



**South Downs National Park
Authority**

**Report to Director of Planning –
Consultation response**

**Local Connection Test for the Self-
build Register**

April 2022

Contents

	Page
Introduction	2
Decision made at Planning Committee	2
Consultation Process	2
Consultation Response	2
Breakdown of responses	2
Common issues	3
Suggested changes	3
Suggested change one	4
Suggested change two	4
Suggested change three	5
Recommendation to the Director of Planning in consultation with the Chair of the Planning Committee	5
Next steps	6
Appendix 1 - Summary of Representations with SDNPA response and actions	7
Appendix 2 - Amended Proposed Local Connection Test showing suggested changes	22

Introduction

1. This report sets out how the consultation on the local connection test for the Self-build register was carried out and summarises the responses received. Based on the responses received a recommendation is made to implement the local connection test. The next steps required to implement the local connection test are set out.

Decision made at Planning Committee

2. At Planning Committee on 09 September 2021 the following was agreed by members. The Committee resolved to:
 1. Approve the draft local connection test to the Self and Custom Housebuilding Register for public consultation subject to the following amendments:
 - a) Remove Grandparents from the local connection test so it was in line with affordable housing criteria.
 - b) Implement an appeals process for any persons failing the local connection test and therefore excluded from Part 1 of the self-build register.
 2. That the authority be delegated to the Director of Planning, in consultation with the Planning Committee Chair, to make any further minor changes to the local connection test prior to public consultation.
 3. That authority be delegated to the Director of Planning, in consultation with the Chair of the Planning Committee, to consider the response from the public consultation, and subject to there being no major matters arising implement the local connection test.
3. The local connection test was amended in accordance with resolution one above. The reference to grandparents was removed from the local connection test before public consultation. Following Planning Committee, further investigations were made by officers into the possibility of having an appeals process. Officers advised the Director of Planning that there should be no appeals process implemented under resolution one. The appeals process would have no benefit in practice as there was no consequence to individuals looking to build their own home if they “failed” the local connection test and were entered on part 2 of the Self-build register.
4. In accordance with resolution one, consultation on the local connection test was carried out for eight weeks between Tuesday 11 January and Tuesday 8 March 2022.

Consultation Process

5. Details of the consultation on the local connection test were added to the Self-build register webpage on the South Downs National Park Authority website. All those persons on the Self-build register were contacted by email or letter and invited to comment on the proposed local connection test. Also all the organisations, public bodies and individuals on the Planning Policy consultation database were contacted and invited to comment on the proposed local connection test.

Consultation Response

6. The summary of representations received during the consultation and the SDNPA response to each one is shown in Appendix 1.

Breakdown of responses

7. There were 34 representations received. There were representations from 16 individuals (including 2 Parish/Town Councillors, 1 District Councillor); 12 Parish Councils; 2 District Councils; 3 National public bodies and 1 local amenity society.

8. The type of representations received were one objecting, nine supporting, one supporting as well as commenting on the criteria to suggest changes, 17 commenting on the criteria to suggest changes and five who replied with no comment to make.
9. Graham Burgess (02) objected strongly on the grounds that the local connection test by splitting the self-build register into two parts discriminates against non-residents and some new-comers to the National Park. The SDNPA officer response is the proposed local connection test is based on the Planning Practice Guidance set out by the Government. It is considered reasonable to prioritise those with a local connection when assessing demand for the purpose of permitting self-build plots. This is in the context of development pressures throughout the National Park, the availability of suitable land, the clear priorities set for the National Park Authority by the two statutory purposes and duty to local communities and reflected in the strategy of the South Downs Local Plan.
10. Four of the 17 representations suggesting changes to the criteria are accepted. The issues raised in these four representations were also touched upon by others within the 17 suggesting changes. It is considered the suggested changes from these four representations should be incorporated into an amended local connection test.
The suggested changes are discussed further below.

Common issues

11. Before discussing the suggested changes it is worth noting the common issues raised in the consultation. In the 17 representations making comments the issues commonly raised were around the proposed time periods used in the criteria, querying why the Armed Forces were granted a local connection and the issue of affordability in the National Park.

The SDNPA officer responses to these issues are as follows.

12. For the time periods in the criteria. The time periods reflect those used in housing registers throughout the National Park and are considered to be consistent with the practice of neighbouring authorities which therefore provide a reference point.
13. The Armed Forces criteria follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection.
14. Affordability mentioned by some respondents is clearly a valid, live issue requiring a range of mechanisms including affordable housing to provide solutions although is outside the scope of the proposed local connection test.

Suggested changes

15. Below is a discussion of the four representations suggesting changes to the criteria that have been accepted and a recommendation made for amendments to the proposed local connection test.
16. For each organisation or individual specifically mentioned their representation number is shown in brackets after their name.
17. The four representations were made by Wealden District Council (WDC) (32), Winchester City Council (WCC) (33), East Meon Parish Council (08) and Reuben Forrester (12). Other representations where similar points were raised have also been mentioned in the discussion.

18. The result is three suggested changes to the wording of the proposed local connection test.

Suggested change one

19. WDC (32) suggested removing the references to split parishes in criteria a), b) and c). WDC are also considering implementing a local connection test with the effect of separating their register into parts 1 and 2. WDC's contention is a resident in a split parish in Wealden, outside the National Park, could meet the local connection criteria for both authorities part 1 register. That resident could legitimately be on part 1 of both the WDC and SDNPA self-build registers. The result would be a double counting of the individual and an overestimation of the demand for plots required to be permitted by both WDC and SDNPA.
20. Extending the principle further, any resident in a split parish in any of the authorities neighbouring the South Downs National Park could be double counted. This would result in overestimated demand for neighbouring local authorities. For SDNPA the part 1 register could be significantly overestimated with the situation in Wealden replicated in other neighbouring authorities. For example Lewes District Council (LDC) have already implemented a local connection test. A check of the current SDNPA register shows 7 individuals in Lewes district in split parishes who live outside the National Park, mainly in Peacehaven and Seaford. If the split parish wording was retained these 7 individuals could be shown to have a local connection for both the SDNPA and LDC registers.
21. Therefore the WDC suggestion is accepted and it is recommended the reference to split parishes is removed. Appendix 2 shows the amended criteria with the reference to split parishes removed.

Suggested change two

22. Winchester City Council (WCC) (33) commented on the definition of a family proposed in the local connection test. In addition East Meon Parish Council (08) suggested amending the immediate family definition to include children living with an ex-spouse or ex-partner.
23. WCC stated the proposed family definition was more restrictive than the wording they used. WCC use the following wording to define family for their local connection test:
"A person shall be taken to be a close family member of another's family if he or she is the spouse, civil partner, mother, father, sister, brother, daughter, son, grandparent or grandchild of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Family includes adopted and step relatives".
24. The WCC definition of family is more comprehensive. All children are included. It is agreed that it is reasonable to include all children as some parents may be seeking to self-build a home closer to children now living with an ex-spouse or partner as suggested by East Meon Parish Council. It is recommended that an amended version of the WCC definition of family is used as the basis for an amended wording in the proposed local connection test. The reference to grandparents in the WCC definition has been removed in line with resolution 1 from Planning Committee on 09 September 2021. Also the last sentence has been amended to clarify which adopted and step relatives are included in the definition. The amended definition would also include children living with an ex-spouse or ex-partner as suggested by East Meon Parish Council.

25. The amended wording for the definition of immediate family is shown in Appendix 2 and is recommended as follows:

“A person shall be taken to be an immediate family member of another’s family if he or she is the spouse, civil partner, mother, father, sister, brother, daughter, son of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Immediate family includes relationships as described above with adopted and step relatives.”

Suggested change three

26. Reuben Forrester (12) suggested an addition to the residency criteria to enable local connection (to measure the demand for self-build homes) of those who have grown up in, or previously been resident for a long period of time in, the National Park. Reuben Forrester said he had spent most of his life living in the National Park. He had recently had to move outside the National Park for reasons of affordability. Based on the originally proposed criteria he currently would be considered to have a local connection as a recent resident although over time that situation would change.
27. Forming the criteria to capture the demand for self-build homes of those who had previously been long-time residents was also commented on by others who responded. Julie Burton (03), Louise Holloway (19), and Jane Scott (29) all felt the criteria would give a local connection to recent residents rather than those who had either lived long term or, born, raised and work in, the National Park, and have subsequently moved further away due to affordability.
28. Therefore the suggestion is accepted. It is recommended an additional residency criteria is added. The new criteria would mean those with a long-term link, for example they were born in and grew up in the National Park, and have subsequently moved away would still be considered to have a local connection for the purposes of measuring demand for self-build homes. The new criteria sets a time period of 15 years as a resident, for example for those who had spent their childhood in the National Park and then left the area, including for reasons of affordability.
29. The recommended new additional residency criteria is shown in Appendix 2 and is as follows:
- “Have lived (as only home or principal residence) in the National Park for a total of 15 years or more.”

Recommendation to the Director of Planning in consultation with the Chair of the Planning Committee

30. The Director of Planning, in consultation with the Chair of Planning Committee, is recommended to implement the proposed local connection test shown in Appendix 2 as amended by the three suggested changes described in the previous section of this report.
31. The three suggested changes are,
- i) Removing the reference to split parishes in criteria a), b) and c),
 - ii) Amending the definition of family and,
 - iii) Adding a new residential criteria for those who have previously lived long term in the National Park to be deemed to have a local connection.
- These three suggested changes are shown in Appendix 2.
32. In accordance with resolution three made by Planning Committee on 9 September 2021, it is considered the three suggested changes fall short of being major matters arising and

therefore the Director of Planning has delegated authority to implement the amended proposed local connection test.

Next steps

33. If the Director of Planning, in consultation with the Chair of the Planning Committee, decides to implement the amended proposed local connection test the following steps will be carried out. The summary of representations (Appendix 2 of this report) will be published on the website along with this report and the decision of the Director of Planning. This is to be transparent and show the SDNPA response to comments received. The self-build register application form will be updated to include the local connection test. All those currently on the self-build register will be contacted to complete a new application including the local connection test. A reasonable period of time will be allowed for those currently on the self-build register to complete the new application. It is suggested a maximum of six weeks is allowed to return the new application form. Once the period for completing the new application has finished the register will be divided into part 1 and 2. All those applicants meeting the local connection test will be entered on part 1 of the new register. The remaining applicants with no local connection will be entered on part 2.
34. Subsequently all new applicants will be entered on either part 1 or 2 depending on their response to the local connection test.

Appendix I – Summary of Representations with SDNPA response and actions

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
Arundel Town Council, Planning Committee (01)	<ul style="list-style-type: none"> No comments to make on the proposed wording of the Local Connection Test. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Graham Burgess (02)	<ul style="list-style-type: none"> Object strongly to proposed local connection tests and splitting register into two parts. Residency tests a) and b) totally arbitrary also discriminate against non-residents and some new-comers to the National Park (NP). NP should be managed in interests of nation as a whole, not those living in it. No evidence cited why discriminating in favour of residents is a good thing. Immediate family test c). No reason and no justification given for privileged position of immediate family. Allows family members no longer living in NP to expedite their access to the register. Working test d). Should not apply as criterion of at least 16 hours per week continuously for last two years is arbitrary. No evidence cited to support why privilege accorded to non- 	<ul style="list-style-type: none"> It is considered reasonable to prioritise those with a local connection when assessing demand for the purpose of permitting self-build plots. There are development pressures throughout the National Park and the availability of suitable land for development is scarce. In this context there are clear priorities set out by the purposes and duty of the South Downs National Park Authority (SDNPA) and these are reflected in the development strategy of the South Downs Local Plan. The duty of the SDNPA is “To seek to foster the social and economic wellbeing of the local communities within the National Park in pursuit of our purposes.” The purposes and duty of the SDNPA are statutory (National Parks and Access to the Countryside Act 1949 as 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	<p>residents working in NP nor the reason for the time period.</p> <ul style="list-style-type: none"> • Armed Forces e). Should not apply, not the only people who serve their country or put their life at risk in doing so, they should not be afforded special treatment. No evidence cited as to reasons for the test. 	<p>amended by the Environment Act 1995).</p> <ul style="list-style-type: none"> • The local connection test and the three criteria for a residential, family or employment connection are based on the Planning Practice Guidance (PPG) set out by the Government Read the Planning Practice Guidance. The time periods are consistent with those used by local housing authorities in the National Park. • The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection. For further details see the link below (Read Planning Practice Guidance paragraph 021). 	
Julie Burton (03)	<ul style="list-style-type: none"> • [Residency connection a) and b)] Two years or three out of five years. Unfair, would mean anyone that wishes to return to where they grew up would not be eligible. This would prioritise the wealthy only that can already afford to live in the 	<ul style="list-style-type: none"> • The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. • The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out 	<ul style="list-style-type: none"> • None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	<p>South Downs National Park (SDNP).</p> <ul style="list-style-type: none"> • [Family connection c)] Prejudice local people that no longer have relatives living in the SDNP and would like to return to this area. • [Working connection d)] This is also excluding historical family ties to the area. • [Armed Forces e)] Why does being in the Armed forces give you priority? • Priority will not look at any historical connection, making harder to live in the area you were born in, being out priced by people moving into SDNP from other areas of the country. 	<p>by the Government. This requires members of the armed forces are treated as having a local connection. For further details see the link below (See the wording in Planning Practice Guidance paragraph 021).</p> <ul style="list-style-type: none"> • Affordability of housing is a significant issue in the SDNP and the wider region of the South East. The cost of building a home in the National Park, including acquiring land, is a challenge to affordability for self-build. The affordability issue needs other interventions for those on lower incomes which is a separate issue irrespective of measuring demand. The time periods provide a reasonable reflection of demand for self-build plots of those with a local connection to the National Park. It is also important to remember firstly, there is no requirement to give priority to those on Part I of the register for any plots becoming available. The local planning authority has no duty to allocate plots to those on the register. Secondly 	

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		anyone can build their own home in the National Park without being on the register.	
Linda Cooper (04)	<ul style="list-style-type: none"> Any person who wants to be entered on the register should have lived (as only home or principal residence) in NP for three out of last five years. 	<ul style="list-style-type: none"> The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. The time periods provide a reasonable reflection of demand for self-build plots of those with a local connection to the National Park. 	<ul style="list-style-type: none"> None
Eric Croft (05)	<ul style="list-style-type: none"> Reservation about including split parishes, might involve large populations outside NP, for which South Downs National Park Authority (SDNPA) has no statutory responsibility. 	<ul style="list-style-type: none"> Concern about split parishes noted. 	<ul style="list-style-type: none"> None
East Dean and Friston Parish Council (06)	<ul style="list-style-type: none"> Welcome the proposed local connection test. 	<ul style="list-style-type: none"> Support for local connection test noted. 	<ul style="list-style-type: none"> None
Cllr Keith Budden (07) East Hants DC	<ul style="list-style-type: none"> I am in agreement with the proposed way of working for this register. 	<ul style="list-style-type: none"> Support for local connection test noted. 	<ul style="list-style-type: none"> None
East Meon Parish Council (08)	<ul style="list-style-type: none"> Amend immediate family definition to "...and children living with an ex-spouse or ex-partner." 	<ul style="list-style-type: none"> Comments noted and recommend amending the criteria to include the wording. It is reasonable parents living outside the boundary can demonstrate a local connection 	<ul style="list-style-type: none"> Recommend amending the immediate family definition to include children living with an ex-spouse or ex-partner.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		through their children who live with an ex-spouse or ex-partner inside the National Park.	
Environment Agency (09)	<ul style="list-style-type: none"> No comment as not relevant for our remit. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Ferring Conservation Group (10)	<ul style="list-style-type: none"> Wrong that any favour given to self or custom build housing proposals but if mandatory, apply the narrowest possible residential test. Two years residence within the NP boundaries. 	<ul style="list-style-type: none"> Context for the local connection test is the pressure for development in the protected landscape of the National Park with a scarcity of suitable land and the SDNPA duty towards local communities. In this context it is considered reasonable to prioritise those with a local connection when assessing demand for the purpose of permitting self-build plots. The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. 	<ul style="list-style-type: none"> None
Findon Parish Council (11)	<ul style="list-style-type: none"> No comments regarding criteria a) to d). Is e) regarding armed forces a legislative requirement? 	<ul style="list-style-type: none"> The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government, which requires service personnel are treated as having a local connection. For further details see the link below (Read 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		<p><u>Planning Practice Guidance paragraph 021).</u></p>	
Reuben Forrester (12)	<ul style="list-style-type: none"> [Residency connection a) & b)] Good idea to add a way for people who have grown up and/or spent significant percentage of their life living in the NP to also be eligible (to meet the local connection). I am currently eligible under b), however having been essentially priced out, the time I am eligible is coming to a close. I am currently 32 and have lived for 27 of those years within the park. I believe strong case for giving me a local connection even after my current eligibility [under b)] expires. 	<ul style="list-style-type: none"> Recognise there may be some people who grew up in, or had lived in, the SDNP for a significant amount of time that want to return, although are outside the criteria for residency. To acknowledge this demand recommend an additional criterion as follows: “have lived (as only home or principal residence) in the National Park for a total of 15 years or more”. 	<ul style="list-style-type: none"> Recommend additional criterion for residency as follows: “have lived (as only home or principal residence) in the National Park for a total of 15 years or more”.
Greatham Parish Council (13)	<ul style="list-style-type: none"> Considered the consultation and would support in principle the local connection test as set out in the consultation documents provided. 	<ul style="list-style-type: none"> Support for local connection test noted. 	<ul style="list-style-type: none"> None
Hambledon Parish Council (14)	<ul style="list-style-type: none"> Discussed and noted the proposal. No further comments to be submitted. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Harting Parish Council (15)	<ul style="list-style-type: none"> The Council has no comments for the consultation and confirms that it agrees with the suggestions 	<ul style="list-style-type: none"> Support for local connection test noted. 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
<p>Cllr Nick Owens (16) Hassocks Parish Council</p>	<ul style="list-style-type: none"> • [Armed forces] e) should not be included at all or not included in that form, because as described, such persons need never to have had any connection with the SDNP or with a parish partially in the SDNP. Would be more appropriate if item e) is included, that such people also need to pass the test of having lived in the SDNP or a parish partially in the SDNP, or have parents who have done so. For otherwise, it is just bias in favour of a certain group of people, who are not representative of the UK population as a whole. 	<ul style="list-style-type: none"> • The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection. For further details see the link below (Read Planning Practice Guidance paragraph 021). 	<ul style="list-style-type: none"> • None
<p>Andrew Hayward (17)</p>	<ul style="list-style-type: none"> • Only people who have lived permanently in the NP within the past five years should be eligible. • People who have served in the armed forces should not be automatically eligible if they have no connection to the NP. Front line NHS workers have done far more to protect the local population in the last 24 months than members of the armed forces (unless they have 	<ul style="list-style-type: none"> • The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. The time periods provide a reasonable reflection of demand for self-build plots of those with a local connection to the National Park. • The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This 	<ul style="list-style-type: none"> • None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	<p>been involved in immunisation or ICU care).</p>	<p>requires members of the armed forces are treated as having a local connection. For further details see the link below (Read Planning Practice Guidance paragraph 021).</p>	
<p>Crispin Holloway (18)</p>	<ul style="list-style-type: none"> • Long-time resident in NP, with immediate family living in the NP and employed almost all my life in NP. • Increasingly difficult to afford to live here (NP). • Affordable self-build, minimalizing environmental impact and energy efficiency would be the solution to me (and I am sure many others). 	<ul style="list-style-type: none"> • Affordability is a wider issue in the National Park. A range of mechanisms are required to tackle affordability, including the provision of affordable housing, all of which are part of a wider discussion outside the scope of this proposed local connection test to enable long-time residents to remain living in the National Park. 	<ul style="list-style-type: none"> • None
<p>Louise Holloway (19)</p>	<ul style="list-style-type: none"> • Strongly support local connection test. • Many people with long-standing and deep connections to locality finding it increasingly difficult to afford to live here. • Example of Kingston near Lewes. Last year or so, large influx of people to village and environs often renting while seeking to buy. We cannot compete. Only way we see to remain here is opportunity to self-build. 	<ul style="list-style-type: none"> • Support for the local connection test is noted. • The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. The time periods provide a reasonable reflection of demand for self-build plots of those with a local connection to the National Park. • Agree there is clearly wider affordability issue for housing in 	<ul style="list-style-type: none"> • None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		<p>general in the National Park. It is considered other mechanisms are needed to assist those seeking to remain in the National Park including the provision of affordable housing. This is part of a wider discussion outside the scope of this proposed local connection test.</p>	
<p>Nadim Khattar (20)</p>	<ul style="list-style-type: none"> Two part register seems to make sense. We support it. 	<ul style="list-style-type: none"> Support for local connection test noted. 	<ul style="list-style-type: none"> None
<p>Keith Lines (21)</p>	<ul style="list-style-type: none"> Live 0.2 miles from NP. We feel we should be on Part I of the list. We could be nearer than resident living in a split Parish situation. It would be unfair not to be on Part I. Perhaps policy should allow residents within a certain mileage of the SDNPA boundary. 	<ul style="list-style-type: none"> Residents outside and close to the National Park boundary may have a local connection through family or employment. Also note in response to other representations received, the split parish wording is being recommended to be removed. Therefore in the light of this recommended removal of the split parish wording, any resident connection should be with the local planning authority where the person lives. 	<ul style="list-style-type: none"> None
<p>Mrs Andrea Mason (22)</p>	<ul style="list-style-type: none"> Family are long-time residents in Funtington area. Evidence of family connection would hope to meet c) and one day build family home in the village. 	<ul style="list-style-type: none"> Comments noted. If the proposed test is implemented. Those on the register would be invited to complete a new application using the local 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		connection test. It is also important to remember firstly, there is no requirement to give priority to those on Part I of the register for any plots becoming available. The local planning authority has no duty to allocate plots to those on the register. Secondly anyone can build their own home in the National Park without being on the register.	
Cllr Judy Fowler (23) Midhurst Town Council	<ul style="list-style-type: none"> Fully support this initiative that offers encouragement to both residents within the Park and those with family connections to be able to afford to live here, subject of course to planning requirements. 	<ul style="list-style-type: none"> Support for the local connection test noted. 	<ul style="list-style-type: none"> None
National Highways Elizabeth Cleaver (24)	<ul style="list-style-type: none"> National Highways do not wish to comment. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Natural England Sharon Jenkins (25)	<ul style="list-style-type: none"> Natural England does not wish to comment on this consultation. 	<ul style="list-style-type: none"> Noted 	<ul style="list-style-type: none"> None
Owlesbury Parish Council Juanita Madgwick (26)	<ul style="list-style-type: none"> Query section e). Would like to understand why Armed Forces should be eligible if they have no connection to the village. To qualify there ought to be some previous period of connection 	<ul style="list-style-type: none"> The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection. For further 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	otherwise this is a strange and not clearly justified condition.	details see the link below (Read Planning Practice Guidance paragraph 021).	
Piddinghoe Parish Council Cllr Paul Bevan (27)	<ul style="list-style-type: none"> Council considers proposed local connection test is too 'generous' in the following respects: <ol style="list-style-type: none"> Criteria a), b) and c) should require past residence only within the boundary of the NP itself. Residence within a 'split parish' but outside the SDNP boundary should not apply. Criterion d) should require a record of formal employment. Criterion e) does not represent a local connection and should be deleted. 	<ul style="list-style-type: none"> Formal employment would include those working part time for a minimum of 16 hours. The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection. For further details see the link below (Read Planning Practice Guidance paragraph 021). 	<ul style="list-style-type: none"> None
Rowlands Castle Parish Council (28)	<ul style="list-style-type: none"> Considered at meeting on 7 February 2022 and unanimously agreed with the proposals. 	<ul style="list-style-type: none"> Support for the local connection test noted. 	<ul style="list-style-type: none"> None
Jane Scott (29)	<ul style="list-style-type: none"> Category a) and b) are irrelevant and should be scrapped. Locals who are born, raised and work in the SDNP all their lives can't afford to buy within the SDNP, so will never qualify. The only people that will qualify for this will be e.g. people who moved down from London 2/3 years ago. 	<ul style="list-style-type: none"> a) and b) relating to residency includes those living in the National Park for a long time. The time periods for criteria a) to d) are broadly consistent with those used for housing registers by local housing authorities in the National Park. The time periods provide a reasonable reflection of demand 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	<ul style="list-style-type: none"> All the time criteria are too low and not in favour of locals. 10 years or more would be a good criteria for all categories. For example, my husband in his mid-40's works in agriculture, born, raised and worked in the SDNP all his life, as a couple we cannot afford to buy in the NP in the village he grew up. 	<ul style="list-style-type: none"> for self-build plots of those with a local connection to the National Park. Agree there is clearly wider affordability issue for housing in general in the National Park. It is considered other mechanisms are needed to assist those seeking to remain in the National Park including the provision of affordable housing. 	
Telscombe Parish Council, Planning & Highways Committee (30)	<ul style="list-style-type: none"> Telscombe Town Council would recommend a point-based system using the suggested criteria and that the eligibility is extended beyond the Armed Forces to include key workers such as doctors, paramedics, teachers, etc. 	<ul style="list-style-type: none"> Proposed test would be simple to administer in terms of staff time and resources. A point based system suggests more complexity and a greater demand on limited resources. The Armed Forces criterion e) follows the Planning Practice Guidance paragraph 021 set out by the Government. This requires members of the armed forces are treated as having a local connection. For further details see the link below (Read Planning Practice Guidance paragraph 021). 	<ul style="list-style-type: none"> None
Walberton Parish Council (31)	<ul style="list-style-type: none"> Support the local connection test. 	<ul style="list-style-type: none"> Support for the local connection test noted. 	<ul style="list-style-type: none"> None

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
<p>Harry Palmer, Assistant Planning Officer (Policy) Wealden District Council (32)</p>	<ul style="list-style-type: none"> • Amend criteria, only those residents who live within administrative boundary of SDNPA can be considered as meeting local connection test. Do not consider those living in a 'split parish' outside of SDNPA administrative boundary to have met the local connection test. • Six split parishes between Wealden and SDNP (Alciston, Berwick, Long Man, Polegate, Selmeston and Willingdon & Jevington). For some only small portion inside SDNP however parish has substantial population, for example Willingdon and Polegate combined had over 16,000 residents in 2011 census with very few living in the SNP. • Wealden District Council (WDC) may also implement a local connection test. Inappropriate for residents of split parishes (living in Wealden) to be on (part 1 of) both registers. Double counting of need in split parishes would result. WDC and SDNPA (under the duty to grant 	<ul style="list-style-type: none"> • Comments noted about split parishes and the possibility of double counting, causing both local planning authorities to overestimate demand if Wealden also implement a part 1 and 2 register. The purpose of the test is for the focus of demand to be those with a local connection when meeting the duty to permit sufficient plots. The comment highlights the reference to split parishes could in the context of the SDNP and Wealden distort demand for self-build plots for those with a local connection. This could also be true for other neighbouring local planning authorities around the National Park. Therefore recommend the reference to split parishes in criteria a), b) and c) is removed. 	<ul style="list-style-type: none"> • Recommend the reference to split parishes in criteria a), b) and c) is removed.

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
	<p>permissions for self-build to meet the demand on part 1 of the register) would both be required to approve more plots than actually needed.</p> <ul style="list-style-type: none"> • Suggest removing references to split parishes in the criteria to avoid double counting. 		
<p>Jill Lee, Principal Planning Officer Winchester City Council (33)</p>	<ul style="list-style-type: none"> • Winchester City Council (WCC) introduced similar test in 2019 and operate a two part register. Eligibility criteria proposed are along similar lines to those introduced by WCC. The definition of immediate family is more restrictive than used by WCC. WCC specify family as “A person shall be taken to be a close family member of another’s family if he or she is the spouse, civil partner, mother, father, sister, brother, daughter, son, grandparent or grandchild of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Family includes adopted and step relatives.” 	<ul style="list-style-type: none"> • Noted that the criteria in the proposed local connection test are similar to those used by WCC. Note the different definition used for family which is more detailed. To bring clarity to the definition recommend using the wording with the exception of references to grandparents and grandchildren. The removal of the latter references would be consistent with the decision of Planning Committee on 9 September 2021 when the report on the proposed local connection was considered. Also for clarity the wording on adopted and step relatives used by WCC is amended. Recommended definition to include, “A person shall be taken to be an immediate family member of another’s family if he 	<ul style="list-style-type: none"> • Recommend the definition of immediate family is amended to include, “A person shall be taken to be an immediate family member of another’s family if he or she is the spouse, civil partner, mother, father, sister, brother, daughter, son of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Immediate family includes relationships as described above with adopted and step relatives.”

Individual or Organisation making the Representation (Rep Number)	Issue raised	SDNPA officer response	Proposed action
		<p>or she is the spouse, civil partner, mother, father, sister, brother, daughter, son of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Immediate family includes relationships as described above with adopted and step relatives.”</p>	
<p>Paul Whitby (34)</p>	<ul style="list-style-type: none"> I am encouraged to see a priority made to ensure that those who are Local to the South Downs are favoured under this scheme when it comes forward and wish to confirm that I am supportive of the test as provided. 	<ul style="list-style-type: none"> Support for the local connection test noted. 	<ul style="list-style-type: none"> None

Appendix 2 – Amended Proposed Local Connection Test showing suggested changes

Text deleted – ~~struck through~~

Text added - underlined

Any person that meets at least one of the following criteria when applying to be entered on the Self-build and Custom housebuilding register, is considered to have met the Local Connection Test and will be entered into Part I of the Register:

a) Have lived (as only home or principal residence) in the National Park ~~(or in a split Parish, part of which is inside the National Park)~~ continuously for at least the last two years; or

b) Have lived (as only home or principal residence) in the National Park ~~(or in a split Parish, part of which is inside the National Park)~~ continuously for three out of the last five years; or

c) Have lived (as only home or principal residence) in the National Park for a total of 15 years or more

~~e)d) Have immediate family* who have lived continuously in the National Park (or lived in a split Parish, part of which is inside the National Park) for at least the previous five years; or~~

~~d)e) Have been employed in the National Park for a minimum of 16 hours per week continuously for the last two years; or~~

~~e)f) You are a member of the armed forces, or an ex-member of the armed forces whose service ended within the last 5 years.~~

* Immediate family is defined as parents, adult siblings and adult children. A person shall be taken to be an immediate family member of another's family if he or she is the spouse, civil partner, mother, father, sister, brother, daughter, son of that other person or if he or she ordinarily resides with that other person as husband or wife or partner but without being legally married to (or in a civil partnership with) that person. Immediate family includes relationships as described above with adopted and step relatives.