the supporting text or implicitly in the policy. Advise that a clear link is established between Policy SD23: Sustainable Tourism and this policy to ensure that the second purpose of Heritage Coasts which is to "encourage and help the public to enjoy, understand and appreciate these areas" is properly recognised. This will aid the re-provision of facilities and facilitate the necessary space for the Trust to provide its countryside management services. Suggest 	<p>R: While it is appreciated that the erosion of the cliffs is a major and complex issue here, as mentioned above the purpose of this policy is to protect the undeveloped character of this part of the coast. The supporting text needs to be concise and relevant to this purpose and cannot include reference to all issues that might be affecting this area. It is considered unnecessary to cross reference to SD23 on Sustainable Tourism as the first paragraph of the Local Plan clearly states in highlighted text that all policies should be viewed together and not in isolation and the policies in the Local Plan do not cross reference to all other policies that might be relevant.</p>

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Summary of Issues

Summary of Representations	Issue and SDNPA Response (I/R)
<p>the supporting text is amended to recognise the second purpose of Heritage Coasts and that there is a link provided to Policy SD23 on Sustainable Tourism to ensure this purpose is achieved. (National Trust)</p> <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support this policy. • Support this policy and consider it is needed to allow for the necessary management of the coast, including coastal erosion and flooding. The best approach at present to achieve appropriate management is through future modifications of the South Marine Plan. 	

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Summary of Issues and Responses

Policy SD19: Transport and Accessibility

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

Summary	Issue and Response (I/R)
<p><u>National agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support (Buriton, Fernhurst PCs, Madehurst Parish Meeting) • Policy is weak and generic, not National Park specific. (Cheriton PC) • Policy duplicates aims of NPPF (Twyford PC) • No strategic approach to traffic on the strategic or minor road network. NPA needs to consider traffic impact of new development both in the National Park and beyond its boundary, and mitigate these impacts through the policy, including through considering the introduction of traffic restrictions. (Cheriton PC, Rodmell PC, Stedham PC, Twyford PC) • Support emphasis on sustainable transport, cycle use and restrictions on heavy goods vehicles (Petersfield TC) • Support elimination of transport through local offices and fast internet. Should also mention driverless cars. (Stedham PC) • Inadequate consideration of ways to facilitate access to the National Park (Rodmell PC) • Inadequate consideration of the existing road network and traffic, and how to regulate it. Particular concern over C7 Newhaven-Lewes- should not be used as a strategic link road- LP should include proposals to manage traffic flows, in accordance with RITSD. (Rodmell PC) 	<p><i>I: Policy is weak and generic, not National Park specific</i> R: Policy SD19 draws on a number of studies to support the policy which are National park Specific (SDNPA Transport Study – Phase I Report, Transport Assessment of the South Downs Local Plan, Site Allocations Highways Assessment, Roads in the South Downs). Its context should also be taken in conjunction with other sustainable transport policies SD20: Walking Cycling and Equestrian Routes, SD21: Public Realm, Highway Design and Public Art and Policy SD22: Parking Provision, covers new public vehicle parks and parking on private developments.</p> <p><i>I: SDNPA should consider impact of new development both inside and outside of the National Park.</i> R: The policies are proportionate and provide a positive framework for the relatively modest amount of development planned across the National Park. There is a wider issue of traffic increasing across the whole sub-region, which can only be dealt with on a cross-boundary basis through the Duty to Cooperate. Also see below for development outside the Park.</p>

Policy SD19: Transport and Accessibility

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Summary of Issues and Responses

Summary	Issue and Response (I/R)
<ul style="list-style-type: none"> • SD21: Policy should summarise the policies of ‘Roads in the South Downs’, to give them increased status. (Cheriton PC) • SD21: Para 6.31: Should review traffic flows on all routes through the park, and lower the threshold of 10%. (Cheriton PC) • Need to consider impact on narrow lanes of delivery vehicles, which, being larger, can cause more damage to verges etc. than motor cars. (Cheriton PC, Petersfield TC) • Transport assessments should be carried out by the Highways Authority, not the developer, but at the developer’s expense. (Fernhurst PC) • Point out importance of transport to sustainable tourism (Liss PC) • Need to strike balance between improving communications (especially East/Wes) and conserving the landscape. (Liss PC) • SD21: Policies should protect sunken and rural green lanes used as walking routes. Would support policy banning motor vehicles on BOATS. (Liss PC) • SD21: Policies should achieve quiet road surfaces (Liss PC) • SD21: Policies should reduce signage clutter (Liss PC) • Policies should prevent main highways becoming development boundaries. (Liss PC) • SD22: May need policy to provide for electric car charging points. (Liss PC) • Would support ongoing sensitive management of A29 (Madehurst PM) • Consider routes for HGV use (Petersfield TC) • Must assess impact of more significant developments (Rowlands Castle PC) • Request Rowlands Castle station be considered as a vital gateway to the Park, though outside the boundary (Rowlands Castle PC) • Para 6.1: amend to ‘duty in pursuit of its purposes’ (Selborne PC) • Para 6.9: Committed development in the area should include development outside the NP, and development with planning applications pending consideration. All TAs, TSs and TPxs should assess cumulative impact, regardless of development size.. (Rowlands Castle PC) • Para 6.9: Delete reference to TA and TS- need for these is determined before the application is considered. (Twyford PC) • Delete reference to transferring freight from road to water- unrealistic (Twyford PC) 	<p><i>I: No strategic approach to traffic on the strategic or minor road network. NPA needs to consider traffic impact of new development both in the National Park and beyond its boundary, and mitigate these impacts through the policy, including through considering the introduction of traffic restrictions</i></p> <p>R: The traffic impact from development outside the National Park has been addressed on page 12 of the Pre-Submission Schedule of Changes (change to paragraph 6.9) and covers both cumulative impact and development where relevant outside the National Park. See above response for strategic approach.</p> <p><i>I: Transport assessments should be carried out by the Highways Authority, not the developer, but at the developer’s expense.</i></p> <p>R: It is normal practice, and more resource-efficient, to place the onus on the applicant to carry out appropriate transport assessments to support planning applications.</p> <p><i>I: Policy should include potential Arundel bypass and other proposals for the A27 where they fall within the SDNP Boundary</i></p> <p>R: Arundel bypass and A27 improvements are outside of the scope of the Local Plan beyond implications for the special qualities and purposes of the Park.</p>

Policy SD19: Transport and Accessibility

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

Summary of Issues and Responses

Summary	Issue and Response (I/R)
<ul style="list-style-type: none"> • Para 6.13:M Reference is inadequate,- should list all strategic roads, which should include B3335/B3354, as meriting special protection from the effects of development, to avoid rat-running away from them onto smaller roads. (Twyford PC) • Consider replacing national speed limit with 50mph on all roads other than strategic roads • SD20: Should be more encouragement for improvement of on-road cycling facilities (i.e. cycle tracks) (Twyford PC) • SD21: 6.28: Footnote should state 'freely available for inspection on the National Library of Scotland website http://maps.nls.uk/os/ (Twyford PC) • SD21: 6.29: Requirement to protect hedgerows and banks may conflict with requirement to provide a safe access. (Twyford PC) • SD21: 6.30: Raise threshold from one net additional dwelling/100m2 of floorspace, to 12-15 two-way vehicle movements in the peak hour (half the threshold for a Transport Statement) (Twyford PC) • SD22: Criteria 2, 4: references re. EV charging facilities (cannot say 'where feasible' and 'must') (Twyford PC) • SD22: Criterion 3: add sub criteria requiring the provision of secure cycle facilities and, where feasible, EV charging facilities. (Twyford PC) • SD22. Criterion 5: Add new clause requiring proposals for new, relocated or extended public parking outside settlements to be appropriate to its location. (Twyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • General support (Angmering Estate, Friends of Lewes Society, South Downs Society) • Support focus on walking, cycling and public transport (Lewes District Green Party) • Support criterion 4(c) (The Chichester Society) • Policy should include potential Arundel bypass (Angmering Estate) • Traffic from additional development, redevelopment or extensions of LP allocations and developments in the setting of the NP should also be minimised. (DMH Stallard LLP, client not stated) • Traffic from additional development, redevelopment or extensions within the Mackley Industrial Estate, Henfield, should also be minimised. (Hopegar Properties) 	<p><i>I: Issues listed regarding Policies SD21 and SD22</i> R: These issues have been added into the responses into their respective Policy summaries as above.</p> <p><i>I: Issues listed regarding Policies SD21 and SD22</i> R: These issues have been added into the responses into their respective Policy summaries as above.</p>

Policy SD19: Transport and Accessibility

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

Summary of Issues and Responses

Summary	Issue and Response (I/R)
<ul style="list-style-type: none"> • Criterion 1 should include the phrase ‘where appropriate’ to cover applications where there is no scope to minimise travel requirements. (NFU South East Region, South Downs Land Mangers Group) • Criterion 2: Add text as follows: ..significant number of journeys (<i>compared to traffic associated with the existing legal/permitted use of a site</i>)... (Springs Smoked Salmon) • The policy is reactive, there is no transport strategy. LP should bring together include any transport proposals e.g. from county councils on the Policies Map. Concern over proposed new bridge at Exceat increasing traffic, and also the future of the cliff-top road at Belle Tout (will it be replaced?) Proposals for A27 widening at Polegate should be shown where they fall within the NP. Request that planning inspector flags this issue for early review of the Plan. (Eastbourne Downland Group) • Need more emphasis on utility cycling- the quality and quantity of routes for them in towns and large villages needs to be improved. (Petersfield Cyclists) • Criterion 2: Add the following text: public transport routes, main roads <i>and provide good access for pedestrians and cyclists from the new development to nearby amenities and services including public transport links. Movement along the footpaths and cycle ways must be a safe and attractive experience for users.</i> • Criterion 3: add the following: <i>Development will not be permitted where it would adversely affect the amenity of users of footpaths, or cycle ways and where no equally attractive, safe and convenient satisfactory remedial measures, such as re-routing , can be undertaken.</i> (Petersfield Cyclists) • Criterion 4: add the following: <i>Support will be given to proposals that improve and extend the existing network of cycle routes and footpaths for utility journeys and for commuter journeys, thus enabling better access to local amenities, to local employment, to rail/bus stations, to green spaces, to new housing where appropriate to the open countryside for recreation.</i> (Petersfield Cyclists) • Criterion 4(d): should refer to wherever cycle journeys are likely end, e.g. shops and banks. (The Midhurst Society) • Add the following paragraph to the policy: <i>Paragraph 6: Economic contributions may be required for transport enhancements to improve the safety and convenience of non-car modes of travel including (but not necessarily limited to) footpaths, bridleways, cycleways, car-sharing</i> 	

Policy SD19: Transport and Accessibility

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

Summary of Issues and Responses

Summary	Issue and Response (I/R)
<p><i>facilities, public transport provision and infrastructure, charging points for electric vehicles and bicycle parking and travel planning. (Petersfield Cyclists)</i></p> <ul style="list-style-type: none"> • Approach will be challenged by Syngenta and Shoreham Cement Works (South Downs Society) • Glossary: Add terms; 'Recreational journeys', 'Utility journeys', 'Sustainable modes of transport'. (Petersfield Cyclists) • Criterion 1: Policy will restrict additional vehicle movements to existing visitor attractions in the countryside. Propose inserting text as follows: <i>Development proposals at existing facilities and services (including visitor attractions) which currently generate significant vehicle movements will be required to demonstrate how any increase can be satisfactorily accommodated, alongside opportunities for encouraging more sustainable transport modes for accessing the site.</i> (National Trust) • 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.) <p>Individuals</p> <ul style="list-style-type: none"> • Support (various individuals) • Policy is weak and generic, not National Park specific. No attempt to quantify current traffic flows or forecast the future. • Criterion 1: Strengthen by changing to 'minimise the need for travel and promote the use of...' • Criterion 1: qualify in terms set out at NPPF Para 34. • Criterion 2: remove 'where relevant' from before 'the cycle network' to give cycling equal status to the other modes. • Support elimination of transport through local offices and fast internet. Should also mention driverless cars. • Support seeking of opportunities to reduce negative impacts of traffic • No strategic approach to traffic on the strategic or minor road network. NPA needs to consider traffic impact of new development both in the National Park and beyond its boundary, and mitigate these impacts through the policy, including through considering the introduction of traffic restrictions. In particular: the C7 Lewes-Newhaven (signage 	

Policy SD19: Transport and Accessibility

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

Summary of Issues and Responses

Summary	Issue and Response (I/R)
<p>to encourage traffic onto the A26 instead); traffic through Owslebury arising from Eastleigh LP proposals;; routes through Alfriston and Telscombe. (Various individuals inc. Lewes District Council, Cllr Vic lent)</p> <ul style="list-style-type: none"> • Market housing in villages will not minimise the need to travel, since its occupants are likely to be commuters rather than working in the community where they live, and are likely to need two cars per household. • Should include review of potential additional public transport routes/stops, to link to PROWs. (Hampshire County Council, Cllr Jackie Porter) • Syngenta and Shoreham Cement Works may need special treatment, from the point of view of transport. (Lewes District Council, Cllr Vic lent) • Strongly encourage use of the rail and bus networks for passenger and commercial traffic, especially rail freight at Newhaven port and rail and bus travel for students at Newhaven UTC. (Lewes District Council, Cllr Vic lent) • Policies should state that major roads, roads in towns, many (not just historic) rural roads, the footpath and bridleway network are important to the National Park and need protection/sensitive planning and maintenance. • Policies should state presumption that any new major roads do not damage the parks landscape and special character. • Strategic roads should not be treated the same as any other infrastructure, as they are uniquely intrusive with widespread environmental impacts. 	

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

Summary of Issues and Responses

Policy SD20: Walking, Cycling and Equestrian Routes

There were a total of 53 representations on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and SDNPA Response (I/R)
<p>National agencies</p> <p>Natural England: Very concerned over potential impacts on Chichester to Midhurst route on biodiversity: Regarding Singleton and Cocking Tunnels SAC: Support the omission of the tunnels from the safeguarded route, but remain concerned over increased recreational access to the vicinity of the tunnel, which will expose the SAC to a significant risk of disturbance and damage. Project level HRA would capture this but need to also clarify this in the policy, adopting a precautionary approach. Regarding West Dean Tunnels: The tunnels contain a significant number of hibernating bats including Annex I species. Advise that alternative route be secured.</p> <p>Borough, City, County and District Councils</p> <ul style="list-style-type: none"> • Support safeguarding of Devils' Dyke Route (Brighton & Hove City Council) • Welcome reference to restoration of Lewes-Uckfield line; consistent with BHCC City Plan. (Brighton & Hove City Council) • Para 6.21: should state that non-motorised transport routes created prior to restoration must not prejudice future restoration. (Brighton & Hove City Council) • Para 6.25: where public path amendments relate to planning issues then the SDNPA as the planning authority is responsible for making PPDOs- not the Highway Authority (East Sussex County Council). • General support (Winchester City Council) <p>Parish and Town Councils</p> <ul style="list-style-type: none"> • General support (Buriton PC, Fernhurst PC, Iford PM, Madehurst Parish Meeting) • Concern over resurfacing of PROWs- avoid hard surfaces for the sake of horses, off road cyclists, and the protection of forest floors. (Bury PC) • Cycle paths on roadways are particularly dangerous, should be avoided (Fernhurst PC). 	<p>I: Natural England: Very concerned over potential impacts on Chichester to Midhurst route on biodiversity: Regarding Singleton and Cocking Tunnels SAC: Support the omission of the tunnels from the safeguarded route, but remain concerned over increased recreational access to the vicinity of the tunnel, which will expose the SAC to a significant risk of disturbance and damage. Project level HRA would capture this but need to also clarify this in the policy, adopting a precautionary approach</p> <p>R: Policy SD20 should not be read in isolation, but in combination with policies SD9 and SD10 which have criteria on impacts and protection on internationally designated sites. Further to this, para 6.18 clarifies the regard for protected species and also refers back again to Policy SD9: Biodiversity and Geodiversity. All policies work together to protect the features of the SAC. SDNPA would work closely with NE on any proposals put forward and although in principle it is a safeguarded route, there may be modifications to the route at the application stage along with an appropriate project HRA.</p> <p>I: Para 6.21: should state that non-motorised transport routes created prior to restoration must not prejudice future restoration</p>

Policy SD20: Walking, Cycling and Equestrian Routes

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Para 6.16: Revise wording of last sentence, which is hard to understand. (Selborne PC) • Para 6.22: Welcome guidance on crossing points. Seeking to improve safety of crossing C7. (Iford Parish Meeting) • Support reopening of Lewes-Uckfield railway (Lewes TC) • Further amendments needed to protect rural green lanes and quiet roads used as walking routes. Would support ban on vehicles on BOATs (Liss PC) • Strongly support safeguarding of potential cycle/walking route from Petersfield to Petworth (Petersfield TC) • Does not adequately address the facilitation of access to the NP by footpaths, roads, traffic management, parking and public transport (Rodmell PC) • Dislike the formulation 'development proposal that facilitate such use will be permitted.' This should not be automatically the case: prefer 'welcomed'. (Rowlands Castle PC) • SDNPA needs to produce a local cycling and walking infrastructure plan as specified by DfT. (Stedham with Iping PC) • Should be more encouragement for improved on-road cycling facilities (Twyford PC) • Welcome protection of Meon Valley Trail. Should recognise vulnerability of crime around it and allocate sufficient budget to minimising crime. (West Meon PC) <p>Other organisations</p> <ul style="list-style-type: none"> • General support (British Horse Society) • Should require improvements to bridleways and footpaths if there is evidence of historic use (CPRE Sussex) • Need to set active travel in a broader context, and address the connectivity of the right of way network and CROW Access Land. (Eastbourne Downland Group) • Support safeguarding of disused railway lines for non-motorised use (Fittleworth and District Association) 	<p>R: The policy is worded to ensure that future restoration would not be prejudiced.</p> <p>I: Para 6.25: where public path amendments relate to planning issues then the SDNPA as the planning authority is responsible for making PPDOs- not the Highway Authority (East Sussex County Council).</p> <p>R: Agreed that a correction is necessary. A post-submission minor change will be proposed to refer to just the 'authority' rather than the 'local transport authority'.</p> <p>I: Concern over resurfacing of PROWs- avoid hard surfaces for the sake of horses, off road cyclists, and the protection of forest floors.</p> <p>R: Resurfacing of every PROW would be considered on a case by case basis, taking into account its setting, the landscape character of the area, its historical context and the uses of the path. However, this is too detailed a matter for the Local Plan.</p> <p>I: Further amendments needed to protect rural green lanes and quiet roads used as walking routes.</p> <p>R: Policy SD21 along with Policy SD21: Public Realm, Highway Design and Public Art and its associated supporting text discuss the issue of historic rural roads and particularly para 6.29 ensures that "...the historical significance, ecological, landscape and</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> Concerned that plan's effectiveness will be compromised by NPA's lack of funds and powers (Fittleworth and District Association) Add new routes to Criterion 2: Most of the former railway line from Lewes to Hamsey (Friends of Lewes Society) Criterion 2: Policy should be more proactive, SDNPA needs to take the lead in creating an action plan and timetable; there should be targets and triggers for the delivery of the network. (The Midhurst Society) Criterion 2: Welcome this section. Label the New Alresford to Kings Worthy route 'Watercress Way' (ultimately intended to run to Sutton Scotney). This route would be of immense value- off road travel along this part of the Itchen Valley, especially for cyclists and horseriders, is currently poor. (Watercress Way, two representors) Criterion 4: Policy should be more proactive; there should be targets and triggers for the delivery of crossing points. (The Midhurst Society) Support policy regarding former Lewes-Uckfield railway line (Lewes District Green Party) Policy is sound but SDNPA should reconsider the decision not to safeguard the Cocking and Singleton Tunnels for restoration. Cycleways share railway tunnels with bats elsewhere, e.g. Combe Down and Devonshire Tunnels, near Bath. (Sustrans, Midhurst Area Cycling) When new NMTR are being developed, should engage with adjacent councils to ensure they are continued outside the SDNP (Sustrans) Policy should include a statement in favour of restoring former railway lines where they have been previously developed, including use of compulsory purchase where necessary (Sustrans) Welcome safeguarding of Lewes-Uckfield railway line. Note that it may be necessary to deviate slightly from the original route. (Railfuture) Welcome proposed cycle route between Petersfield and Midhurst, road access currently unsafe for cyclists. Further improved access west and south of Petersfield would also be beneficial. Para 6.24: The example given in the third sentence currently gives the impression of cyclists and horse riders on a footpath. (South Downs Land Managers Group) 	<p>recreational value and character of those roads are conserved and enhanced"</p> <p>I: Criterion 2: Welcome this section. Label the New Alresford to Kings Worthy route 'Watercress Way' (ultimately intended to run to Sutton Scotney).</p> <p>R: This is corrected on page 13 of the Pre-Submission Schedule of Changes to include the words "Watercress Way"</p> <p>I: When new NMTR are being developed, should engage with adjacent councils to ensure they are continued outside the SDNP</p> <p>R: This is a Duty to Cooperate issue the detail of which need not be included in the Local Plan.</p> <p>I: SDNPA needs to produce a local cycling and walking infrastructure plan as specified by DfT</p> <p>R: The size of the National Park does not lend itself to the definition of the DfT's LCWIPs as these are by definition local and tend to be focused on towns. However, we have consultant support on this project with West Sussex County Council and the Park's 'LCWIP' will be of a strategic nature building on the business case for the strategic routes identified in our strategy which will be published on the website shortly.</p> <p>I: Criterion 6(b): insert wording as follows: amenity value, <u>biodiversity value</u> and tranquillity</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • Para 6.24: Final sentence: change to may<u>will</u> be required to provide a mitigation contribution. Such contributions should be ring fenced for dealing with the problems arising from additional pressure on rights of way across farmland (South Downs Land Managers Group) • Design of new non-motorised routes and connections should take into account the needs of land management, especially livestock grazing. (South Downs Land Managers Group) • Policy is entirely reactive, not positively prepared. Should encourage improvement of the bridleway network and upgrading footpaths to bridleways where there is evidence of historic use. Should specifically encourage provision for wheelchair/all terrain scooter access. (South Downs Society) • Criterion 6(b): insert wording as follows: amenity value, <u>biodiversity value</u> and tranquillity (Sussex/Hampshire Wildlife Trust) • Development and associated traffic increases on local roads are already harming and fragmenting the network of safe routes. (British Horse Society) • Propose replacing the phrase ‘Will be permitted provided’ with “Will be permitted where’ (Glynde Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • General support (Hampshire County Council, Cllr Jackie Porter) • Object to the policy since part of the Petersfield-Chichester railway route runs through their garden- risk to domestic food production and biodiversity. • Need to take opportunities to install facilities for cyclists on roads e.g. good junction design cycle parking close to main entrances, etc. • The Watercress Way is a charity seeking to open more sections of the old railway line from Alresford to Kings Worthy, with further links to the north. WCC and HCC are supportive of this project. (Hampshire County Council, Cllr Jackie Porter) • Should reword for more positive encouragement of bridleway networks. (Lewes DC, Cllr Vic lent) • Off road route development should provide for users of mobility scooters(Lewes DC, Cllr Vic lent) 	<p>R: Policy SD20 should be read in conjunction with Policy SD9: Biodiversity and Geodiversity to ensure the conservation and enhancement of biodiversity is included.</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and SDNPA Response (I/R)
<ul style="list-style-type: none"> • New footpaths must adopt straight lines rather than following field headlands, especially where they connect communities. New footpaths should not follow more than one boundary of a residential property, nor be directly against hedges, but should leave a 4m buffer for wildlife. New footpaths should be inaccessible to motorised transport. (Various individuals) • New non motorised transport routes should not lead to the diversion of or substitute existing footpaths. (Various individuals) • Should refer to creation of new routes/improvement of existing routes (Lewes DC, Cllr Vic lent) • Should give clearer support to the restoration of the Lewes-Uckfield line to railway use. (Lewes DC, Cllr Vic lent) • Policy imprecise and repetitive. Should actively promote the creation of new bridle paths. • Should commit to a local cycling and walking plan, as per DfT Technical Guidance for Local Authorities, April 2017. • Criterion 1: New development may not always be able to contribute to a network of non-motorised routes. Add 'where possible'. • Policy needs to emphasise that the PROW network is a key part of the Park's character and economy, but is fragile and needs protection and good maintenance. • Busy roads, including B roads, form barriers to the Downs for horse riders. Gates and parking areas are often unsuitable for horse riders. Frustrations over coordination between route managers and information provision. 	

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

Summary of Issues and Responses

Policy SD21: Public Realm, Highway Design and Public Art

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Welcome and support the reference to historic rural roads in the policy, and also paragraphs 6.28 and 6.29, as part of a positive strategy for the historic environment, as per paras 126 and 157 of the NPPF.</p> <p><u>Borough, City, County and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • General support (Buriton, Fernhurst, Rowlands Castle PCs, Iford, Madehurst PMs) • Support protection of historic rural roads (Madehurst PM) • ‘Context-sensitive street design and management’ is vital in retaining the purposes and character of the NP (Buriton PC) • Extend policy to include financial support for community highway management projects. (Iford PM) • Need for policies to protect sunken and rural green lanes and quiet roads used as walking routes; to achieve quiet road surfaces; to reduce signage clutter. (Liss PC) • Widening of the A29 contradicts policy on historic rural roads (Madehurst PM) • Criterion 2: list of factors should include tranquillity. (Colemore and Priors Dean PM) 	<p><i>I: Extend policy to include financial support for community highway management projects.</i> R: This is considered to be a detailed matter and beyond the scope of the Local Plan.</p> <p><i>I: Need for policies to protect sunken and rural green lanes and quiet roads used as walking routes; to achieve quiet road surfaces; to reduce signage clutter.</i> R: The policy refers to Roads in the South Downs (PCP 04) which provides guidance on such matters.</p> <p><i>I: Comments requesting detailed wording changes including referencing ‘tranquillity’, ‘sunken lanes’, character of ancient lanes, ‘compliant with Highway adoption standards’, alleys and twittens, entrances to ancient byways in villages, more attention to ‘B’ and ‘C’ roads, rural roadside margins, and shared spaces.</i> R: The policy refers to Roads in the South Downs (PCP 04) which provides guidance on such matters as appropriate. It is not necessary to include very fine-grained detail which duplicates published and established guidance.</p> <p><i>I: Paragraph 6.31, third sentence: change to ‘conserve <u>and</u> or enhance’</i> R: This change has been made on page 13 of the Pre-Submission Schedule of Changes.</p>

Policy SD21: Public Realm, Highway Design and Public Art

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>Other organisations</p> <ul style="list-style-type: none"> • Criterion 2: Add 'historic rural roads <u>including sunken lanes</u>' (Selborne PC) • Paras 6.28, 6.29: Expand to include sunken lanes (ref East Hants Local Plan policy HE19). There are more than 60 miles of such lanes containing microclimates with enormous and internationally important ecological variety. (Selborne PC) • Support paragraphs 6.28-6.32, in particular monitoring of the cumulative effect of development on traffic. (Iford PM) • Para 6.29: List of characteristics in third paragraph should include tranquillity. (Colemore and Priors Dean PM) • Para 6.31: Strongly support 10% threshold as potential grounds for refusal. (Colemore and Priors Dean PM) • Para 6.31: Strongly support principle of assessing cumulative impact. Question how this would be applied to future proposals. (Colemore and Priors Dean PM) • Paragraph 6.31, third sentence: change to 'conserve <u>and</u> or enhance' (Harting PC) • Support new public art (Lewes TC) • SDNPA should support putting much used paths/historic highways on the Definitive Map. Rural roadside margins should be recognised for their biodiversity value. (St John Without PM) • 6.28: Footnote should state 'freely available for inspection on the National Library of Scotland website http://maps.nls.uk/os/ (Twyford PC) • 6.29: Requirement to protect hedgerows and banks may conflict with requirement to provide a safe access. (Twyford PC) • 6.30: Raise threshold from one net additional dwelling/100m² of floorspace, to 12-15 two-way vehicle movements in the peak hour (half the threshold for a Transport Statement) (Twyford PC) 	<p>I: SDNPA should support putting much used paths/historic highways on the Definitive Map. R: Amendments to the Definitive Map sites under different legislation, and is undertaken by the local highways authority subject to specific legal process and tests. It would therefore not be appropriate to include this.</p> <p>I: Paragraph 6.28: footnote should state 'freely available for inspection on the National Library of Scotland website http://maps.nls.uk/os/ R: This change has been proposed on page 13 of the Pre-Submission Schedule of Changes.</p> <p>I: Paragraph 6.30: raise threshold from one net additional dwelling/100m² of floorspace, to 12-15 two-way vehicle movements in the peak hour. R: The current wording is in line with current guidance and advice, and is therefore the most appropriate.</p> <p>I: Similar considerations that apply to historic rural roads should apply to historic lanes in towns. R: Historic rural roads are a distinctive feature of the National Park and are essential parts of the walking, equestrian and cycling routes network. They are treated as landscape heritage assets. Whilst historic streets in towns are also important, these are not subject to the same kinds of pressures and where appropriate will generally be protected by other means e.g. as part of a conservation area.</p> <p>I: Need further definition of 'historic rural roads' to avoid subjective interpretation by developers. R: The five paragraphs of supporting text 6.28 to 6.32 explain the approach to historic rural roads. This is considered sufficient detail for interpreting the policy.</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Welcome inclusion of policy on historic rural roads. Need to interpret the term widely, and explain in Glossary. Policy needs to be robustly worded enough to pick up implications of small and large developments. Similar considerations should apply to historic lanes in towns. (South Downs Society) • Welcome support for public art and also the proviso about appropriate locations- not all locations appropriate for all types of art. (South Downs Society) <p>Individuals</p> <ul style="list-style-type: none"> • General support • Particular support for historic rural roads policy, including sunken lanes. (Various individuals) • Current issue of damage to historic rural road fabric by traffic from existing development e.g. internet delivery vehicles and 4x4s is not addressed by the policy: could introduce restrictions on vehicles over a certain size on minor roads. • Criterion 2: Add the text ‘or where it would adversely affect the character, setting or historical, ecological and archaeological value of ancient tracks and lanes.’ There are 60-70 miles of such sunken lanes in East Hampshire and parts of West Sussex that go back to pre-Roman times, often housing rare plants or insects. Ref. East Hants Local Plan policy HE19. • Criterion 3: Add the text ‘The design and layout of new development <u>must be compliant in design with Highway adoption standards and</u> must give priority...’ Need to ensure the public realm is truly in public ownership, not apparent ownership. (Hampshire County Council Cllr Jackie Porter) • Need further definition of ‘historic rural roads’ to avoid subjective interpretation by developers. (Lewes DC, Cllr Victor Ient) • Historic lanes/alleys/twittens within towns also need protection. (Lewes DC, Cllr Victor Ient) 	<p>I: Need policies addressing safety for non-motorised users. Where developments increase traffic on the National Park’s roads, the Authority should insist on adequate traffic calming and speed limit restrictions. R: It is considered that Policies SD19 to 21 already address these concerns.</p> <p>I: Any new vehicle movements associated with agricultural building conversions should be routed away from public rights of way. R: This is considered too detailed a point for inclusion in the policy, and may not always be achievable in practice.</p> <p>I: The policy should summarise ‘Roads of the South Downs’ to give it statutory status. R: It is considered that the policy, together with supporting text (especially 6.27), provide appropriate guidance and signposting to ensure that the guidance is used in decision-making.</p> <p>I: Paragraph 6.31: threshold of 10% is unacceptably high, especially in a National Park setting; should require Transport Statements to detail all expected traffic flows on all routes. R: The 10% guideline is considered appropriate. A very low guideline threshold would present practical difficulties in determining whether the threshold were likely to be exceeded.</p>

Policy SD21: Public Realm, Highway Design and Public Art

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Concerned over development at the entrance to ancient byways in villages. (Lewes DC, Cllr Victor lent) • Need more attention to B and C roads with policies to keep traffic increases on them to a minimum, and specify what sort of traffic is suitable for these roads, while directing traffic from new developments onto A roads instead. (Lewes DC, Cllr Victor lent) • Need policies addressing safety for non motorised users. Where developments increase traffic on the Park's roads, the NPA should insist on adequate traffic calming and speed limit restrictions. Off-road routes are an inadequate substitute for dealing with traffic on the minor road network. Propose re-categorising some rural routes as 'green routes' with priority for non-motorised users. (Lewes DC, Cllr Victor lent) • Any new vehicle movements associated with agricultural building conversions should be routed away from public rights of way, for example on existing farm tracks; this routing should be secured through S106 agreement. . • Should be bolder, including shared space and other contemporary, people-centric ideas. • Should summarise 'Roads of the South Downs' in the policy, to give it statutory status as the only relevant Park-wide document on the topic. • 6.31: Threshold of 10% is unacceptably high, especially in a National Park setting; should require Transport Statements to detail all expected traffic flows on all routes. 	

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

Summary of Issues and Responses

Policy SD22: Parking Provision

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General support (Fernhurst and Slindon PCs) Very disappointed by removal of the commitment to produce park wide parking standards. Current HCC standards are inadequate, geared to urban areas. Unreasonable to expect NDPs to produce new standards. (Liss PC) All new development in rural areas should provide sufficient parking to prevent overspill. Village roads are increasingly clogged by parking. (Elsted and Treyford PC) Should consider demands for parking by visitors to the National Park which lead to parking in adjacent areas, for example Rowlands Castle. (Rowlands Castle PC) Paragraph 6.47: Third sentence: expand to read 'duty <i>in pursuit of that purpose</i>'. (Selborne PC) Remove the sentence 'Wherever feasible, electric vehicle charging facilities must also be provided. Cannot say 'Wherever feasible' and 'must'. Add new sub criteria to criterion 3: '(c) provide secure cycle facilities' and '(d) where feasible, electric vehicle charging 	<p><i>I: Very disappointed by removal of the commitment to produce park wide parking standards. Current HCC standards are inadequate, geared to urban areas.</i> R: The South Downs National Park covers a huge area, and it is not practical at the current time to produce parking standards that reflect the needs of different areas. However, SDNPA intends to produce a technical advice note to address the Hampshire area in particular.</p> <p><i>I: Should consider demands for parking by visitors to the National Park which lead to parking in adjacent areas.</i> R: Policy SD22 seeks to balance the need for appropriate visitor parking to support visitor attractions, with the need to avoid a proliferation of public parking. Proposals for new visitor attractions will need to comply with the relevant parking standards.</p> <p><i>I: Add new criterion to require cycle parking.</i> R: Paragraph 6.44 clarifies that cycle as well as car parking should be provided in accordance with locally published standards.</p> <p><i>I: Comments requesting detailed changes to policy wording, including replacing 'where feasible' with 'must', objection to 'will be permitted', requirement for new car parks to link to the settlement on foot.</i> R: The current form of wording is considered to balance requirements with practical issues, and be positively worded.</p>

Policy SD22: Parking Provision

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>facilities should be provided'. Remove reference to EV charging from criterion 4. Add allowance for new, relocated or extended public parking outside defined settlements. (Twyford PC)</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Commitment to electric charging facilities should be stronger, to comply with NP Vision and Circular (CPRE Sussex) • Criterion 3: Should include provision of appropriate tree cover (Friends of Lewes Society) • Welcome requirement for electric charging facilities at new car parks, should also support installation of such points at existing car parks. (Lewes District Green Party) • Consider the provision of seasonal parking to overcome the disruption caused to farming operations near visitor 'hot spots' (South Downs Land Managers Group) • Criterion 1: add a criterion that 'the car park site can be linked to other parts of the settlement by attractive walking routes, to allow easy onward journeys on foot' (South Downs Society) • Suggest former Holmbush Caravan Park site as a location for a supermarket over a ground floor car park. (The Midhurst Society) • Criterion 1 and paragraph 6.43: Welcome amended wording following Regulation 18 consultation (The National Trust) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Remove words 'wherever feasible'. Electric charging points should be mandatory other than in exceptional circumstances. (Lewes District Council. Cllr Victor Ient) • Should encourage provision of bicycle charging points. (Lewes District Council. Cllr Victor Ient) • Parking provision should be linked to the off road pathway network. (Lewes District Council. Cllr Victor Ient) 	<p><i>I: Add allowance for new, relocated or extended public parking outside defined settlements.</i> R: The policy allows for this, provided that criteria 1(a) to (c) are complied with.</p> <p><i>I: Commitment to electric charging facilities should be stronger.</i> R: Parts 2 and 4 of the policy provide an appropriate framework for seeking electric charging points.</p> <p><i>I: Part 3 should include provision of appropriate tree cover.</i> R: Part 3(a) of the policy requires appropriate location, scale and design. The matter of tree cover is a detailed design matter and may not be appropriate in all cases.</p> <p><i>I: Policy should support installation of electric charging points at existing as well as new car parks.</i> R: Whilst SDNPA would support this aspiration, the Local Plan is not the appropriate vehicle to deliver it.</p> <p><i>I: Consider the provision of seasonal parking to overcome the disruption caused to farming operations near visitor 'hot spots'.</i> R: The policy does not preclude such provision, however, any such proposals would need to comply with the Local Plan as a whole.</p> <p><i>I: Suggest new car park at Holmbush Caravan Park with a new supermarket.</i> R: This is not considered to be an appropriate use of this development site.</p> <p><i>I: Should encourage provision of bicycle charging points.</i> R: This is set out in part 2 of the policy.</p>

Policy SD22: Parking Provision

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Parking provision should include provision of recycling facilities, which the provider of the parking facility should be required to empty and maintain. (Lewes District Council. Cllr Victor Ient) • Criterion 1: Should begin with the need for parking, not simply state 'will be permitted' Access should take priority. • Premature to require EV charging points in all new dwellings, in particular for affordable housing. Electric cars are expensive, technology may change. • If new / extended / re-located parking is permitted, there should be compensatory closing of some of the numerous ad hoc parking areas which currently harm the landscape. 	<p><i>I: Parking provision should include provision of recycling facilities.</i> R: This may not always be appropriate or deliverable.</p> <p><i>I: It is premature to require EV charging points in all new dwellings, in particular for affordable housing.</i> R: The limitations to delivering EV charging for all dwellings / development is recognised through inclusion of the wording 'where feasible'.</p> <p><i>I: If new / extended / re-located parking is permitted, there should be compensatory closing of some of the numerous ad hoc parking areas.</i> R: This policy approach would be very difficult to achieve on the ground and is not appropriate.</p>

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

Summary of Issues and Responses

Introduction 6b Understanding and Enjoyment of the National Park - Introduction

There was one representation on this section. A summary of the main issues raised is set out below.

Representations	Issue and SDNPA Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none">No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none">No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none">This section should address and manage the impacts of commercial shooting and hunting (Kingston PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none">No comments received <p><u>Individuals</u></p> <ul style="list-style-type: none">No comments received	<p><i>I: This section should address and manage the impacts of commercial shooting and hunting</i></p> <p>R: Shooting and hunting licencing is outside the remit of a local plan. However any proposals would be considered on a case by case basis and covered by the same policies. The Local Plan can provide requirements related some activities that can be connected with commercial shooting and hunting such as new and converted buildings in the countryside, farm and forestry diversification and tourism activities. Policies SD41, SD40 and SD23 respectively provide requirements on these matters.</p>

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

Summary of Issues and Responses

Policy SD23: Sustainable Tourism

There were a total of 43 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Supports criteria c), d) and g) of this policy Natural England: Policy also needs to explicitly protect against impacts on biodiversity from tourism activity</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The marketing requirements should be in line with other business uses with a minimum marketing requirement of 18 months (Chichester DC) SD23 should include criteria / limitations on the size of visitor attractions / accommodation. The policy should also refer to impacts on visual amenity and tranquillity (Winchester DC) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support for policy SD23 (Fernhurst PC, Madehurst Parish Meeting, Rowlands Castle PC) Local Plan should contain a policy on major events (Cheriton PC) Local Plan should contain a policy addressing the impacts of commercial shooting and hunting (Rodmell PC) Policy needs to ensure tourist accommodation meets the needs of visitors to the National Park (Bury PC) Policy should address the growth in 'shepherd hut' accommodation in the National Park (Bury PC) 	<p><i>I: Policy also needs to explicitly protect against impacts on biodiversity from tourism activity</i> R: Para 6.56 of the supporting text to this policy recognises that tourism has potential to have an impact and addresses this point. In addition, the Local Plan should be read as a whole as a combination of policies can work together to address certain matters. Policies SD9 Biodiversity and Geodiversity, and SD11 International Sites set out requirements relating to biodiversity.</p> <p><i>I: The marketing requirements should be in line with other business uses with a minimum marketing requirement of 18 months</i> R: Different marketing periods have been set out for different land uses in the Local Plan based on the Authority's experience of dealing with a large range of planning applications for changes of use. The twelve month requirement set in Policy SD23 seeks the correct balance between protecting visitor accommodation in line with the second purpose of national parks and allowing businesses to respond to market forces.</p> <p><i>I: SD23 should include criteria / limitations on the size of visitor attractions / accommodation</i> R: Policy SD23: Sustainable Tourism parts 1(c)-(e) ensure that the style and size of any accommodation is relative to its setting.</p>

Policy SD23: Sustainable Tourism

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Reuse of farm buildings for tourist activity should be carefully monitored and supported by sound business case (Bury PC) • Clarify that references to 'special qualities' means 'the special qualities of the National Park (Selborne PC) • Para 6.56 should be reworded to better reflect the National Park purposes • Policy needs greater guidance on and distinction between visitor accommodation and visitor attractions/facilities. Separate policy on visitor accommodation should allow for development in settlements/ through conversion or linked to well established attractions (Twyford PC) <p>Other organisations</p> <ul style="list-style-type: none"> • Tourist accommodation outside the National Park can also contribute to the SDNP objectives (Madehurst Parish Council) • Support for the policy (Alice Holt Communtiy Forum, Friends of Lewes Society, Leconfield Estate, Lewes District Green Party, South Downs Society, The National Trust, Wiston Estate, Glynde Estate) • Local Plan should contain a policy on major events (Upper Itchen Valley Society) • Clarity sough on how proposals should demonstrate an increase in awareness, understanding and enjoyment of the special qualities (Angermerring Estate, Brighton & Hove Council's Downland Estate, West Dean – The Edward James Foundatation, Leconfield Estate) • Criteria (b) is too restrictive – some tourism-related activities require a remote location and cannot make use of sustainable transport modes (Angermerring Estate, Brighton & Hove Council's Downland Estate, West Dean – The Edward James Foundatation, Leconfield Estate) 	<p>I: The policy should also refer to impacts on visual amenity and tranquillity R: Para 6.56 recognises that tourism has potential to have an impact and addresses the point. In addition, the Local Plan should be read as a whole, as a combination of policies can work together to address certain matters. For example, Policies SD5: Design, SD6: Safeguarding Views and SD7: RelativeTranquillity address visual amenity and tranquillity.</p> <p>I: Local Plan should contain a policy on major events R: Paragraph 27 of the DEFRA National Park Vision & Circular (Nat 03) says that events with the potential to harm the special qualities of a Park will need to be controlled. The Local Plan contains a number of polices which work together so that tourism activities and events will contribute to conserving and enhancing the special qualities. Examples of these polices include SD4: Landscape, SD5: Design, SD8: Dark Night Skies and SD23: Sustainable Tourism. A separate policy on major events is not considered necessary as it would unnecessarily duplicate policy from elsewhere in the Local Plan. Major events can also be diverse in timespans, numbers and nature and it would be difficult to have a policy to cover all.</p> <p>I: Local Plan should contain a policy addressing the impacts of commercial shooting and hunting R: Shooting and hunting licencing is outside the remit of a local plan. However, any development proposals would be considered on a case by case basis. There are a number of Local Plan policies that are relevant to commercial shooting and hunting such as new and converted buildings in the countryside, farm and forestry diversification and tourism activies. Policies SD41, SD40 and SD23 respectively provide requirements on these matters.</p>

Policy SD23: Sustainable Tourism

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Marketing campaign requirements are too onerous and should be more flexible (Angermering Estate, Brighton & Hove Council's Downland Estate, West Dean – The Edward James Foundation, Leconfield Estate) Policy should allow greater flexibility for different types of tourist accommodation to meet market demand (Angermering Estate, Brighton & Hove Council's Downland Estate, West Dean – The Edward James Foundation, Leconfield Estate) Para 6.56 should be reworded to better reflect the National Park purposes (CPRE Hampshire) Clarify that references to 'special qualities' means 'the special qualities of the National Park (CPRE Hampshire) References to active travel should be set in broader context than just relating planning applications (Eastbourne Downland Group) Policy is overly restrictive on development outside settlement boundaries (farm diversification or WEP related only). Allowance should be made for 'buildings only' tourism development (NFU South East Region) SD23 should be reworded to require applicants to demonstrate a net benefit to the local economy (South Downs Society) SD23 should also reference replacing facilities lost through cliff erosion (The Gilbert Estate) A specific policy on Birling Gap and the unique challenges faced at this location should be included in the Local Plan (The Gilbert Estate) The wording of Policy SD23 should be more to take into account the significant contribution that development such as Bohunt Park can make to sustainable tourism (Green Village Investments). <p>Individuals</p>	<p>I: Policy needs to ensure tourist accommodation meets the needs of visitors to the National Park and the Policy should address the growth in 'shepherd hut' accommodation in the National Park R: The South Downs Local Plan recognises the need to ensure that visitor accommodation, even if temporary in nature, does not affect the landscape or other visitors experience and this is reflected in policy SD23, I.c). This seeks to ensure that visitor accommodation is proportionate to its surrounds. Para 6.56 is also worded to ensure there is a balance between visitors and the environment.</p> <p>I: Reuse of farm buildings for tourist activity should be carefully monitored and supported by sound business case R: The reuse of any buildings in the National Park for tourism uses is addressed by criteria I(d) of this policy and paragraph 6.60 of the supporting text.</p> <p>I: Policy needs greater guidance on and distinction between visitor accommodation and visitor attractions/facilities. Separate policy on visitor accommodation should allow for development in settlements/through conversion or linked to well established attractions R: It is considered that this distinction is sufficiently clear in the Plan as worded.</p> <p>I: Clarity sought on how proposals should demonstrate an increase in awareness, understanding and enjoyment of the special qualities R: The background document "Sustainable Tourism Strategy 2015-20" (PCP 16) is designed to promote a more sustainable approach to the development of tourism so that visitors can enjoy more of the National Park without compromising its Special Qualities.</p>

Policy SD23: Sustainable Tourism

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Local Plan should contain a policy on major events (multiple individuals) Local Plan should contain a policy that addresses the impacts of commercial shoots (Lewes District Councillor Victor lent) Policy needed to address the impacts of commercial sports venues including golf courses and sports pitches Reference to the role and importance of visitor gateways (such as Liphook) should be reinstated in the Local Plan Large-scale events which require security fencing should be refused Criteria 1(b) is too restrictive and unrealistic – tourist related activities (e.g. public house) often exist in remote rural locations Criteria 2 should require either a viability assessment or evidence of a robust marketing campaign – not both Criteria 1(b) should be removed – repeats Policy SD19 SD23 should ensure tourism development benefits the local community and economy (Lewes District Councillor Victor lent) SD23 should also address the need for cooperation between statutory bodies in promoting and managing tourism in and around the National Park e.g. the NPA should be working with 'gateway towns' outside the National Park Recognition should be made to a limit on carrying capacity of certain locations within the National Park for any additional tourism visits Provision should be made for free horsebox parking where free car parking is provided 	<p><i>I: Criteria (b) is too restrictive – some tourism-related activities require a remote location and cannot make use of sustainable transport modes</i> R: It is considered that criterion 1(g) of Policy SD23 provides sufficient flexibility in this respect.</p> <p><i>I: Marketing campaign requirements are too onerous and should be more flexible</i> R: It is considered that the policy together with para 6.61 provide sufficient flexibility.</p> <p><i>I: SD23 should be reworded to require applicants to demonstrate a net benefit to the local economy</i> R: This is considered to be sufficiently covered in para 6.56.</p> <p><i>I: Policy needed to address the impacts of commercial sports venues including golf courses and sports pitches</i> R: Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries provides policy criteria relating to this point.</p> <p><i>I: Reference to the role and importance of visitor gateways (such as Liphook) should be reinstated in the Local Plan</i> R: The role of gateways is discussed in the the spatial portrait in Chapter 3. Liphook is named a gateway in the Western Weald in Appendix 1: Broad areas and river corridors. Further information on gateways is included in the background document Sustainable Tourism Strategy 2015-20 (PCP 16).</p>

Policy SD23: Sustainable Tourism

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

Summary of Issues and Responses

Policy SD24: Equestrian Uses

There were a total of 12 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support for the policy (Fernhurst PC, Liss PC) Add detail on the use of agricultural land for equestrian use (Bury PC) Strengthen policy by discouraging cumulative equestrian uses / field fragmentation (Liss PC) Allowance should be made for the sympathetic subdivision of fields and use of appropriate fencing materials (Rowlands PC) Para. 6.68 final sentence should be clarified (Selbourne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support for the policy (CLA, South Downs Society) Criteria 1(a) should refer to the 'special qualities' of the national park (also paragraphs 6.53 and 6.58) (CPRE Hampshire) Additional paragraph should be included on the requirements for planning consent for the keeping of horses for recreation (CPRE Hampshire) 	<p><i>I: Add detail on the use of agricultural land for equestrian use</i> R: The change in use of land from agricultural to equestrian is covered within the South Downs Local Plan Core Policy SD2 criterion (g) which ensures the conservation of best and most versatile soils. Policy SD2 also requires applicants to prepare a statement which assesses the impacts on ecosystem services. Technical advice notes on how applicants may prepare such a statement are included in the Core Document Library (Core 06 and Core 07).</p> <p><i>I: Allowance should be made for the sympathetic subdivision of fields and use of appropriate fencing materials</i> R: Para 6.66 of the supporting text to this policy outlines the parameters for subdivisions and fencing ensuring there is no effect on the purposes and special qualities of the national park.</p> <p><i>I: Policy should address impacts on footpaths and recreational enjoyment of the National Park</i> R: It is considered that policy SD20 Walking, Cycling and Equestrian Routes adequately address this point.</p>

Policy SD24: Equestrian Uses

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Individuals</u></p> <ul style="list-style-type: none">• Restrict the expansion of existing equestrian uses onto agricultural hinterland / open countryside (multiple individuals)• NPA should produce good practice guide on keeping horses in the countryside• Enforcement of this policy will be key• Policy should address impacts on footpaths and recreational enjoyment of the National Park	

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

Summary of Issues and Responses

Chapter 7 Introduction

There were a total of 5 representations on this section. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support quality, vision and breadth contained in the Pre-submission Plan especially Section 7, Housing. (Lavant PC) Support affordable housing policies. (Petersfield TC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Presumption against major infrastructure development is inappropriate, if proposal seeks to address long-standing issues that are detrimental to residents and users of the National Park. (The Midhurst Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> 7.1 states that the approach to sustainable development is primarily based on the SDNPA Duty, however this is inconsistent with the NPPF definition of sustainable development. The environmental role has not been considered. 	<p><i>I: Presumption against major infrastructure development is inappropriate.</i> R: There is no reference to major infrastructure development in this section.</p> <p><i>I: Approach to to sustainable development is inconsistent with the NPPF definition. The environmental role has not been considered.</i> R: It is agreed that sustainability includes environmental as well as social and economic objectives. This chapter deals primarily with matters relating to the National Park's Duty, but in the context of the wider definition of sustainability, and is read alongside all other Local Plan policies.</p> <p><i>I: The phrase 'people and wildlife' used in Chapter 5 should equally be used in Chapter 7.</i> R: The Local Plan is read as a whole. Over-repetition of phrases would reduce the readability of the Plan.</p> <p><i>I: Inappropriate abbreviation excludes the caveat that the Duty is in pursuit of the purposes.</i> R: This comment relates to Chapter 1: Introduction (Figure 1.1), where the Purposes and Duty are set out in full.</p>

Chapter 7 Introduction

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none">• The phrase 'people and wildlife' used in Chapter 5 should equally be used in Chapter 7. Figure 1.1 is inappropriately abbreviated to exclude the caveat that the Duty is in pursuit of the purposes.	

Summary of Issues

Chapter 7a: Introduction to Development

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

Representation	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Concern over potential shortfall of at least 380 dwellings in East Hants in respect of commitment given in Memorandum of Understanding and in paragraph 7.20 of the Pre-submission Plan. Question whether SDNPA has considered all opportunities for meeting the need in E Hants, e.g. additional dwellings within Petersfield, Liss and in/around Liphook. Unclear as to strategy for meeting overall housing requirements, therefore Plan is unsound. (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Subsection does not reflect S.62 of the 1995 Act / NPPF paragraph 7 insofar as it does not adequately consider environmental objectives. (Selborne PC, Cheriton PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Housing development at Lower Hoddern Farm, Peacehaven should be allocated for, as the promoted site does not deliver many of the National Park's special qualities, is a highly sustainable location, is appropriate to support gateway function of Newhaven, and would assist cross-boundary housing delivery in line with NPPF paragraphs 178 & 179. (EPV (East Sussex) Ltd.) 	<p><i>I: Concern over potential shortfall of at least 380 dwellings in East Hants. Question whether SDNPA has considered all opportunities for meeting the need.</i> R: This representation was made by East Hampshire District Council and has been resolved, as set out in the Statement of Common Ground (SoCG 06).</p> <p><i>I: Subsection does not reflect S.62 of the 1995 Act / NPPF paragraph 7 insofar as it does not adequately consider environmental objectives.</i> R: The development strategy and Local Plan as a whole have environmental objectives at their heart. Key evidence to support this lies in the Sustainability Appraisal (SDLP 04). The Local Plan should be read as a whole.</p> <p><i>I: A housing site at Lower Hoddern Farm, Peacehaven should be allocated.</i> R: The development of Hoddern Farm would constitute major development in terms of paragraph 116 of the NPPF and its sensitive location high up on the Downs would result in a severe adverse impact on the landscape. There are alternative sites in and around Lewes District that are outside the National Park that are suitable for development. See also the SDNPA response to Omission Sites.</p>

Chapter 7a: Introduction to Development

Summary of Issues

Representation	Issue and Response (I/R)
<p>Individuals</p> <ul style="list-style-type: none"> 7.3 incorrectly refers to the Spatial Strategy as justification for medium growth – but no justification given. 7.4 does not explain how or why the 53 settlements [listed in Policy SD25] have been chosen. 	<p>I: No justification is given for medium growth. No explanation for how the 53 settlements in SD25 have been chosen.</p> <p>R: Justification for the spatial strategy and development strategy are given in Chapters 3 and 7 respectively. Reference should also be made to background papers. The approach to identifying the 53 settlements in Policy SD25 is set out in the Development Strategy Background Paper (TSF 02).</p>

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

Summary of Issues and Responses

Policy SD25: Development Strategy

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u></p> <p>Highways England state they have no concerns at this time regarding the potential impacts of planned development as contained within the Authorities emerging Local Plan. This assumes that the maximum housing and the employment provision contained therein and otherwise modelled is not exceeded.</p> <p>Portsmouth Water states that SD25 settlements Singleton, West Meon and Funtington have been identified to be within or in close proximity to the Company's Groundwater Source Protection Zones for public water supplies. They wish to be consulted on proposals within or in close proximity to these zones.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> SD25 pt 2 should be amended to refer to a 'genuine and proven need for a countryside location' and reference appropriate uses e.g. agriculture, forestry. (East Hampshire District Council) Support core approach of dispersed medium level of growth that supports affordability, sustainability and vitality of settlements, and minimises need for car journeys on rural roads. Conclude that the level of development proposed, with appropriate mitigation, can be adequately accommodated without severe impact on the transport network. (Hampshire County Council) 	<p><i>I: Particular settlements are too constrained (either by landscape and environment, or by lack of facilities) to accommodate the amount of housing proposed, and/or the number does not reflect the Medium Dispersed Growth approach or reflect local need.</i> R: See SDNPA responses to Policy SD26: Supply of Homes.</p> <p><i>I: Policy SD25 is too inflexible, and will prevent locally-preferred alternative sites or additional growth coming forward.</i> R: The policy provides full flexibility for parish and town councils with advanced-stage neighbourhood plans to allocate sites themselves, rather than the Local Plan do so. The policy also allows for appropriate additional housing development to come forward in settlements, where this is supported by a future neighbourhood plan.</p> <p><i>I: Particular settlements without a settlement boundary should be given one.</i> R: Settlement boundaries have been applied where it is appropriate to do so, having regard to the Settlement Facilities Assessment and nature of built form. Justification for the approach taken is given in the Development Strategy Background Paper (TSF02).</p> <p><i>I: The policy should expand definition of exceptional development, permissible outside a settlement boundary, to include other uses</i></p>

Policy SD25: Development Strategy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>Parish and Town Councils</p> <ul style="list-style-type: none"> • Support the strategy. (various PCs/TCs) • Support 7.12 landscape-led approach. (Selborne PC) • Support all proposed changes to Buriton settlement boundary (Buriton PC) • Support SD25 and tightening of the settlement boundary as shown in the Policies Map. (Corhampton & Meonstoke PC) • Support Liss being treated as a single village, and recognition that settlement boundaries may be defined in neighbourhood plans. Welcome strategy of medium growth dispersal across the National Park. (Liss PC) • 7.3 implies that evidence for a plan to adopt a medium level of dispersed growth is in Chapter 3 but this is absent and instead in Sustainability Appraisal. Spatial strategy not consistent with housing number for Cheriton which is higher. (Cheriton PC) • Approach in SD25 does not properly reflect opportunities provided by neighbourhood plans. In Easebourne there is limited previously developed land available, the need should be met through a range of site allocations or windfall, in tandem with Whole Estate Plan. Easebourne has unique and important heritage setting and this has not been adequately assessed. Distinction between 'strategic allocation' and 'strategic site' is unclear. Policy should include wording to prevent coalescence of settlements. Settlement boundary is unjustified. Allocations should be excluded from boundary until they are built out, parts of boundary do not comply with methodology. No evidence of Duty to Cooperate. (Easebourne PC) • On the basis of the Sustainability Appraisal, many of the site allocations arising from SD25 are not justified, particularly in landscape terms. Propose more flexible approach to allow alternative sites to be allocated for small-scale development in 	<p>(examples given are major commercial and educational establishments, and ancillary school facilities).</p> <p>R: The policy as worded allows for exceptions as appropriate, including for essential community infrastructure (which may include school and educational uses) and appropriate use of previously developed land. Any further relaxation to include, for example, commercial development, would not be in keeping with the purposes or duty of the National Park.</p> <p>I: There is too much reliance on neighbourhood plans bringing sites forward, and more sites should be allocated in the Local Plan.</p> <p>R: See response to Policy SD26: Supply of Homes.</p> <p>I: The development strategy should allow sites to come forward in the National Park adjacent to settlements outside of, but abutting, the National Park boundary. This would also help address unmet housing need within certain districts. The Settlement Facilities Assessment and Sustainability Appraisal should assess such opportunities.</p> <p>R: The main driver for the development strategy is the socio-economic duty, which seeks to foster the economic and social well-being of the local communities within the National Park. Housing growth in the National Park is not intended to address wider strategic housing need. Also, a key reason for the National Park boundary being drawn as it is, is to prevent further urban development on settlement edges which intrudes into the National Park. The approach suggested in these representations is therefore not appropriate.</p> <p>I: Approach to setting settlement boundaries is unclear or unreasonable / does not reflect opportunities provided by neighbourhood plans / does not allow for reasonable infill.</p> <p>R: The Settlement Boundary Review Methodology (TSF 03) and 2017 Update Background Paper (TSF 05) provides a clear and consistent methodology for the determination of settlement boundaries. Some minor</p>

Policy SD25: Development Strategy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>settlements without a boundary, particularly on brownfield sites. (Harting PC)</p> <ul style="list-style-type: none"> No land available for housing development in Kilmeston. (Kilmeston PC) 7.10 is too inflexible, should recognise that larger towns may have to expand. (Midhurst TC) Consultation on changes to settlement boundaries has been inadequate. (Stedham with Iping PC) Support changes to settlement boundary whilst noting that they are in some places both extensive and restrictive. (Steep PC) Allowing building of new smaller dwelling for retired agricultural workers would help free up existing larger dwellings, and help numerous farms and estates. (Steyning PC) SD25 pt 2d allowing re-use of previously developed land is contrary to objectives of SD1, SD6, SD7, SD8 and SD19 and in conflict with statutory purposes, regarding keeping landscapes free of development, and may lead to haphazard and unplanned development. Policy should be limited to sites closely associated with other buildings and settlements. (Twyford PC) East Worldham should be given a settlement boundary on the basis of consistency between EHDC and SDNPA Local Plans, to support Worldham Village Design Statement, and in line with NPPF objectives to promote and secure sustainable development to maintain the vitality and viability of existing communities. This reflects that Worldham is sustainably located only 2 miles from Alton. (Worldham PC) <p>Other organisations</p> <ul style="list-style-type: none"> General support for principles of SD25. (various organisations) Support inclusion of Greatham in SD25. (Cove Homes) SD25 would result in the development of new housing in unsustainable locations (various organisations) 	<p>changes have been made in response to representations to the Pre-submission version Policies Map, which are specific factual updates. Otherwise, the settlement boundaries are considered to be appropriate. It should be noted that neighbourhood plans being advanced have generally determined the settlement boundary, rather than the Local Plan.</p> <p>I: There are significant shortcomings in the Settlement Facilities Assessment – the existence or relevance of services and facilities for particular settlements are not accurate and the scoring is not therefore correct.</p> <p>R: The Settlement Facilities Assessment (TSF 01), dated 2015, is a comprehensive exercise that considered key facilities and services in some 167 settlements across the National Park, and provided a score for each of these. The report notes that there are some limitations to this study, as the number and nature of facilities is subject to constant change, and there were variations in the information available relating to each settlement. However, it provides a robust overview of the overall relative sustainability of settlements, having regard to facilities that people visit or need on a regular basis or require for day-to-day essentials.</p> <p>I: Some settlements proposed for inclusion have not been assessed for landscape impact.</p> <p>R: Regard has been had to the South Downs Integrated Landscape Assessment 2011 (SDILCA) (TLL 02) and, where relevant, to the landscape assessments for sites identified in the Strategic Housing Land Availability Assessment (SHLAA, TSF10). The SDLP is a landscape-led local plan, therefore full regard has been had at all times to landscape impacts and opportunities.</p> <p>I: The settlement boundary for Sheet should not exclude part of the allocated site SD89 (Land at Pulens Lane, Sheet). It should extend to the natural boundary of the River Rother.</p>

Policy SD25: Development Strategy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> The policy and supporting text should be amended to include ancillary school facilities, such as staff accommodation, within the definition of exceptional development (SD25 pt 2). (Bedales School) SD25 pt 2 should be expanded to include a similar policy to Winchester District Local Plan Part I Policy MTRA5 which supports retention and development of major commercial and educational establishments that occupy rural locations. (Prince's Mead School Trust) SD25 omits any mention of infrastructure e.g. should require that current infrastructure can cope with new development. (The Midhurst Society) SD25 should give more explicit indication of exceptional development in the countryside (e.g. SD25 2b – essential need for a countryside location), as worded there is too much uncertainty. (Madehurst Parish Meeting) Sites are being unnecessarily excluded due to falling within a designated Neighbourhood Plan Area. SD25 is too restrictive and places too much reliance on neighbourhood plans coming forward which could delay housing delivery, hence more sites should be allocated in the local plan, and a fallback position included to trigger a site allocations DPD if a neighbourhood plan becomes excessively delayed. Wording to allow flexibility for sites to come forward in the National Park adjacent to settlements outside but abutting the National Park should be reintroduced, and some of these sites allocated, e.g. the site 'Land at Sweetland' at Steyning. (CALA Group Ltd) Object to scale of development proposed for Coldwaltham which is disproportionate compared with other rural villages in East and West Sussex, would urbanise the village, and is unnecessary given lack of local housing need. (Coldwaltham Meadow Conservation Group) 	<p>R: The settlement boundary purposefully excludes the part of the allocation site that is not suitable for built development (it is identified as a Biodiversity Opportunity Area and is a buffer for the undeveloped River Rother corridor). However this area is included in the site allocation as Policy SD89 requires that this area provides a linear, publicly accessible woodland park with the aim of improving local accessibility and site ecology. A similar approach has been taken for the Coldwaltham settlement boundary and Policy SD64: Land South of London Road, Coldwaltham.</p> <p><i>I: Insufficient consideration given to advice in NPPF paragraph 55 to look at the role larger settlements play in supporting smaller communities.</i></p> <p>R: There are a number of smaller villages listed in Policy SD25, and allocations have been made in some of these settlements, in line with the medium dispersed growth spatial strategy. Therefore the policy recognises the inter-relationships between settlements. However, the policy has also factored in the settlements' pattern and character.</p> <p><i>I: Policy SD25 2(d) does not accurately reflect NPPF paragraph 55(3), given redundant agricultural buildings are not defined as previously developed land, thereby there is concern that the conversion of these buildings to residential is prohibited.</i></p> <p>R: The policy criteria reflects NPPF 'core planning principles' paragraph 17(8) which encourages the effective use of previously developed (brownfield) land. The NPPF glossary specifically excludes land that is, or has been, occupied by agricultural or forestry buildings. However, Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings provides some flexibility for the conversion of agricultural buildings to appropriate alternative uses.</p>

Policy SD25: Development Strategy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Object to omission of Swanmore from the Settlement Service Availability Assessment and SD25 as land at Dodd's Lane, Swanmore is sustainably located to help meet affordable housing needs. (Consentium Limited) Welcome tightly drawn boundary around East Dean. Whole Estate Plans should have wider scope than just planning. (Eastbourne Downland Group) Support reinstatement of East Dean settlement boundary but do not believe this will yield the number of dwellings needed. (The Gilbert Estate) Growth on the edge of Peacehaven would help address unmet housing need in Lewes district (including in the National Park), and could be delivered in a way which contributes to the English National Parks Vision and Circular, the Special Qualities, General Policy 50 of the South Downs Management Plan and complies with NPPF paragraph 116. The Lower Hodder Farm site is a highly sustainable location adjacent to the existing built-up area. (EPV (East Sussex) Ltd) Various comments on structure of policy which needs improving for clarity. Approach in SD25 does not properly reflect opportunities provided by neighbourhood plans. SD25 should include a settlement hierarchy. Distinction between 'strategic allocation' and 'strategic site' is unclear. Methodology for determining settlement boundary for Greatham is unclear, allocations should be excluded from boundary until they are built out, parts of boundary do not comply with methodology. SD25 does not indicate how development will be best and most suitably delivered. Significant shortcomings in scoring within Settlement Facilities Assessment with respect to Greatham. Decision to include Greatham in SD25 is unjustified, and at odds with the Inspector's Report on the East Hants District Local Plan: Second Review (2006) which identifies that significant residential 	<p>I: Policy SD25 also does not reflect NPPF para 55 in respect to the optimum viable use being appropriate for heritage assets, and exceptional quality / innovative development being material. R: It is considered that Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings addresses this point.</p> <p>I: Smaller farms should be given opportunity to submit an estate or farm plan in light of NPPF para 28 which relates to all types of rural enterprise. R: Whole Estate Plans (WEP) are designed to support organisations with large land holdings that include complex commercial, social and environmental activities. If a WEP is undertaken in the right way it can contribute to a number ecosystem service benefits. It is generally expected that WEPs will be land holdings in excess of 400 acres, with multiple diverse activities, and employing or having residents in excess of 30 people. This approach supports, rather than contradicts, the NPPF.</p> <p>I: The SDNPA should not expect formal endorsement of Whole Estate Plans for them to be material. R: WEPs should represent a collaborative effort between the estate and the SDNPA, to ensure that it contributes as fully as possible to the objectives of the National Park as well as supporting the operations and future sustainability of the estate. It is therefore correct that WEPs should be endorsed by the Authority to become a material planning consideration.</p> <p>I: The requirement for a WEP should not apply where development opportunities are small in scale. R: There is no 'requirement' for a WEP. Local Plan policies will be the primary material consideration for all development proposals, albeit an endorsed WEP may allow additional flexibility as it shows how the objectives of the National Park are being met.</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>development should not be encouraged. SD25 is not consistent with NPPF as it fails to direct development to the most appropriate locations and instead applies a broad-brush approach. (Greatham Voice)</p> <ul style="list-style-type: none"> • Stroud settlement boundary should be amended to include the Seven Stars public house. It is not sensible to show a boundary that reflects development on three sides of this site. Settlement boundaries should include built form and closely associated infill land. Public houses should be included in the Settlement Facilities Assessment as a community facility. (Hall & Woodhouse Ltd) • Development proposed in many smaller villages has not been assessed for landscape impact, and are likely to cause harm. Sites adjacent to Midhurst (land south of Barlavington Way, land fronting Holmbush Way) should be included within the Midhurst settlement boundary as sustainable locations for new housing. (ICS Estates Ltd) • Sheet settlement boundary should not exclude part of the allocated site SD89 (Land at Pulens Lane) which as stands has no apparent connection with the settlement boundary methodology given it cuts through the site rather than extend to the natural boundary of the River Rother. (Landowners of the site covered by proposed Policy SD89 at Pulens Lane, Sheet) • Insufficient consideration given to advice in NPPF paragraph 55 to look at the role larger settlements play in supporting smaller communities, e.g. Petworth and adjoining villages of Tillington and Byworth. Splitting of settlements into 'broad areas' does not help with understanding why settlements do or do not have boundaries. Recommended alternative is to balance landscape capacity with services and facilities, and relationship of a settlement with other places. (Leaconfield Estate) • West Meon settlement boundary should be amended to include the Storeys Meadow site, as it is surrounded by development to 	<p><i>I: The list of settlements should not be finite and the policy applied flexibly to all settlements / outside settlement boundaries where appropriate development can be justified.</i> R: The approach suggested is not appropriate, as there are many very small settlements that are essentially part of the open countryside. A definitive list of settlements provides certainty to developers and communities'.</p> <p><i>I: It is inappropriate to redraw settlement boundaries specifically to include site allocations, as this is a self-justifying procedure.</i> R: The inclusion of site allocations in redrawn settlement boundaries is entirely logical. To exclude them would create an internal conflict between Local Plan policies.</p> <p><i>I: Housing and other infrastructure projects should not be built on greenfield sites and in the National Park around Steyning, including Bayards Fields which is shown in the Wiston Whole Estate Plan.</i> R: There are no proposals in the Local Plan to allocate sites for housing in or around Steyning. Any housing allocations in the parish of Steyning will be progressed through the Steyning NDP. The Wiston WEP is a material consideration for future decision-making, but is not part of the statutory development plan, and Local Plan policies would generally take precedence.</p> <p><i>I: It is not clear what is meant by a 'Whole Estate Plan' that has been endorsed by the National Park.</i> R: Paragraph 7.15 refers users of the policy to the Whole Estate Plan guidelines published by the SDNPA. This document included in the Core Document Library as TSF06 Whole Estate Plans Preparation Guidelines.</p> <p><i>I: The Authority should have sought sites within the existing Kingston near Lewes settlement boundary ahead of extending the boundary outwards to incorporate new edge-of-settlement allocations.</i></p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>the north, west, south and east by development that reads as part of the village. (Naboth's Garden Ltd)</p> <ul style="list-style-type: none"> • The Settlement Facilities Assessment 2015 and Settlement Hierarchy Study 2013 are both flawed. Some settlements have been under-scored and facilities such as sports fields, community halls, places to eat and employment should have been assessed. e.g. Selborne, where existence of a pre-school has been omitted. The apportionment of housing to settlements is also inconsistent with the scores given. Approach to settlement boundaries unreasonably limits reasonable infill development and will impact on the level of windfall development. (Newton Valence Farm) • Cooksbridge should be included in the list of settlements in SD25, as there is a suitable site available for development in a location that is close to a primary school and a railway station. The settlement should be reassessed in the Settlement Facilities assessment and the SA. (Rydon Homes Ltd.) • West Dean and Singleton taken together are broadly the same size, and with similar facilities, as settlements listed in SD25, and also benefits from the presence of West Dean College. A West Dean settlement boundary would represent a more consistent approach. (West Dean – The Edward James Foundation) • Bohunt Park is a site in a highly sustainable location within Liphook, the Settlement Facilities Assessment should be reviewed to include it. The site has potential to significantly contribute to meeting housing needs along with other economic, recreational and social opportunities. This would be more sustainable than identifying sites in villages with low sustainability scores. (Green Village Investments) • SD25 pt 2d does not accurately reflect NPPF paragraph 55(3), given redundant agricultural buildings are not defined as previously developed land, thereby there is concern that the conversion of these buildings to residential is prohibited. SD25 also does not 	<p>R: A full assessment of sites known to be potentially available was undertaken in the SHLAA. No suitable and available sites were identified at this time. The SDNPA is confident that the most appropriate site has been allocated in this settlement.</p> <p><i>I: Supporting text (7.11) should include definition of brownfield to only include previously developed by permanent structures.</i> R: The definition of previously developed (brownfield) land is given in the NPPF.</p> <p><i>I: Description of 'overdevelopment' (7.14) should be clarified.</i> R: The term is a general one and is read in the context of the whole paragraph. Policy SD5: Design sets out the policy approach to site design and layout.</p> <p><i>I: The process for developing Whole Estate Plans must be more transparent and open to the public. Wording on Whole Estate Plans should be stronger, to call for community wide consultation on WEPs.</i> R: The Whole Estate Plan guidance encourages those undertaking WEPs to engage fully with local stakeholders.</p> <p><i>I: Request stronger policy wording on containment of settlements within an existing defensible boundary, and to repair and restore incremental degradation of the urban fringe.</i> R: Policy SD5: Design, and Policy SD4: Landscape, set out the approach to enhancing the settings of settlements.</p> <p><i>I: Further development at Cheriton/Hinton Marsh is contrary to NPPF paragraph 7 as more development around the headwaters of the River Itchen would impact upon the River Itchen SAC and upon BAP irreplaceable habitats.</i></p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>reflect NPPF para 55 in respect to the optimum viable use being appropriate for heritage assets, and exceptional quality / innovative development being material. Smaller farms should be given opportunity to submit an estate or farm plan in light of NPPF para 28 which relates to all types of rural enterprise. (NFU South East Region)</p> <ul style="list-style-type: none"> • Provision for adoption of Whole Estate Plans is particularly welcomed. (Sompting Estate) • Policy on enhancing rural communities and protecting open countryside are strongly supported. SD25 pt 3 should refer to Whole Estate Plans for schools, colleges and other institutions. (CPRE Hampshire) • Welcome encouragement of Whole Estate Plans but would like SD25 pt 2 to be more specific in respect of 'essential need for a countryside location to reflect NPPF paragraph 25. (CPRE Sussex) • The requirement of a Whole Farm Plan should be commensurate with the scale and impact of the development proposed. Delete word 'large'. (South Downs Land Managers Group) • Support in principle for Whole Estate Plans, but concerned that SD25 expects formal endorsement by the National Park Authority. SD25 should also allow for partnership-produced (but not endorsed) WEPs to carry material weight. (The National Trust) • Support approach to allow small settlements to accommodate new housing to meet the needs of local people and businesses. Whole Estate Plans should be flexible. (Elizabeth Lawrence Ltd) • The requirement for an estate plan should be amended to reflect that an estate plan will not always be required, e.g. where development opportunities are small in scale. (Angmering Estate) • SD25 does not include all villages in the National Park – only 53 of them. Reliance on NDPs to 'fill the gap' is well meaning but is not positive planning. (Glynde Estates) 	<p>R: Relevant policies in Chapter 9: Sites and Settlements ensure appropriate mitigation will be undertaken in relation to the modest development proposals in this area.</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> 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.) <p>Individuals</p> <ul style="list-style-type: none"> Support principles of the development strategy. (Lewes District Council, Cllr Joanna Carter) Support for settlements listed (and/or omitted) in SD25. The spatial strategy is not landscape-led as it is based on existence of facilities and services. Should be more flexibility to allow for small scale development outside settlement boundaries, only if little or no negative landscape, wildlife or cultural heritage impact. Inappropriate to redraw settlement boundaries specifically to include site allocations, as this is a self-justifying procedure. Support expansion of Droxford settlement boundary to include Land at Park Lane and the adjacent school. Buriton benefits from a nursery, primary school, library, post office and other facilities & services which have not been considered within the Settlement Facilities Assessment. (various individuals) The settlement boundary for Selborne accurately reflects the views of the community as reflected in the VDS, VCP and Parish Council view. Insufficient consideration given to advice in NPPF paragraph 55 to look at the role larger settlements play in supporting smaller communities, and focusing development opportunities / drawing settlement boundaries to reflect this. Examples of Abbots Worthy (close to Kings Worthy) and Exton (close to Corhampton & Meonstoke) are given. (2 individuals) 	

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Local residents in Steyning do not want housing and other infrastructure projects built on greenfield sites and in the National Park around Steyning, including Bayards Fields which some note is shown in the Wiston Whole Estate Plan. Some consider that school and health centre in Steyning are at capacity. Some consider that it would set precedent for further development in the countryside. (various individuals) Object to Itchen Abbas settlement boundary as the village is clearly larger than the boundary shown. (Hampshire County Council, Cllr Jackie Porter) Chawton settlement boundary is overly tight and restrictive. The boundary should not be arbitrary lines on a plan, but follow defensible physical natural boundaries. Certain properties have been excluded from the Clapham settlement boundary in error. It is not clear what is meant by a 'Whole Estate Plan' that has been endorsed by the National Park, i.e. what is the process for endorsement? Object to Lodsworth settlement boundary which does not take into account existing recent development. Object to Poynings settlement boundary as it unreasonably excludes land north of Cora's Walk, Poynings. Object to creation of a settlement boundary for Owslebury, as shown it cuts through properties, and has caused local concern and division amongst villagers. The village should be treated as open countryside. Object to Owslebury settlement boundary as it is haphazard and unreasonably excludes land at Holly Hatch. Object to the approach taken to revising the settlement boundary for Kingston near Lewes, which on the one hand extends the boundary to incorporate allocation site SD77 (Land at Castelmer Farm) whilst on the other hand contracting the boundary to 	

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>exclude a more suitable alternative (Land at Audiburn Farm). The Authority should have sought sites within the existing settlement boundary ahead of extending the boundary outwards.</p> <ul style="list-style-type: none"> • Removal of settlement boundary for Blackmoor is unjustified, given proximity of services in Whitehill-Bordon, therefore does not comply with the procedural requirements in Policy SD25. • The scores given in the Settlement Facilities Assessment are incorrect / give misleading results. (various individuals) • The conservation and enhancement of small hamlets at the foot of the South Downs is essential. • Supporting text (7.11) should include definition of brownfield to only include previously developed by permanent structures. Description of 'overdevelopment' (7.14) should be clarified. • The process for developing Whole Estate Plans must be more transparent and open to the public. Not all brownfield sites are appropriate for development. (Lewes District Council, Cllr Victor lent) • Wording on Whole Estate Plans should be stronger, to call for community wide consultation on WEPs. (2 individuals) • Policy SD25 should include proviso that expansion of any settlement must be contained within an existing defensible boundary, and the landscape and townscape character features maintained and enhanced. • Request strong policy driver to repair and restore incremental degradation of the urban fringe. • Approach to settlement boundaries unreasonably limits reasonable infill development and will impact on the level of windfall development, vitality of village – not positively prepared (examples of land east of Cotehele, Upper Farringdon; land north of Cora's Walk, Poynings; and Selborne are given). (various individuals) • Further development at Cheriton/Hinton Marsh is contrary to NPPF paragraph 7 as more development around the headwaters of 	

Policy SD25: Development Strategy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>the River Itchen would impact upon the River Itchen SAC and upon BAP irreplaceable habitats.</p> <ul style="list-style-type: none">• Object to any further development in South Harting.• Greatham has limited access by public transport and limited facilities, and may not therefore be appropriate for development on the scale proposed.• Slindon settlement boundary is welcomed but is drawn too tight thereby making it unlikely that smaller dwellings could be added.• Object to scale of development proposed for Coldwaltham which is disproportionate compared with other rural villages in East and West Sussex, would urbanise the village, and is unnecessary given lack of local housing need.	

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

Summary of Issues and Responses

Section 7b: Introduction to Homes (Strategic)

There were a total of 4 representations on this policy. A summary of the main issues raised is set out below.

Representation	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Request clarification whether the affordable housing requirement is part of the overall objectively assessed need figure, or additional to it. Inconsistent numbers on affordable housing need comparing 7.19 (i.e. 293) to 7.52 (i.e. 294) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The Local Plan housing strategies should recognize the economic circumstances prevailing in different settlements and propose innovative methods for ensuring that developments are configured in a manner which assists affordability. Options could include splitting some “houses” into flats. (Kingston-near-Lewes PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The approach to housing has not robustly tested Housing Market Areas, or come up with a figure for objectively assessed need across the National Park and how the deficit will be dealt with. Pre-submission Plan should be withdrawn and resubmitted with a full explanation of how the deficit will be addressed. (Buriton Estates) 	<p><i>I: Request clarification whether the affordable housing requirement is part of the overall objectively assessed need figure, or additional to it.</i> R: The affordable housing need across the National Park is calculated using a different methodology to the overall objectively assessed housing need (OAHN). The OAHN includes total housing need, so in effect incorporates the separately calculated affordable housing need.</p> <p><i>I: Inconsistent numbers on affordable housing need comparing 7.19 (i.e. 293) to 7.52 (i.e. 294).</i> R: The correct figure (in the HEDNA – TSF 08) is 293 dwellings per annum. The figure of 294 dpa in paragraph 7.52 will be corrected in the final version of the Plan.</p> <p><i>I: The approach to housing has not robustly tested Housing Market Areas, or come up with a figure for objectively assessed need across the National Park and how the deficit will be dealt with.</i> R: See SDNPA response on Policy SD26: Supply of Homes.</p>

Section 7b: Introduction to Homes (Strategic)

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

Summary of Issues and Responses

Representation	Issue and Response (I/R)
<u>Individuals</u> <ul style="list-style-type: none">• Commend wording 'sustainable development within the limits of the environment and to ensure Purposes 1 and 2 are not compromised' which should be applied across all housing sections.	

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

Summary of Issues and Responses

Policy SD26: Supply of Homes

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>Portsmouth Water: Two settlements named in the policy, Corhampton and Droxford, are within Groundwater Protection Zones. These are areas which are sensitive given our abstraction of water. Further allocations are proposed for Lavant which are both within Source Protection Zone 2 and near to Source Protection Zone 1. Portsmouth Water should be consulted on any development proposed within these zones due to the sensitivity of the groundwater catchments.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Discrepancies in housing figures, and minor wording issues, are highlighted. (various local authorities) Worthing has a shortfall in housing supply against assessed need of around 6,500 dwellings, and for Adur it is around 3,100. Engagement across the sub-region to address this is ongoing. It is accepted that the South Downs National Park is unlikely to be in a position to meet its own need let alone accommodate any of the shortfall arising from neighbouring areas. (Adur & Worthing Councils) Shortfall of 197 homes per annum within the National Park is noted. Highlight need for robust evidence of work done to meet housing need within the National Park and elsewhere in housing market areas, and pressure on neighbouring authorities to accommodate extra housing. (Waverley Borough Council) 	<p><i>I: Two settlements named in the policy, Corhampton and Droxford, are within Groundwater Protection Zones. Portsmouth Water should be consulted on any development proposed within these zones due to the sensitivity of the groundwater catchments.</i> R: Comments noted. This is considered to be a matter of detail to be dealt with at the development management stage.</p> <p><i>I: Particular settlements should have their housing provision figure be reduced, or be deleted from the policy, as they are not suitable for housing growth / proposed allocation(s) are not suitable.</i> R: The development strategy is evidenced by the South Downs Integrated Landscape Character Assessment (TLL02), the Settlement Facilities Assessment (TSF01), and the SHLAA (TSF10). Settlement housing provisions take their cue from the Sustainability Appraisal Medium Dispersed Growth option, but also to reflect locally specific opportunities and constraints, and the availability of suitable sites. The SDNPA is therefore confident that the numbers proposed are the correct ones.</p> <p><i>I: Particular settlements are missing from Policy SD26 which should be included, as they have capacity for growth, local housing needs, would be more sustainable, etc. Only broad locations need be identified for development for the later part of the Plan period.</i> R: A full justification for the levels of housing growth is given in the Supply of Homes Background Paper Update (TSF 07). A comprehensive SHLAA has been undertaken, and full regard had to landscape capacity and</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Support Duty to Cooperate statement that housing provision in the National Park part of Winchester is over and above provision already made for whole of district in the Winchester Local Plan Part 1. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support policy (various PCs) Reference to Cheriton/Hinton Marsh should be deleted as site proposed for allocated is not suited for development. (Cheriton PC) 50 dwellings for Easebourne is unjustified, based on flawed evidence and inappropriate for the village and represents a 150% increase in the number put forward in the Preferred Options Local Plan. Suggestions that neighbourhood plans cannot plan for a lower number than in strategic local plan policies, or that their ability to determine where allocations are located should be limited, should be removed. The King Edward VII development in Easebourne parish (402 net dwellings) should be a material consideration in determining the number for Easebourne. (Easebourne PC) Information in Figure 7.3 is incorrect/unclear. (various PCs) Object to allocation of only 9 houses in Itchen Abbas, which is the only one of four villages in the parish to have a settlement boundary. More houses are needed to sustain village life and meet identified affordable housing need. (Itchen Abbas PC) Not convinced that delivery of 4,750 net additional homes is the maximum that can be accommodated without detriment to the purposes of the SDNP. Settlements that should be included in SD26 include Glynde/Beddingham, Firle and Falmer. (Ringmer PC) No reference as to whether new houses will be permitted outside settlements. Needs clarifying. (Upham PC) 	<p>opportunities to improve the special qualities. However, it is not appropriate to commit to housing growth in settlements where there are limited opportunities to deliver this, due to either landscape or environmental constraints, or because there is a lack of suitable and available sites. Nevertheless, 36 settlements have been included in Policy SD26 spread across the whole National Park, which is a considerable number given the inherent constraints.</p> <p><i>I: Information in Figure 7.3 is incorrect/unclear.</i> R: Figure 7.3 is proposed for deletion on page 15 of the Pre-Submission Schedule of Changes. This is because the numbers in the table will change each time the Authority Monitoring Report and Housing Trajectory are updated.</p> <p><i>I: Object to allocation of only 9 houses in Itchen Abbas. More houses are needed to sustain village life and meet identified affordable housing need.</i> R: The housing provision figures for settlements reflect the spatial strategy (medium dispersed growth) and also the estimated capacity of allocated sites which are suitable for development. Only one site is identified in Itchen Abbas that is suitable and that has a capacity for nine new homes. This is considered to be an appropriate level of growth for a small village located in the sensitive Itchen Valley.</p> <p><i>I: No reference as to whether new houses will be permitted outside settlements. Needs clarifying.</i> R: This matter is dealt with in Policy SD25: Development Strategy. Other policies in the Local Plan are also relevant.</p> <p><i>I: Housing provision of 250 homes per annum is inadequate compared with an objectively assessed housing need (OAHN) of 447. This</i></p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Support policy (various organisations) • Housing provision of 250 homes per annum is inadequate compared with an objectively assessed need of 447, and will result in an excessive undersupply. Some organisations considered this would compromise the objective of addressing socio-economic and community needs. Some respondents commented that this could have a suppressing impacts on economic growth. Further respondents stated that the capacity led 'bottom up' approach (as opposed to starting with OAN and working downwards) is inappropriate / conflicts directly with the courts' interpretation of NPPF paragraph 47. A further respondent cited the 2017 Budget announcement that 300,000 dwellings per year are planned nationwide, therefore more opportunities should be taken to address the shortage. (various organisations) • The housing provision figure for the National Park should be stated as a minimum as an approximate figure does not support positive and effective planning. The Plan should test the potential of Petersfield to deliver more than the 805 dwellings set out in the Neighbourhood Plan. (Home Builders Federation) • Support Medium Growth (+60%) option tested in the Sustainability Appraisal which would deliver an additional 1,007 dwellings to meet local housing needs. (Alfred Homes) • Housing provision figure should be termed as 'at least' not 'approximately' to reflect socio-economic benefits of more housing. Some respondents have related this to a particular settlement(s). (several organisations) • Displacing housing need to areas outside the National Park will increase car travel and reduce tranquillity. (Angmering Estate) • Objections to omission of various settlements from Policy SD26, or insufficient homes allocated to settlements that are included, to address general and affordable housing needs. Reasons behind 	<p><i>compromises socio-economic, economic and community needs, and conflicts with NPPF and the soundness test of positive planning.</i></p> <p>R: A full justification of the National Park-wide housing provision figure is given in the Supply of Homes Background Paper Update (TSF 07). National policy is clear that development should be restricted in National Parks (NPPF footnote 9), and the focus should be on meeting affordable housing requirements, and supporting local employment opportunities and key services (National Parks Vision and Circular, NAT 03). Essentially, within the context of a spatial strategy of dispersed medium growth, it has been informed by the identification of suitable housing sites through the SHLAA, together with assessment of settlement facilities, and regard to historic development trends. Above all, a landscape-led approach has been taken, with over-riding regard to the objective of conserving and enhancing the special landscape character of the National Park.</p> <p><i>I: The Plan should test the potential of Petersfield to deliver more than the 805 dwellings set out in the Neighbourhood Plan.</i></p> <p>R: The Petersfield Neighbourhood Plan was thoroughly tested at examination, and it was concluded by the examiner that allocations to support delivery of some 805 homes was appropriate. This is a higher figure than the one committed to in the East Hampshire Joint Core Strategy (EX 01) (a minimum 700 dwellings for Alton and Horndean and Petersfield).</p> <p><i>I: Housing provision figures should be expressed as a minimum rather than as an approximate figure.</i></p> <p>R: In terms of the overall figure for the National Park, it is considered that as a landscape-led Local Plan for an area where development necessarily must be restricted, a minimum figure would be inappropriate. For individual settlements, some of the figures relate to the estimated capacities of the sites being allocated, therefore, again a minimum would be inappropriate and may lead to overdevelopment of those sites. The remaining</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>these objections include sustainability of locations/settlements, limited impact on landscape, importance of enhancing vitality in relevant rural communities, and suitable sites that have been missed/incorrectly assessed in the SHLAA. One respondent felt there was an inconsistent approach regarding settlement sizes/importance e.g. comparing Petworth (150) with Liss (150) Fernhurst (220). Another respondent stated that a settlement could be apportioned more housing as only broad locations need be identified for development for the later part of the Plan period. (various organisations)</p> <ul style="list-style-type: none"> • Site allocations should additionally be made in neighbourhood plan areas, to take account of stage of production or local support. (CALA Group Ltd.) • Essential that policy takes account of National Park purposes and the constraints this entails. There should be no requirement to make up shortfalls relating to these settlements in inappropriate locations elsewhere in the National Park. (Campaign for National Parks) • It is not clear whether a year-on-year delivery of 250 homes per year, or a stepped trajectory based on anticipated completion rates, is intended. This should be clarified. (CPRE Sussex) • Object to basis of the HEDNA which has recycled dated previous work related to other local authorities' local plans. Failure to maximise opportunities to increase housing on sites with permission. There is no agreed proposal for how the deficit between OAN and housing requirement will be managed and dealt with. (Deansmore Properties Limited, Newton Valance Farm) • Policy should include sustainable settlements which are outside the National Park. (DMH Stallard LLP) • Planning permissions granted since 1 April 2015 in Pyecombe mean that the 8 dwellings allocated has been exceeded before the Plan is adopted. (Britecroft Ltd) 	<p>settlements have figures to be taken forward by neighbourhood plans, and can legitimately be exceeded as made clear in SD26(4).</p> <p>I: It is not appropriate to displace housing need to areas outside the National Park (places undue pressure on neighbouring areas; increases car travel; impacts on tranquillity).</p> <p>R: As it is necessary to restrict housing growth in the National Park, it is not possible to meet the full OAHN. Paragraphs 3.122 and 3.123 in the Local Plan explain that the SDNP is working with neighbouring and partner authorities to address unmet strategic housing needs in an appropriate manner. Full details are provided in the Duty to Cooperate Statement (SDLP 11).</p> <p>I: Inconsistent approach regarding settlement sizes/importance e.g. comparing Petworth (150) and Liss (150) with Fernhurst (220).</p> <p>R: It is acknowledged that Fernhurst has a particularly high housing provision for its size and functionality. This reflects the significant number of homes allocated as part of mixed-use development in the Fernhurst Neighbourhood Plan at the Syngenta site (a large mainly derelict employment site just outside the main settlement). Other settlements' figures broadly reflect their status, size and facilities, albeit there is some variation reflecting the sites' capacities.</p> <p>I: Site allocations should additionally be made in neighbourhood plan areas, to take account of stage of production or local support.</p> <p>R: National guidance and good practice point to neighbourhood plans being the mechanism by which site allocations are determined locally. Therefore, where neighbourhood plans are sufficiently advanced and allocating sites to meet the provision set out in Policy SD26, it is considered inappropriate for the Local Plan to allocate additional sites. The relationship between the Local Plan and neighbourhood plans is explained in paragraphs 1.36 to 1.41 of the Local Plan.</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> The Plan should have a separate policy dealing with neighbourhood plans. Figure 7.3 is not up-to-date and is unclear in relation to permissions post-April 2015. Housing provision of 38 dwellings is not evidenced, therefore the number should be 30 as in the Preferred Options consultation. Increase in the number does not suggest a capacity-led approach. Object to reliance on one site with no contingency. (Greatham Voice) There should be more consideration of cross-border locations on the edge of the National Park given OAN is not being met e.g. at Liphook. Policy is too reliant on development of strategic sites and other allocations which have overly optimistic assumptions applied, given the nature of the National Park. Discounts should be applied to site allocation supply figure. The windfall allowance is too high. The Plan should undertake a systematic review of sustainable locations for development that relate to otherwise sustainable settlements. (Green Village Investments) There is a residual requirement to identify more housing sites for 207 homes that will need to be identified through subsequent non-strategic allocations. No sites are currently allocated on the boundary of Peacehaven/Newhaven or in the south east of the SDNPA area – an allocation here could also improve the existing harsh edge of development. (EPV (East Sussex) Ltd.) Number of homes apportioned to Lewes (875) seems at the high end of the scale. (Lewes District Green Party) Should either Old Malling Farm or North Street Quarter sites fail to go forward, there is limited scope within the current Lewes Neighbourhood Plan to absorb such numbers and green fields may be put at risk. (Houndean Residents Association) Statement “To seek to meet the full, objectively assessed needs for the area would conflict with the statutory purposes and duty” is disputed as this is not positive planning. SHLAA should have tested all sites including those under 5 dwellings. One suggestion that a 	<p><i>I: It is not clear whether a year-on-year delivery of 250 homes per year, or a stepped trajectory based on anticipated completion rates, is intended. This should be clarified.</i> R: There is no stepped trajectory proposed, and this is not suggested anywhere in the Local Plan. It is in any case expected that housing delivery will be front-loaded, as shown in the housing trajectory in the AMR(IM 03), so there is no need to defer delivery to later parts of the Plan period.</p> <p><i>I: Object to basis of the HEDNA which has recycled dated previous work related to other local authorities' local plans.</i> R: The Housing and Economic Development Needs Assessment (HEDNA, TSF08) builds on the latest sub-national population projections, albeit adjusted to take account of the non-alignment of the National Park boundaries compared with district area data upon which the demographic base data is based. It is therefore entirely bespoke for the National Park.</p> <p><i>I: The policy should include sustainable settlements which are outside the National Park.</i> R: See SDNPA responses to Policy SD25: Development Strategy.</p> <p><i>I: The Plan should have a separate policy dealing with neighbourhood plans.</i> R: The relationship between the Local Plan and neighbourhood plans is explained in paragraphs 1.36 to 1.41 of the Local Plan. It is unnecessary to have a separate policy.</p> <p><i>I: Object to reliance on one site [in Greatham] with no contingency.</i> R: All allocated sites have been thoroughly assessed for availability and achievability. It is not considered good practice to allocate a contingency site for every settlement, which would introduce uncertainty.</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>site allocations DPD is prepared for a particular settlements to allocate sites of less than 5 dwellings. (various organisations)</p> <ul style="list-style-type: none"> Winchester OAN is not being met as the figure used for the Winchester JCS predates both the NPPF and the designation of the National Park. (Naboth's Garden Ltd.) Paragraph 2 of the policy should include further criterion to refer to the realisation of opportunities provided by Whole Estate Plans. (Newton Valance Farm) Shoreham Cement Works should be added to the settlements listed in the policy, with an estimate of 2,000 dwellings. (South Downs Project) Proposal to allocate no further sites in Petersfield additional to the Neighbourhood Plan is flawed given the Neighbourhood Plan end-date of 2028 and SDLP end date of 2033. Housing provision of 31 dwellings in Sheet should be deleted in favour of less constrained sites in Petersfield. (Pulens Lane Residents Action Group) Allocation of 10 houses to Steep seems to reflect a SHLAA-led approach not a landscape-led approach. SHLAA does not recognise open space/village green designation in the East Hampshire Local Plan. Sustainability appraisal 'medium level of growth dispersed' does not include Steep. (Save Our Village Green) Concern over impact on infrastructure (particularly traffic congestion) of apportioning 175 dwellings to Midhurst. (The Midhurst Society) Would welcome positive wording in the policy to recognise benefits of student housing. (The Edward James Foundation – West Dean) Given numbers planned for in Lewes, Petersfield and Fernhurst, it is unclear if the demand for school places has been properly planned for. This needs to be rectified if the plan is to be 'positively prepared'. (Education & Schools Funding Council) 	<p>I: Policy is too reliant on development of strategic sites and other allocations which have overly optimistic assumptions applied, given the nature of the National Park. Discounts should be applied to site allocation supply figure.</p> <p>R: There is robust evidence to support the delivery of housing on strategic sites. Realistic and generally conservative assumptions have been made on site capacities and constraints. A discount of 10% has been applied to the site allocation supply figure (see the AMR - IM 03). Even with discounts applied, the expected supply exceeds the housing provision figure, therefore there is an in-built contingency in the unlikely event that not all the sites come forward.</p> <p>I: There is a residual requirement in the Lewes Joint Core Strategy to identify more housing sites for 207 homes that will need to be identified through subsequent non-strategic allocations. No sites are currently allocated on the boundary of Peacehaven/Newhaven or in the south east of the SDNPA area.</p> <p>R: The Lewes JCS (Ex 03) makes clear in paragraph 6.116 that opportunities for expansion of the built-up area are limited by the sea to the south and the boundary of the South Downs National Park to the north. It is clearly not therefore the intention of the JCS that further sites should be identified in the National Park in this locality. The South Downs Local Plan does however make a significant contribution to housing need in Lewes through provision of 875 homes in Lewes and a further 111 homes in Kingston-near-Lewes.</p> <p>I: Concern that failure of either Old Mallings Farm or North Street Quarter sites in Lewes to come forward will put pressure on green fields elsewhere in the area.</p> <p>R: North Street Quarter has been granted planning permission and is near certain to come forward. Old Mallings Farm is inherently deliverable having already been allocated in the Lewes JCS.</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> 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.) <p>Individuals</p> <ul style="list-style-type: none"> Support policy, or specific settlement housing numbers. (various individuals) No mention of Bramshott and Liphook. Yet there is a sustainable site within walking distance of schools, services and the station and offering potential for new infrastructure requirements. (East Hampshire DC, Cllr Angela Glass) Seek agreement to additional housing on exception sites within the Itchen Valley parish, subject to community agreement. (Hampshire County Council, Cllr Jackie Porter) Not consistent with national policy: there should be no ceiling on housing delivery and housing numbers should be expressed as a minimum to reflect positive planning / to significantly boost housing supply. No evidence to support open market house-building in South Harting. Liss lacks strong architectural heritage and has benefit of a railway station and good road access, compared with this historic towns of Petersfield and Petworth. The Authority is not permitted to set housing target for South Harting nor other areas, but must exercise their powers to protect the landscape unfettered. 	<p>I: The SHLAA should have tested all sites including those under 5 dwellings; a site allocations DPD should be prepared for sites of less than 5 dwellings. R: Planning Practice Guidance (Paragraph: 010 Reference ID: 3-010-20140306) recommends a lower site size threshold of 5 dwellings. This is considered a proportionate approach. A windfall allowance has been included in the housing supply to take account of sites below this threshold.</p> <p>I: The Winchester OAHN is not being met as the figure used for the Winchester Joint Core Strategy (JCS) predates both the NPPF and the designation of the National Park. R: The Winchester JCS is based on an objectively assessed housing need of 625 dwellings per annum. The JCS remains the up-to-date adopted plan for Winchester, therefore the housing target for the whole Winchester district including the National Park is set to be exceeded year-on-year. Notwithstanding the JCS, the South Downs Local Plan will deliver around half the OAHN for the National Park part of Winchester as concluded by the South Downs HEDNA (TSF 08), which is a significant contribution for an area with National Park status, i.e. is not appropriate for unrestricted housing growth.</p> <p>I: Part 2 of the policy should reference to opportunities provided by Whole Estate Plans. R: Whole Estate Plans do not form part of the development plan. Therefore such a reference would not be appropriate.</p> <p>I: Shoreham Cement Works should be added to the settlements listed in the policy, with an estimate of 2,000 dwellings. R: Strategic Site Policy SD56: Shoreham Cement Works sets out the approach to this important strategic development site. Development of the</p>

Policy SD26: Supply of Homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Facilities offered by settlements have changed since the SA was prepared, therefore allocations should change to reflect newer evidence. Housing for Petersfield should increase to reflect that the neighbourhood plan only extends to 2028 whereas the SDLP period is until 2033. Land South of the Causeway should be included as a strategic site. It should be made clear that the National Park is not bound by any specific housing targets. No requirement for the amount of extra housing being proposed in Greatham. One concern was inappropriateness of scale and density of development. Reference to Cheriton/Hinton Marsh should be deleted from policy as the SA and HRA that support the strategy are flawed. Object to allocation of houses in Sheet. Object to further housing in Easebourne. Concerns over lack of 1- and 2-bedroom houses in Kingston-near-Lewes for downsizers. Rural aspects of the National Park should be given separate consideration given wide coverage of general policies. 	<p>site is focused on delivering benefits to the National Park's purposes, and the development should not be residential-led. It is not therefore appropriate to list the site as a 'settlement' in Policy SD26.</p> <p><i>I: Proposal to allocate no further sites in Petersfield additional to the Neighbourhood Plan is flawed given the Neighbourhood Plan end-date of 2028 and SDLP end date of 2033.</i> R: The Petersfield Neighbourhood Plan allocates for 805 dwellings over the 17 year period 2011-2028, which is significantly higher than the East Hampshire Joint Core Strategy apportionment of 700 dwellings to be delivered in Petersfield, Horndean and Alton over the same period. This additional supply is considered to provide sufficient housing supply to cover the 2028-33 period.</p> <p><i>I: SHLAA does not recognise open space/village green designation in the East Hampshire Local Plan.</i> R: See SDNPA response to Policy SD93: Land at South of Church Road, Steep.</p> <p><i>I: Given numbers planned for in Lewes, Petersfield and Fernhurst, it is unclear if the demand for school places has been properly planned for.</i> R: Statements of Common Ground have been jointly signed with East Sussex, Hampshire and West Sussex County Councils respectively confirming that there are sufficient school places existing or planned in the three County areas respectively (SoCG 13, 14 & 12).</p>

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

Summary of Issues and Responses

Policy SD27: Mix of homes

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Clarification urged for part 3 of the policy (provision for older persons accommodation) on sites over 5 units). Footnote (*) should limit substitution to 'some' 1 bedroom dwellings and be 'subject to evidence needed'. Details on how mix will be required on smaller sites should be provided. Should state that 2 bedroom units should be provided as 50:50 mix of flats and houses. (Chichester District Council) Object to footnote (*) which allows 1 bedroom affordable housing to be substituted with 2 bed units. Current Government policy which limits eligibility for larger units etc. means that need for smaller units is very high. Policy should refer to dwelling sizes and accessibility by adopting Nationally Described Space Standards and requiring Part M4 Category 2 [accessible dwellings] particularly for affordable units. Older person schemes need a critical mass of development to be viable and sites close to large settlements should be provided to achieve this. In paragraph 7.37 'homes' should be substituted for 'houses' as priority need and take-up is by families with children. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support policy. (Liss PC, Selborne PC, Titchborne PC) 	<p><i>I: Should be more flexibility within prescribed requirements; evidence for departures is too onerous</i> R: The policy is flexible enough to allow alternative mixes to respond to bespoke local evidence, e.g. a local housing needs survey which are commonplace across the National Park.</p> <p><i>I: Should adopt National Space Standards and be more prescriptive about types of unit (e.g. smaller dwellings, older persons' accommodation)</i> R: There is not sufficient evidence pointing to the need for adopting the nationally prescribed space standards. The dwelling mix and policy requirements are correct as they reflect the HEDNA.</p> <p><i>I: There should be policy advice specifically on self-build dwellings</i> R: Providing for self-build is more appropriately dealt with through the allocation of sites or via bespoke self-build proposals as windfall development.</p> <p><i>I: Dwelling mix should not be prescribed in policy as this fetters or skews the open housing market</i> R: The dwelling mix policy responds appropriately to the national park duty by addressing the need for a greater number of smaller dwellings.</p> <p><i>I: The policy raises concerns over viability</i></p>

Policy SD27: Mix of homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Policy is welcome as there is a lack of smaller properties in the parish. (Buriton PC) • Policy welcomed as a pragmatic approach. (Corhampton & Meonstoke PC) • Mix of housing is too prescriptive and will need regular reassessment. (Fernhurst PC) • Support as makes homes more attainable (affordable) to maintain local family connections. However a pragmatic approach will in reality be required. (Hawkley PC) • Supporting text should mention self-build which offers opportunities to local families, in line with Government policy. (Midhurst TC) • Principle commended, but policy is too prescriptive. Localism Act requires that a neighbourhood plan takes precedence over the local plan with respect to housing types – policy should be reworded to reflect this. (Ringmer PC) • Agree with policy, except to limit the size (i.e. floorspace) of houses and omitting any 4 bedroom dwellings. Policy should allow for local circumstances and refer to neighbourhood plans. (Twyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Support policy as it reflects the HEDNA and SHMA. (various organisations) • It is not for the development plan to specify the mix of open market homes. Policy as drafted would artificially constrain the supply of open market housing which overall will raise cost of home ownership (constrain on upsizing referred to by some). At least 80% of all homes as 2 or 3 bedroom homes is a significant percentage to attain. May lead to out-of-context developments, homogenisation, undue impact on local infrastructure. More flexibility should be written into the policy. One respondent 	<p>R: The Whole Plan Viability Study (Core I3) has shown that the objectives and policies of the Local Plan are achievable.</p> <p><i>I: Inadequately addresses housing for older people and disabled people</i></p> <p>R: SD27 part 3 provides a clear policy response to the need for older people's housing, and adaptable housing stock to address the needs of less able bodied people.</p>

Policy SD27: Mix of homes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>referred to evidence specific to Petersfield suggesting an alternative mix as appropriate. (various organisations)</p> <ul style="list-style-type: none"> • Policy should require the mix of market housing to be approximate or flexibly applied (one respondent noted specifically an issue with small sites). One respondent cited marginal viability on small sites, and also suggested removal of reference to 'National Park Purpose 1' in part 2(b) of the policy. A further respondent referred to the Whole Plan Viability Study which refers to the importance of flexibility for specific sites. (various organisations) • Recognition should be made of the different demographics of settlements. (The Midhurst Society) • A standalone policy to address the needs of older people should be introduced, given it is clear that the needs of older people makes up a high percentage of the need. (McCarthy and Stone Retirement Lifestyles Ltd.) • 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.) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Should positively support provision of social housing in villages to re-dress balance against expensive 'detached house style' villages. (Lewes District Council, Cllr Victor Ient) • Policy should be amended to provide greater flexibility e.g. to say that the mix should be in line with the identified local need set out in the SHMA. Should be amended to allow for larger dwellings. The need for a housing need survey to evidence an alternative mix is unduly onerous. 	

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none">• Target for older people's housing is ludicrously low given current demographics. Little is said about innovative solutions. Little mention of housing for the disabled.• Should reduce the number of mansions through sub-division into smaller units. Question any requirement for 4 bedroom houses.	

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

Summary of Issues and Responses

Policy SD28 Affordable homes

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

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Generally support approach although in practice it is difficult to secure onsite units on sites where only one or two affordable units are to be provided. Specific changes to policy requested: lower threshold should be 4 not 3 dwellings on a site; include further guidance on levels of integration, and state that policy may not be circumvented by under-delivery of housing. (Chichester District Council) Part 1(b) should signpost to paragraphs 7.72 and 7.73 to explain 'meaningful financial contribution'. Correct inconsistencies in parts 1 and 2 re lower thresholds in policies for on-site financial contributions. Amend 7.67 to state that all viability appraisals should be independently at the applicant's expense. (East Hampshire District Council) Object to part 4 of the policy which appears to exclude local housing authorities and registered providers, who are likely to be the main agents of delivery, from involvement in occupancy conditions and local connections criteria. Policy should refer to these, plus housing associations and HARAH. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcome/support policy. (Cheriton PC, Liss PC, Petersfield TC, Slindon PC, Steyning PC, Buriton PC) 	<p><i>I: In practice it is difficult to secure onsite units on sites where only one or two affordable units are to be provided.</i> R: The SDNPA considers it is important to explore every opportunity to deliver affordable homes on-site, given that many small settlements are often reliant on just one or two small allocation sites (or potential windfall sites) that are suitable for development. Therefore a higher threshold would severely limit or remove any chance of securing affordable homes for that settlement. The SDNPA understands there is support for successfully delivering these small schemes from some registered providers. Paragraph 7.71 allows the exceptional use of financial contributions where on-site provision is demonstrably not feasible.</p> <p><i>I: There should be a lower threshold of 4 not 3 dwellings</i> R: The three dwelling lower threshold has been shown in the Whole Plan Viability Study (Core 13) to be viable with financial contributions for affordable housing. On-site provision is only required on sites of 4 or more dwellings.</p> <p><i>I: The Local Plan should state that the policy may not be circumvented by under-delivery of housing.</i> R: Part 5 of Policy SD28 makes this requirement clear.</p> <p><i>I: Correct inconsistencies in parts 1 and 2 re lower thresholds in policies for on-site financial contributions.</i> R: SDNPA accepts that there remains an inconsistency in the policy wording. It is recommended that this is addressed through a minor modification on page 15 within the Pre-Submission Schedule of Changes.</p>

Policy SD28 Affordable homes

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

Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Welcome policy but would like it strengthened to ensure affordable housing is pepperpotted throughout the development and is tenure-blind. (Easebourne PC) • Support policy, but consider it is not always desirable or economically viable to combine market and affordable housing on a single site. (Hawkley PC) • There is a concern about part 3 including ‘where feasible’ as it is too lenient / the emphasis should be on the party wishing to take the property out of being an affordable home. (Lavant PC, Selborne PC) • Re 7.58: concern over last sentence re exceptional viability constraints, which is an easy get-out clause for developers. (Selborne PC) • Regarding 7.62, there is experience of applying cascade of local connections is frustrated due to adjoining parishes falling under different district councils. Unclear on approach to CIL where affordable housing is to be provided off-site. Note that managing just 2 affordable homes on a 6 home development might be difficult. (Amberley PC) • Concern re how SDNPA will identify what is a genuinely affordable rent. (Elsted & Treyford PC) • The affordable housing mix is too high and a disincentive to any development. (Fernhurst PC) • Requirement that affordable housing should take preference over all other requirements is a decision that should be based on local circumstances. Policy should refer to ‘except as provided for by development briefs or allocations in neighbourhood plans, or as justified by local circumstances.’ (Twyford PC) • There is a need for larger family homes in West Meon as it is strategically important to support existing families and this should be a consideration for the housing mix of the site. (West Meon PC) 	<p>I: Amend 7.67 to state that all viability appraisals should be independently prepared at the applicant’s expense. R: It is considered that the text as drafted already makes this clear.</p> <p>I: Policy SD28 (4) appears to exclude local housing authorities and registered providers, who are likely to be the main agents of delivery, from involvement in occupancy conditions and local connections criteria. Policy should refer to these. There is too much emphasis on Community Land Trusts (CLTs) (few in existence; difficult to administer). R: Paragraph 7.63 clarifies that the local housing authority will be involved where appropriate in determining local connection criteria. It is unnecessary and potentially confusing to provide a full list of potential consultees, given the housing authority will provide the lead on such matters where there is no CLT or other local framework in place. Whilst CLTs are strongly encouraged, there is nothing in the Local Plan that suggests the SDNPA will not equally work with other bodies to ensure appropriate sites are delivered – this is in any case happening in practice.</p> <p>I: Policy should be strengthened to ensure affordable housing is pepperpotted throughout the development and is tenure-blind. R: Policy SD28(3) makes this requirement clear.</p> <p>I: It is not always desirable or economically viable to combine market and affordable housing on a single site. R: A key aim of the Local Plan is to ensure community integration as part of achieving thriving, successful communities. However, Policy SD28 and supporting text provides some flexibility (for example financial contributions in lieu of on-site provision) where it is demonstrably not feasible to provide both on one site.</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Concern over emphasis on the word ‘affordable’. Support level of affordable housing. (Lewes TC) <p>Other organisations</p> <ul style="list-style-type: none"> Support policy reflecting that affordable housing to meet local needs is crucial, and reflecting evidence in the HEDNA/SHMA. One respondent welcomed policy in respect of supporting younger generations to remain in the locality. (various organisations) Policy (sliding scale of affordable housing requirement) does not reflect the Written Ministerial Statement (WMS) made by the Minister Brandon Lewis MP on 28 November 2014, also reflected in Planning Practice Guidance (PPG) Paragraph 031 Ref ID: 23b-031-20161116. This sets thresholds of 10 units or less or 1,000 sqm or less for seeking on-site affordable housing, and of 5 units or less in National Parks / Designated Rural Areas for seeking commuted sums. PPG does not make an exception argument to be made based on a specific need within the local authority area. The Government’s approach reflects that small developers have tighter cashflow / lower viability margins and will otherwise be disincentivised to build houses to meet the housing need. (various organisations) A target of 50% affordable housing on sites of 11 or more may prevent the delivery of homes, which does not reflect the objective set out in NPPF paragraph 47 to assist the delivery of much needed affordable homes in the National Park. One respondent expressed surprise that a minimum 50% is sought given the previous viability study prepared by Dixon Searle LLP recommended a maximum 40% level be sought on sites of 10 units or more. Others considered this level would, on basis of viability evidence, put the Plan’s delivery at risk, particularly in medium- to low-value settlements. (various organisations) 50% affordable housing is not considered achievable on previously developed land (PDL), which is a site typology not tested by BNP 	<p>I: The phrase ‘where feasible’ in SD28 (3) relating to affordable housing in perpetuity, is too lenient. R: The wording is necessary given the ‘Right to Buy’ legislation from which there are only some exemptions.</p> <p>I: Concern over last sentence of 7.58 re exceptional viability constraints, which is an easy get-out clause for developers. R: The supporting text reflects the NPPF with regards the importance of viability constraints not unduly holding up development.</p> <p>I: Applying a local connections cascade [7.62] is frustrated due to adjoining parishes falling under different district councils. R: This relates implementation and joint working between different authority areas. The policy and supporting text do not prevent working across districts to ensure the cascade is properly applied.</p> <p>I: Unclear on approach to CIL where affordable housing is to be provided off-site. R: CIL cannot be used for affordable housing provision by the SDNPA. This is set out in national policy and guidance on CIL. It is unnecessary to repeat this guidance in the Local Plan.</p> <p>I: Concern re how SDNPA will identify what is a genuinely affordable rent. R: The definitions of social rented and affordable rented are provided in the Glossary. These definitions reflect the NPPF. Paragraph 7.61 clarifies that levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.</p> <p>I: Requirement that affordable housing should take preference over all other requirements is a decision that should be based on local circumstances, e.g. development briefs or neighbourhood plan</p>

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

Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<p>Paribas and has sometimes significantly higher costs of development compared with greenfield sites. Policy should instead require c.30% on PDL sites but with flexibility for site specific costs. (West Sussex County Council, Cowdray Estates)</p> <ul style="list-style-type: none"> • The burden of this policy together with other policy requirements will in many cases fail to allow a competitive return to a willing landowner (NPPF paragraph 173 cited). This will mean that no sites will come forward. Examples of other competing requirements are Policy SD27 Mix of homes, high design standards, low densities and provision of zero carbon homes. One respondent cited evidence of decline of SME house builders over the last 30 years. (various organisations) • Unclear on what part 2 of the policy cross-refers to. Viability exception should also apply to larger sites of 11+ dwellings. (Barlavington Estate) • Levels of affordable housing contribution are far too prescriptive and not justified due to huge flexibility in house prices across the region. Example given of conversion of former employment buildings to provide modest sized dwellings for private rent. (Bryan Jezeph Consultancy Ltd) • Requirement to provide complex viability assessments discourages landowners from bringing forward proposals. (Bryan Jezeph Consultancy Ltd) • The phrase 'meaningful financial contribution, to be negotiated case by case' is very vague and does not provide the necessary level of guidance for any potential developer to assess the prospects for development. (Bryan Jezeph Consultancy Ltd) • Current policy wording is ambiguous and may in some cases lead to no contributions being made to affordable housing or other aspects. Recommend policy is reworded. (Comer Homes) • The typologies used in the Whole Plan Viability Assessment (BNP Paribas, 2017) do not reflect the lower densities being proposed 	<p><i>allocations; local need for market housing; downsizing; existing stock of affordable housing; provision in other areas, and the limited supply of land.</i></p> <p>R: Paragraph 7.60 clarifies that there is flexibility to take account of robustly produced local evidence, when considering tenure mix.</p> <p><i>I: Policy (sliding scale of affordable housing requirement) does not reflect the Written Ministerial Statement (WMS), which sets thresholds of 10 units or less or 1,000 sqm or less for seeking on-site affordable housing, and of 5 units or less in National Parks / Designated Rural Areas for seeking commuted sums.</i></p> <p>R: It is confirmed that the Local Plan proposes to take a different approach to that set out in the WMS and Planning Practice Guidance. The justification for this, which includes the particularly acute lack of housing affordability in the National Park, the National Park duty, and reliance on small sites, is set out in the Affordable Housing Background Paper (TSF 12).</p> <p><i>I: A target of 50% affordable housing on sites of 11 or more may prevent the delivery of homes, and does not reflect the evidence in the Dixon Searle LLP report on viability (TSF 13). Particular concern over deliverability of 50% on previously developed land.</i></p> <p>R: The Whole Plan Viability Study undertaken by BNP Paribas (Core 13) demonstrates the deliverability of 50% affordable housing on the majority of site typologies tested, including previously developed ones (e.g. Typology 13 – town-based infill, houses). The study concludes:</p> <p style="padding-left: 40px;">“Our assessment indicates that most development typologies providing 11 or more units can viably provide 50% affordable housing, with the exceptions being those at the very bottom of the value range. The unviable scenarios could come forward with alternative tenure mixes or with reduced affordable housing percentages if a proven viability case is submitted reflecting site-specific factors. We would also expect improvements in market</p>

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<p>on some allocation sites, and is considered to underestimate the build cost of flats. The study also does not test larger allocations made through the Plan which are critical to housing supply. (Cove Homes)</p> <ul style="list-style-type: none"> Given a high affordable housing requirement of 50%, the overall housing target should be increased to nearer the 'high' level. To not do so will mean the OAN will be far from met and strategic housing need will not be addressed, putting significant pressure on surrounding authorities. Propose alternative requirement of 35-40% affordable housing. (EPV (East Sussex) Ltd) Too much emphasis/reliance placed on Community Land Trusts – there are very few in existence. Local housing authorities and registered providers are likely to be the main agents of delivery. HARAH is a good example of a successful delivery partnership. Policy should emphasise these. In 7.61 the phrase 'genuinely affordable' requires clarification. Linking affordability so closely to Local Housing Allowance makes the policy too rigid to adapt to new measures and affordable housing products. Alternative wording suggested. Request option for local connections to extend to parishes adjoining the National Park. (Hampshire Alliance for Rural Affordable Housing - HARAH) For developments of 10 dwellings or less, the level of affordable housing delivery is unlikely to generate interest from Registered Providers (RPs) who will see significant management issues in serving a small number of isolated units in remote locations within the National Park. Community Land Trusts (CLT) will be very difficult to administer given the nature of these organisations and the complexity of delivery/management. (Murray Planning Associates) Links should be made between these policies and SD34 Sustaining the Local Economy. Affordable Housing development that is to be built with locally sourced sustainable building materials should be 	<p>values over the plan period to extend the range of viable typologies to these lower value cases.” (para. 8.4)</p> <p>The BNP Paribas study uses more up-to-date evidence on market conditions and real estate values, and also factors in greater certainty on CIL (which has now been adopted by the SDNPA). It is therefore considered the more reliable of the two studies undertaken on this matter.</p> <p><i>I: The burden of this policy together with other policy requirements will in many cases fail to allow a competitive return to a willing landowner.</i></p> <p>R: The Whole Plan Viability Study (Core 13) factors in other policy requirements that may affect the cost of development. For example, there are additional uplifts of 7.5% and 6% applied to base build costs to account for enhancements to landscaping/design, and more stringent carbon reduction/water consumption standards, respectively. The mix of house sizes assumed reflect Policy SD27: Mix of Homes (para. 5.5). The report also explains how the principle of a competitive return to the landowner has been built in, essentially assuming an approximate 14-fold increase in the value of agricultural land, and a 20% uplift on the value of land whose current use is commercial (Core 13, para. 5.42 & 5.43).</p> <p><i>I: It is unclear on what part 2 of the policy cross-refers to. Viability exception should also apply to larger sites of 11+ dwellings.</i></p> <p>R: Criterion 2 of the policy has been amended (SDLP01.I Schedule of Changes, p15) to clarify that the viability test can apply to all sizes of site, i.e. the whole of part 1 of the policy.</p> <p><i>I: Levels of affordable housing are too prescriptive and do not reflect variability in house process across the region.</i></p> <p>R: The policy is designed to provide certainty to developers and communities, and respond to the substantial need for affordable housing in the National Park.</p>

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<p>looked on more favourably, thus supporting the local forestry industry. (South Downs Land Managers Group)</p> <ul style="list-style-type: none"> • Welcome approach to including all development in Use Class C3 being subject to the policy. However consider that 7.68 is in contravention of PPG paragraph 017, Ref ID: 10-017-20140306 which makes clear that planning applications should be considered in today's circumstances unless a scheme phases delivery over a medium or longer term. This is confirmed in Government guidance 'Section 106 Affordable Housing Requirements Review and Appeal' and RICS guidance GN 94/2012 Financial Viability in Planning. (McCarthy and Stone Retirement Lifestyles Ltd) • 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.) <p>Individuals</p> <ul style="list-style-type: none"> • Policy is contrary to NPPF paragraph 173 requiring that sites should not be subject to a level of policy burdens that threatens viability, and Written Ministerial Statement of 28 November 2014 and PPG ref: 3b-031-20161116 which sets a lower threshold of 5 units in national parks and only tariff style contributions up to 10 units. (various individuals) • Young people are being priced out of villages and the policy does not go far enough. Support a positive policy of temporary accommodation for young people to stay living in the countryside. (Lewes District Council, Cllr Victor Ient) • Welcome policy upper threshold of 11, percentages, and move to prevent developers circumventing the policy by dividing sites or claiming unviability. (Cllr Joanna Carter, Green Party, Lewes District Council) 	<p>I: The requirement to provide complex viability assessments discourages landowners from bringing forward proposals. R: The policy reflects standard practice. It also reflects that the inability to provide the requisite amount of affordable housing will be exceptional, and therefore provision of a viability assessment also will be exceptional. Viability appraisal is a tool commonly used by developers to inform commercial decisions on land acquisition and purchase price, irrespective of planning policies.</p> <p>I: The phrase 'meaningful financial contribution, to be negotiated case by case' is very vague. R: The SDNPA will be producing a Supplementary Planning Document (SPD) on Affordable Housing in the coming months which will set out a methodology for calculating financial contributions.</p> <p>I: The typologies used in the BNP Paribas Whole Plan Viability Study (Core 13) do not correspond well to densities and site sizes being proposed as Local Plan allocations. R: The seventeen development typologies have been designed to reflect the types of sites in the emerging Local Plan, as well as reflecting recent planning permissions. (Core 13, paras. 5.1-5.6)</p> <p>I: The Whole Plan Viability Study (Core 13) underestimates build costs. R: BNP Paribas have used the RICS Building Cost Information Service (BCIS) to source their base build costs, and applied an uplift factor of 20% as a local adjustment. There are additional uplifts of 7.5% and 6% applied to base build costs to account for enhancements to landscaping/design, and more stringent carbon reduction/water consumption standards, respectively. The report confirms that these are cautious assumptions and in reality, the additional costs will be lower than assumed in the study.</p>

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<ul style="list-style-type: none"> Statement that insufficient affordable housing provision which is contrary to the policy is a significant factor weighing against approval is wholly unjustified and in conflict with the NPPF and PPG. Policy is not supported by evidence, including that prepared in relation to the Old Malling Farm strategic site where the Secretary of State's Inspector concluded that 40% affordable housing was reasonable. Concern over strict requirement to integrate affordable units throughout a development, given some Registered Providers (RPs) require affordable units to be located together for management purposes. Exceptional circumstances requiring an off-site payment should be expanded to smaller sites, to allow for where RPs are not in a position to manage the properties. The Authority appears to countenance acceptance of Neighbourhood plans which fail to set concrete targets to be achieved within measurable timescales. No suggestion that larger sites should be looked at to maximise affordable housing numbers. Some Neighbourhood plans seek to limit site density although this may mean that the financial viability of such sites to provide affordable housing becomes an issue. The affordable housing target of 293 per year over the plan period seems very low. The sliding scale in the policy is not flexible and will not help those who need affordable housing. Concern that the policy creates too much of a burden on small holding landowners looking to deliver less than 5 new homes. Policy fails to take into account the following criteria: the needs of the local community for additional market housing; the need for downsizing opportunities; the proportion of affordable housing already provided in the community; the likelihood of affordable housing being provided in other areas, and the limited supply of land. The policy could undermine recently made neighbourhood 	<p><i>I: Given a high affordable housing requirement of 50%, the overall housing target should be increased to nearer the 'high' level to avoid pressure on other local authorities.</i> R: The proposed level of housing provision overall in the National Park has been shown to be the most appropriate strategy through the Sustainability Appraisal and taking account of public consultation. Significant affordable housing is expected to be delivered within that number.</p> <p><i>I: Affordable Housing development that is to be built with locally sourced sustainable building materials should be looked on more favourably, thus supporting the local forestry industry.</i> R: Policy SD5: Design and Policy SD48: Climate Change and Sustainable Use of Resources require sustainable design for all developments. There is no need to duplicate these requirements in Policy SD28.</p> <p><i>I: Paragraph 7.68 [concerning a clawback clause in S106 agreements] is in contravention of PPG paragraph 017, Ref ID: 10-017-20140306 which makes clear that planning applications should be considered in today's circumstances unless a scheme phases delivery over a medium or longer term. This is confirmed in Government guidance 'Section 106 Affordable Housing Requirements Review and Appeal' and RICS guidance GN 94/2012 Financial Viability in Planning.</i> R: A clawback clause will allow the Authority to recoup affordable housing contributions that would have been required, where the actual development (sale) value is higher than anticipated thus increasing the margin of viability to make such contributions. This is considered a reasonable and proportionate approach which is already in use in other authority areas, and may reduce time taken to agree the details of the submitted viability appraisal.</p>

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<p>plans that meet locally identified needs in a different way to that proposed by this blanket approach.</p>	<p><i>I: Support a positive policy of temporary accommodation for young people to stay living in the countryside.</i> R: The policy as drafted is considered to address this point as far as is possible within the scope of the Local Plan.</p> <p><i>I: Concern over strict requirement to integrate affordable units throughout a development, given some Registered Providers (RPs) require affordable units to be located together for management purposes.</i> R: The integration of affordable units with other tenures is widely acknowledged as good practice. There is nothing in the policy text that would prevent clustering of affordable units, which can be achieved whilst also integrating with the wider development. The supporting text (7.74) acknowledges the operational management requirements of the relevant housing association.</p> <p><i>I: Some neighbourhood plans seek to limit site density although this may mean that the financial viability of such sites to provide affordable housing becomes an issue.</i> R: This is a matter that should be considered during neighbourhood plans' preparation stages, drawing on local evidence.</p>

Summary of Issues and Responses

Policy SD29 Rural Exception Sites

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

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<p><u>National agencies</u> Historic England: Would prefer paragraph 7.80 to read “...on the ability of the natural <u>and historic</u> environment to contribute to ecosystem services...”</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Object to part 3 as the policy (and 7.81 with respect to councils) should refer to housing associations, councils/local housing authorities, registered providers, HARAH and the Hampshire Community Housing Partnership. Where sites/settlements are near the edge of the National Park, local connections criteria should include adjoining parishes outside the Park. Market housing provided where justified by viability (7.79) is a key issue that should be addressed in the policy itself. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The policy is welcomed/supported. (Cheriton PC, Liss PC, Petersfield TC, Steyning PC) Would wish to see the wording of the policy and supporting text tightened so that the role of the Parish in identifying need, subsequent allocation, size, type and occupancy criteria/conditions is formalised, and role as link between SDNPA and local housing authority recognised. Amended wording suggested along these lines. (Corhampton & Meonstoke PC) Policy fails to appreciate the high cost of land and building in the SDNP, and would be more successful if it allowed for a small number of market houses to fund the social housing and/or community facilities. (Itchen Abbas PC) Policy should recognise that it is not always possible to provide affordable housing in perpetuity given a community land trust’s potential need to sell 	<p><i>R: Policy SD29 (3) should refer to housing associations, councils/local housing authorities, registered providers, HARAH and the Hampshire Community Housing Partnership.</i> I: The SDNPA considers that community support and buy-in are crucial in delivering rural exception sites. The current wording is therefore appropriate. In practice, rural housing providers and local housing authorities will be involved as appropriate.</p> <p><i>R: Where sites/settlements are near the edge of the National Park, local connections criteria should include adjoining parishes outside the Park.</i> I: This is an issue with implementation and joint working between different authority areas. The policy and supporting text do not prevent working across districts to ensure the cascade is properly applied.</p> <p><i>R: The wording of the policy and supporting text should be tightened so that the role of the Parish in identifying need, subsequent allocation, size, type and occupancy criteria/conditions is formalised, and role as link between SDNPA and local housing authority recognised.</i> I: Paragraph 7.82 states that rural exception sites should take into account the aspirations of the local community. The wording of the policy and text is clear that the local community should be involved in working up details of the scheme.</p>

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<p>houses to raise capital for further developments, or given potential future Government instruction to housing associations to implement Right to Buy. (Midhurst TC)</p> <ul style="list-style-type: none"> Community targets, and an overall SDNP target, for rural exception schemes should be included in the Plan similar to the Lewes District Local Plan. This will contribute to meeting overall housing delivery. (Ringmer PC) Add to part I(d): 'It is shown that there is community support for the site...' Amend 7.81 to say the choice of site should be supported by the community. (Selborne PC) Object to omission of allowing a market element of 30% for rural exception sites, which puts it at odds with both the Winchester JCS and has been adopted by the Twyford Neighbourhood Plan. This would encourage more land to come forward and would not reduce the willingness of the community to support such sites. (Twyford PC) <p>Other organisations</p> <ul style="list-style-type: none"> To be consistent with national policy (NPPF para54), Policy SD29 should allow for mixed tenure schemes to facilitate the provision of significant additional affordable housing to meet local needs. (Cowdray Estates Office) Rural exception sites should allow for some/up to 30% open market housing in line with Policy CP4 of the Winchester JCS and Policy CP14 of the East Hampshire JCS. Reasons given include: to meet the aspirations of local communities; provide for mixed communities through a mix of market and affordable housing; 100% affordable housing renders such sites undeliverable due to squeeze on housing association funds; important for meeting the objectives of the NPPF and English National Parks Vision and Circular. (various organisations) Policy should at least allow the inclusion of open market homes on exception sites where schemes arise from endorsed Whole Estate Plans. (Glyne Estates) Policy should take account of evidence on delivery from elsewhere, for example how landowners might be incentivised to bring sites forward. Sites in 	<p>R: Rural exception sites should allow for some up to 30% open market housing, to ensure deliverability and allow for a mix of tenures.</p> <p>I: It is considered that rural exceptions sites represent exceptional opportunities to provide affordable housing to meet local affordable housing need, in line with the statutory duty. It is therefore crucial that the amount of affordable housing is maximised. The NPPF (para. 54) states that authorities should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local need. The Local Plan (para. 7.79) confirms that the Authority will take account of a robustly prepared viability appraisal in finding the optimum viable option for the site that best meets local need. This is in line with the NPPF para. 54.</p>

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<p>villages may have a value far in excess of current agricultural land value, for example as an alternative use as private amenity/garden land. Values generated by 100% affordable scheme might be lower than the current use value of a potential site. This can be squared by allowing such sites to contain an element of higher value open market housing, or by being flexible on site selection. (The Leconfield Estates)</p> <ul style="list-style-type: none"> • There is no apparent effective vehicle through which to convey the aspirations and opinions of local people in Madehurst. Object to apparent link between rural exception sites and tourism (7.10). (Madehurst Parish Meeting) • Links should be made with Policy SD34 Sustaining the rural economy. Affordable housing built with local sustainable building materials should be looked on more favourably. It is not clear ow the policy actually encourages their delivery. (South Downs Land Managers Group) • The policy should be reworded to stress that community involvement is essential from the outset and not only in respect of design, layout and types of dwellings. Question the ability of housing providers to guarantee local connection criteria for affordable homes on a long term basis. (South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support policy. • Important to choose sites carefully to ensure access to sustainable transport and services. (Lewes District Council, Cllr Victor lent) • Rural exception sites should allow for up to 30% open market housing in line with Policy CP4 of the Winchester JCS and Policy CP14 of the East Hampshire JCS, to address near drying up of affordable housing supply. 	

Summary of Issues and Responses

Policy SD30: Replacement Dwellings

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

Summary of Representations	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The constraint of only being able to provide a 30% uplift could be limiting and does not appear consistent with the SDNPA landscape led approach (Brighton & Hove City Council) The Estate supports Policy SD30 criterion 2 however the use of the term small would benefit from being more precise to avoid future uncertainty (Brighton & Hove City Council) Preventing the loss of smaller dwellings would be better if it was pro-actively addressed by an increase in the supply of such dwellings to ensure an appropriate mix of housing is available (Brighton & Hove City Council) Criterion 1(b) refers to loss of light; we consider that the policy should be amended to include overshadowing/overbearing impacts (East Hampshire District Council) Recommend that a new criterion (1c) is inserting to an assessment on the character and appearance of the area (East Hampshire District Council) Supporting text should address Lawful Development Certificates (East Hampshire District Council) There is no limit on the size of replacement dwellings within settlements but there is a limitation on extensions (East Hampshire District Council) Support Policy SD30 (Cllr Jackie Porter, Hampshire County Council) 	<p><i>R: The restriction to 30% increase in the original dwelling is too limiting / inconsistent with the approach taken in adjacent planning authorities.</i> I: The primary purpose of SD30 is to encourage supply and retention of small and medium-sized homes in the National Park, consistent with Policy SD27: Mix of Homes and the recommendations of the South Downs Housing and Economic Development Needs Assessment (HEDNA, TSF08). The secondary purpose is to avoid adverse impacts on the character and appearance of rural countryside locations. The current policy wording is considered appropriate to achieve these aims.</p> <p><i>R: Should be additional clarifications relating to overshadowing/overbearing, character and appearance.</i> I: Part 1(b) of the policy is considered to already address these points.</p> <p><i>R: There is no limit on the size of replacement dwellings within settlements but there is a limitation on extensions.</i> I: It is considered appropriate to take different approaches to replacement dwellings (as opposed to extending a single unit) outside settlement boundaries. There are particular sensitivities and opportunities (such as large plot sizes) in a countryside setting, which are less likely to apply in built-up areas. On the other hand, extensions are more likely to reduce the overall stock of smaller dwellings both within and outside settlements if permitted unfettered, therefore it is correct to treat developments inside and outside the settlement broadly the same.</p>

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<ul style="list-style-type: none"> SD30 makes no reference to design issues – presumably to avoid repetition with other policies – but this needs to be stressed (Winchester City Council) <p>Parish and Town Councils</p> <ul style="list-style-type: none"> Text change suggested (East Lavington Parish Councils) Typos in Paragraphs 7.87 and 7.89 (Harting Parish Council; Selborne Parish Council) Supports Policy SD30 (Hawkley Parish Council) Supports Policy SD30 but also suggests an addition clause (1c) “the replacement dwelling(s) should not be detrimental to the dynamic character of a settlement already comprising large (>400m²) housing (Itchen Abbas Parish Council) Objection. Policy SD30 is contrary to general protection of countryside and National Park, and has not been consulted upon. Not the same as EHDC Local Plan policy H9; it invites interpretation and challenge. Changes suggested (Liss Parish Council) Supports policy subject to typo corrections but has concerned about impact on rural area. Suggests text changes (Selborne Parish Council) No objection provided it is made clear that this would not prevent the building of a granny annexe; should be made clearer that this applies only outside settlement boundaries; will object if anything in excess of 2 dwellings as it risks creating pockets of housing remote from villages (for example a 5000 sq/ft house could be replaced by 6/7 dwellings); larger grounds would need different maintenance regime if sub-divided (Twyford Parish Council) Additional clause needed in SD30 addressing impact on street scene (Upham Parish Council) <p>Other organisations and individuals</p> <ul style="list-style-type: none"> The policy would provide opportunity for developers to seek sub-division of many properties in the countryside contrary to policy 	<p><i>R: There is a risk of creating pockets of isolated development outside settlement boundaries, and further risk of prejudicing areas of special landscape character through inappropriate intensification.</i></p> <p>I: It is considered that the benefits of making modest increases to the small dwelling stock outweighs the risks outlined. The policy as drafted will also help sustain very small communities in the countryside, or in some cases support estates, whilst safeguarding against significant increases in built development. The Local Plan contains a robust policy framework to ensure that the special character of the countryside in the National Park is maintained and enhanced.</p> <p><i>R: Making large properties substantially larger will not alter the housing mix.</i></p> <p>I: It would be inappropriate to allow significantly larger replacement dwellings in place of existing large dwellings in the countryside, as to do so carries significant risk of negative impacts on landscape and setting. There is no identifiable benefit to a different approach being taken to very large existing houses.</p> <p><i>R: Would welcome alteration to SD30 to confirm that dwellings that are subject to cliff erosion can be replaced on a more appropriate long-term site.</i></p> <p>I: This may not be appropriate in many cases, and would also be a disproportionate policy response to an issue affecting relatively few properties.</p> <p><i>R: Suggest an additional criterion relating to reducing carbon footprint than the existing dwelling.</i></p> <p>I: This is not necessary as it is already set out in Policy SD48: Climate Change and Sustainable use of resources.</p>

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<p>SD25 which precludes development in the countryside other than in exceptional circumstances (Individual)</p> <ul style="list-style-type: none"> • Within East Hampshire there are currently many developments of low density housing within “Areas of Special Housing Character” which have been protected from intensification of development by saved policy H9 of the East Hampshire District Local Plan. Policy SD30 criterion 2 puts at risk the ability to maintain valued character and landscape of such areas (Individual) • The Estate does not believe that imposing an arbitrary limit on the net increase in internal area of 30% is appropriate and as such the policy should be amended accordingly (Cowdray Estate) • The policy is overly restrictive. There are a number of properties within the SDNP where a significantly larger replacement dwelling can be justified as they are already large properties and so making them substantially larger still will not alter the mix. Durford Wood (near Petersfield) is an example of this type of area and as such the policy should be amended accordingly (Durford Wood Landowners Limited) • Support policy but seek further clarity on how it would be provided in practice (Leconfield Estate; The Edward James Foundation) • The policy should be rewritten to make it clear that it should be generally applied - unless there is cause for exception (Individual) • Inconsistency of approach in planning policy – it would mean that you could built houses in the countryside but not in “enclaves” (such as Abbots Worthy) (Individual) • Policy SD30 has no conditions attached (Individual) • Policy SD30 is laudable but in practice will increase dwellings in unsustainable locations whilst the settlement boundaries have been rightly redrawn (Individual) 	

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<ul style="list-style-type: none">• It is not clear how the 30% increase threshold for extended or replacement dwellings has been established; may be weakened by appeal decisions (South Downs Society)• Would welcome alteration to SD30 which concerns replacement dwellings to confirm that dwellings that are subject to cliff erosion can be replaced on a more appropriate long-term site (The Gilbert Estate)• Additional criterion relating to reducing carbon footprint than the existing dwelling (Midhurst Society)• Provision should be made for policy exceptions in appropriate circumstances. (The Goodwood Estate Company Ltd.)	

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Policy SD31: Extensions to existing dwellings, and provision of annexes and outbuildings

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

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy SD31 should be amended to refer to character and appearance, and replace reference to 'loss of light' with 'detrimental... by virtue of <u>overshadowing/overbearing impacts...</u>' (East Hampshire District Council) Policy makes no reference to the need for appropriate design, materials, character, form or style – if this is to avoid repetition, important that the need to meet all policy requirements is stressed. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Strongly support policy (Liss PC, Selborne PC) Excellent policy, 7.97 should include something about home deliveries and noise. (Bury PC) Object to 7.94 - larger may be permitted where no harmful intrusion on the landscape which will encourage larger dwellings. (Elsted & Treyford PC) 30% limit is too low and prescriptive – each case should be judged on merits (Fernhurst PC) Policy SD31 should be 'grandfathered' so as to apply only to houses which change hands in future i.e. people who owned the properties prior to this policy should not be subject to it. Question 	<p><i>I: Policy should be clarified with respect to character and appearance, loss of light, overshadowing/overbearing, design, materials, character etc.</i> R: Part 1(b) of the policy is considered to already address these points.</p> <p><i>I: The 30% limit on extensions is too low and prescriptive/arbitrary. Amount of development should be based on its specific impacts – examples given included impact on landscape and scenic quality.</i> R: The primary purpose of SD31 is to protect the limited supply of small and medium-sized homes in the National Park, consistent with Policy SD27: Mix of Homes and the recommendations of the South Downs Housing and Economic Development Needs Assessment (HEDNA, TSF08). The secondary purpose is to avoid adverse impacts on the character and appearance of both settlements and the countryside, due to over-extension. The Authority understands the need for flexibility and has thus proposed adding the word 'approximately' to criterion 1(a) of the Policy on page 16 of the Pre-Submission Schedule of Changes. The Policy already allows for larger extensions to address exceptional circumstances whereby a different approach could be taken. The policy approach and wording is therefore considered appropriate.</p> <p><i>I: There appears to be no mechanism to stop an applicant growing their home by up to 30% every few years.</i> R: The policy includes a base date of 18 December 2002 (see proposed date on page 16 of the Pre-Submission Schedule of Changes) with respect</p>

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Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<p>whether 30% rule will help with homes being ‘attainable’. (Hawkley PC)</p> <ul style="list-style-type: none"> • There appears to be no mechanism to stop an applicant growing their home by up to 30% every few years; this is a serious oversight. (Lavant PC) • Should explicitly state that stock of smaller ‘starter homes’ must not be eroded. There should not be a block where family circumstances may require greater flexibility. (Rowlands Castle PC) • Not clear on whether policy applies both within and outside settlement boundaries. If outside of it, the limitation is supported. Granny flats or annexes outside the settlement boundary should be treated as a special case and not limited to 30%. (Twyford PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • The constraint of only being able to provide a 30% extension is too limiting; the amount of development should not be constrained as a percentage. Amount of development should be based on its specific impacts – examples given included impact on landscape and scenic quality, in line with the landscape-led approach; proportionate in size and scale to existing dwelling; heritage assets and their settings. Some considered 30% as arbitrary and inappropriate. (various organisations) • The overall policy objective is supported although it is unclear whether it will be effective in controlling unsightly roof dormers (Friends of Lewes Society) • Not clear how the 30% was established. Absolute thresholds may be too inflexible, as opposed to guidelines beyond which higher levels have to be individually justified. (South Downs Society) • Additional criteria should be added that any extension must not increase the carbon footprint of the existing dwelling. (The Midhurst Society) 	<p>to what is counted as the original house. This prevents indefinite extensions from occurring.</p> <p><i>I: Granny flats or annexes outside the settlement boundary should be treated as a special case and not limited to 30%.</i></p> <p>R: The policy and supporting text allow for exceptions to the policy approach, including extenuating family circumstances such as a disabled family member. Potential exceptions will be considered on their merits.</p> <p><i>I: Additional criteria should be added that any extension must not increase the carbon footprint of the existing dwelling.</i></p> <p>R: This would not be appropriate as it is not supported by national policy and guidance. It would also cut across Policy SD48: Climate Change and Sustainable use of resources.</p>

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Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Provision should be made for policy exceptions in appropriate circumstances. (The Goodwood Estate Company Ltd. <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Policy should be redrafted to anticipate the reality of circumstances that exist (e.g. extension of dwellings on large plots that have capacity to accommodate this). • Concern expressed over enlargement of houses when it is smaller dwellings that are needed. • A consistent 30% limit would be better as the reasons for exceptions to this will not be clear. 	

Summary of Issues and Responses

Policy SD32: New Agricultural & Forestry Workers' Dwellings

There were a total of 56 responses on this policy. A summary of the main issues raised is set out below.

Summary of Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy wording is too restrictive; Criteria 2(c) could preclude a new dwelling if other dwellings had been sold off for valid reasons and does not take account of unforeseen changes of circumstances; the 120m² limit appears arbitrary and not consistent with the landscape led approach or there is a specific circumstance that dictates the need for a larger dwelling (Brighton & Hove City Council Estate Dept.) We consider that Policy SD32, criterion 3 should be amended to make it clear that the first preference will be for re-use as an affordable unit and only then as an open market dwelling where it can be robustly demonstrated that is not viable / unsuitable for use as an affordable unit (East Hampshire District Council) Too often in the past we have seen agricultural workers houses only built a few decades ago being allowed to be retained for non-agricultural purposes. Often these buildings are in totally unsuitable locations. This backdoor method of improving the value of land should be discouraged. Developers should be required to 	<p><i>I: Part 2(c) is too inflexible</i> R: The approach to resisting new dwellings where residential assets have been sold off is considered reasonable given the over-riding need to conserve and enhance the special qualities of the National Park.</p> <p><i>I: In part 2(e), the 120 sqm limit is arbitrary and too inflexible. Many farm workers will require more space.</i> R: The 120 m2 is consistent with the approach throughout the Local Plan whereby small dwellings are defined as those not exceeding this limit. This is appropriate given the lack of smaller homes in particular in the National Park, and the need to keep such dwellings as affordable as possible.</p> <p><i>I: Part 3 should make clearer that the first preference is for re-use as an affordable unit.</i> R: The policy as drafted makes clear that removal of occupancy conditions will only be considered where an affordable tenure has been considered in the first instance.</p> <p><i>I: Temporary permissions [for changes of use to agricultural dwellings] should be limited to temporary building so they can be removed when the permission expires.</i> R: The approach in the policy is a presumption against new dwellings in the countryside or change in occupancy conditions, except where the policy</p>

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Summary of Issues and Responses

Summary of Representations	Issue and Response (I/R)
<p>demonstrate an absolute need. Any temporary permissions should be limited to temporary building so they can be removed when the permission expires (Lewes District Council)</p> <ul style="list-style-type: none"> A number of policies inc. SD32 make no reference to the need for appropriate design, materials, character, form or style, all of which can have an adverse effect on visual amenity and local character if not appropriately addressed. It is assumed that this is to avoid repetition with other policies, but it is important that the need to meet all policy requirements is stressed (Winchester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> There seems to be no mention of the difference between Horticultural use and Agricultural use (Bury Parish Council) Policy SD32 supported (Fernhurst Parish Council) The restriction of this policy (SD31) to new housing for agricultural and forestry purposes is not sound, as it does not recognise the full range of rural activities for which rural housing might be required, and is thus not fully in accordance with NPPF para 55 (Ringmer Parish Council) Support Policy SD32 (Selborne PC) The general sequence runs that an agricultural smallholding is created and a barn will be put up. This will then be converted to a dwelling. A more rigorous application of a) will be essential (Upham PC) 	<p>tests have been met. This is considered the most appropriate and most practical approach.</p> <p><i>I: Policy SD32 makes no reference to the need for appropriate design, materials, character, form or style, all of which can have an adverse effect on visual amenity and local character if not appropriately addressed.</i> R: Policy SD5: Design sets out the policy relating to such matters.</p> <p><i>I: Policy should differentiate between horticultural and agricultural use.</i> R: The definitions used reflect national legislation.</p> <p><i>I: Restriction to new housing for agricultural and forestry purposes is not sound, as it does not recognise the full range of rural activities for which rural housing might be required.</i> R: The policy reflects national legislation and guidance. This is considered appropriate given the need to prioritise core farming and forestry activities.</p> <p><i>I: Object to the reduction of the period during which other dwellings must not have been sold, from 10 to 5 years.</i> R: Five years is a reasonable time period providing a proportionate safeguard against asset-stripping for the sole purpose of financial gain. This is a common time period for business plans, and allows reasonable flexibility in the policy to allow for changing circumstances.</p> <p><i>I: Minimum size of an agricultural or forestry enterprise for allowing new rural worker dwellings should be 10-15 hectares, as this is minimum required to run a bona fide agricultural business.</i></p>

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Summary of Representations	Issue and Response (I/R)
<p><u>Other organisations and individuals</u></p> <p>A high number of individuals (approx. 30) submitted the same letter which made the following key points:-</p> <ul style="list-style-type: none"> • Reduction of time period in the emerging policy from 10 years to 5 years. The reason given by the SDNPA for the reduction in the time period is that there were objections to the ten year period from "various Estates" that considered the ten year period to be too restrictive. These are the organisations that can directly benefit financially from the time reduction so they would obviously want this change. The SDNPA has decided that the five years period is a common figure for business plans and that "five years strikes a reasonable compromise between disposing of property". These reasons for reducing the time period are very questionable for the following reasons: <ul style="list-style-type: none"> i. The SDNPA guidance for Whole Estate Plans quotes a practical period of 15 years for a WEP, the same as a Local Plan. Five years for a business plan is very short term and ten years is a reasonable compromise. ii. Business plans would not normally take into account personal issues such as death and divorce. iii. Interested organisations that supported the ten year period would not have commented. The ten year period was reasonable and should not have been changed. iv. Example of the Wiston Estate set out. • Generally supported but considered potentially restrictive because criteria 2(c) could preclude a new agricultural/forestry dwelling if other dwellings had been sold off for perfectly valid reasons, and it does not take into account unforeseen changes of circumstance 	<p>R: It is considered that a 5 hectare farm or forestry enterprise is still extensive in relative terms, and it is possible that an enterprise of this size may have a genuine need for an agricultural dwelling.</p> <p><i>I: Part 4 of the policy should require that it is demonstrated that at the end of any temporary permission the financial viability is proven if any buildings approved under this policy are to be retained, and that occupancy terminates if the enterprise ceases.</i></p> <p>R: As this part of the policy relates to temporary permissions, it is not necessary to stipulate conditions for renewal of that consent, which will need to be considered on its merits at the appropriate time.</p> <p><i>I: 7.100 in respect of rural workers should refer to 'making a core contribution to the operation and viability of that enterprise'.</i></p> <p>R: It is considered that the paragraph as drafted is sufficiently robust.</p> <p><i>I: Object to the word 'extensive' in part 2(a), as it does not reflect all circumstances of where a need will arise, and may contradict national guidance regarding encouraging the expansion of all types of rural business (NPPF para 28).</i></p> <p>R: The policy as drafted is considered to strike an appropriate balance between the genuine needs that may arise for agricultural workers' dwellings, and the prevention of multiple dwellings proposed on smallholdings. The term 'extensive' is clarified in para 7.111 as 'at least 5 hectares'.</p> <p><i>I: Part 2(a): the proposed enterprise should be required to demonstrate financial viability.</i></p> <p>R: This is required in paragraph 7.101.</p>

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Summary of Representations	Issue and Response (I/R)
<p>(e.g. economic cycles); the specific limit of 120m² appears arbitrary, and not consistent with the 'landscape-led' approach followed by the SNDPA (Angmering Estate)</p> <ul style="list-style-type: none"> • I support SD32 overall and it has been well put together. In 7.100 I consider that the minimum should be 10-15 hectares, as it is unviable to run any kind of bona fide agricultural business on less than this. I do not think that an ag-tied dwelling should be permitted for small-scale hobby farming, and in keeping the minimum at 5 there is a risk that this will encourage unsuitable and unviable applications; There should be a requirement for the business to submit audited accounts as proof (Bignor Park Estate) • Support Policy SD32 (CLA) • We support SD32 as we believe that it is in line with national guidance. However, we would like to see further evidence of how the 5 hectares criterion in para 7.100 has been arrived at and we also like to see para 7.100 expressed as part of the policy text. In section SD32 bullet (4) it should be demonstrated that at the end of any temporary permission the financial viability is proven if any buildings approved under this policy are to be retained and that occupancy terminates if the enterprise ceases (CPRE Sussex) • It does not cater for other essential rural workers and in this respect it is inconsistent with paragraph 55 of the NPPF/the Plan's strategic objectives (Elizabeth Lawrence Ltd, Glynde Estates) 	<p><i>I: Request new criterion to state that any dwellings permitted under this policy must be constructed according to best sustainable and environmental practice.</i></p> <p>R: These matters are addressed in Policy SD48: Climate Change and Sustainable Use of Resources.</p> <p><i>I: Time frames between an established enterprise (3 years) and the time frame for disposal (5 years) are mismatched. Unreasonable as a new owner could be burdened by the actions of a previous owner.</i></p> <p>R: There is no inconsistency as these two criteria act independently from one another. The policy relates to the enterprise itself, irrespective of changes of ownership.</p>

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Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • 7.100 in respect of rural workers should refer to ‘making a core contribution to the operation and viability of that enterprise’ • Part (d) only allows for 120 m² of habitable floorspace. Many farmworkers have families and may require a larger amount of floorspace. The wording of the policy is too prescriptive and should be amended to ensure it provides sufficient flexibility to allow for larger dwellings where there is a demonstrable need (Leconfield Estate) • We’re concerned with the word “extensive” (Part 2.a) as this would be open to a considerable degree of interpretation and very likely to lead to objections or appeals; could be a discrimination against holdings below the “extensive” size criterion, whatever that may be? The relative size of the enterprise is not engaged by NPPF 55, which relates to the “the essential need for a rural worker to live permanently at or near their place of work in the countryside”. The essential and permanent need criteria would not in every case be linked with the question of holding size as it would be plausible for a viable rural undertaking to involve relatively small areas of land in some cases. Furthermore given that NPPF 28 relates to the sustainable growth and expansion of all types of rural business, the introduction of a requirement that those businesses are “extensive” would contradict national guidance? In our view the use of the word “extensive” should simply be deleted as it has no relevance to the material planning issues. The use of this word is not proportionate, effective or consistent with national policy (NFU and South Downs Land Management Group) 	

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Summary of Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Supported. At 2a) the proposed enterprise should be required to demonstrate financial viability. At 4 (temporary dwellings) the applicant must be able to provide evidence of the intention to proceed towards the development of an agricultural or forestry enterprise. At the end of any temporary permission it must be demonstrated that the financial viability is proven if any buildings approved under this policy are to be retained (South Downs Society) Policy SD32 defines the criteria for permitting the development of new and temporary dwellings for agricultural and forestry workers (Page 139). An additional criterion should be applied namely that such permanent or temporary dwellings must be constructed according to best sustainable and environmental practice (Midhurst Society). There is a mismatch in the time frame between the established criteria (three years) of clause 7.100 and the disposal criteria (five years) of 7.102. This seems unreasonable because a new owner could be burdened by the actions of a previous owner and this is not consistent with the duty of the NPA to seek to foster the economic and social well-being of the local communities (Individual) SD32 requires “conserve and enhance” focus (eg shepherds managing flocks to conserve rare chalk grassland, woodsmen managing broadleaved woods, nature reserve wardens protecting rare biodiversity – benign “agrienvironment” not intensive “agri-business”) (Individual) 	

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Policy SD33: Gypsies and Travellers and Travelling Showpeople

There were a total of 21 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> Environment Agency: Support that provision made for foul water infrastructure.</p> <p><u>Borough, City, Council and District Councils</u></p> <ul style="list-style-type: none"> Note the joint site search exercise between the two authorities and regret no suitable sites identified (Brighton & Hove City Council) A new GTAA has been recently finalised and once published it should be taken into account. If there is a shortfall in meeting needs EHDC expect the SDNPA to have analysed all potential sources of supply before approaching adjoining authorities to meet any unmet need. (East Hampshire District Council) A new GTAA has recently been produced and it is understood that the SDNPA is satisfied that the need for additional pitches can now be met without additional provision. The City Council supports this conclusion. (Winchester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Concerned that Gypsies are able to build on agricultural land that others are not. (Bury PC) Support (Fernhurst PC) Policy does not require the consideration of the protection of the landscape or any of the other interests and objectives of the SDNP. These objectives are required to be considered in any development within the settled community. (Hawkley PC) 	<p><i>I: Concerned that traveller sites not evenly dispersed across [East Hampshire] district/over-concentration in Greatham & Hawkley.</i> R: The Local Plan proposes to allocate 13 Gypsy or Traveller pitches across the National Park, of which 8 are to be located in the East Hants district. 5 of these already exist, therefore 3 new pitches are proposed (two additional at Fern Farm, Greatham and one additional at New Barn Stables, Binsted). The site Half Acre, Hawkley (Allocation policy SD75) has recently received planning permission to make the temporary permission for three existing pitches permanent. The change to the existing situation is therefore considered to be minimal, and to represent the most pragmatic and deliverable approach.</p> <p><i>I: Should be clear whether figures are based on earlier definition of Gypsies and Travellers.</i> R: The Planning Policy for Traveller Sites (2015) (PPTS) (TSF 15) definition has informed the assessment and allocation of pitches. This is confirmed in the Gypsy, Traveller and Travelling Showpeople Background Paper 2018 Update (TSF 14).</p> <p><i>I: The requirement for a local connection is contrary to the PPTS 2015.</i> R: The policy requirement for a local connection has been removed on page 18 the Pre-Submission Schedule of Changes (SDLP 01.1).</p> <p><i>I: The term 'locality' [used in part 3(b)] is vague.</i> R: This criterion has been removed in the submission Schedule of Changes (SDLP 01.1).</p>

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Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Concerned traveller sites not evenly dispersed across district. (Liss PC) Support SDNPA working with other parties to ensure sites do not cause harm to special qualities. (Madehurst Parish Meeting) Should be clear whether figures are based on earlier definition of Gypsies and Travellers. It should be stated that the SDNPA has been working with partner authorities to test all reasonable options for meeting unmet need outside the National Park boundaries. Wording of policy should make it clear that all other policies in the Development Plan apply. The requirement for a local connection is contrary to the PPTS 2015. Needs greater reference to Travelling Showpeople. The term 'locality' is vague. Part d) should apply to whole policy not just infrastructure. Concerned about removal of parts of policy contained in Preferred Options version. (Colemore & Priors Dean PC) Policy seeks to avoid over concentration of sites, yet sites in Greatham and Hawkley. Sites should be screened. Remove 'unacceptable' before 'harm' in 3 f) (Selbourne PC) <p>Other organisations</p> <ul style="list-style-type: none"> Assessment of need was not based on 2015 guidance. Policy is based on inaccurate and out of date evidence. There was only a limited response to the survey work. Request an up to date GTAA is undertaken. (Greatham Voice, Hawkley PC, Heine Planning) To avoid harm, previously developed land should be considered. (South Downs Society) Support inclusion of site allocations in plan but query why not listed in policy SD33 and why point 2 of policy refers to unidentified sites. (Heine Planning) The assessment fails to have regard to the application (and current appeal) for Three Cornered Piece, Nyewood, Harting. As the SDNPA have established they are unable to find sufficient suitable 	<p>I: Assessment of need was not based on the 2015 guidance. Policy is based on inaccurate and out of date evidence / based on a number of different studies with no apparent cross-boundary cooperation, and does not account for recent appeal decisions or in-migration. There was only a limited response to the survey work.</p> <p>R: The Gypsy, Traveller and Travelling Showpeople Background Paper 2018 Update (TSF 14) sets out the evidence base. The evidence is considered to be up-to-date and as accurate as is possible within the limitations of the work undertaken. A National Park-wide GTAA or TSAA was considered unnecessary as this would have duplicated existing recent studies. However, as evidenced in the Background Paper (TSF 14) and Duty to Cooperate Statement (SDLP 11) there has been significant cross-boundary cooperation with regards these studies. The SDNPA maintains a rolling record of planning and appeal decisions relating to sites within the National Park, and due account has been taken of these. An assumption of no net migration has been assumed in some studies, reflecting the complexity of accurately estimating migration, and the likely balancing out of in-migration by out-migration.</p> <p>I: To avoid harm, previously developed land should be considered.</p> <p>R: All potential sites, including previously developed, were considered. This is set out in the Background Paper (TSF 14).</p> <p>I: Question why allocated sites are not listed in policy SD33 and why part 2 of policy refers to unidentified sites.</p> <p>R: It is not necessary to list allocated sites in the policy as the allocations are policies in their own right. Reference to unidentified sites acknowledges that there are identified needs that are not fully met by the total of sites identified as suitable and deliverable (i.e. allocated).</p> <p>I: The assessment fails to have regard to the application (and current appeal) for Three Cornered Piece, Nyewood, Harting.</p>

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Representations	Issue and Response (I/R)
<p>sites this site should be revisited. Various pieces of supporting information supplied. Considered as an Omission Site. (Heine Planning)</p> <ul style="list-style-type: none"> Aspects of Policy are not compliant with national guidance in PPTS: no requirement to demonstrate a local connection; no justification for criteria 3b – Travellers are entitled to choice of accommodation by location, tenure and price; the term ‘in the locality’ is vague; criteria c is considered unnecessary, given the small scale of existing provision, scattered nature of most sites around the periphery of the NP and small need identified. (Heine Planning) Assessment of need does not cover the National Park as a whole. Background paper based on an update of a number of different studies. No apparent cross boundary cooperation between the constituent authorities within the NP. Several studies are out of date. No assessment of recent applications/ appeal decisions in districts such as Chichester and Horsham. Query how the NP can claim that there is no further need in Chichester. There appears no allowance for in migration even though Councils are aware that in the past some families have relocated to this area. (Heine Planning) <p>Individuals</p> <ul style="list-style-type: none"> Potential of all unauthorised sites / those with temporary permission in East Hampshire must be considered as part of the site search. The site search was not comprehensive (Cllr Budden, Liss PC) Support criteria 1. Expect the need is higher than reported, seek more proactive action. The definition of gypsy and traveller goes beyond ethnicity to include van-dwellers of diverse ethnic backgrounds, including new age travellers. Plan should recognise the need to provide sites for all travellers, and to ensure sites are 	<p>R: The comment refers to the recent appeal decision (SDNP/16/06318/FUL), which granted a temporary and personal consent limited to three years and one family. This does not provide an appropriate reason to allocate the site.</p> <p>I: There is no justification for criterion 3(b) [demonstrate there is no alternative available pitch].</p> <p>R: This criterion has been removed on page 18 of the Pre-Submission Schedule of Changes (SDLP 01.1).</p> <p>I: Criteria 3(c) is unnecessary, given the small scale of existing provision, scattered nature of most sites around the periphery of the National Park and small need identified.</p> <p>R: This criterion is considered appropriate and reflects national policy.</p> <p>I: Plan should recognise the need to provide sites for all travellers, and to ensure sites are not restricted to those of a certain ethnic background.</p> <p>R: The Local Plan and evidence base reflect the PPST definitions of Gypsy, Traveller and Travelling Showpersons.</p> <p>I: Site at Warren Barn should be allocated for Travelling Showpeople and the requirement for pitches in Hampshire increased to 15 to include them.</p> <p>R: A planning application for Travelling Showpeople was refused planning permission by the Authority in February 2018 for landscape, biodiversity and foul drainage reasons. The site is not considered suitable for allocation in the Local Plan.</p> <p>I: Allocations fail to meet full need, insufficient sites to provide a 5 year supply. No new sites have been allocated.</p>

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Representations	Issue and Response (I/R)
<p>not restricted to those of a certain ethnic background. (Cllr Carter)</p> <ul style="list-style-type: none"> • Should review whether there is still a current need as there may be a decreasing demand for sites. (Lewes District Council, Cllr Ient) • Site at Warren Barn should be allocated for Travelling Showpeople and the requirement for pitches in Hampshire increased to 15 to include them. The impact of the site could be mitigated by landscaping and improvements to the adjoining land in the ownership of the applicant. Considered as an Omission Site. • Allocations fail to meet full need, insufficient sites to provide a 5 year supply. No new sites have been allocated. • Suggest using largest allocations to accommodate pitches e.g. Midhurst Caravan site. 	<p>R: Paragraph 27 of the Planning Policy for Traveller Sites 2015 (TSF 15) confirms that there is an exception to the lack of a 5 year supply of deliverable sites being a significant material consideration, when applied to National Parks.</p> <p><i>I: Suggest using largest allocations to accommodate pitches e.g. Midhurst Caravan site.</i></p> <p>R: Large allocation sites such as Holmbush Caravan Park are critical to providing bricks-and-mortar housing to address local housing needs. This is especially so given there are not enough suitable sites overall to meet the objectively assessed housing need within the National Park. Therefore it is not considered appropriate to co-locate Gypsy, Traveller or Travelling Showpeople accommodation with housing on such sites.</p>

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Policy SD34: Sustaining the Local Economy

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> Sports England: requested that the value of sport to the local economy be reflected in the Local Plan.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Concerned that the policy has no limits on the scale of business uses that may be permitted or whether they are located inside settlement policy boundaries. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support and welcomes policy (Buriton PC, Fernhurst PC, Rowlands Castle PC, Selborne PC) Concern over noisy light industrial sites (Bury PC) Considers the policy to be unduly restrictive (Liss PC) The Local Plan should relate to all types of employment and not just farming, forestry and tourism (Midhurst TC) There should be a commitment to minimum broadband speeds of >10Mbps rather than just superfast broadband (Stedham with Iping PC) Suggestions that the chapter should be renamed economic development, that the phrase local economy should be defined and questioned the use of brownfield land (Twyford PC) The policy should be amended to allow NDP policies to take precedence (Twyford PC) <p><u>Other organisations</u></p>	<p><i>I: The value of sport to the local economy be reflected in the Local Plan.</i> R: Sport and recreational facilities are covered by Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries.</p> <p><i>I: Concerned that the policy has no limits on the scale of business uses that may be permitted or whether they are located inside settlement policy boundaries.</i> R: Although the Policy SD34 does not set out parameters or locations for economic development, all the policies of the Local Plan need to be considered in combination. Policy SD25: Development Strategy is particularly relevant in terms of supporting development within the boundaries of specific settlements and requiring the development to be of a scale and nature appropriate to the character and function of the settlement in its landscape context.</p> <p><i>I: Concern over noisy light industrial sites.</i> R: This issue is addressed in SD5: Design under criterion (k) as follows: 'have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.'</p> <p><i>I: Considers the policy to be unduly restrictive.</i> R: The Authority does not consider Policy SD34 to be unduly restrictive, but instead seeks to address the challenge of encouraging sustainable development within the limits of the environment whilst ensuring the purposes are not compromised by meeting the socio-economic duty, given that the duty is pursuant to the purposes.</p>

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Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Suggested changes to criterion I(a) to promote the flexible development of permitted and allocated sites (JLL on behalf of Gentian Developments Limited) • Suggested changes to criterion I(f) to refer to wider employment uses outside the traditional B use classes (JLL on behalf of Gentian Developments Limited) • Welcome the focus on green and micro businesses (Lewes District Green Party) • Suggestion that the policy should reference creative businesses such as Glyndebourne (Lewes District Green Party) • Reference should be made to Shoreham Cement Works as a specific location with significant employment opportunities (South Downs Project) • Locally sourced sustainable building materials should be used to build affordable housing (South Downs Land Managers Group) • The permitted scheme at North Street Quarter, Lewes will result in the loss of many small and micro businesses (South Downs Society) • Support for employment allocation at Longmoor (Whitehill & Bordon Regeneration Company on behalf of Defence Infrastructure Organisation) • Suggestion that the policy should be widened to include other businesses particularly the digital technology sector • The focus on the three key sectors is inconsistent with the positive approach taken to employment land in Policy SD35 (Glynde 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.) 	<p>I: The Local Plan should relate to all types of employment and not just farming, forestry and tourism. R: The Local Plan does relate to all types of employment, but it does identify its three key sectors following on from the State of the Park Report. This is in line with paragraph 21 of the NPPF.</p> <p>I: Reference should be made to Shoreham Cement Works as a specific location with significant employment opportunities. R: Shoreham Cement Works is referenced in paragraph 7.145 of the Local Plan as a strategic site with limited additional potential supply of employment land. It is allocated under Policy SD56.</p> <p>I: There should be a commitment to minimum broadband speeds of >10Mbps rather than just superfast broadband. R: There is an acknowledged problem with internet provision in the National Park with too many 'not spots' rather than 'hot spots.' Making a commitment to minimum broadband speeds of >10Mbps although desirable may not be achievable across the National Park.</p> <p>I: Suggestions that the chapter should be renamed economic development that the phrase local economy should be defined and questioned the use of brownfield land. R: The chapter was re-named after the Preferred Options in response to representations and so that it was in accordance with the socio-economic duty of the Authority.</p> <p>I: The policy should be amended to allow NDP policies to take precedence R: Paragraph 184 of the NPPF states that 'Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.'</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>Individuals</p> <ul style="list-style-type: none"> • Suggestion that all planning applications should provide evidence that they will benefit the local economy. • Suggestion that planning applications that do not provide irrefutable evidence that they foster the economic and social well-being of local communities should be refused • There should be a commitment to minimum broadband speeds of >10Mbps rather than just superfast broadband. • Support for employment allocation at Longmoor (EHDC Councillor) • The Local Plan should relate to all types of employment and not just farming, forestry and tourism • Supply chains should be local to avoid inappropriate development in the National Park • Reference should be made to renewable energy schemes that make a positive impact on climate change 	<p>I: Suggested changes to criterion 1(a) to promote the flexible development of permitted and allocated sites (JLL on behalf of Gentian Developments Limited) R: Policy SD34 applies to all planning applications relating to sustainable economic development in the National Park and not just permitted and allocated sites.</p> <p>I: Suggested changes to criterion 1(f) to refer to wider employment uses outside the traditional B use classes R: Criterion f refers to the ‘commercial’ use of an employment site, which is a broader definition than the traditional B use classes.</p> <p>I: Suggestion that the policy should reference creative businesses such as Glyndebourne R: Although it is acknowledged by the Authority that creative businesses are important in the National Park it is not possible to name every type of business in the Local Plan. The Glyndebourne Opera House is located in the parish of Ringmer and is identified in the NDP as a major source of local employment.</p> <p>I: The permitted scheme at North Street Quarter, Lewes will result in the loss of many small and micro businesses. R: Although there will be a loss of some low quality employment floorspace at North Street Quarter, at least 5,000 square metres of B1a office and / or B1c light industrial floorspace will be re-provided, subject to market needs and general viability, according to Policy SD57. Further employment floorspace will be provided nearby at Malling Brooks under Policy SD80.</p> <p>I: Should acknowledge that estates must be allowed to evolve as businesses and generate funds to reinvest in maintaining the National Park.</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
	<p>R: The Authority has developed an approach to whole estate plans set out in Policy SD25.</p> <p><i>I: Suggestion that all planning applications should provide evidence that they will benefit the local economy.</i></p> <p>R: The Authority considers it unduly onerous for all planning applications to provide such evidence.</p> <p><i>I: Support for employment allocation at Longmoor</i></p> <p>R: Longmoor Depot is listed as an employment omission site. A meeting of the interested parties took place in May and work has started on a statement of common ground. The landowner, the Defence Infrastructure Organisation (DIO), intend to bring forward an outline or hybrid planning application for the site by the end of 2018 although a Planning Performance Agreement (PPA) is yet to be signed. The Authority recognises that the site comprises a significant brownfield resource and welcomes the opportunity to work with the DIO to enable development to come forward in a manner that conserves and enhances the National Park.</p> <p><i>I: Supply chains should be local to avoid inappropriate development in the National Park</i></p> <p>R: Criterion (c) of the Policy supports rural supply chains across the National Park and its environs.</p>

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

Summary of Issues and Responses

Policy SD35: Employment Land

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Supports the approach to meet the objectively assessed needs for employment (Brighton & Hove City Council) • Policy SD35 and appendix 3 now provides the necessary details for marketing requirements for change of use applications (Chichester District Council) • A definition of 'fit for purpose' should be added to the supporting text (East Hampshire District Council) • Clarification is required on whether the additional employment land requirements in Policy SD35 are already permitted or allocated as per figure 7.7. The policy should be clearer to avoid ambiguity (Winchester City Council). <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Supports the policy (Fernhurst PC and Selborne PC) • Supports the policy on safeguarding and the requirement for 18 months' marketing (Liss PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Clarification should be added to the policy that employment sites allocated for other uses do not need to meet the marketing requirements set in policy SD25 (Comer Homes). 	<p><i>I: A definition of 'fit for purpose' should be added to the supporting text.</i> R: A definition of fit for purpose is provided in the Glossary.</p> <p><i>I: Clarification is required on whether the additional employment land requirements in Policy SD35 are already permitted or allocated as per figure 7.7.</i> R: Paragraph 7.144 states that there are three tranches of employment land set out in figure 7.7, which will meet the provision figure set out in Policy SD35. No additional land needs to be permitted or allocated to meet employment need in the National Park.</p> <p><i>I: Clarification should be added to the policy that employment sites allocated for other uses do not need to meet the marketing requirements set in policy SD25.</i> R: As there is a plan led system of planning in this country it is not necessary to provide that clarification.</p> <p><i>I: Add Shoreham Cement Works as a specific location that will provide employment.</i> R: Shoreham Cement Works is referenced in paragraph 7.145 of the Local Plan as a strategic site with limited additional potential supply of employment land. It is allocated under Policy SD56.</p>

Policy SD35: Employment Land

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Welcome the safeguarding of existing employment sites such as Cliffe Industrial Estate (Lewes District Green Party) • Add Shoreham Cement Works as a specific location that will provide employment (South Downs Project) • Welcome the commitment to safeguard and allocate employment sites but concerned about the loss of small and micro enterprises at North Street Quarter, Lewes (South Downs Society) • Policy SD35(2) should refer to 'conserving and enhancing' rather than 'potentially adverse impact' (Sussex/Hampshire Wildlife Trust) • Considers that the approach taken by the Employment Land Review (ELR) has resulted in requirements for new employment land being significantly underestimated for the plan period. A demand of 67.18 hectares of new employment land is identified from an analysis of forecast economic growth over a 20-year period (2013 – 2033) based upon extrapolated Experian econometric demand forecast data and ONS Business Register and Employment Survey (BRES) data. Over two thirds of the demand is for B8 warehousing. The demand figure does not take into account latent demand which is expected to arise from a number of emerging sectors in this area (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation) • Evidence prepared in the context of Whitehill and Bordon has identified a number of growth sectors which include a focus on the digital economy, speciality manufacturing and agri-tourism industries and support service as advocated and supported by the M3 Enterprise LEP. As currently worded the Local Plan would significantly restrict the ability of companies to expand and cluster within the SDNP catchment area. This would result in companies seeking locations outside of the area, resulting in a significant adverse impact on economic growth and employment diversification, which is of fundamental importance in achieving a prosperous and sustainable economic future for National Park 	<p><i>I: Policy SD35 (2) should refer to 'conserving and enhancing' rather than 'potentially adverse impact.'</i></p> <p>R: The phrase 'conserve and enhance' relates back to the first purpose of the National Park and is used consistently throughout Local Plan policies. In this instance it was felt that 'potentially adverse impact' was more relevant to change of use applications from B8 to B2.</p> <p><i>I: Considers that the approach taken by the Employment Land Review (ELR) has resulted in requirements for new employment land being significantly underestimated for the plan period. A demand of 67.18 hectares of new employment land is identified from an analysis of forecast economic growth over a 20-year period (2013 – 2033) based upon extrapolated Experian econometric demand forecast data and ONS Business Register and Employment Survey (BRES) data. Over two thirds of the demand is for B8 warehousing. The demand figure does not take into account latent demand which is expected to arise from a number of emerging sectors in this area.</i></p> <p>R: The Authority consider the employment land requirements calculated in the Employment Land Review (ELR, TSF29) and then then updated in the Housing and Economic Development Needs Assessment (HEDNA, TSF08) are robust. The representor, GVA, have taken the wider projections and done pro rata extrapolations based on land area rather than population; the South Downs ELR used population. The GVA approach is flawed as it essentially assumes a field the same size as a city would demand the same amount of employment land.</p> <p><i>I: Evidence prepared in the context of Whitehill and Bordon has identified a number of growth sectors which include a focus on the digital economy, speciality manufacturing and agri-tourism industries and support service as advocated and supported by the M3 Enterprise LEP. As currently worded the Local Plan would significantly restrict the ability of companies to expand and cluster</i></p>

Policy SD35: Employment Land

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>residents (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation).</p> <ul style="list-style-type: none"> The employment land requirements set out in policy SD35 should be increased in line with the new evidence on objectively assessed need as follows: B1a/b: 8.2ha, B1c/B2: 8.2 ha and B8: 48.2 ha (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation). Longmoor Depot should be allocated as an employment site (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation). 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.) <p>Individuals</p> <ul style="list-style-type: none"> Support for employment allocation at Longmoor (East Hampshire District Council, councillor) Employment development should be linked to sustainable forms of transport (Lewes District Council, councillor) The Local Plan should take account of Newhaven Enterprise Zone (Lewes District Council, councillor) The allocation of Stedham Sawmills does not comply with policy SD35. Employment sites should not be included within settlement boundaries as this puts them at risk from redevelopment for housing. 	<p>within the SDNP catchment area. This would result in companies seeking locations outside of the area, resulting in a significant adverse impact on economic growth and employment diversification, which is of fundamental importance in achieving a prosperous and sustainable economic future for National Park residents (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation).</p> <p>R: The ELR did take account of the growth sectors albeit different ones suggested by GVA. It is relevant to refer back to the duty of national park authorities, which is to 'see to foster the economic and social well-being of the <u>local</u> communities within the National Park.' The level of growth suggested by GVA for these growth sectors is much greater than that need to meet the needs of the local community.</p> <p>I: The employment land requirements set out in policy SD35 should be increased in line with the new evidence on objectively assessed need as follows: B1a/b: 8.2ha, B1c/B2: 8.2 ha and B8: 48.2 ha.</p> <p>R: The Authority considers the calculation of employment need in the ELR and the HEDNA to be robust and therefore considers the provision figures set out in Policy SD35 to be sound.</p> <p>I: Longmoor Depot should be allocated as an employment site (Whitehill & Bordon Regeneration Company on behalf Defence Infrastructure Organisation).</p> <p>R: Longmoor Depot is listed as an employment omission site. A meeting of the interested parties took place in May and work has started on a statement of common ground. The landowner, the Defence Infrastructure Organisation (DIO), intend to bring forward an outline or hybrid planning application for the site by the end of 2018 although a Planning Performance Agreement (PPA) is yet to be signed. The Authority recognises that the site comprises a significant brownfield resource and welcomes the</p>

Policy SD35: Employment Land

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Parish councils and local communities should be made aware of marketing exercises. Policy SD35 (2) should refer to ‘conserving and enhancing’ rather than ‘potentially adverse impact’. Objection to the ‘additional potential supply’ of employment land as it is pro-growth. 	<p>opportunity to work with the DIO to enable development to come forward in a manner that conserves and enhances the National Park.</p> <p>I: Needs to reflect role and importance of landed estates. R: Policy SD25 and its supporting text sets out the Authority’s approach to whole estate plans.</p> <p>I: Support for employment allocation at Longmoor (East Hampshire District Council, councillor) R: The Authority recognises that the site comprises a significant brownfield resource and welcomes the opportunity to work with the DIO to enable development to come forward in a manner that conserves and enhances the National Park.</p> <p>I: Employment development should be linked to sustainable forms of transport R: Policy SD19: Transport and Accessibility addresses this issue. Policy SD19 encourages development towards the most sustainable locations in transport terms. Policy SD325 is consistent with SD19.</p> <p>I: The Local Plan should take account of Newhaven Enterprise Zone R: The Newhaven Enterprise Zone is located outside the National Park and its development has the potential to be a strategic cross-boundary issue. The Authority will work with Lewes District Council and other relevant bodies on matters arising from its development.</p> <p>I: The allocation of Stedham Sawmills does not comply with policy SD35. R: The allocation of Stedham Sawmills arose from work done on both the ELR (TSF29) and its Update and the Strategic Housing Land Availability Assessment (SHLAA, TSF10). The ELR Update update found that it was a very poor quality and under occupied site and recommended the</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
	<p>consideration of alternative uses. The SHLAA found it suitable for housing development. It was allocated for mixed use following informal consultation with the parish council, and to ensure that local employment opportunities remained. The loss of some poor quality employment floorspace balanced up with the gain of some new high quality floorspace with new homes as part of a mixed use scheme is, in the opinion of the Authority, the best use of the site and does comply with Policy SD35.</p> <p><i>I: Employment sites should not be included within settlement boundaries as this puts them at risk from redevelopment for housing.</i> R: If employment sites were to be located outside settlement boundaries it would make it more difficult for small scale applications for business activities to comply with Policy SD25: Development Strategy. All existing business premises are at risk of change of use applications to housing whether they are located inside or outside the policy boundaries.</p> <p><i>I: Parish councils and local communities should be made aware of marketing exercises.</i> R: The details of marketing requirements are set out in Appendix 3 of the Local Plan.</p> <p><i>I: Objection to the ‘additional potential supply’ of employment land as it is pro-growth.</i> R: The identification of additional potential supply was in line with advice set out in the ELR and is consistent with strategic allocations in this Local Plan and the Fernhurst NDP.</p>

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

Summary of Issues and Responses

7g: Introduction to Town Centre and Retail

There was one response to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u></p> <ul style="list-style-type: none">• No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none">• No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none">• No comments received <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none">• The links between the National Park's towns and the rural hinterland should be explained further.	<p><i>I: The links between the National Park's towns and the rural hinterland should be explained further.</i></p> <p>R: Additional explanatory text added to paragraph 7.157 on page 20 of the Pre-Submission Schedule of Changes.</p>

7g: Introduction to Town Centre and Retail

Summary of Issues and Responses

SD36: Town and Village Centre

There were 12 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Support</p> <p><u>Boroughs, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy refers to loss of Use Class A but not to reduction of retail floorspace in existing units. This reduction can affect the viability of shops and should be resisted where possible. (Chichester District Council) Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support (East Dean & Friston PC, Fernhurst PC, Petersfield TC, Liss PC) Part 2 re historic nature of centres should apply to larger village centres (Liss PC) Welcomes the support for town centres (Petersfield Town Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support (South Downs Society) No developments can be considered for Midhurst without reference to the traffic problem between Rumbolds Hill and North Mill Bridge. Without resolving this, it is difficult to see how a new 	<p><i>I: Policy refers to loss of Use Class A but not to reduction of retail floorspace in existing units. This reduction can affect the viability of shops and should be resisted where possible.</i> R: It is considered that the policy as worded achieves a proportionate and pragmatic approach to the loss of retail.</p> <p><i>I: Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council)</i> R: As a type of community facility it is appropriate for the loss of pubs to be addressed in SD43. The marketing period for pubs in SD43 has been changed on page 21 of the Pre-Submission Schedule of Changes to make it consistent with the SD37.</p> <p><i>I: Criterion 2 of the policy regarding the historic nature of centres should apply to larger village centres (Liss PC)</i> R: Criterion 2 of the Policy has been deleted on page 21 of the Pre-Submission Schedule of Changes as it duplicates criterion 5 of SD37.</p> <p><i>I: No developments can be considered for Midhurst without reference to the traffic problem between Rumbolds Hill and North Mill Bridge. Without resolving this, it is difficult to see how a new convenience goods store can be contemplated. The Plan should not be constrained by decisions from previous planning regimes e.g. identifying the area adjacent to The Grange Centre as suitable for a</i></p>

SD36: Town and Village Centre

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>convenience goods store can be contemplated. The Plan should not be constrained by decisions from previous planning regimes e.g. identifying the area adjacent to The Grange Centre as suitable for a medium-sized supermarket. The only access is from Bepton Road which has traffic issues. In view of its proximity to the town's facilities this site might be suited to retirement units (The Midhurst Society)</p> <ul style="list-style-type: none"> • Support in full (Glynde Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • There are three supermarkets in the town and not two 	<p><i>medium-sized supermarket. The only access is from Bepton Road which has traffic issues. In view of its proximity to the town's facilities this site might be suited to retirement units (The Midhurst Society)</i></p> <p>R: Para 7.164 highlights the issues to be considered with respect to retail development in Midhurst. The Schedule of Changes includes an addition to refer to the impact of traffic, particularly on Rumbolds Hill. Transport issues are also dealt with in Policy SD19: Transport and Accessibility. Criterion 2 sets out the need for a transport assessment for significant increase in numbers of journeys.</p> <p><i>I: There are three supermarkets in the town and not two</i></p> <p>R: Midhurst has one large Supermarket (Kavanagh's Budgens) and a small supermarket (Tesco Express).</p>

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

Summary of Issues and Responses

SD37: Development in Town and Village Centres

There were 12 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Support</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support (Fernhurst PC, Liss PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support (South Downs Society) The policy should reference the need for adequate infrastructure to support developments. (The Midhurst Society) Support in full (Glynde Estate and Weston Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Banks, cash machines, Post Offices, Libraries, recycling centres are at risk in rural market towns. For the viability of market towns, there needs to be a full range of services, their lack also hinders smaller retailers. (Cllr Porter) Concern no protection of independent shops and the loss of shops from Lewes High Street. (Cllr Carter) 	<p><i>I: Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council)</i> R: As a type of community facility it is appropriate for the loss of pubs to be addressed in SD43. The marketing period for pubs in SD43 has been changed on page 21 of the Pre-Submission Schedule of Changes to make it consistent with the SD37.</p> <p><i>I: The policy should reference the need for adequate infrastructure to support developments.</i> R: The Policy should be read alongside SD19: Transport and Accessibility in order to cover infrastructure issues.</p> <p><i>I: Banks, cash machines, Post Offices, Libraries, recycling centres are at risk in rural market towns. For the viability of market towns, there needs to be a full range of services, their lack also hinders smaller retailers. (Cllr Porter)</i> R: The loss of banks and other town centre uses from our town centres is widely recognised as a problem, but it is beyond the remit of the Local Plan to prevent.</p> <p><i>I: Concern no protection of independent shops and the loss of shops from Lewes High Street</i></p>

SD37: Development in Town and Village Centres

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Query why the primary shopping frontage in Lewes not been changed. The designation of large parts as secondary retail is leading to many charity shops and conversion into residential or offices. Should be primary retail on both sides. (Cllr Carter) • Policy should stress the principle of conserving and enhancing, rather than doing no harm. 	<p>R: Protection of shops on the High Street is covered within the Lewes Neighbourhood Development Plan (Policy HC1, protection of Existing & New Community Infrastructure)</p> <p><i>I: Query why the primary shopping frontage in Lewes not been changed. The designation of large parts as secondary retail is leading to many charity shops and conversion into residential or offices. Should be primary retail on both sides. (Cllr Carter)</i></p> <p>R: SD37 is robust in its criterion (2) to ensure that there is no loss of Use Class A on the High Street. This should be read alongside policy SD52: Shop Fronts to ensure that the character and appearance of the frontages are maintained, and also, SD15: Conservation Areas where “Development proposals within a conservation area, or within its setting, will only be permitted where they preserve or enhance the special architectural or historic interest, character or appearance of the conservation area.”</p> <p><i>I: Policy should stress the principle of conserving and enhancing, rather than doing no harm.</i></p> <p>R: Within Policy SD37 “harm” is referred to in the context “of the retail function of the centre.” The principle of conserving and enhancing relates more to the first purpose of the National Park and so is used in the policies relating to landscape, biodiversity and the historic environment.</p>

SD37: Development in Town and Village Centres

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

Summary of Issues and Responses

SD38: Shops outside Centres

There were 9 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support / support with minor textual changes (Selbourne PC, Fernhurst PC) Traffic generated by shops outside centres needs to be addressed in Local Plan (Liss PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support the approach to farm shops (CLA) Approach to farm shops is not enforceable, inflexible, suggest a voluntary system showing origin of food. (South Downs Society) Support in full (Glynde Estate and Wiston Estate) <p><u>Individuals</u></p> <ul style="list-style-type: none"> The percentages set out in the policy are not enforceable and another method of ensuring local produce is sold should be devised (Lewes DC Councillor) 	<p><i>I: Policy protects the loss of all “A” uses. Policy SD43 includes the loss of pubs (A4 use class) and is duplication (East Hampshire District Council)</i> R: As a type of community facility it is appropriate for the loss of pubs to be addressed in SD43. The marketing period for pubs in SD43 has been changed in the Schedule of Changes to make it consistent with the SD37.</p> <p><i>I: Traffic generated by shops outside centres needs to be addressed in Local Plan</i> R: Policy SD38 should be read alongside Policy SD19: Transport and Accessibility, which promotes the use of sustainable modes of transport. Paragraph 6.12 seeks to clarify negative impacts from traffic. Policy SD42: Infrastructure deals with projects which relate to strategic roads.</p> <p><i>I: Approach to farm shops is not enforceable, inflexible, suggest a voluntary system showing origin of food</i> R: The South Downs National Park Authority already supports an initiative created by National Partnerships CIC, which is now government funded and guides residents and visitors to local produce “South Downs Food & Drink” http://www.southdownsfood.org/#home</p> <p><i>I: The percentages set out in the policy are not enforceable and another method of ensuring local produce is sold should be devised</i> R: Percentages set out in the policy would be viewed on a case by case basis at application stage. Local produce is covered in the response above.</p>

SD38: Shops outside Centres

Summary of Issues and Responses

7g: Introduction to Agriculture and Forestry

There was one response to this policy. A summary of the main issues raised is set out below.

Representations	Issue and SDNPA Response (I/R)
<p><u>National Agencies</u></p> <ul style="list-style-type: none"> No comments received <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Other organisations and individuals</u></p> <ul style="list-style-type: none"> This section is more sympathetic to the National Park than other sections of the Local Plan. 	<p>No response required</p>

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

Summary of Issues and Responses

Policy SD39: Agriculture and Forestry

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> Natural England: Should refer to the impact of damage to woodland habitats, in particular to ancient woodland, which is irreplaceable and requires particular consideration.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> No comments received <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The policy is particularly important and welcome in rural villages (Buriton PC) Track surfacing: Public bridleways should not be smoothed and made unsuitable for horses. Hardcore used should be in accordance with importance of forest floors. (Bury PC) Criterion 1(f): 3 years is too short, would be open to abuse. (Fernhurst PC) Should be a policy to encourage the use of traditional timber gates and fences where possible, and discourage their damaging replacement with steel gates. (Elsted and Treyford PC) Should refer to smallholders/small livestock flock owners and how their buildings would be assessed. Such landowners have responsibility for land in key locations. (Rowlands Castle PC; Stedham with Iping PC) Support, but should state how outside storage will be controlled. (Selborne PC) 	<p><i>I: Should refer to the impact of damage to woodland habitats, in particular to ancient woodland, which is irreplaceable and requires particular consideration.</i> R: All the policies in the Local Plan should be read together. Policy SD9: Biodiversity and Geodiversity includes specific requirements and guidance related to ancient woodland (criteria 2(d) and paragraph 5.80 of the Pre-Submission Local Plan).</p> <p><i>I: Public bridleways should not be smoothed and made unsuitable for horses. Hardcore used should be in accordance with importance of forest floors.</i> R: Criterion 2(c) requires the design of new tracks to conserve and enhance local landscape character.</p> <p><i>I: Criterion 1(f): 3 years is too short, would be open to abuse.</i> R: The Authority believes, based on previous applications and discussions with farmers that this policy requirement is reasonable.</p> <p><i>I: Requirement to demonstrate that suitable buildings have not been lost in last three years is too prescriptive and inconsistent with PD rights. Delete.</i> R: The Authority believes, based on previous applications and discussions with farmers that this policy requirement is reasonable.</p>

Policy SD39: Agriculture and Forestry

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Other organisations</u></p> <ul style="list-style-type: none"> Supporting text should give a more balanced account of the impact of agriculture on the National Park. Plan should acknowledge the negative landscape/public access impact of excessively intensive farming, and provide guidance on the avoidance and mitigation of its adverse effects. (Eastbourne Downland Group) Generally support policy (Various estates, CLA) Wording should recognise that sometimes new buildings are required to replace buildings that are no longer fit for purpose, or to accommodate new farming practices. (Various estates) Should include an emphasis on the importance of protecting agricultural land , as per NPPF para 112 (CPRE Sussex) Need to demonstrate non-NP sites have been assessed first is too prescriptive and inconsistent with PD rights (Various estates) Question if it complies with national policy for the NP to export activities deemed unseemly, to other areas. (South Downs Land Management Group) Requirement to demonstrate that suitable buildings have not been lost in last three years is too prescriptive and inconsistent with PD rights. Delete. (Various estates) Proposal to open new tracks as paths for permissive usage where appropriate seems unfair to the applicant / Unrealistic and overly burdensome; issues with public safety, security and biosecurity, may cause loss of crops/livestock, additional insurance and public liability premiums. Delete. (CLA, NFU South East, South Downs Land Managers Group) 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 	<p><i>I: Should be a policy to encourage the use of traditional timber gates and fences where possible, and discourage their damaging replacement with steel gates.</i> R: This is a very detailed matter which is addressed by criterion 1(c), which requires buildings to be in keeping with local character.</p> <p><i>I: Should refer to smallholders/small livestock flock owners and how their buildings would be assessed. Such landowners have responsibility for land in key locations.</i> R: The buildings on smallholdings are agricultural in nature and thus covered by Policy SD39.</p> <p><i>I: Support, but should state how outside storage will be controlled.</i> R: Policy SD40 (1) (c) requires outdoor storage to be a minor ancillary element of other uses.</p> <p><i>I: Supporting text should give a more balanced account of the impact of agriculture on the National Park., acknowledge the negative landscape/public access impact of excessively intensive farming and provide guidance on the avoidance and mitigation of its adverse effects.</i> R: These are matters better addressed in the Partnership Management Plan.</p> <p><i>I: Wording should recognise that sometimes new buildings are required to replace buildings that are no longer fit for purpose, or to accommodate new farming practices.</i> R: This is addressed in the first criterion of the policy.</p> <p><i>I: Should include an emphasis on the importance of protecting agricultural land, as per NPPF para 112</i></p>

Policy SD39: Agriculture and Forestry

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>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.)</p> <p><i>The following comments relate to the requirement to remove existing buildings that have a negative landscape impact:</i></p> <ul style="list-style-type: none"> • This requirement seems to imply that this applies even to operational buildings, which is onerous and would not provide flexibility in supporting the rural economy. Decision on whether a building is creating a negative landscape impact is highly subjective (Various estates) • Existing buildings that are necessary for business operations should not become a negotiation tool; remove this section (CLA) • Gives the impression that every building within a planning unit would require a LVIA. This and the cost of demolition would impose a disproportionate cost on the applicant- not compliant with NPPF paras 21, 173 and 154. Remove criterion or limit the unit of consideration in LVIA to the application site boundary. (NFU South East) • Would have significant impact on farm viability. Remove or amend so it applies only to buildings within the site which have been redundant for 10 or more years and would require substantial reconstruction to improve their appearance or their impact cannot be reduced by some other means. South Downs Land Managers Group) <p>Individuals</p> <ul style="list-style-type: none"> • Does not address buildings for hobby farmers and smallholdings • Should highlight the importance of agricultural land for food production, and that that could be a possible reason for refusing or 	<p>R: Criterion (g) Policy SD2: Ecosystem Services has been amended in the Post-Submission Schedule of Changes to ‘conserve and enhance soils, <u>use soils sustainably</u>, and protect the best and most versatile agricultural land.’</p> <p><i>I: The requirement to demonstrate that sites outside the National Park have been assessed first is too prescriptive and inconsistent with PD rights</i></p> <p>R: It is agreed by the Authority that this requirement is unduly onerous and it has been deleted in the Schedule of Changes.</p> <p><i>I: Proposal to open new tracks as paths for permissive usage where appropriate seems unfair to the applicant / Unrealistic and overly burdensome; issues with public safety, security and biosecurity, may cause loss of crops/livestock, additional insurance and public liability premiums. Delete.</i></p> <p>R: The permissive public usage of new farm tracks is in line with the second purpose of national parks to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. The policy does include the word ‘appropriate’ so that if there were local issues of public safety or biosecurity then an exception may be made to the policy.</p> <p><i>I: Remove the words ‘where appropriate; should state ‘dedicated access in perpetuity’.</i></p> <p>R: The phrase has been retained so that if there were local issues of public safety or biosecurity then an exception may be made to the policy.</p> <p><i>I: 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</i></p>

Policy SD39: Agriculture and Forestry

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>limiting development; no measures to ameliorate the visual impact of large barns. Should include positive encouragement for materials and roof treatments which minimise visual landscape impact; should give particular consideration to the impact of large barns on rural roads, discouraging access through villages; impact of major changes to agricultural on open downland (e.g. Steyning pig-farm). Policy should positively discourage the building of farm structures on the Downs, and where structure exist, strongly encourage the landscaping of their roofs to lessen the visual impact. (Lewes DC, Cllr V lent)</p> <ul style="list-style-type: none"> • 'Where feasible' in criterion 1(b) should have commas before and after. • Criterion 2(c) Should require 'enhancement' rather than 'minimising impacts' • Remove the words 'where appropriate; should state 'dedicated access in perpetuity'. • Para 7.189- Remove the words 'within the context of the NP purposes and duty', and replace 'agricultural' with 'agriculture'. • Para 1.90-1.191- Should stress local native species planting. 	<p>R: The Authority believes that its agriculture and forestry policies strike the right balance between encouraging this crucial part of the National Park's economy whilst meeting both purposes of the National Park.</p> <p><i>I: Objections to the requirement to remove existing buildings that have a negative landscape impact:</i></p> <p>R: The Authority has sought to provide clarity in the revision to the policy set out in the Schedule of Changes. The requirement only applies to buildings within the application site and they only need to be removed 'as appropriate.'</p> <p><i>I: Should highlight the importance of agricultural land for food production, and that that could be a possible reason for refusing or limiting development.</i></p> <p>R: Policy SD40: Farm and Forestry Diversification requires the diversification activities to be subsidiary to the farming operation. Agricultural food production is a matter more properly addressed in the Partnership Management Plan.</p> <p><i>I: No measures to ameliorate the visual impact of large barns.</i></p> <p>R: Criterion (c) requires all new buildings to be in keeping with local character.</p> <p><i>I: Criterion 2(c) Should require 'enhancement' rather than 'minimising impacts.'</i></p> <p>R: The change has been made in the Schedule of Changes.</p> <p><i>I: Para 1.90-1.191- Should stress local native species planting.</i></p> <p>R: This matter is addressed in Policy SD4: Landscape Character, which requires the planting of native species unless there are appropriate and justified reasons to select non-native species.</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)

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

Summary of Issues and Responses

Policy SD40: Farm and Forestry Diversification

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Winchester City Council request a reference to the need for appropriate design, materials, character, form or style, or else to stress the need to meet the requirements of all other policies. <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> The policy is particularly important and welcome in rural villages (Buriton PC) Support (Selborne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support the policy (Eastbourne Downland Group) Policy broadly acceptable but could be worded more flexibly; this would make the policy more consistent with Class R PD rights (Various estates) Should make specific allowance for 'estate diversification' (BHCC Downland Estate) Support requirement for a financial viability test to ensure proposals are intended to form part of and contribute to a functional farm unit. (CPRE Sussex, South Downs Society) 	<p><i>I: Winchester City Council request a reference to the need for appropriate design, materials, character, form or style, or else to stress the need to meet the requirements of all other policies.</i> R: It is written in the first paragraph of the Local Plan and highlighted in yellow that the plan should be read as a whole and all the policies should be viewed together. Policies SD4 and SD5 deal with landscape character and design respectively.</p> <p><i>I: Policy broadly acceptable but could be worded more flexibly; this would make the policy more consistent with Class R PD rights.</i> R: The Authority considers that this policy provides the correct balance between supporting the long term viability of the National Park's farm and forestry enterprises whilst conserving and enhancing its landscape, biodiversity and cultural heritage.</p> <p><i>I: Should make specific allowance for 'estate diversification.'</i> R: Estate diversification can be addressed in a Whole Estate Plan, which is allowed under Policy SD25: Development Strategy.</p> <p><i>I: Unreasonably restrictive to expect diversification activities to remain subsidiary to the farm/forestry operation.</i> R: The Authority recognises that it is unreasonable to expect diversification activities to be subsidiary in terms of income streams and this has been deleted from criterion 1 (a) of the Policy in Appendix 2 of the Pre-Submission Schedule of Changes. However, it is reasonable to expect that</p>

Policy SD40: Farm and Forestry Diversification

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Unreasonably restrictive to expect diversification activities to remain subsidiary to the farm/forestry operation, and to avoid severance or disruption to the holding. (CLA) Remove requirement for subsidiarity. Ownership is not a material planning consideration and a change would not be considered development. There is little planning justification for this control over ownership structures, which would impose a burden in direct antipathy to the ambitions of NPPF paras 21 and 28, contrary to the National Park Duty, and would be unenforceable. (NFU South East, South Downs Land Managers Group) Replace criterion (a) (ii) with “Diversification activities are not detrimental to the farming or forestry operation, in terms of physical scale” (South Downs Land Managers Group) Remove requirement not to sever or disrupt the farm holding; severing the farm holding may be advantageous to businesses for various reasons and the policy does not meet their development needs. (South Downs Land Managers Group) 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.) <p>Individuals</p> <ul style="list-style-type: none"> Conversion for commercial use will add to traffic and pollution on country lanes. Transport sustainability should be tested for such 	<p>they are subsidiary in terms of physical scale and environmental impact so that the inherent agricultural nature of the holding is retained.</p> <p>I: Remove requirement for subsidiarity. Ownership is not a material planning consideration and a change would not be considered development. There is little planning justification for this control over ownership structures, which would impose a burden in direct antipathy to the ambitions of NPPF paras 21 and 28, contrary to the National Park Duty, and would be unenforceable.</p> <p>R: The reference to ownership in paragraph 7.200 of the supporting text has been deleted in response to the representation as set out in Appendix 2 of the Pre-Submission Schedule of Changes.</p> <p>I: Remove requirement not to sever or disrupt the farm holding; severing the farm holding may be advantageous to businesses for various reasons and the policy does not meet their development needs.</p> <p>R: The Authority values the link between an agricultural/forestry building and its land holding. Severance of this link can harm the long term viability of the agricultural/forestry operation.</p> <p>I: Conversion for commercial use will add to traffic and pollution on country lanes. Transport sustainability should be tested for such planning applications. Diversification should not involve renting or selling off farm buildings for commercial use.</p> <p>R: The impact of the proposed diversification scheme is a matter that will be tested at the planning application stage.</p> <p>I: Should not prohibit diversification schemes which contribute to the second purpose of the National Park.</p> <p>R: There is no intention by the Authority to prohibit diversification schemes which contribute to the second purpose of the National Park.</p>

Policy SD40: Farm and Forestry Diversification

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>planning applications. Diversification should not involve renting or selling off farm buildings for commercial use. (Lewes District Council, Cllr V lent)</p> <ul style="list-style-type: none"> • Should not prohibit diversification schemes which contribute to the second purpose of the National Park. • Add new paragraph stating that ‘Development proposals which are not supported by irrefutable evidence proving that they would be subsidiary to the farming or forestry operation in terms of both physical scale and income stream will be refused.’ • Remove requirement for diversification to be subsidiary in terms of income stream; the income stream from diversification will often be bigger than from farming. • Remove requirement for subsidiarity. Should not prohibit diversified activities from contributing more than 50% of farm business income. • Criterion I(a)(iii) is unnecessary, as such severance would not be interest of the farm business. 	<p><i>I: Add new paragraph stating that ‘Development proposals which are not supported by irrefutable evidence proving that they would be subsidiary to the farming or forestry operation in terms of both physical scale and income stream will be refused.’</i></p> <p>R: Although the Authority thinks that subsidiarity is an important issue, the proposed paragraph is unduly onerous and would be difficult to implement.</p>

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

Summary of Issues and Responses

Policy SD42: Infrastructure

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>Portsmouth Water: Should mention regional infrastructure and the benefits of green infrastructure as part of regional ecological works outside the NP perimeter. Promote potential reservoir at Havant Thicket.</p> <p>Thames Water: General support. Propose adding the following text: <i>“Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water and/or waste water infrastructure. Drainage on the site must maintain separation of foul and surface flows. Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.”</i></p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Support (Winchester City Council) • Welcome the clarity provided by the Position Statement on the A27 corridor. Would welcome collaborative approach between SDNPA and Highways England on proposals for M3 Junction 9. Would welcome reference to this scheme in the supporting text. (Hampshire County Council) 	<p><i>I: The Plan should identify in detail where infrastructure is constrained and require infrastructure to be upgraded prior to allowing further development</i> R: The SDNPA worked with infrastructure providers to understand the strategic need for infrastructure resulting from the strategy and policies within the Submission Local Plan. More local requirements are set out in individual site allocation policies or will be dealt with as planning applications come forward. Infrastructure providers are best placed to understand the potential impacts on their networks. The Infrastructure Delivery Plan is available in the Core Document Library referenced as TSF 38.</p> <p><i>I: The Plan should support improvements to the road network even when there is environmental harm</i> R; The SDNPA will consider road improvements on balance and in accordance with the principles of sustainable development set out in the NPPF as well as the statutory purposes and duty but cannot disregard environmental harm.</p> <p><i>I: Proposed changes to policy wording</i> R: No changes are proposed. The wording is consistent with national policy and guidance, and reflects the most up-to-date terminology in environmental assessments.</p>

Policy SD42: Infrastructure

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support (Selborne PC) • Support, in particular the emphasis on infrastructure delivery being integrated with development phasing. (Liss PC) • Major road building which reduces the flow of traffic into and through the National Park should be supported, even where there is an environmental cost to it (Amberley PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • General support (Angmering Estate) • Policy should include potential Arundel bypass (Angmering Estate) • Support minimisation of infrastructure impact and specific reference to strategic road proposal approach. (Campaign for National Parks) • Should insert a criterion summarising the Position Statement on the A27 and refer to it, bringing it into the frame of a development plan policy. (Folkington Estate) • Criterion 1 welcomed (Lewes District Green Party) • Support. Reassured by reference here to the approach to strategic road schemes. (south Downs Society) • Criterion 1(b): amend to 'The design minimises the impact on <u>conserves and enhances</u> the natural beauty...' for consistency with the landscape-led approach of the rest of the local plan. (Wildlife Trusts) • Local Plan should identify settlements where infrastructure is over-stretched, and reject all further planning applications there until the infrastructure problems are resolved. • Too early to say whether CIL will be effective in covering the infrastructure funding deficit. Alternative sources of funding needed, including commercial sponsorship, and increased/ new Council charges to residents and visitors. • Plan should state current usage and capacity of the existing sewage treatment, telecoms, social and parking infrastructure. Developers 	

Policy SD42: Infrastructure

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>should be required to demonstrate the adequacy of existing infrastructure or provide for additional infrastructure.</p> <p>Individuals</p> <ul style="list-style-type: none"> • Criterion I(a): Not necessary or justified- goes beyond NPPF- does it require an EIA type exercise? • Criterion I(a): Not effective: 'least environmental harm' not clearly defined. If it is related to the NP Special Qualities, it should state impacts on the special qualities, rather than least environmental harm. Alternative wording proposed. • Paragraph 7.219: Add the text '<i>presumption against major infrastructure in the National Park except in exceptional circumstances</i>'. • Fully support proposal to protect the environment regarding major infrastructure development. Major road building schemes would cause damage to the National Park disproportionate to the economic benefits. (Lewes District Council, Cllr Victor Ient) • Criterion I, paragraph 7.222: The phrases 'Least environmental harm' and 'minimises impact' should be replaced by something more affirmative on conservation and enhancement. 	

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

Summary of Issues and Responses

Policy SD43: New and Existing Community Facilities

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Criterion 2: amend to include requirement for any alternative community facilities to be of an equivalent or better quality. (East Hampshire District Council) • Supporting text should define ‘local need’ - including reference to meeting the social, recreational and cultural needs of the community, or providing for older and younger people, and set out how such a need can be demonstrated. (West Sussex County Council) • Supporting text should state that proposals affecting waste management facilities will be considered against the relevant Waste Local Plan. (West Sussex County Council) • Should stress need to meet all policy requirements, or refer to the need for appropriate design. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Policy particularly important and welcome in rural villages (Buriton PC) • Support, in particular where it relates to new recreational facilities. (Iford PC) • Criteria for provision new community facilities should be more general for development within settlement boundaries (Liss PC) 	<p><i>I: Policy should clearly reference other policies or documents in the Development Plan</i> R: The first paragraph of the Submission Local Plan states that the Plan should be read as a whole.</p> <p><i>I: Facilities should be allowed outside settlement boundaries if there are no other sites available or in locations where a settlement does not have a defined boundary</i> R: The Policy and Supporting Text only look unfavourably on new facilities outside of settlement boundaries where existing, sustainably located facilities would be replaced. Other proposals would be considered on their merits.</p> <p><i>I: Marketing facilities</i> R: Marketing periods have been extended to 24 month to be consistent with Policy SD37 (6). This change is set out on p21 of the Schedule of Changes to the Pre-Submission Local Plan.</p>

Policy SD43: New and Existing Community Facilities

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Criterion 2: Remove text ‘...or have an unacceptable adverse impact upon...’. (Selborne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Unclear how the policy relates to settlement boundaries. (CPRE Sussex, South Downs Society) ‘Where the settlement which the community facility serves has a boundary, then the facility should be located within or adjacent to that boundary.’ • Community facilities outside settlement boundaries should be permitted in appropriate cases where they serve the adjacent settlement and there are no suitable sites within that settlement. (South Downs Society) • Criterion 1: Support, although object to a potential conflict with SD23 with regard to public houses, where expansion may cater primarily to tourists rather than meeting a local need. Add the words ‘or complies with another relevant policy in the Plan’ onto criterion 1(a). (Hall & Woodhouse Ltd) • Criterion 2/Appendix 3: Unsound; remove the requirement in Part 2 of Appendix 3 for a demonstration of financial non-viability, which is not stated in Criterion 2. A robust marketing campaign that is unsuccessful would be enough to demonstrate non-viability. (Hall & Woodhouse Ltd) • Appendix 3: Para. 2.4 criterion (c): add ‘if appropriate’ at the beginning; on-site marketing boards can divert away trade and business from a facility. (Hall & Woodhouse Ltd) • Support, as a landowner (Hampshire County Council) • (also SD57) Should recognise existing community facilities on the North Street Estate and try to rehouse them in the new development. (Lewes District Green Party) • (also SD79) Should make provision for new community facilities at Old Malling Farm to address local deficit. (Lewes District Green Party) 	

Policy SD43: New and Existing Community Facilities

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Include active support for community renewable energy generation in this policy. (South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support; multi-use facilities could benefit rural communities, though would need careful management (Hampshire County Council, Cllr Jackie Porter) • Vague and not focussed enough on new facilities. No mechanism for requiring development to provide new community facilities. SDNPA should produce a template for NDPs on the provision of new community facilities. • No clear guidance on new community facilities outside settlement boundaries. These should be permitted in appropriate cases where they serve the adjacent settlement and there are no suitable sites within that settlement. (Lewes District Council, Cllr Victor Ient) • Should use the phrase ‘conserve and enhance’ rather than ‘would not have an adverse impact’, to remedy historic damage done. In particular relates to criterion 2(b). • Support references to Assets of Community Value and Article 4 directions. 	

Summary of Issues

Policy SD44: Telecommunications and Utilities Infrastructure

There were a total of 16 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Insert additional criterion 1(f) 'They do not have a negative impact on neighbouring properties and/or uses'. (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> General support (Rowlands Castle PC, Selborne PC) Welcome emphasis on mitigating impact of existing infrastructure (Liss PC) Support emphasis on need for superfast broadband (Liss PC, Madehurst Parish Meeting, Elsted and Treyford PC) Improved broadband and other infrastructure would not be supported as a 'trade-off' for a development that would otherwise be deemed inappropriate. (Madehurst PC) Need to find additional funding for broadband, existing funding may not permit undergrounding as well as rapid roll out. (Elsted and Treyford PC) Should strike a balance between planning requirements and the viability of infrastructure enhancements, especially for farmers. (Rowlands Castle PC) Paragraph 7.236: first sentence- should end 'special qualities of the National Park'. (Selborne PC) 	<p><i>I: Policy wording should be amended to further restrict the impact of new or existing infrastructure</i> R: No changes are proposed to the wording of the policy. The policy will be implemented alongside the rest of the policies within the Local Plan relating to impact and amenity. Each proposal will be assessed on its merits. A preference for burying cable could be more harmful to the landscape in some instances.</p> <p><i>I: Policy wording should be amended to refer to specific broadband speeds or technology</i> R: No changes are proposed to the wording of the policy. The criteria within the policy reflect the terminology in national policy and also allows flexibility for improving technology (e.g. the term 'superfast' allows for increasing speeds over time as the definition is updated).</p> <p><i>I: The Local Plan is not proactive in seeking out opportunities to provide improved infrastructure outside of the development process</i> R: The South Downs Local Plan sets out what can be delivered through the planning system as development comes forward. The SDNPA will work with companies and organisations on a wide range of projects outside of the planning system and that may include work on improving telecoms within the National Park. The current Partnership Management Plan (2014-2019) (Core 03) sets out three areas of delivery (100 to 102) for Outcomes 9, 10 and 11 to improve access to broadband and telecommunication infrastructure.</p>

Policy SD44: Telecommunications and Utilities Infrastructure

Summary of Issues

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Paragraph 7.238: refer to 'placed underground', not 'undergrounded'. (Selborne PC) Request commitment to promote basic minimum broadband speed of >10Mbps, in addition to superfast. (Stedham with Iping PC) Should emphasise benefits to reduced transport resulting from improved broadband (Stedham with Iping PC) Use opportunity of new developments to enhance internet to neighbours. (Stedham with Iping PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> General support (South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Criterion 1: should amend to 'development proposals... <i>are actively encouraged with a presumption of support, and will be permitted...</i>' Criterion 1(a)- should delete; unsound, biased against new infrastructure Criterion 1(b)- replace with '<i>it can be demonstrated that they have been selected as the most appropriate solution taking account of all reasonable alternatives</i>' (intended to include use of existing infrastructure) Fully support Propose for septic tanks be registered on every new planning application, to make the SDNPA aware of the systems in use and their impact on the environment. Advise on or require updates to septic tank systems when changes to properties are made (Hampshire County Council, Cllr Jackie Porter) Minimise overhead telecoms wires and masts; preference for burying cable. Resist local drop wires too in sensitive areas. (Lewes District Council, Cllr Victor Ient) 	

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

Summary of Issues

Representations	Issue and Response (I/R)
<ul style="list-style-type: none">• Work with other National Parks and mobile operators to find solutions to 4/5G mobile provision that do not harm the National Park landscape. (Lewes District Council, Cllr Victor Ient)• Make clear who is responsible for providing superfast broadband infrastructure- it should not be individual developers in rural areas.• Add clear and correct definition of “superfast broadband” to the glossary. Current reference to 100Mbps is incorrect.• Utilities should enhance the NP, not just avoid an adverse impact. Need to change the policy so as to prevent the use of standardised, urban designs.• Paragraph 7.241 is well phrased regarding landscape enhancement.• Not enough about anticipating the rapid change of technology over the plan period, for example promoting fast broadband speeds for local communities in general (as opposed to new development) by working proactively with other bodies.	

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

Summary of Issues and Responses

Policy SD45: Green Infrastructure

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>Environment Agency: Supports this policy.</p> <p>Natural England: Requests that reference to the Green Infrastructure Framework is re-instated in the Local Plan with provision to embed the Framework into the Local Plan. The Framework area stretches beyond the National Park boundaries, into the neighbouring LPAs and therefore provides an exemplar opportunity to secure a joined-up, landscape-scale approach to Green Infrastructure from a robust evidence-base.</p> <p>Portsmouth Water: Considers that the benefits of the Havant Thicket Winter Storage Reservoir application should be mentioned in this section. This could assist future green infrastructure provision immediately adjacent to the National Park and reduce visitor pressure on the South Downs and the protected harbours.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome a policy on Green Infrastructure. The South Downs Way Ahead Nature Improvement Area (NIA) which seeks to protect chalk grassland should be referenced in this policy as should the Brighton and Lewes Downs Biosphere Reserve (also known as "The Living Coast"). (Brighton and Hove City Council) • Support this policy. (Horsham, Mid Sussex and Winchester District Councils) 	<p><i>I: Reference to the Green Infrastructure Framework should be re-instated in the Local Plan</i> R: The GI Framework is currently being progressed but it is not yet sufficiently completed to refer to in policy in the manner requested.</p> <p><i>I: References to specific GI projects and assets such as the Havant Thicket Winter Storage Reservoir application, South Downs Way Ahead Nature Improvement Area, and the Brighton and Lewes Downs Biosphere Reserve and the Itchen Valley.</i> R: References to individual green infrastructure assets or projects across the National Park is considered to be too detailed for this strategic policy and its supporting text.</p> <p><i>I: Reference to community food growing projects as an element of green infrastructure</i> R: Food growing is recognised in the definition of 'green infrastructure' and 'green infrastructure asset' in the Glossary.</p> <p><i>I: Consider criterion 1b) and the requirement to 'meet the needs of existing communities' does not relate to a site-specific impact and is therefore unsound and contrary to National Policy</i> R: Provision of new or improvement of existing green infrastructure is often experienced (through use or through views) by the community beyond the new development. Schemes for new or improved green infrastructure should have due regard to also incorporating the needs of</p>

Policy SD45: Green Infrastructure

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Welcome this policy. (Buriton, Liss and Selbourne Parish Council, Madehurst Parish Meeting, Petersfield Town Council) • Specific reference should be made to the Itchen Valley as strategic green infrastructure. (Twyford Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Welcome a policy on Green Infrastructure, however reference to the role of community food growing projects as an element of green infrastructure should be included in this policy. (Brighton & Hove Food Partnership) • Request an additional criterion in this policy to protect the South Downs Way Ahead Nature Improvement Area, and the Brighton and Lewes Downs Biosphere Reserve. (Brighton & Lewes Downs Biosphere Partnership) • Support this policy. (Eastbourne Downland Group, Lewes District Green Party, Petersfield Town Development Committee, South Downs Society, Sussex and Hampshire Wildlife Trusts, and The British Horse Society) • Support this policy as the proposal at Bohunt Manor would fully meet the criterion providing a strategic cross boundary green infrastructure resource. (Green Village Investments) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support this policy. (Various individuals and Cllr Jackie Porter, Hampshire County Council) • Consider criterion 1b) and the requirement to ‘meet the needs of existing communities’ does not relate to a site-specific impact and is therefore unsound and contrary to National Policy. • Request equestrian use is included wherever recreational and leisure walking and cycling activities are mentioned. 	<p>the wider community within which the GI assets sit and may be used. This is best practice in place making and important for contributing to the purposes of the National Park</p> <p><i>I: Request equestrian use is included wherever recreational and leisure walking and cycling activities are mentioned</i></p> <p>R: The policy supports multifunctional green infrastructure including multi user routes as set out in criteria 2(d).</p>

Policy SD45: Green Infrastructure

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Summary of Issues and Responses

Summary of Issues

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

There were a total of 14 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Fig 7.8 sets out the standards for open space provisions. For information, the Council has recently commissioned a study of open space and playing pitch provision which will be used to update the relevant open space and playing pitch standards applications. However, Sport England has indicated that they may not require the use of open standards in future, but will rely on the demand in any given area for new provision. (Mid Sussex District Council) Support this policy but question why it does not refer to Natural Greenspace or Allotments. (Winchester City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Welcomes this policy. (Liss Parish Council) Supports this policy. (Selbourne Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The proposals for Bohunt Park align with this policy as they will provide a nature reserve, allotments and provision of Sustainable Alternative Natural Green Space (SANGS). (Green Village Investments) Welcome and support this policy. (Various organisations) 	<p><i>I: Question why it does not refer to Natural Greenspace or Allotments</i> R: Specific standards are not set for these so that they can be provided in response to local opportunities and needs. Natural Greenspace and Allotments are included within the definition of Green Infrastructure. Requirements for green infrastructure are set out in policy SD45.</p> <p><i>I: This policy is not fully in compliance with Paragraph 74 of the NPPF. In order to comply with this, it will be necessary to undertake a Playing Pitch Strategy in order to fully assess need across the National Park</i> R: Paragraph 7.257 states the position of the SDNPA on this. In summary, the SDNPA, 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 SDNPA will adopt the standards identified through this work with the twelve authorities based on their evidence work, including playing pitch strategies.</p> <p><i>I: Not clear why the requirement for biodiversity enhancements is only limited to burial grounds and cemeteries and not all open space</i> R: The Local Plan should be read as a whole. Development proposals are also subject to the requirements of policy SD9: Biodiversity and Geodiversity which requires development to conserve and enhance biodiversity. Special mention was made here, in a list of three requirements</p>

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

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

Summary of Issues

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • This policy is not fully in compliance with Paragraph 74 of the NPPF. In order to comply with this, it will be necessary to undertake a Playing Pitch Strategy in order to fully assess need across the National Park. (Sport England) • Support this policy but it is not clear why the requirement for biodiversity enhancements is only limited to burial grounds and cemeteries and not all open space. (Sussex and Hampshire Wildlife Trusts) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Support this policy (Various individuals and Cllr Jackie Porter, Hampshire County Council) • The allocation of land South of Church Road, Steep does not meet the requirements of this policy as it does not provide for the provision of an alternative village green. 	<p>due to the particular unique role cemeteries and burial grounds have played in their importance for biodiversity and green infrastructure.</p>

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

Summary of Issues and Responses

Policy SD47: Local Green Spaces

There were a total of 64 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No Comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome the designation of Green Ridge as a Local Green Space (LGS). (Brighton and Hove City Council) • Object to the inclusion of LGS6, Land at Common View (Allotment Gardens) in Stedham as LGS as these are not statutory allotments and the site is not accessible to all for recreational purposes. (West Sussex County Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Disappointed that a number LGS's identified in earlier versions of the Local Plan have been removed, in particular the Pickle Lane site in Weston as it has historic, public access, wildlife and tranquillity benefits. (Buriton Parish Council) • Welcome that two of the three the sites put forward by the parish council for designation as LGS have been accepted. However, land at The Fridays, part of which is allocated for housing, should not be available for development. (East Dean & Friston Parish Council) • Object to the decision to exclude three areas within Hambledon from LGS designation, i.e. Mason's Field and The Donkey Field which are both used for village activities; and The Whitedale 'Millennium' Field which has a magnificent view across the valley to 	<p><i>I: Object to the inclusion of the following sites:</i></p> <ul style="list-style-type: none"> - <i>LGS6 Land at Common View, Stedham</i> - <i>LGS8 Dowlings Little Mead and Church Meadow</i> - <i>LGS12 Burlands Field or Culverscroft Selborne</i> - <i>LGS55_c Half Moon Covert, Midhurst</i> - <i>LGS76 Tide Mills, Seaford</i> - <i>LGS94 The Horsefield, East Dean</i> - <i>LGS96 Went Way Allotments, East Dean</i> <p><i>R:</i> Each nominated Local Green Space has been given an independent assessment for their potential for LGS designation using the methodology as set out in the 2017 study '<i>Local Green Spaces in the South Downs National Park (TSF41)</i>'. The methodology is based on the guidance set out in the National Planning Policy Framework and in the National Planning Practice Guidance, taking into account the circumstances of the National Park designation, and uses information available via desktop research, direct observation and information provided by the nomination forms received. The evaluation matrix of all the sites assessed is set out in Appendix I of the study <i>Local Green Spaces in the South Downs National Park</i> which sets out the reasons why these sites were considered suitable for LGS designation. It is the position of the SDNPA not to designate LGS sites where a neighbourhood plan is being prepared or has been made. Therefore, LGS6 and LGS76 are removed from the Local Plan Policy SD47, as shown page 21 and 22 of the submitted Schedule of Changes, as they are now being progressed by their respective NDPs.</p>

Policy SD47: Local Green Spaces

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>the hangars and is a rare, unspoilt flower meadow. (Hambledon Parish Council)</p> <ul style="list-style-type: none"> Support this policy but consider that this policy should also make reference to LGS designated in Neighbourhood Plans. (Liss Parish Council) Strongly support the LGS designations in Selbourne. (Selbourne Parish Council) Additional LGS's will be designated in the Stedham with Iping Neighbourhood Plan. (Stedham with Iping Parish Council) <p>Other organisations</p> <ul style="list-style-type: none"> Support this policy. (Various organisations) Strongly oppose the inclusion of LGS8 – Dowlings, Little Mead and Church Meadow as LGS's as they do not fulfil the NPPF criteria for designation. (Derek Warwick Developments Ltd) Object to the inclusion of Tide Mills as LGS as it fails to accord with NPPF criteria for designation in that it is already protected by its location within the National Park, it is not located in close proximity to the community serves and it is an extensive tract of land. (DMH Stallard LLP on behalf of Newhaven Port & Properties) Object to the inclusion of LGS94, The Horsefield and LGS 96, Went Way Allotments in East Dean as LGS as these sites do not fulfil the NPPF criteria for designation. The sites are already protected by existing designations, there is no public access and LGS 94 is an extensive tract of land. (The Gilbert Estate) Support the designation of Speltham Down (1) and (2) in Hambledon, Half Moon Covert in Midhurst, Dowlings Little Mead and Church Meadow in Selbourne and Top Playing Field, The Forge Field, Jubilee Orchard and The Allotments in Slindon. Also agree that High and Over, part of Seaford Head Nature Reserve and the Village Field in Slindon should not be designated as LGS as they do 	<p>I: Object to the exclusion of the following assessed sites:</p> <ul style="list-style-type: none"> LGS40 Masons Field, Hambledon LGS42 Field behind Whitedale House The Donkey Field Barn Field aka Under the Hill, Selborne <p>R: Each nominated Local Green Space has been given an independent assessment for their potential for LGS designation using the methodology as set out in the 2017 study 'Local Green Spaces in the South Downs National Park'. The methodology is based on the guidance set out in the National Planning Policy Framework and in the National Planning Practice Guidance, taking into account the circumstances of the National Park designation, and uses information available via desktop research, direct observation and information provided by the nomination forms received. The evaluation matrix of all the sites assessed is set out in Appendix I of the study <i>Local Green Spaces in the South Downs National Park</i> which sets out the reasons why these sites were not considered suitable for LGS designation.</p> <p>I: The following unassessed sites should have been included:</p> <ul style="list-style-type: none"> Bayards Field, Steyning South of Church Road, Steep <p>R: A key part of the definition of LGS suitable sites are that they should be demonstrably special to the community, the SDNPA therefore undertook a call for sites for the communities, residents and users of the National Park to nominate sites to be considered for LGS designation. These sites were not put forward in the call for sites.</p> <p>Bayards Field was a site proposed for housing in the draft Steyning, Wiston Ashurst and Bramber joint NDP. Prior to the pre-submission consultation of the SDLP the NDP group disbanded and the joint NDP would no longer be progressed. Following the pre-submission consultation of the SDLP a new NDP group formed and applied to the SDNPA to designate Steyning to prepare a Steyning NDP. The preparation of the Steyning NDP is in progress. It is the position of the SDNPA not to designate LGS sites where</p>

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>not comply with the criteria identified in para 77 of the NPPF. (National Trust)</p> <p>Individuals</p> <ul style="list-style-type: none"> Strongly support the application for Baynards Field in Steyning to be designated as a LGS as it meets all the NPPF criteria. There are many studies and reports on its landscape and historical/heritage importance, including the Conservation Area Appraisal and Review that Horsham District Council carried out this year. This identified Baynards Fields as highly sensitive in the Conservation Area Fringe. Public consultation in the Steyning, Washington, Ashurst and Bramber (SWAB) area showed that 85% of residents are opposed to house building in the National Park area. (A large number of individuals) Object to the proposed inclusion of Half Moon Covert (Midhurst) as a LGS, as it does not meet NPPF criteria for designation in that it does not contain any statutory wildlife designations and there is no public access to it. Strongly support the LGS designations in Selbourne. (Various individuals) Not enough LGS's have been designated given the size of the National Park. Object to the site at Burlands Field Selbourne, being designated as LGS, as it does not meet the NPPF criteria. It would be more suitable for housing. Land south of Church Road in Steep should be designated as a LGS to ensure public access to it. Barn Field, also known as Under the Hill in Selbourne should be designated as a LGS as it meets the NPPF criteria for designation and its value has been recognised by a Planning Inspector and in the Selborne Village Design Statement and Local Landscape Character Assessment. 	<p>a neighbourhood plan is being prepared or has been made. Steyning has been designated as an NDP area, therefore the SDNPA would not seek to designate any LGS in Steyning via the Local Plan.</p> <p>I: Policy should also make reference to LGS designated in Neighbourhood Plans R: Made Neighbourhood Plans are part of the Development Plan for their respective areas of the South Downs National Park. The status of Neighbourhood Plans is set out on page 14 of the Local Plan and therefore it is not considered that there would be unnecessary repetition in the document.</p> <p>I: Not enough LGS's have been designated given the size of the National Park R: The National Park as a nationally important designated landscape is already subject to a high level of protection. As set out in the methodology of the 2017 study 'Local Green Spaces in the South Downs National Park' a fundamental part of the definition of LGS suitable sites are that they should be demonstrably special to the community, the SDNPA therefore undertook a call for sites for the communities, residents and users of the National Park to nominate sites to be considered for LGS designation.</p>

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Summary of Issues and Responses

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

Summary of Issues and Responses

Policy: Introduction to climate change

There were a total of 4 representations on the introduction to this section. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Welcome the inclusion of policies on renewable energy, sustainable development and content on Electric Vehicle Charging. (Chichester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Minor rewording suggested to para 7.273. (Selbourne Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Consider that this section is unsound as it is not consistent with national policy in that the risk of wildfire has not been considered within this section or appropriately cross referenced with relevant sections, including; Green Infrastructure, Agriculture and Forestry, Landscape, Biodiversity or relevant affected communities. Paragraph 164 of the NPPF is specifically quoted. Advise that the SDNPA works with the South East England Wildfire Group (SEEWG), as well as the relevant Local Resilience Forums to address the NPPF requirements. Additionally SDNPA should address paras 94, 99 and 156 of the NPPF which are linked to climate change in terms of wildfire. (Forestry Commission) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Consider that climate change should be the foundation of the Local Plan and therefore this chapter should be leading the way as it applies to all policies. 	<p><i>I: The risk of wildfire has not been considered in this section as set out in the NPPF or appropriately cross referenced to other relevant sections.</i></p> <p>R: The NPPF does not make specific reference to wildfire as an issue though it is appreciated that the occurrence of wildfires will be exacerbated by climate change. The NPPF does refer to flood risk, coastal change, water supply and demand and changes to biodiversity and landscape. The Local Plan cannot address all issues and agendas of partner organisations that are relevant to climate change. Its focus is on helping to address potential impacts from land use planning through sustainable construction, reducing the risk of flooding and renewable energy. It is considered unnecessary to cross reference to other policies as the first paragraph of the Local Plan clearly states in highlighted text that all policies should be viewed together and not in isolation and the policies in the Local Plan do not cross reference to all other policies that might be relevant.</p>

Policy SD48: Climate Change and Sustainable Use of Resources

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

Summary of Issues and Responses

Policy SD48: Climate Change and Sustainable Use of Resources

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u></p> <p>Environment Agency: Support the inclusion of this policy; in particular the direct reference to water efficiency standards and that the tighter standard of 110 litres per person per day has been chosen for residential use. Given the recognition that the SDNP is located in a part of the country recognised as being at serious water stress and the fact that the tighter water efficiency standard has been chosen for residential use, we would have expected to see the tighter standard also being proposed for non-residential use i.e. a BREEAM 'excellent' rating as opposed to the 'very good' rating.</p> <p>Portsmouth Water: Highlight that in their forecasts for water consumption the target is 125l/h/d as opposed to 110 l/h/d in the Local Plan. Point out that the section 'On-site Water Use'; Paragraph 7.282 is incorrect as Portsmouth Water's area of supply is not classified as an area of serious water stress.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> The policy should require major commercial development to meet BREEAM Excellent rather than just Very Good. (Chichester District Council) Consider that the policy requirements of SD48 are unreasonable for householder applications. (East Hampshire District Council) <p><u>Parish and Town Councils</u></p>	<p><i>I: The policy should require major commercial development to meet BREEAM Excellent rather than just Very Good.</i></p> <p>R: It is proposed in the Schedule of Changes to make this change so that criterion 2.i. relating to Major non-residential development proposals instead refers to BREEAM Excellent (please see page 22 of the Pre-Submission Schedule of Changes, Para Policy ref: SD48 (2)). This is in line with best practice by other local planning authorities and with the Vision and Circular for National Parks regarding National Parks leading the way in adapting and mitigating climate change. It also is supported by the SDNPA's Renewable and Low Carbon Energy Study - AECOM, 2013 (Core Document TSF 43). We have looked into the implications of this change on the financial viability of developments and have found evidence that this higher standard will result in relatively small additional costs, with costs recouped over a number of years through savings in water and energy use. In addition, if viability is an issue in some cases, criterion 2 of the policy has an exemption clause that states that 'unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable.'</p> <p><i>I: Paragraph 7.282 is incorrect as Portsmouth Water's area of supply is not classified as an area of serious water stress.</i></p> <p>R: Paragraph 7.282 does not specifically relate to Portsmouth Water's area of supply but refers to the overall situation across the National Park and the South East as evidenced by the Environment Agency.</p>

Policy SD48: Climate Change and Sustainable Use of Resources

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Enforcing these targets should not be at the expense of the architectural merits of the existing housing stock. (Fernhurst Parish Council) Support this policy. (Liss, Madehurst, Rowlands Castle and Selbourne Parish Councils) Overall certain points are welcomed but consider that the energy reduction aspects of this policy are not ambitious enough and should aim for Passivhaus or zero carbon standards. (Petersfield Town Council) <p>Other organisations</p> <ul style="list-style-type: none"> General support for this policy, however concerned that the policy does not recognise that some forms of low carbon technology (e.g. solar panels on buildings and wind turbines) could have a detrimental impact on the scenic beauty of the National Park. (Angmering, Brighton and Hove Council's Downland Estate, Leconfield and West Dean Estates) Disappointed that the positive words in the supporting text about meeting high environmental standards in construction, and specifically BREEAM, are disappointingly not carried through into the policy text. There should also be a stronger encouragement to the incorporation of renewable energy measures in new developments. (CPRE Sussex and South Downs Society) Supports this policy (Eastbourne Downland Group) Welcome criteria 3, 4 of this policy as they reflect what is practically achievable now. However, the requirement to reduce carbon from residential buildings by an additional 19% compared to Part L of the Code for Sustainable homes is not ambitious enough. The ambition should be that all new developments, including non-residential buildings are zero carbon, including embedded emissions in building materials. This policy should cross reference SD3, which requires major developments to be Zero Carbon. (Lewes District Green Party) 	<p>I: Consider that the policy requirements of SD48 are unreasonable for householder applications. R: It is considered that all types of development proposals should seek to deliver high standards of sustainable building and design if the South Downs National Park is to lead the way in adapting and mitigation climate change in accordance with the Vision and Circular for National Parks. As explained above, if viability is an issue in some cases, criterion 2 of the policy has an exemption clause that states that 'unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable.'</p> <p>I: Enforcing these targets should not be at the expense of the architectural merits of the existing housing stock. R: Any development proposals would also need to be in accordance with Local Plan Policy SD5: Design.</p> <p>I: Not ambitious enough and should aim for Passivhaus or zero carbon standards. R: The standards in this policy are in accordance with Government advice set out in the Housing Standards Review 2015.</p> <p>I: The standards should not have a detrimental impact on the scenic beauty of the National Park. R: Any development proposals would also need to be in accordance with Policy SD4: Landscape Character and National Park statutory purpose 1.</p> <p>I: No mention is made of the collection and use of rain water and domestic grey water. R: It is implicit in seeking to meet the water saving target that development proposals will need to make provision for specific water saving measures including allowing for the collection of rainwater and potentially also domestic grey water.</p>

Policy SD48: Climate Change and Sustainable Use of Resources

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Disappointed to see that an issue as overarching as climate change is placed so close to the end of the plan. Would have liked to see a more strategic policy relating to climate change mitigation and adaptation in the Thriving Living Landscape section of the plan. Strongly support the proposed adoption of the optional water efficiency requirement of 110 l/pppd, which exceeds the Building Regulations requirement of 125l/pppd. Recommend that the reference to viability is removed from part 2 of the policy. (Sussex and Hampshire Wildlife Trusts) No mention is made of the collection and use of rain water and domestic grey water. (Midhurst Society) <p>Individuals</p> <ul style="list-style-type: none"> The principles set out in Policy SD3: applying to major development should apply to all developments. Concern over climate change seemingly relegated to a latter section (7k) of main development management chapter. SD48 has low targets and the move should be towards a carbon-neutral National Park and an enhanced environment. The policy targets should be more joined up with that of national agencies and utility companies. Support this policy, as building and adapting to the highest standards feasibly possible will go some way to mitigate climate change. (Hampshire County Council, Cllr Jackie Porter) Consider that the policy requirements are not strong enough and should be much clearer as to what is required from each development. Recommend that all new developments to include electric car charging points within the development which would help the Government move towards its 2040 electric car target. (Lewes District Council, Cllr Victor Ient) 	<p>I: Recommend that all new developments to include electric car charging points within the development which would help the Government move towards its 2040 electric car target.</p> <p>R: Local Plan Policy SD22: Parking Provision Criterion 4.a) refers to the requirement, where feasible, for electric vehicle charging facilities.</p>

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

Summary of Issues and Responses

Policy SD: 49 Flood Risk Management

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

Representations	Issue and Response (I/R)
<p><u>National Agencies</u></p> <p>Environment Agency:</p> <ul style="list-style-type: none"> • Support inclusion of the flood risk management policy. • However, consider that the current wording of the policy is not as effective as it could be in terms of directing development to Flood Zone 1 and incorporating the recommendations from the Level 1 Update and Level 2 SFRA Final Report (Core Document TSF 45) regarding what a site specific flood risk assessment should cover. • Specifically, the supporting text in para 7.286 is not in line with the requirements of footnote 5 to paragraph 103 of the NPPF and the last sentence of this para requires rewording to clarify that advice on flood risk should only be sought from the EA where the sources of flooding include fluvial and tidal flood risks and that advice from the Lead Local Flood Authority, Local Authority and relevant water company should be sought on local sources of flooding (e.g. surface water, groundwater, sewer). • Suggest revised wording to address these issues as follows: '<u>and directing development to Flood Zone 1, wherever possible</u>' is included in criteria 1a of SD 49, that the Recommendations for a Site Specific Flood Risk set out in Box 5.1 page 43 of the Level 1 Update and Level 2 SFRA Final Report is included in the wording of Strategic Policy SD 49 and revisions are made to para 7.286. 	<p><i>I: The policy should incorporate the recommendations from the Level 1 Update and Level 2 SFRA Final Report regarding what a site specific flood risk assessment should cover. The supporting text in para 7.286 is not in line with the requirements of footnote 5 to paragraph 103 of the NPPF. Suggest revised wording to this policy.</i></p> <p>R: We agree that the changes proposed by the Environment Agency will improve the clarity and effectiveness of the policy. It is therefore proposed in the Pre-Submission Schedule of Changes to make these changes (please see pages 22 -23, Para Policy ref: SD49 (1a), Para 7.286, and To follow 7.286). The Environment Agency has confirmed in our joint statement that they are content with this (Environment Agency Position Statement - Core Document SoCG15).</p> <p><i>I: The policy should state a preference for Natural Flood Management over engineered solutions.</i></p> <p>R: It is considered that paragraph 7.287 covers this issue as it refers to Flood Management incorporating suitable design, appropriate green infrastructure, the use of SuDS and safeguarding land for flood risk management.</p>

Policy SD: 49 Flood Risk Management

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Request amendments to para 7.286 so that it is consistent with para 103 of the NPPF regarding when a site specific flood risk assessment is required and that the 'Guide to Sustainable Drainage in East Sussex' is mentioned in the supporting text or footnotes. (East Sussex County Council) Pleased to see that flooding is covered. (Hampshire County Council) Criteria 1c should be amended to state a preference for Natural Flood Management over engineered solutions. (Sussex and Hampshire Wildlife Trusts) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Policy needs to be more explicit and ensure that no development is permitted within flood plains or locations prone to flooding. (Fernhurst Parish Council) Support this policy. (Liss and Selbourne Parish Councils) There is a need to refer in para 7.290 to the role of the District as well as County Councils in supporting Flood Plans. The wording of SD49.1 - "steering development away from areas of flood risk." should be strengthened. As Flood Action Groups become a stronger feature in local communities they should play an advisory role in planning applications which fall within sensitive zones. (Rowlands Castle Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Welcomes this policy. (Lewes District Green Party and South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Flood risk management (para7.287) gives the opportunity to enhance the National Park landscape and the goal should be for decreasing surface water run-off. 	<p><i>I: There is a need to refer in para 7.290 to the role of the District as well as County Councils in supporting Flood Plans.</i></p> <p>R: In the interest of providing concise supporting text, it is not possible to refer to all the different roles and responsibilities of different organisations.</p>

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

Summary of Issues and Responses

Policy SD50: Sustainable Drainage Systems

There were a total of 12 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u></p> <p>Environment Agency: Support the inclusion of this policy. However, with reference to para 7.296, the EA does not need to be consulted regarding the suitability of SuDS. Suggest removal of reference to EA.</p> <p>Natural England: Support policies promoting good practice such as Sustainable Urban Drainage (SuDs)</p> <p>Portsmouth Water: Requests the inclusion of additional text in para 7.294 regarding requirements for deep bore soakaways systems.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> Recommend amendments to the policy wording as LLFAs are only required to comment on 'major' development proposals, and the LLFA does not have the power to 'require' SUDs but only for them to be considered. Suggest revised wording for the second sentence of criteria 2 of this policy to 'give priority to' the use of suitable sustainable drainage systems and remove reference to being required by LLFA's. Also suggest revised wording for para 7.295 that LLFA's are only consulted when there is a high risk of surface water flooding. (Hampshire County Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support this Policy (Liss and Selbourne Parish Councils) Request paragraph 7.294 to be amended so that when considering the use of deep borehole schemes these do not lead the surface 	<p><i>I: With regards para 7.296, the Environment Agency does not need to be consulted regarding the suitability of SuDs</i> R: This change is proposed on page 23 of the Pre-Submission Schedule of Changes which deletes the reference to the Environment Agency needing to be consulted.</p> <p><i>I: Request the inclusion of additional text in para 7.294 regarding requirements for deep borehole soakaways systems. Deep borehole schemes should not lead the surface water into aquifers or ground with solution features</i> R: It is proposed to make this change and include reference to deep borehole soakaways demonstrating how risk to groundwater can be mitigated (please see the Pre-Submission Schedule of Changes page 23 Policy ref: Para 7.294).</p> <p><i>I: Recommend amendments to the policy wording in relation to the role of LLFAs as they are only required to comment on 'major' development proposals, they do not have the power to 'require' SUDs, and that LLFA's are only consulted when there is a high risk of surface water flooding</i> R It proposed to make changes to the wording of criterion 2 of SD50 to remove reference to other development proposals that are not Major Development being required to provide SuDS but instead use the wording give priority to the provision of SuDS where advised by the LLFA (please see Schedule of Changes, Policy ref: SD50 (2)), page 23.</p>

Policy SD50: Sustainable Drainage Systems

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<p>water into aquifers or ground with solution features. (Rowlands Castle Parish Council)</p> <p>Other organisations</p> <ul style="list-style-type: none"> • Welcome this policy (Lewes Green Party and South Downs Society) • Welcome this policy, in particular the requirement that SuDS should seek to enhance biodiversity and that arrangements should be put in place for their whole life management and maintenance. Suggest additional information is provided on: the maintenance, management and design of SuDS including through the provision of Service Level Agreements with local land management or nature conservation organisations; that SuDS are designed to protect water quality and greater recognition is given to the role natural management features. (Sussex and Hampshire Wildlife Trusts) • Consider that the policy misses a number of opportunities to promote SuDS more effectively within the plan in order for it to provide a robust line on delivery as well as clarity to planning officers and developers. These opportunities include: providing the definition of sustainable drainage given in Schedule 3 of the Flood and Water Management Act 2010; requiring SuDS to achieve greenfield run-off rates for all previously undeveloped sites and developed sites; encouraging retrofitting of SuDS to existing development, listing all the multi-functional benefits SuDS can provide and referencing these in more policies such as SD9, SD14 and SD17. (Wildfowl and Wetlands Trust) <p>Individuals</p> <ul style="list-style-type: none"> • Welcome this policy but consider it could be more sustainable and the inclusion of the wording “where feasible” is a let-out loophole. 	<p>I: Suggest additional information is provided on: the maintenance, management and design of SuDS R: Paragraph 7.297 to this policy clearly states that suitable whole life management and maintenance will be secured through planning obligations and /or conditions. Paragraph 7.294 explains that further information is set out SDNPA's Level 1 Update and Level 2 SFRA (Core Document TSF 45) on the design of SuDS.</p> <p>I: Consider that the policy misses a number of opportunities to promote SuDS more effectively within the plan R: Paragraph 7.296 sets out the multi- functional benefits of SuDS and it is considered that it is sufficiently promoted in the Local Plan.</p> <p>I: The inclusion of the wording “where feasible” is a let-out loophole R: SuDS are not always suitable in some locations, for example, infiltration systems may not be suitable on floodplains, certain geology or areas of high groundwater, therefore this wording is necessary.</p>

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

Summary of Issues and Responses

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

Summary of Issues and Responses

Policy SD5 I: Renewable Energy

There were a total of 21 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> Historic England: Welcomes and supports this policy.</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Welcome this policy but recognition could also be given to Hydrogen Fuel Cells. (Brighton and Hove City Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Supports this policy (Liss Parish Council) • Supports this policy but the word unacceptable in criteria 2.c) should be removed as it is unnecessary. (Selbourne Parish Council) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • The support offered to estates and farms by this policy is encouraging. The policy should give more explicit support to schemes that do not have a landscape impact e.g. the Archimedes Screw that was recently installed at Coultershaw Bridge near Petworth. (Angmering, Leconfield and West Dean Estates) • Request the policy is amended to make it clear that the major development test should apply to large scale renewable energy developments. (Campaign for National Parks) • Support this policy but suggest an amendment to criteria 1.c) to include the wording 'minimal loss' as in some instances there may need to be a minor loss of high quality agricultural land. (Countryside Landowners Association) 	<p><i>I: Greater recognition should be given to other types of renewable energy such as Hydrogen Fuel Cells, Archimedes Screw, small scale schemes such as solar panels on pitched roofs, small scale hydro-electricity, small wind turbines on farms, community heating systems and air and ground-source heat pumps</i> R: The policy refers to renewable energy developments in general and therefore does not preclude consideration of all the various different types of renewable technologies that exist. The SDNP Renewable and Low Carbon Energy Study, AECOM 2013 (Core Document TSF 43) identifies the key energy technologies that are most likely to be prevalent in this National Park.</p> <p><i>I: Request the policy is amended to make it clear that the major development test should apply to large scale renewable energy developments. The policy seems to offer almost unconditional support to major renewable energy schemes</i> R: This issue is covered by paragraph 7.299 which refers to large scale schemes are subject to the tests of Local Policy SD3: Major Development. In addition, the policy is qualified by the supporting text, which identifies the key issues are associated with assessing the appropriateness of large scale renewable energy schemes in the National Park in view of the sensitivity of the landscape to renewable energy schemes. All schemes will also be subject to the requirements of the other relevant policies in this Local Plan.</p>

Policy SD5 I: Renewable Energy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> Support this policy, however the wording could be misread to allow inappropriate schemes. (Eastbourne Downland Group) Support this policy in general but concerned that the policy does not address the effects of biomass schemes, such as wood burning on air quality. (Friends of Lewes Society , Lewes District Green Party and The Midhurst Society) The plan should also encourage small scale schemes such as solar arrays on pitched roofs, small scale hydro-electricity, small wind turbines on farms, community heating systems and ground-source heat pumps. (Lewes District Green party and The Midhurst Society) Strong concerns as the policy seems to offer almost unconditional support to major renewable energy schemes whatever their impact. Request that the policy only deals with schemes of modest impact. Support should also be given for community renewables.(South Downs Society) <p>Individuals</p> <ul style="list-style-type: none"> All new housing and business sites should be ‘future proofed’ to ensure that parking facilities contain electric vehicle charging points in light of the Government’s support for electric vehicles and rapid advances in battery technology. (Chichester District Council, Cllr Andrew Shaxson) Support this policy but consider that it is negated by paras 7.302 to 7.307 (Hampshire County Council, Cllr Jackie Porter) Greater recognition should be given to other forms of renewable energy such as air source and ground source heating, solar tiles. Developers should include a renewable energy plan in support of their applications. If all developments contain a renewable energy fuel source there will be less pressure for large scale schemes. (Lewes District Council, Cllr Victor lent) Support small scale and well-sited renewable energy schemes e.g. solar panels on buildings and not open fields. Do not agree that high quality agricultural land should be protected over and above biodiverse-rich land. Biomass should be locally sourced renewable supplies not landscape insensitive-intensive crops. 	<p>I: Suggest an amendment to criteria 1.c) to include the wording ‘minimal loss’ as in some instances there may need to be a minor loss of high quality agricultural land. Do not agree that high quality agricultural land should be protected over and above biodiverse-rich land</p> <p>R: Policy criteria 1.c) is in line with paragraph 112 of the NPPF which seeks to protect high quality agricultural land from development. It is not considered appropriate to introduce an element of acceptability of some loss of the best and most versatile land within this policy. Biodiverse rich land would be protected by the requirements of Local Plan policy SD9: Biodiversity and Geodiversity.</p> <p>I: This policy does not address the effects of biomass schemes, such as wood burning on air quality</p> <p>R: While it is appreciated that this can be an issue in certain parts of the Country, particularly cities, the SDNP Renewable and Low Carbon Energy Study, AECOM 2013 (Core Document TSF 43) highlights that there are also clear benefits from the use of biomass due to the availability of woodfuel and other crops helping to maintain forestry which is one of the key sectors of the National Park’s economy.</p> <p>I: Parking facilities should contain electric vehicle charging points in light of the Government’s support for electric vehicles</p> <p>R: Local Plan Policy SD22: Parking Provision Criterion 4.a) refers to the requirement, where feasible, for electric vehicle charging facilities.</p> <p>Support this policy but consider that it is negated by paras 7.302 to 7.307</p>

Policy SD51: Renewable Energy

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
	In determining planning applications for commercial scale wind farms schemes, the National Park's first purpose must be paramount and therefore these paragraphs are necessary in order to be realistic and not unduly raise expectations.

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

Summary of Issues and Responses

Policy SD52: Shop Fronts

There were a total of 8 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Support</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Support (Fernhurst PC, Liss PC, Selbourne PC) Support hand painted signs (Midhurst TC) Replace 'required' with 'essential', part 4 of SD52 (Selbourne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Section out of place between Climate Change and Pollution. (Friends of Lewes Society) The title should be changed to "Shop fronts and Advertisements". (Friends of Lewes Society, Selbourne Parish Council) Should be much stronger link back to Historic Environment Chapter (Friends of Lewes Society) Supports / Supports Society existing policies (Friends of Lewes Society, South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> Need to take opportunities to restore / enhance street scene, joined up policy with police and highways. 	<p><i>I: Replace 'required' with 'essential', part 4 of SD52</i> R: The wording has been amended as set out on page 24 of the Schedule of Changes to the Pre-Submission Local Plan</p> <p><i>I: The title should be changed to "Shop fronts and Advertisements".</i> R: In order to provide consistency the title of the section has been changed on page 24 of the Pre-Submission Schedule of Changes to 'Advertisements & Signage.'</p> <p><i>I: Should be much stronger link back to Historic Environment Chapter</i> R: All the policies throughout the Local plan are designed to be read together. Any development proposal concerning a historic element would need to comply with the Historic Environment Policies.</p> <p><i>I: Need to take opportunities to restore / enhance street scene, joined up policy with police and highways</i> R: Restoring street scenes are covered within Policy SD15: Conservation Areas (I.c)), Policy SD21: Public Realm, Highway Design and Public Art and the supporting text in paragraphs 6.26 and para 6.42, which seeks to limit street clutter.</p>

Policy SD52: Shop Fronts

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

Summary of Issues and Responses

Policy SD53: Adverts

There were a total of 10 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Historic England: Support</p> <p><u>Borough, City, County and District Councils</u></p> <ul style="list-style-type: none"> • Criterion 3 include reference to avoiding vertical light spillage / dark skies. (East Hampshire District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support (Fernhurst PC, Liss PC, Selbourne PC) • Replace 'required' with 'essential', 3) of policy (Selbourne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • All references to 'adverts' should be replaced with 'advertisements' (CPRE Hampshire, Selbourne PC) • Support (Friends of Lewes Society, South Downs Society) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Area of Special Advertisement Control should cover all National Park, • Policy does not cover proliferation of signs for events and resulting cluttering and littering. 	<p><i>I: Criterion 3 include reference to avoiding vertical light spillage / dark skies</i> R: Policies within the Local Plan are designed to be read in conjunction with each other. Any development proposals that may cause light pollution would be viewed alongside Policy SD8: Dark Night Skies and supporting text in paragraph 5.58, which refers to outdoor lighting and vertical luminance.</p> <p><i>I: Replace 'required' with 'essential', 3) of policy.</i> R: This error is corrected on page 24 of the Schedule of Changes as follows: 'If required <u>it cannot be avoided.</u>'</p> <p><i>I: Area of Special Advertisement Control should cover all National Park</i> R: Paragraph 7.317 explains the purpose of the policy is to ensure that adverts do not adversely detract from the location in which they are placed. This refers to the whole National Park. However there are areas with stricter limitations and this is covered within para 7.318.</p> <p><i>I: Policy does not cover proliferation of signs for events and resulting cluttering and littering.</i> R: This is covered within SD21: Public Realm, Highway Design and Public Art and its supporting text, which and refers to limiting and removal of clutter in para 6.34 and again mentioned in para 6.42.</p>

Policy SD53: Adverts

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

Summary of Issues and Responses

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

Summary of Issues and Responses

Policy SD54: Pollution and Air Quality

There were a total of 16 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> No comments received.</p> <p><u>Specific consultation bodies – other local authorities</u></p> <ul style="list-style-type: none"> • Criterion 3) add that new development leading to the declaration or extension of an AQMA might lead to that development being resisted in the first instance. (Chichester District Council) <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> • Support (Fernhurst PC, Selbourne PC) • Park should work with other Authorities to mitigate issues. Rumbolds Hill, Midhurst exceeds guidelines in nitrous oxide. (Midhurst Town Council) • Greater mention of noise pollution and impact on tranquillity (Selbourne PC) <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Policy only addresses development control aspects. Most air pollution comes from road traffic / agriculture. The Plan's absence of any transport strategy means this issue is not considered / plan should seek to reduce traffic across the NP. (Eastbourne Downland Group, Individual) • Ways to move vehicles away from children walking to school should be considered (Cllr Porter) 	<p><i>I: Add to part 3 of policy that development may be resisted if it may lead to the declaration of an AQMA.</i> R: It is considered unlikely that this scenario would arise in the National Park, given that most developments are small in scale. <i>There should be greater mention of noise pollution and impact on tranquillity.</i> There are separate Local Plan policies dealing with these issues.</p> <p><i>I: Most air pollution comes from road traffic / agriculture. The Plan's absence of any transport strategy means this issue is not considered.</i> R: The concern raised would seem to fall outside the scope of the Local Plan. However Policy SD19: Transport and Accessibility does include measures to encourage sustainable modes of travel.</p> <p><i>I: The policy should include a requirement that new major commercial development has an air quality assessment plan.</i> R: This requirement is effectively already in the policy and clarified in paragraph 7.326.</p> <p><i>I: There should be more support for implementing, monitoring, reviewing and enforcing AQAPs.</i> R: Chapter 10: Implementation and Monitoring sets out when it will be appropriate to review AQAPs.</p>

Policy SD54: Pollution and Air Quality

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Mention monitoring station at Lullington Heath (Friends of Lewes Society) • Include requirement that new major commercial development has an air quality assessment plan. (Lewes District Council, Cllr V lent) • Seek more support for implementing, monitoring and reviewing air quality action plans and dealing with them when they are not working. (Cllr Carter) • Further information on sustaining dark night skies requested. • Development should make a positive impact, insist on improvements, not just seek them. • Support. (South Downs Society) • SDNPA should be more proactive in identifying areas of poor air quality (e.g. Rumbolds Hill / North Street). AQAP may be appropriate. Roadside shrubs and tree planting can help. (The Midhurst Society) <p><u>Individuals</u> No comments received.</p>	<p><i>I: SDNPA should be more proactive in identifying areas of poor air quality.</i> R: Responsibility for declaring an AQMA lies with the district / unitary authorities. SDNPA works in partnership with these authorities on this matter.</p>

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

Summary of Issues and Responses

Policy SD55: Contaminated Land

There were a total of 5 responses to this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u> Environment Agency - Policy should make specific reference to ensuring that unacceptable risk to the environment should be removed/avoided. Para 7.329 should note that the remedial process needs to be undertaken with care so as not to cause contamination to the environment. Portsmouth Water - Add text to highlight the risk assessments and site investigations should be carried out to ensure development is being carried out in a way that protects groundwater quality.</p> <p><u>Borough, City, Council and District Councils</u> No comments received</p> <p><u>Parish and Town Councils</u> Support (Fernhurst PC, Selbourne PC)</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> Support (South Downs Society) 	<p><i>I: Policy should make specific reference to ensuring that unacceptable risk to the environment should be removed/avoided. Para 7.329 should note that the remedial process needs to be undertaken with care so as not to cause contamination to the environment.</i> R: The submitted Schedule of Changes (SDLP 01.1) as set out on page 24 includes changes to the text which address these points. Environment Agency has agreed that the changes overcome their objection.</p> <p><i>I: Should require risk assessments and site investigations to be carried out to ensure development is being carried out in a way that protects groundwater quality.</i> R: Policy SD55, together with Policy SD17: Protection of the Water Environment, is considered to adequately address this.</p>

Policy SD55: Contaminated Land

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

Summary of Issues and Responses

Chapter 8: Strategic Sites

There was a total of 3 representations on this chapter. A summary of the main issues raised are set out below.

Representations	Issue and Response (I/R)
<p><u>National Agencies</u> No comments received.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u></p> <ul style="list-style-type: none"> Northfields Farm and adjacent land in Twyford should be allocated as a strategic site in the Local Plan (Twyford Parish Council). <p><u>Other organisations</u></p> <ul style="list-style-type: none"> The former 'Syngenta' site in Fernhurst should be allocated as a strategic site in the Local Plan as only referring to the allocation in the made Fernhurst Neighbourhood Plan is inconsistent with the NPPF and does not provide certainty. Reference to the allocation in the Neighbourhood Plan is not sufficient (Comer Homes). <p><u>Individuals</u> No comments received.</p>	<p><i>I: Should be allocating Northfields Farm and adjacent land at Twyford as a strategic site.</i> R: Northfields Farm does not represent one-off opportunities for developments of exceptional quality in comparison to the three strategic sites named in the Local Plan.</p> <p><i>I: Should be allocating the former 'Syngenta' site in Fernhurst as a strategic site as only referring to the made Fernhurst Neighbourhood Plan is inconsistent with the NPPF.</i> R: The former 'Syngenta' site is allocated in the made Fernhurst Neighbourhood Plan (made in 2016). As the Fernhurst Neighbourhood Plan forms part of the Development Plan for the South Downs National Park there is no need to duplicate the policy within the South Downs Local Plan.</p>

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

Summary of Issues and Responses

Policy SD56: Shoreham Cement Works

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

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>Environment Agency: Policy is not currently effective at protecting the environment and mitigating flood risk. Recommends additional criteria is added 1e) requiring a comprehensive assessment of contaminated land and any risks it may pose to water quality and a clear remediation strategy and 1f) redevelopment takes into account is location close to River Adur and ensure protection of water quality. They also recommend addition text in 2 to include more specific flood risk management requirements to include 1) all housing to located in Flood Zone 1, 2) commercial development may be appropriate in Flood Zones 2 and 3 subject to appropriate mitigation measures, 3) development should avoid other low-lying areas within Flood Zone 1 and incorporate appropriate mitigation measures and if necessary the least vulnerable uses should be directed to those areas, 4) finished floor levels of habitable areas to be in excess of 1:100 AEP plus climate change plus freeboard level, 5) Compensatory measures to be provided of any flood defence measures and 5) safe means of emergency access and egress during a flooding event is demonstrated for all developable areas of the site.</p> <p>Historic England: Welcomes the recognition of the opportunity for the interpretation of the history of the site and supports the aims of criteria 1b).</p> <p><u>Borough, City, County and District Councils</u></p>	<p><i>I: Comments in relation to specific flood defence requirements and identifying risks to water quality.</i> R: The SDNPA do not propose to make any changes to this policy as the issues raised by the Environment Agency are referenced in the supporting text and will also be addressed in more detail in the Area Action Plan (AAP). This approach is now supported by the Environment Agency – see ‘SoCG 15 – Position Statement with the Environment Agency dated February 2018’.</p> <p><i>I: Comments in relation to fully restoring the site in line with the purposes of the National Park, the timeline for restoration falls outside the lifetime of the Local Plan, and the potential for the development of the site to lead to erosion of the integrity of the National Park.</i> R: The SDNPA do not propose to make any changes to this policy in response to these comments. As set out in the supporting text of the policy, there is a need to restore and regenerate this site as it is having an adverse impact on the landscape and scenic of beauty of the National Park. Suitable development presents an opportunity to achieve a significant level of restoration that would enhance the landscape, scenic beauty, wildlife and cultural heritage of this part of the National Park.</p>

Policy SD56: Shoreham Cement Works

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

Summary of Issues

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Would like to be part of any discussions on the Area Action Plan. (Adur District Council and Worthing Borough Council, Horsham District Council) • Would seek to ensure appropriate uses which would contribute to the local economies of Adur and Worthing, to contribute to regeneration and ensure satisfactory environmental and visual restoration of the site. (Adur District Council and Worthing Borough Council) • Surprised to see B2 uses as appropriate uses for the site given they are likely to generate noise and heavy good vehicle movements. (Adur District Council and Worthing Borough Council) • Question whether employment, leisure and tourism uses would generate sufficient value to bring the site forward for development given the significant costs associated with restoring the site and installing the necessary infrastructure. (Adur District Council and Worthing Borough Council) • Notwithstanding concerns about whether the site is a sustainable location for residential development, the policy should include specific reference to residential being an acceptable use on the site. (Adur District Council and Worthing Borough Council) • Supportive of the need to bring forward the restoration of the site however concerned policy does not address the potential impact on the vitality of neighbouring settlements, such as Steyning. Would like additional text added to the policy to ensure that a viable scheme does not impact on the vitality of neighbouring settlements. (Horsham District Council) • Support the policy and request a broad interpretation in respect of 'local economy' and 'local communities' to recognise that the site could be considered for types of development serving the coastal conurbation. (Brighton and Hove City Council) <p>Parish and Town Councils</p>	<p>In addition, Criterion 3 provides the certainty to ensure the SDNPA's main objective to secure a significantly enhanced landscape is achieved.</p> <p><i>I: Comments about land uses, such as employment (excluding residential – see response below), viability and potential impact on neighbouring settlements.</i></p> <p>R: The SDNPA's main objective is to secure a significantly enhanced landscape and it accepts that major development provides the opportunity to achieve this and that any scheme has to be viable to ensure delivery. However, the type and scale of the land uses has to be consistent with this main objective for the site and meet the National Park's purposes.</p> <p>The SDNPA do not propose to make any changes to the wording of the policy in relation to these comments. It is more appropriate that these detailed issues are addressed through the AAP process. The AAP will also have a particular focus on viability and a clear delivery process.</p> <p><i>I: Comments in relation to the policy making specific reference to residential uses being acceptable on the site.</i></p> <p>R: The SDNPA do not propose to make any changes to the policy in relation to this issue.</p> <p>The National Park Authority's priority is to see the environmentally-led restoration of the site with uses compatible with the purposes of a National Park. Criterion 2c of the policy explicitly states that further types of development would be acceptable provided they would enable the environmentally-led restoration of the site. The SDNPA believes that provides sufficient flexibility to address the issue of viability and deliverability. It is not appropriate for the National Park to meet unmet housing need from elsewhere outside of the National Park. The issue of affordable housing and housing mix are addressed in other policies in the Local Plan and there is no need to repeat them in this specific policy.</p>

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Summary of Issues

Representations	Issue and Response (I/R)
<p>No comments received.</p> <p><u>Other organisations</u></p> <ul style="list-style-type: none"> • Support the promotion of the site as a strategic allocation for a mixed use development. (The Dudman Group, South Down Project) • Policy should include reference to ‘residential’ and the in absence of any such reference fails to provide the necessary certainty and transparency. There is a need for housing and such a use can help ensure viability and deliverability (The Dudman Group, South Down Project) • The wording of criteria 2c and 3 together with supporting text are unduly restrictive and lack necessary clarity. (The Dudman Group) • It is unclear if residential uses are ruled out. If it is intended to resist residential uses then wording of policy should be clearer. (South Downs Society) • Support the approach set out in the policy and stated opportunities and delivers a range of benefits (South Down Project, University College London) • Support the policy however unclear if residential uses are supported. If the intent is to resist residential then the policy wording should be clear. (South Downs Society) • Support the identification of employment needs and support main objective to restore the site. (South Down Project) • Object to paragraph 8.24 as it fails to provide policy context for a ‘self-sustaining eco village’. South Down Project’s aspirations can be realised and incorporated into the policy and Area Action Plan. (South Down Project) • Reference to mineral sites being excluded from the definition of previously developed land is incorrect. The NPPF states any exclusion applies only to minerals sites where provision for 	

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Summary of Issues

Representations	Issue and Response (I/R)
<p>restoration has been made through the development control procedures. (Tony Thorpe Associates)</p> <ul style="list-style-type: none"> • Would like to see full restoration of the site in line with the purposes of the SDNP following the end of its operational activities. (Sussex and Hampshire Wildlife Trust) • Extant permission runs until 2042 with a basic restoration scheme, given the timeline for restoration falls outside the lifetime of the Local Plan concerned about the sites progression to allocation. Potential for the development of the site to lead to slow erosion of the integrity of the National Park. (Sussex and Hampshire Wildlife Trust) • Without the Area Action Plan in place it is difficult to determine the suitability of the site for allocation. Need to clearly answer the question whether developing the site to allow for restoration is less harmful to the National Park's purposes and special qualities than leaving the site until restoration can be enforced in 2042. The policy does not answer this question. (Sussex and Hampshire Wildlife Trust) • Criteria 3 should be given greater priority. (Sussex and Hampshire Wildlife Trust) <p><u>Individuals</u></p> <ul style="list-style-type: none"> • Object to the policy, the site should not an opportunity for development but fully landscape restored. Development of the site will lead to further incremental developments and erosion of the National Park's integrity. • Site is terrible eyesore and should be redeveloped for housing to protect neighbouring communities of Steyning, Bramber and Upper Beeding where farmland and attractive and valued parts of the SDNP are under threat from development. (2 individuals) • Site can make a contribution to the Housing needs of Brighton and Hove, and Adur and Worthing. 	

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Summary of Issues

Representations	Issue and Response (I/R)
<ul style="list-style-type: none">• Sandiford principle is aimed at protecting greenfield sites with the National Park and should not be used as a justification for greening a major brownfield site that has huge economic potential.• Policy is not proven to be economically viable.• Timing of Area Action Plan should be included in Local Plan.• Employment land allocations should refer to jobs as well as land allocation.	

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Summary of Issues and Responses

Policy SD57: North Street Quarter and adjacent Eastgate Area, Lewes

There were a total of 10 representations on this policy. A summary of the main issues raised is set out below.

Representations	Issue and Response (I/R)
<p><u>National agencies</u></p> <p>Environment Agency: Support the policy but recommend addition text in 3 a) to include more specific flood defence requirements to include 1) adopting a sequential approach to site layout, 2) no development other than Essential Infrastructure or Water Compatible uses in Flood Zone 3b, 3) finished floor levels of habitable areas to be in excess of 1:100 AEP plus climate change plus freeboard level, 4) Compensatory measures to be provided of any flood defence measures and 5) safe means of emergency access and egress during a flooding event is demonstrated for all developable areas of the site.</p> <p>Historic England: Welcomes and supports criteria 3 d) and e) as part of a positive strategy for the conservation and enjoyment, and a clear strategy for enhancing, the historic environment.</p> <p>Education and Skills Funding Agency: There is no reference to school capacity and any need for new / expanded provision.</p> <p><u>Borough, City, County and District Councils</u> No comments received.</p> <p><u>Parish and Town Councils</u> No comments received.</p> <p><u>Other organisations</u></p>	<p><i>I: Additional text should be added to include more specific flood defence requirements.</i> R: Criterion 3a) of the policy (SD57) is proposed to be amended in the Post-submission Schedule of Changes, to “Appropriate flood mitigation measures are incorporated into any redevelopment scheme, to include measures as set out in the Level 1 Update and Level 2 SFRA final report 2017”. This is now supported by the Environment Agency – see ‘SoCG 15 – Position Statement with the Environment Agency dated February 2018’.</p> <p><i>I: The policy should make reference to need for additional school capacity.</i> R: The issue of educational needs for Lewes is addressed in the SoCG 13 - Statement of Common Ground with East Sussex County Council (dated February 2018). In addition, as set out in the Introduction of the Local Plan, there is no need to duplicate the requirements of other policies (such as SD42: Infrastructure) within the specific site allocation policies as the plan should be read as a whole.</p> <p><i>I: The policy should exclude the Wenban Smith Building as it is allocated in the emerging Lewes Neighbourhood Plan.</i> R: The Wenban Smith Building forms part of this wider strategic site and it is appropriate for it to be part of this site allocation policy. In addition, the separate proposed allocation in the emerging Lewes Neighbourhood Plan has been deleted to avoid duplication.</p>

Policy SD57: North Street Quarter and adjacent Eastgate Area, Lewes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none"> • Recognise the need for the policy and welcome the requirement for early provision of the flood defences. (Friends of Lewes Society) • The policy should not include the Wenban Smith building as this is now part of the Lewes Neighbourhood Plan (Houndean Residents Association) • Support the policy (South Downs Society) • Site allocation should be deleted as since planning permission was granted in 2016 no further applications have been submitted demonstrating the site may not be viable or deliverable unlike the land south of Barlavington Way, Midhurst which should be allocated for development instead (ICS Estates Ltd) • Concerned about on-going flood risk as there is evidence that developments that meet the Environment Agency advice are still liable to flood. Suggests additional text to the policy to state that development should make additional provision to prevent buildings and infrastructure flooding under intense rain fall or tidal surges beyond the Environmental Agency's advice. (University College London) • Recognise that planning permission has been granted but as development has not commenced the scheme could take a different route. (Lewes District Green Party) • Correct factual errors about the age of some of the buildings and recognise that the bus station is a vital asset. (Lewes District Green Party) • Existing creative businesses and community will not fit in low-cost box space work units or the performance hub space. (Lewes District Green Party) • There is no need for more restaurants, cafes or shops and would question the need for office space. (Lewes District Green Party) • Relocation options for existing businesses are not suitable. (Lewes District Green Party) 	<p><i>I: The allocation should be deleted as the site is not viable / deliverable (nothing has progressed since the permission was granted in 2016).</i></p> <p>R: It is appropriate that this site is allocated through the Local Plan as it is available and deliverable. In addition, the team behind the North Street Quarter planning permission have recently submitted the necessary 'discharge of conditions' applications to enable Phase I to start on site in 2018/19 (planning references SDNP/18/02078/DCOND and SDNP/18/01950/DCOND).</p> <p><i>I: There is no need for additional restaurants and office space etc and existing businesses will not fit into new units / relocation options not suitable.</i></p> <p>R: Given the site's proximity to Lewes Town Centre and that the site represents the only opportunity for high level of growth within Lewes town, it is appropriate that the policy seeks to provide a mix of uses to support the communities living and working in and around the site. In addition, the wording of the policy seeks to ensure that any redevelopment proposals would not undermine the vitality or viability of the Lewes Town Centre.</p> <p>Other comments made in relation to the form of any new business units and the relocation of existing business are comments relating to the 2016 planning permission and do not relate specifically to the wording of policy SD57.</p> <p><i>I: Policy should make specific reference to affordable housing requirement of 50%.</i></p> <p>R: As set out in the introduction of the Local Plan, there is no need to duplicate the requirements of other policies (such as affordable housing requirement) within the specific site allocation policies as the plan should be read as a whole.</p>

Policy SD57: North Street Quarter and adjacent Eastgate Area, Lewes

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

Summary of Issues and Responses

Representations	Issue and Response (I/R)
<ul style="list-style-type: none">• Policy does not mention the affordable housing requirement, would like to see 50% requirement explicitly mentioned and would like to see a better ratio of affordable rented to shared ownership. (Lewes District Green Party) <p><u>Individuals</u></p> <ul style="list-style-type: none">• The policy should not include the Wenban Smith building as it is part of the emerging Lewes Neighbourhood Plan as a housing allocation.	