



# South Downs Local Plan Review

## Draft Project Initiation Document

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March 2024 **DRAFT v0.3**

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# I. Introduction

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## Purpose of this document

- I.1 This draft Project Initiation Document (PID) defines the scope of and programme for the South Downs Local Plan Review undertaken by the South Downs National Park Authority (SDNPA). It is important to note that the Local Plan Review is being undertaken at a time when considerable change to the planning system is in progress. The contents of this PID, including the timetable, are subject to the progression of legislation, national planning policy and transitional arrangements for these reforms.
- I.2 In this draft PID:
- Section 1 explains the purpose of this document, the requirement for a Local Plan Review, gives an overview of the adopted South Downs Local Plan and explains the commencement of the Local Plan Review.
  - Section 2 defines the scope of the local plan and identifies evidence required to create a sound plan and identifies key issues likely to be relevant to the plan or environmental assessment.
  - Section 3 sets out the timetable.
  - Section 4 sets out the project management, governance, risks to delivery and resourcing arrangements.
  - Section 5 outlines the overall approach to community and stakeholder engagement.

## Requirement for a Local Plan Review

- I.3 The National Planning Policy Framework paragraph 33 states ‘policies in local plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary’. The [Planning Practice Guidance for plan-making and reviews](#) (2019) advises ‘Under regulation 10A of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#) local planning authorities must review local plans, and Statements of Community Involvement at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand’ (Paragraph: 062 Reference ID: 61-062-20190315).

## The South Downs Local Plan and commencement of the Local Plan Review

- I.4 The SDNPA’s development plan includes the South Downs Local Plan (SDLP), Minerals & Waste Plans prepared jointly with other local planning authorities, and Neighbourhood Development Plans (NDPs). The SDLP establishes the strategic planning policy framework for the preparation of NDPs in the National Park. As of March 2024, there are a total of 61 areas designated for the purposes of neighbourhood planning and 43 NDPs made part of the development plan.
- I.5 The SDLP was adopted in 2019. It is landscape-led and seeks to deliver ecosystem services. It has a development strategy of a medium level of growth dispersed across the National Park. It also sets ambitious requirements for affordable housing provision. The SDLP includes 55 core, strategic and development management policies setting development requirements across a

range of topics/issues. In addition, there are 37 site allocation policies, two of which are strategic sites: Shoreham Cement Works, and North Street Quarter in Lewes.

- 1.6 The SDNPA has Full Authority approval to proceed with the Local Plan Review. At a Full Authority Meeting on 19 May 2022, SDNPA resolved to:
1. Note the purpose, resourcing and risks for the Local Plan Review and associated potential reviews of Neighbourhood Development Plans.
  2. Approve the commencement of the Local Plan Review.
  3. Approve the virement (budget transfer) of £227K from other Planning Policy budgets to the Development Plan budget in line with the Authority's financial procedures.
  4. Approve the Local Development Scheme (seventh revision) for the South Downs National Park set out in Appendix I of this report.

Papers for the Full Authority Meeting on 19 May 2022 can be viewed by clicking this [link](#). Minutes from the Full Authority Meeting on 19 May 2022 can be viewed by clicking this [link](#).

- 1.7 At the Full Authority meeting on 14 December 2022 Members approved the integration of the Shoreham Cement Works Area Action Plan into the Local Plan Review, and a revised timetable for the Local Plan Review accordingly. The Authority:
1. Noted the current uncertainty in national and regional planning matters and the Authority's resourcing for the Shoreham Cement Works Area Action Plan and Local Plan Review
  2. Approved the integration of the Shoreham Cement Works Area Action Plan into the Local Plan Review
  3. Approved the Local Development Scheme (eighth revision) for the South Downs National Park, incorporating a revised timetable for the Local Plan Review, as set out in Appendix I of this report.

Papers for the Full Authority Meeting on 14 December 2022 can be viewed by clicking this [link](#).

Minutes from the Full Authority Meeting on 14 December 2022 can be viewed by clicking this [link](#).

## National Planning Reforms

- 1.8 In September 2023 Government consulted on proposed changes to the plan-making system being introduced through the Levelling Up and Regeneration Act 2023. Government has also confirmed that there will be a cut-off date for submission of Local Plans under the existing planning system of June 2025. Implications of these proposals and a response to this consultation were considered in a report to Planning Committee in October 2023. The proposals include a 30-month timescale incorporating three 'Gateway' checks by the Planning Inspectorate or similar body. Secondary legislation is expected later this year with the intention of the new planning system commencing in Autumn 2024. The consultation proposed selecting 10 'frontrunners' to start preparing plans under the new system in Autumn 2024, followed by others in waves at six-month intervals to manage the workload impact on the Planning Inspectorate and consultees.
- 1.9 There are many uncertainties about what the new system would comprise, and it is possible that the deadline will be moved back to allow the Local Plan Review to progress under the current system. As a result, the approach to the Local Plan Review set out in this PID seeks to progress the Local Plan Review in a way that would work under both systems, taking what we know about the new one and combining it with what we would need to do under the existing

one. However, as more is known about the new planning system, aspects of this PID, such as the timetable, may need to be revised.

**Finalising the PID**

I.10 This document is a draft PID. It will be updated and finalised following public engagement in summer 2024.

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## 2. Scope of the Local Plan Review

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### Key issues for the Local Plan Review

#### Environment, Social and Economic Overview

##### 2.1 Key matters include:

- The **Climate emergency** and the **biodiversity crisis**. Climate change is one of the principal drivers of environmental change worldwide. In the UK, projections indicate we will see hotter, drier summers, changes in patterns in rainfall and increase in the impact of extreme weather events such as flooding. We are already seeing the beginning of these changes. The Government has committed to a legally binding target to achieve net zero by 2050 through joining the Paris Agreement, an international treaty on climate change which came into force in 2016. The UK, like most other countries worldwide, has seen significant loss of biodiversity, and as recognised in the [State of Nature Report 2023](#) the UK is now one of the most nature-depleted countries on Earth. We are all dependent on nature and so there is a clear need for actions to achieve nature recovery and creation of a resilient ecological network. The Government has made a variety of legislative and policy commitments referenced in paragraph 2.2 below.
- **Economic challenges:** Inflation, supply chains / UK EU Exit, including economic and social impacts from the Covid-19 pandemic such as increased remote and flexible working, increased demand for online services, awareness and value of gardens, public open space and other access to nature.
- **Social issues:** Health, including both mental and physical health, access to nature, and quality homes. The South Downs National Park has a role to help address these issues as the 'natural health service' for the South East. Housing, including affordability of homes in general and homes for those on low incomes living in the National Park, availability of types of homes and design of homes for adaptability and suitability over our lifetime, including for older people and people with disabilities, and maintaining vibrant communities.

The Local Plan Review will consider how choices in strategy, allocations, and topic based / park-wide policy requirements can contribute to addressing these overarching environmental, social and economic matters.

#### Strategic Matters

##### 2.2 Key matters include:

- **National Planning Reform** – The Levelling Up and Regeneration Act (LURA) 2023 and emerging subsequent secondary legislation will introduce a new plan-making system as described in paragraph 1.8 above. In addition to the changes and implications mentioned in paragraph 1.8 the following key matters noted from the LURA or from the direction of travel indicated by the Government's plan-making reforms consultation in 2023:
  - **National Development Management Policies (NDMPs)** – Government intends to produce a suite of NDMPs to sit alongside an updated NPPF. It is intended that these would cover policy matters which typically occur and are dealt with in a similar way across the country, avoiding the need for each Local Planning Authority (LPA) to write their own very similar version. Matters covered by NDMPs would not be appropriate to address in Local Plans. However, it is anticipated that Local Plans would be able to have policies that cover locally specific matters not addressed in NDMPs.

- **Loss of Supplementary Planning Documents (SPDs)** – It is indicated that these would fall away once a Local Plan is adopted under the new system. A new type of document called a ‘Supplementary Plan’ is intended to be introduced. These would have the same weight as the Local Plan but generally can only cover a specific area within the LPA i.e., not be LPA wide. The exception to this is a Design Code (see below). If the Local Plan Review progresses under the new system, it will be necessary to consider what aspects of existing SPDs should be incorporated into the Local Plan Review or Design Code documents.
- **Design Codes** – A new document and a type of supplementary plan. This would have the same status as the Local Plan and it is mandatory under the new planning system. More information about Design Codes and the potential scope for a South Downs Design Code is set out in Appendix A.
- **Environmental Outcomes Reports** – The Government is intending to replace the current Strategic Environmental Assessment (SEA) process with a new ‘Environmental Outcomes Report’. The intention is for the process to become more outcome focused. It is understood that the Government will publish an Outcomes Framework and targets which Plans will be assessed against.
- **The strengthened duty** – The strengthened duty under Section 245 of the Levelling Up and Regeneration Act 2023 requires all relevant authorities to seek to further the purposes of the National Park, this includes the South Downs National Park Authority as well as other public bodies.
- **National planning policy changes** under the current system including but not limited to:
  - New NPPF(s). Since the SDLP was adopted there have been several iterations with varying degree of changes to the NPPF.
  - The new [National Design Guide](#) and [National Model Design Code](#).
  - [First Homes](#).
  - An updated Use Class Order.
  - Various changes to Permitted Development Rights.

These national planning policy changes will be considered in the Local Plan Review alongside emerging national planning reforms as appropriate.
- **Changes in legislation and national policy regarding nature**, including:
  - The [25 Year Environment Plan](#) and its first revision the [Environmental Improvement Plan 2023](#).
  - The [Environment Act 2021](#)
  - Local Nature Recovery Strategy Regulations
  - Biodiversity Net Gain Regulations

These will be addressed as appropriate through the Local Plan Review to ensure legal compliance.
- **Agricultural Sector Changes** – The agricultural sector is undergoing key changes following the UK’s Exit from the EU which is changing the approach to payments made to farmers and landowners, various economic challenges, climate change, and emerging role in nature-based solutions markets. There is increasing farm diversification in response to these changes.
- **Protected Landscapes Environmental Outcomes Framework** – The government has set ambitious targets for National Parks and National Landscapes. They will set the ambition for how Government expect Protected Landscapes to achieve 3 key outcomes from the Environmental Improvement Plan (EIP) 2023. National Park Authorities should incorporate the targets into their statutory management plans.

Local Matters

2.3 Key matters include:

- **SDNPA Corporate Priorities** - The Local Plan Review will consider how choices in strategy, allocations, and topic based / park-wide policy requirements can contribute to achieving these corporate priorities and associated targets.

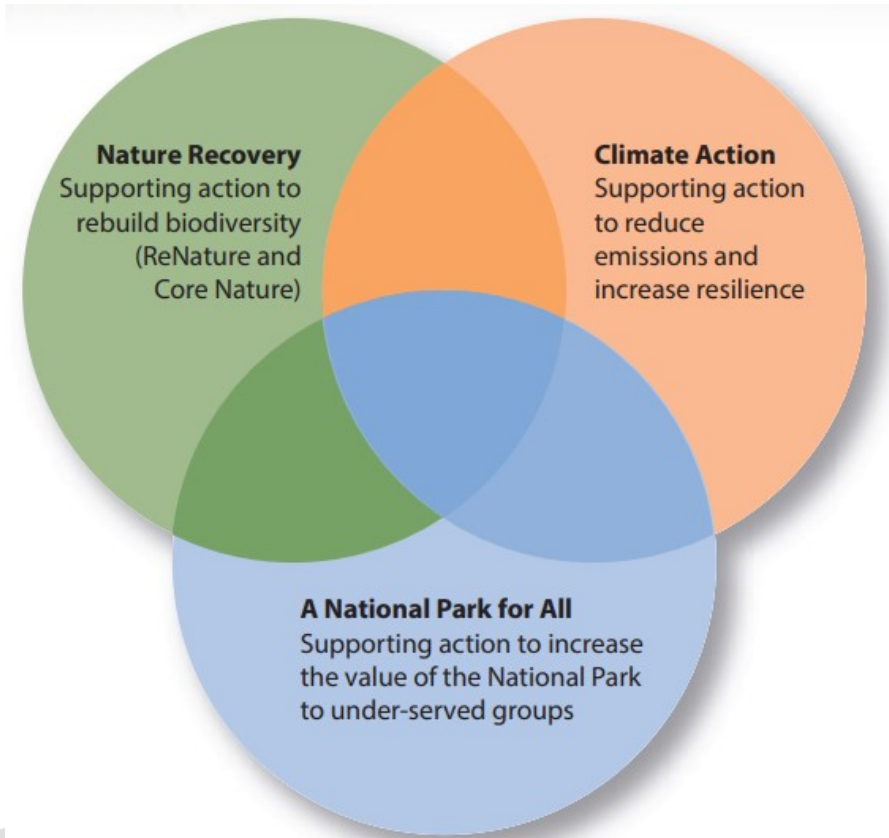


Figure 1: SDNPA Corporate Priorities

**High Level Targets**

**Nature Recovery**

- To secure an additional 13,000ha, or 33% of land managed for nature by 2030 from a baseline of 25%.
- Maintain, enhance and/or restore existing key sites, habitats and species.

**Climate Action**

- South Downs National Park Authority to reduce its carbon footprint by 150 tons per annum in line with the 2030 net zero target.
- 5% reduction per annum in the overall carbon footprint of the South Downs National Park from the baseline reported in 2019.

**National Park For All**

- Increase diversity of visitors to, and those engaging with, the South Downs National Park.
- ‘Your National Park’ campaign reaches 20,000 people by 2025.
- Impact measure for direct engagement.

Figure 2: High Level Targets for SDNPA Corporate Priorities



- The **Climate Change Adaptation Plan** and the **Climate Change Action Plan 2023** – The South Downs is particularly vulnerable to the impacts of present and future climate change. These documents recognise that impacts are likely to be significant and profound across a wide range of areas and assets. They set out a range of responses to the risks and opportunities from climate change, including flood and coastal erosion management, building ecological resilience to the impacts of climate change and effective water management. The Action Plan sets out a climate change programme with a series of objectives and key actions. The National Park Authority agreed in March 2020 to 'Committing to working towards the South Downs National Park becoming 'Net-Zero with Nature' by 2040 as defined within appendix 1' see [agenda item 12 of the March 2020 National Park Authority meeting](#). The Local Plan Review will need to consider how strategy and topic-based policies can address these targets and objectives.
- The **Partnership Management Plan Review** – The Partnership Management Plan (PMP) sets out the overarching five-year strategy for the management of the South Downs National Park. The PMP 2020-2025 sets out a series of outcomes and priorities that partners across the National Park together will deliver over the next five years to achieve by 2050. During preparation of the Local Plan Review, the production of the next PMP will take place. These timings will allow the preparation of these plans to inform each other, including opportunities to share evidence.
- **Affordable Housing Delivery** – There is a pressing need for affordable homes in the National Park, as with elsewhere in the South East. For this reason, the Local Plan has demanding policy requirements for affordable housing. Whilst these requirements are supported by viability evidence, there have still been challenges with delivery, particularly in the smaller villages and rural areas of the National Park, largely due to insufficient on-going management models.
- **New HRA issues have arisen** since the adoption of the Local Plan such as Nutrient Neutrality and Water Neutrality. Joint working with other affected partners is ongoing and will inform policy approaches in the Local Plan Review.
- **Overall Housing delivery** – The provision figure for approximately 4,750 net additional dwellings between 2014 and 2033 is set out in policy SD26 of the Local Plan and equates to an annualised number of approximately 250 net additional dwellings per annum (dpa). Between 2014/15 and 2019/20 (i.e., within the plan period pre Covid-19 pandemic) completion rates were at or above 250 per annum. From 2020/21 onwards completions have been below the annualised provision figure from the Local Plan, clearly showing the impact on construction progress of the Covid-19 pandemic, multiple lockdowns and economic impacts. However, in 2022/23 the level of completions has picked up from the previous two years. As well as the impact on construction from the pandemic, there are other national level challenges which impact housing delivery such as inflation.
- **Shoreham Cement Works** - In December 2022, the Authority agreed to incorporate the work on Shoreham Cement Works into this Review rather than progressing a separate Area Action Plan.

2.4 **Sustainability Appraisal Scoping Report** – Sustainability Appraisal (SA), including Strategic Environmental Assessment, is a key part of Local Plan preparation. The aim of SA is to promote sustainable development by assessing how well or otherwise a plan will help achieve environmental, economic and social objectives. The first step in the SA process is to produce a Scoping Report and consult statutory consultees. A Scoping Report sets the context and objectives, establishes the baseline and decides the scope. A Scoping Report for

the SA for the Local Plan Review has been prepared which pulls together data and evidence on a variety of issues across the South Downs National Park area and provides more detail on key issues for the Local Plan Review. It was subject to consultation with statutory and key consultees in 2023. The document was amended following feedback and the [Scoping Report is now published.](#)

### What will the LPR include

2.5 The Local Plan Review documents will consist of:

- An updated South Downs Local Plan for the period 2022-2042 which will include:
  - Vision and objectives,
  - Policies in relation to the amount, type, location of and timetable (trajectory) for development, including site allocation policies, and
  - Parkwide strategic and development management policies setting requirements that should be met for planning permission for development to be granted on topics such as landscape, design, affordable housing, infrastructure and other particular characteristics or circumstances of the area.
- Policies Map
- Environmental Assessments (SA/EOR, HRA)
- Equalities Impact Assessment
- Other supporting evidence
- Infrastructure Delivery Plan
- Design Code (see Appendix A Design Code Scope)

### Evidence required

2.6 At the scoping stage, a series of evidence studies to support the Local Plan Review have been identified. Further evidence may be required as the project progresses. Some studies will be undertaken internally by SDNPA officers, and others will be externally commissioned. Current evidence studies identified:

- Housing and Economic Needs Assessment (HEDNA) – Completed. The HEDNA has been published and is available on the SDNPA website and can be viewed by clicking on this [link](#).
- Land Availability Assessment (LAA) – Internal and in progress.
- Employment Land Review (ELR) – Internal and in progress.
- Gypsy and Traveller Accommodation Assessment (GTAA) – Commissioned and in progress.
- Local Green Space Assessment – Internal and in progress.
- Landscape Assessment – To be commissioned.
- Renewable Energy Study – Commissioned and in progress.
- Transport Assessment – Commissioned and in progress.
- Water Cycle Study – Commissioned and in progress.
- Settlement Study – Internal and in progress.
- Open Space Study – Internal and in progress.
- Viability Report – To be commissioned.
- Sustainability Appraisal / Environmental Outcomes Report – Commissioned and in progress.
- Habitats Regulations Assessment – Commissioned and in progress.
- Equalities Impact Assessment – Internal and in progress.

## Project Objectives

- 2.7 The objective for the Local Plan Review is to deliver an up-to-date Local Plan, Policies Map and Design Code which:
- Will set the framework for development in the South Downs National Park for at least 15 years from adoption.
  - Sets the vision, strategy, and requirements for how the area should develop over the lifetime of the plan.
  - Seeks to further the National Park Purposes, and pursuant to these, the Duty.
  - Delivers the SDNPA Corporate priorities and PMP outcomes where relevant.
  - Is designed to secure that the use and development of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change.
  - Takes into account any local nature recovery strategy.
  - Is prepared in a way that makes efficient use of resources.
  - Is evidence based.
  - Is legally compliant and sound.

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### 3. Timetable

#### Overview

3.1 The key stages in the preparation of the Local Plan Review and the Design Code are set out in Table I below. The statutory milestones for the Local Plan Review are set out in the updated Local Development Scheme (9th Revision).

**Table I: Local Plan Review & Design Code Timetable**

	23-24	24-25				25-26				26-27				27-28	
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
<b>Local Plan Review</b>															
Evidence gathering & preparing a draft Plan	■	■	■												
Early participation Summer 2024			■												
Regulation 18 Member Consideration				■											
Regulation 18 Consultation					■										
Revisions to the Plan						■	■								
Regulation 19 Member Consideration								■							
Regulation 19 Consultation									■						
Prepare the Plan for Submission										■					
Submit the Plan											■				
Examination												■			
Main Modifications Consultation													■		
Adoption														■	
<b>Design Code</b>															
Evidence gathering and preparing a draft Design Code			■	■	■	■									
Member consideration for consultation alongside Reg. 19 LPR								■							
Consultation of the Design Code alongside Reg. 19 LPR									■						
Prepare the Design Code for Submission										■	■	■			
Submit the Design Code													■		
Examination														■	
Adoption															■

3.2 The timetable above is subject to the progress of the national planning reforms. The timetable for the Design Code shows work beginning in Autumn 2024. The production of a Design Code will depend on which system the Local Plan Review will be progressed under. If the transitional arrangement deadlines are delayed and the Local Plan Review progresses under the current system, then the Design Guide and other SPDs will still apply, and it would not be necessary to produce a Design Code at this time.

3.3 Figure 3 below shows the steps of the new plan-making system and what this may mean for the Local Plan Review timetable. This is based on (a) the new plan-making system commencing from September 2024 and (b) the Department for Levelling Up Homes and Communities (DLUHC) approving the South Downs Local Plan Review to be in the ‘first wave’ of the plans to progress under this new system.

### New Plan-making System

### South Downs Local Plan Review

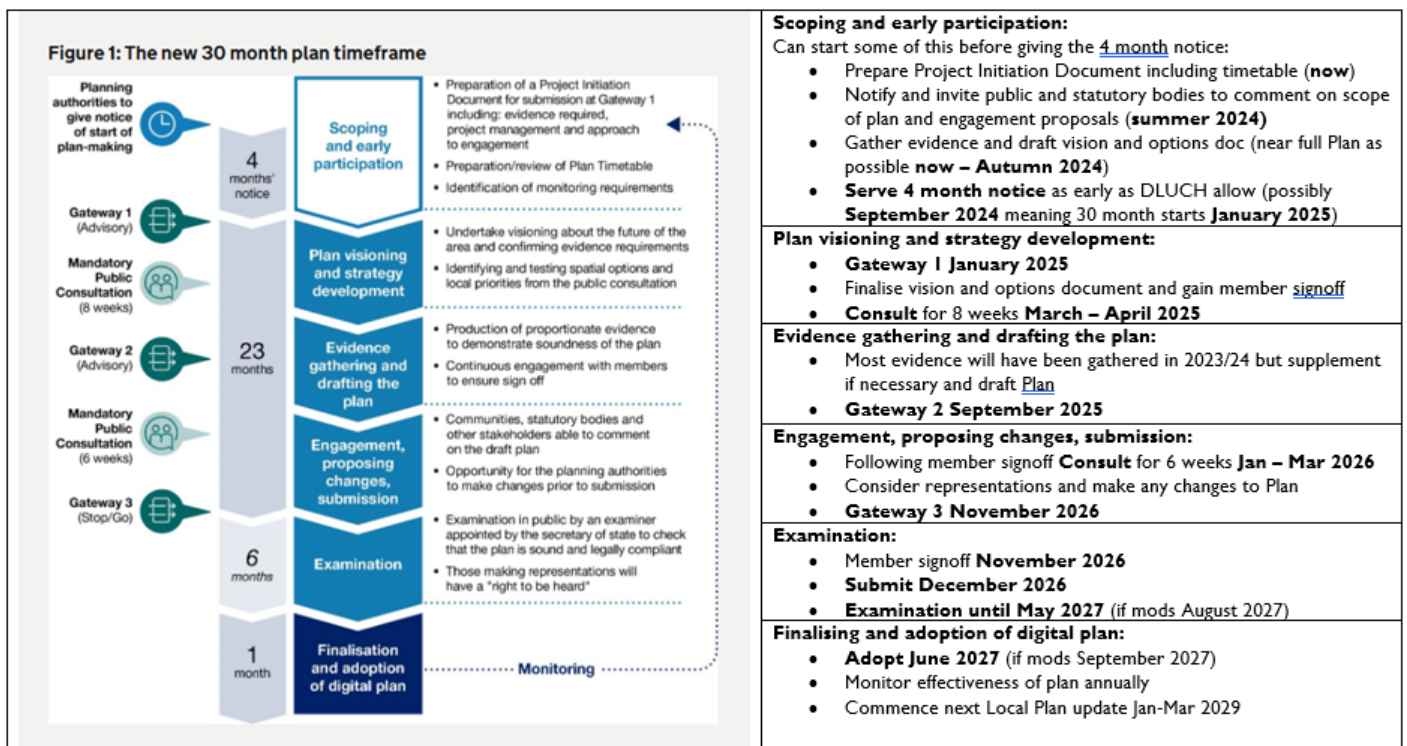


Figure 3: The proposed new plan-making system alongside a potential LPR timetable under this system

### Evidence Gathering Stage

3.4 The first step of the Local Plan Review is to gather evidence and review and update the contents of the Local Plan accordingly. The Local Plan Review is being undertaken at a time of uncertainty in the context of wider national planning reforms as discussed earlier in this PID.

3.5 It is expected that the Local Plan Review will be prepared and submitted under the new planning system. However, we do not yet know (a) key details such as the content of National Development Management Policies and (b) whether the new planning system will come in according to Government’s intended timetable, or whether transitional arrangements may change or be delayed; indeed, we may find ourselves progressing under the current system.

3.6 To manage this risk, preparatory work for the draft Local Plan has been sequenced as shown in Figure 4. For either the current or new planning system information on development needs,

supply and allocations, and other items of evidence will be required. The biggest impact of planning reforms is likely to be on park-wide / topic-based policies, because aspects of these policies could be addressed by the National Development Management Policies. This approach allows the Authority to respond to emerging planning reforms.

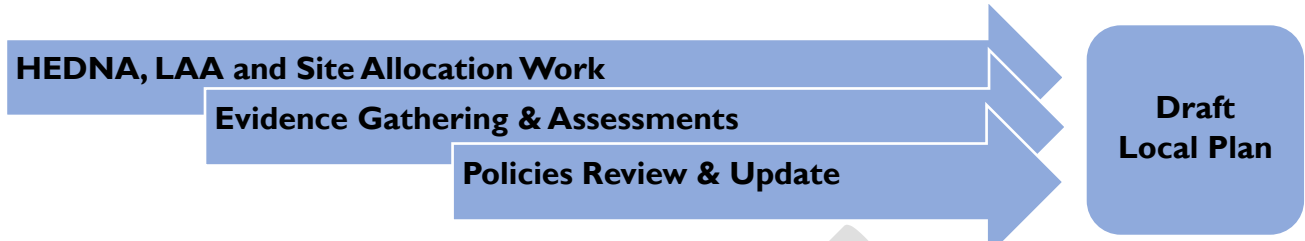


Figure 4: Draft Plan Preparation Workstreams Timing

### Early Participation

- 3.7 The Government, in their plan-making reforms consultation ‘*Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms*’, has indicated that there will be an ‘early participation stage’ in the new plan-making process. Although not a statutory step under the current planning system, to support our preparedness and to be proactive in regards the new planning system, an additional step for early participation has been built into the timetable. Please see Section 5 of this PID and Appendix D for further information.

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## 4. Project Governance

### Project Team

4.1 The Local Plan Review project team and their roles are:

- **Member Lead** – Vanessa Rowlands, Chair of the National Park Authority and Heather Baker, Chair of Planning Committee
- **Project Sponsors** – Mike Hughes, Director of Planning (Interim) and Claire Tester, Planning Policy Manager
- **Project Manager** – Katharine Stuart, Planning Policy Lead
- **Core Project Team** – Planning Policy Team

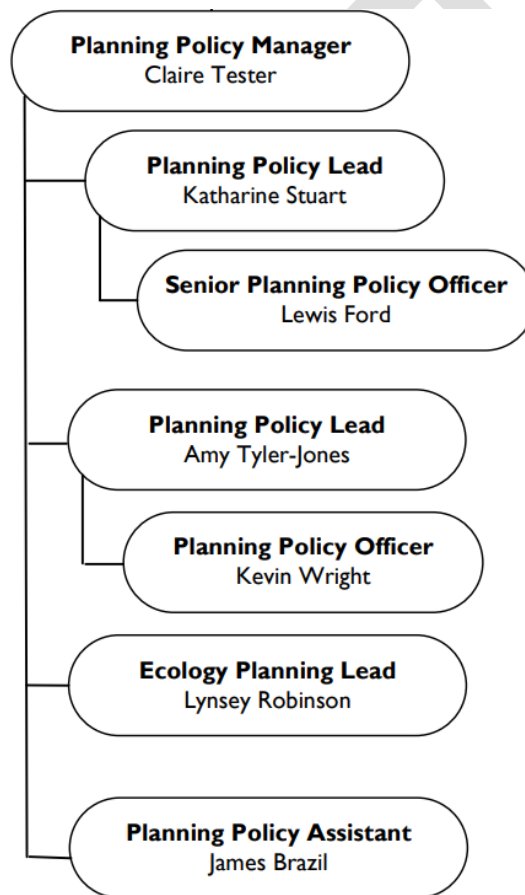


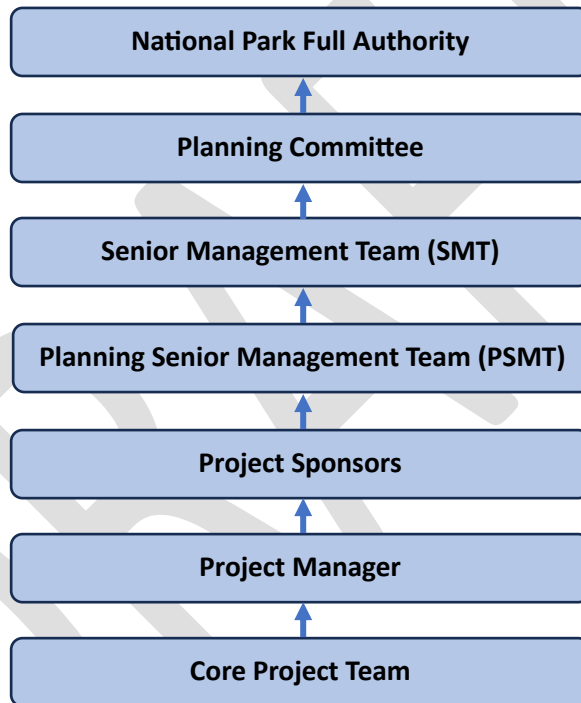
Figure 5: Planning Policy Team Structure

- **Specialist and technical input from the following:**
  - Development Management Team, Planning Directorate – providing development management input.
  - Major Projects and Performance Team, Planning Directorate – providing specialist input on design, landscape, heritage, transport, major projects, affordable homes, CIL and S106.
  - Countryside and Policy Management Directorate – providing specialist input on climate change, nature recovery, ecosystem services, tourism, economy, access, links with the Partnership Management Plan Review.

- Corporate Strategy Directorate – providing support on procurement, budget, communications, IT and GIS, and administrative support.
- **Legal Support** – Senior Solicitor, Environment – West Sussex County Council

**Decision making and advisory structures**

- 4.2 Regular updates on progress and any issues arising will be provided to the Planning Senior Management Team (PSMT) (comprising the Director of Planning, Planning Policy Manager, Major Projects and Performance Manager and Development Manager) and Senior Management Team (SMT) (comprising Chief Executive, Director of Planning and Director of Landscape and Strategy) as necessary. For a steer on key matters in the Local Plan Review, plus comment on draft documents in whole or in part will be provided primarily from PSMT. Officers will also receive steer from members on key matters via a series of Workshops.
- 4.3 The formal approval of final documents for the statutory milestones will be undertaken in accordance with SDNPA Standing Orders.



**Figure 6: Governance Pathway**

**Key assumptions and dependencies**

- 4.4 The following have been identified as key assumptions and/or dependencies in the development of the Local Plan Review:
- Staff resources and budget to complete the project.
  - The progression of national plan-making reforms will have implications for the timetable and contents of the Local Plan Review.
  - Close working and input from officers across the SDNPA.

**Budget**

- 4.5 As a multi-year project, the overall budget for the Local Plan Review sits across more than one financial year. Resourcing a Local Plan Review requires detailed evidence gathering, public



consultations, document preparations and amendments, examination in Public by an independent Inspector before adoption by the Authority.

- 4.6 The budget for the Local Plan Review is currently approximately £465,000. This excludes staff time and other similar 'in house' costs. Some of this initial budget has already been spent or committed to the evidence base documents referred to in paragraph 2.6. Further evidence-base work will need to be commissioned and the existing budget includes examination costs of £125,000. Officers are exploring the additional costs associated with the new planning system (for Gateway checks and barrister support at the examination) and these will be considered as part of the 2024/25 budget.

### Risks

- 4.7 A risk register is set out in Appendix B and will support Project Management and the Project Plan of the Local Plan Review. Risks and scores may change during the Local Plan Review process as issues arise and mitigation applied.

## 5. Stakeholders and Engagement

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- 5.1 Appendix C sets out the **Alignment and Cooperation Strategy** for engagement with partners.
- 5.2 Appendix D sets out the **Local Plan Review Engagement Strategy** with community and stakeholders.



## Appendix A - SDNPA Design Code Scoping

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### Legislative Basis

1. Section 15F (1) of the Levelling Up and Regeneration Act 2023 Schedule 7—Plan making requires a local planning authority to produce a design code for the whole of its area that “includes requirements with respect to design that relate to development, or development of a particular description, which the authority consider should be met for planning permission for the development to be granted”. This does not have to include every type of development or every aspect of design.
2. The Local Plan timetable required for every local planning authority (15B) must include how it intends to meet the requirements of 15F to produce a design code. The Secretary of State has the power to issue a direction if a local planning authority does not comply with these requirements.
3. The Design Code is a ‘supplementary plan’ (15CC), and is the only one that can be prepared on an area-wide rather than a site specific basis. The Secretary of State will make regulations about the preparation of supplementary plans, which must require a proposed supplementary plan to be the subject of consultation with the public.

### Emerging Planning Reform - Plan-making Consultation September 2023

4. The following are extracts from the Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms launched July 2023. These provide a direction of travel from the government regarding Design Codes.
  - 176. ... local planning authorities will also be able to use supplementary plans to discharge the new Bill requirement to produce an authority-wide design code which will be used to provide, or reinforce an authority’s overarching design vision, setting out high level strategic design parameters to apply to development.
  - 178. The reforms will remove the role of Supplementary Planning Documents and Area Action Plans... Supplementary plans will have the same weight as a local plan and other parts of the development plan. They will therefore also be subject to consultation and an independent examination.
  - 183. The Bill states that all supplementary plans must be designed to secure that the development and use of land in the authority’s area contribute to the mitigation of, and adaption to, climate change, so far as the relevant plan-making authority consider appropriate, having regard to the subject matter of the supplementary plan.
  - 184. Supplementary plans will also benefit from wider reforms mentioned in this consultation document. These include ensuring evidence base requirements are proportionate and plan preparation processes and plans themselves are digital, transparent, understandable and map-based.

- 185...supplementary plans will not have a defined preparation time such as the 30 months proposed for local plans and minerals and waste plans...
- 186. The Bill sets out that supplementary plans must be in general conformity with a relevant operative spatial development strategy and the relevant plan-making authority must have regard to any other part of the development plan which has effect for the area or a site to which the plan relates when preparing a supplementary plan (including the local plan and its local vision for growth, and any neighbourhood plans). **However, they can be prepared prior to the adoption of a new style local plan.**
- 190. Depending on content, supplementary plans may be subject to Environmental Assessment (or subsequent Environmental Outcomes Reports) obligations. We expect planning authorities to use an environmental screening approach for supplementary plans similar to that used for neighbourhood plans.
- 194... The Bill ensures that regulations must require a proposed supplementary plan to be the subject of consultation with the public. We intend to set out in regulations that supplementary plans should have a minimum of one formal consultation stage, the timeframe for which will be set out in the local plan timetable or minerals and waste plan timetable.
- 195. The Bill's approach to the independent examination of supplementary plans is broadly modelled upon the existing arrangements for neighbourhood plans (which already form part of the development plan once brought into force).
- 196. The general rule is that the independent examination is to take the form of written representations. However, the examiner must cause a hearing to be held for the purposes of receiving oral representations if the examiner considers that the consideration of oral representations is necessary to ensure adequate examination of an issue or that a person has a fair chance to put a case.
- 197. The Bill provides two options for the independent examination of supplementary plans. Plan-making authorities may submit their draft supplementary plan to the Secretary of State, for the examination to be carried out by a person appointed by the Secretary of State, or to an examiner of the authority's choosing who is an independent, impartial person and who is suitably qualified.
- 204. ...SPDs will remain in force until planning authorities adopt a new style local plan or minerals and waste plan.

### **Baseline documents**

- Design Guide SPD (2022)
- Sustainable Construction SPD (2020)
- Habitats Regulations Assessments TAN (2021)
- Dark Skies TAN (2021)
- Ecosystem Services TAN (2019)
- Extensions and Replacement Dwellings TAN (2023)
- Camping & Glamping TAN (2021)
- Viticulture TAN (2021)

- Biodiversity Net Gain TAN (2022)
- Scale-Scale Renewable Energy TAN (2022)
- Equestrian Development TAN (2023)
- Landscape Character Area Assessments
- Roads in The South Downs
- Nationally Described Space Standards

### Precedent Document

- Lake District Design Code

### Document Scope (subject to potential change as work progresses)

#### 1. How to Use the Design Code (Checklists?)

#### 2. Landscape Led (Contextual) Design Approach

#### 3. All Development

- Character (content distilled from Design Guide SPD and LCAs)
- Site Context (new content, starting with Lake District context study)
- Settlement pattern (content distilled from Design Guide SPD + new map-based evidence)
- Orientation (content distilled from Design Guide SPD)
- Placemaking (content distilled from Design Guide SPD)
- Access (content distilled from Design Guide SPD)
- Legibility (content distilled from Design Guide SPD)
- Active frontages (content distilled from Design Guide SPD)
- Scale (Grain and Mass) (content distilled from Design Guide SPD)
- Street Design (content distilled from Design Guide SPD)
- Natural surveillance (content distilled from Design Guide SPD)
- Materials (content distilled from Design Guide SPD + new map-based evidence)
- Building Design (content distilled from Design Guide SPD)
- Hard Landscaping (content distilled from Design Guide SPD)
- Ecosystem Services (content distilled from ES TAN)
- Biodiversity (content distilled from BNG TAN, HRA TAN and updated)
- Blue and Green Infrastructure (content distilled from Design Guide SPD)
- Sustainable Construction (new content detailing requirements for new LP sustainable policy)
- Built Heritage (content distilled from Design Guide SPD updated for sustainable retrofitting measures)
- Dark Skies (content distilled from DNS TAN)
- Rural Roads (content distilled from Design Guide SPD + new map-based evidence)

#### 4. New Homes (content distilled from Design Guide SPD)

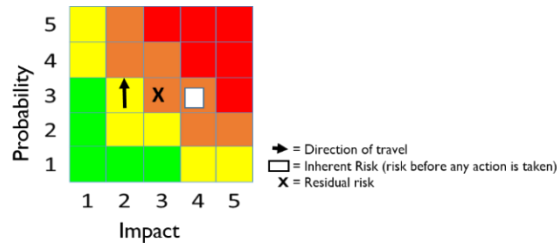
- Affordable Housing (content distilled from AH SPD)
- Countryside/settlement edge (content distilled from Design Guide SPD and new content)
- Single Dwellings (content distilled from Design Guide SPD)
- Perimeter blocks (content distilled from Design Guide SPD)
- Density (content distilled from Design Guide SPD)
- Accessibility (content distilled from Design Guide SPD)
- Parking (content distilled from Design Guide SPD and Parking SPD)

- Residential Amenity (content distilled from Design Guide SPD)
- Daylight and Sunlight (new content based on BRE guidance)
- 5. House Extensions and Alterations** (content distilled from Design Guide SPD and Extensions and Replacement Dwellings TAN)
- 6. Conversions** (new content)
- 7. Rural Holiday Accommodation** (content distilled from Design Guide SPD Extensions and Replacement Dwellings TAN)
- 8. Farmstead Development** (content distilled from Design Guide SPD)
- 9. New Agricultural Buildings** (content distilled from Design Guide SPD)
- 10. Older Peoples' Accommodation** (content distilled from Design Guide SPD updated for daylight/sunlight/dementia friendly)
- 11. Non-residential Development**
  - Viticulture (content distilled from Viticulture TAN)
  - Commercial development (content distilled from Design Guide SPD reviewed and updated)
  - Shopfronts (content distilled from Design Guide SPD and reviewed)
- 12. Equestrian Development** (content distilled from Equestrian TAN)
- 13. Small-Scale Renewable Energy** (content distilled from S-SRE TAN)

## **Supporting Information**

## **Glossary**

## Appendix B – South Downs Local Plan Review Risk Register



Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
RI	<p><b>Delay or changes to Government’s National Planning Reforms.</b></p> <p>The probability of the new Planning System being implemented increased by Government consultation in September 2023. However, the expected consultation on National Development Management Policies (NDMPs) has not yet occurred. The expectation of an announcement of a general election in the next year may also impact progression of planning reforms. Timings are overall not certain as they are subject to various required legislation and policy changes and processes.</p> <p>Impact could be significant as existing Local Plan will be over five years old in July 2024 and its weight will start to diminish especially if the 5-year housing land supply is not maintained.</p>	<b>4x4 (16)</b>	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies.</li> <li>• Jointly raising concerns with other LPAs about relevant aspects of planning reforms.</li> <li>• Maintaining momentum on LPR so ready to respond to any changes to transitional arrangements.</li> <li>• Starting with aspects of the Local Plan Review least likely to be substantially affected by the Planning Reforms – starting with development need, land availability assessment, site allocations, and other key pieces of evidence or assessments. Starting national park-wide thematic policy review later in the process to respond to any steer on NDMPs.</li> </ul>	<b>4x3 (12)</b>

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
R2	<p><b>Other changes to national policy or legislation.</b>                      Various changes to the plan making system have been proposed and sit within a period of many amendments to the planning system, such as changes to PD rights. There has also been Government interest in legislation and policy changes which may impact the planning system, such as proposed changes regarding nutrient neutrality and the Habitats Regulations. Various national policy or legislative changes that impact the Local Plan review are possible. Whilst these are likely to be topic specific compared with the overarching planning reforms referenced above, they could cause significant delay, especially if arising at later stages of the plan making process.</p>	3x4 (12)	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies. This will assist in being ready to respond with any actions required in relation to relevant national policy or legislation changes and reduce the impact on the Local Plan Review and its timetable.</li> </ul>	3x3 (9)
R3	<p><b>Delays in completion of evidence studies and assessments.</b>                      Either internal studies or those being undertaken by consultants commissioned.</p>	3x4 (12)	<ul style="list-style-type: none"> <li>• Communication of the LPR timetable and specific evidence studies.</li> <li>• Regular check ins on progress of evidence studies to identify delays and address these.</li> </ul>	2x3 (6)



Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
R4	<p><b>New or changing topics / key issues arising for the Local Plan Review to address.</b>                      Arising from evidence studies, cross boundary working, or otherwise raised. For example, a new or changing HRA matter that requires further evidence and/or a policy position in the Local Plan. These are likely to be relatively focused / topic specific matters. If arising through evidence studies at the relatively early stages of plan making, then these can be more straightforwardly addressed without significant delay. However, if such matters were to arise at later stages of the plan making process this could cause significant delay.</p>	3x4 (12)	<ul style="list-style-type: none"> <li>• Taking an appropriate balance in the timing of commissioning evidence – early enough to allow sufficient time for plan-making responses, but not too early so as to be incomplete or out of date.</li> </ul>	3x3 (9)
R5	<p><b>Changes in Members and associated direction of travel of corporate priorities.</b>                      This could result in revisions to policies and/or changes or new evidence studies after they have been completed.                      Some change in Members may occur (and is usual) but the extent of any changes or their implications are unknown.                      No significant local elections are expected</p>	2x3 (6)	<ul style="list-style-type: none"> <li>• Induction of new members on the issues identified for the Local Plan, and early understanding of any changes in direction of travel on priorities.</li> </ul>	2x2 (4)
R6	<p><b>Staff resourcing changes.</b>                      (a) Change in officers in the core project team or supporting the Local Plan Review process.                      (b) Reduction in staff resource</p>		<p>(a) Appropriate staff and budget resource is in place to deliver the Local Plan Review.</p>	

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
<b>R7</b>	<p><b>Significant objections from Statutory Consultees.</b> Comments from Statutory Consultees have significant weight in the plan-making process. However statutory consultees are also under significant resource pressure and may have limited or variable capacity to engage and input through the plan-making process.</p>	<p><b>3x4 (12)</b></p>	<ul style="list-style-type: none"> <li>Best efforts to engage with statutory consultees either directly or through existing officer groups to share information and receive input on the approach taken in the Local Plan Review. This may assist in reducing likelihood and impact of any objections.</li> </ul>	<p><b>2x3 (6)</b></p>
<b>R8</b>	<p><b>Planning Inspectorate (PINS) delays following submission of the Plan.</b> This could result in a delay in the examination process and eventual adoption of the Local Plan. PINS are likely to be navigating a period of transition in planning reforms which could result in particular peaks and logjams in the examination process.</p>	<p><b>4x4 (16)</b></p>	<ul style="list-style-type: none"> <li>Communication with PINS in regards the timetable of the Local Plan Review and in regards any actions SDNPA can take to support an efficient examination process.</li> </ul>	<p><b>3x3 (9)</b></p>

**KEY TO PROBABILITY / LIKELIHOOD AND IMPACT**

**LIKELIHOOD**

Almost certain – 5  
Likely – 4  
Possible – 3  
Unlikely -2  
Almost impossible – 1

**IMPACT**

Catastrophic - 5  
Significant – 4  
Moderate – 3  
Minor – 2  
Insignificant - 1

**OVERALL SCORE FOR SEVERITY**

1-3 - Insignificant  
4-6 - Moderate  
7-12 - Significant  
13-25 - High

## **Appendix C**

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# **South Downs Local Plan Review**

## **Cooperation and Alignment Strategy**

**February 2024**

## Contents

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## I. Introduction

- I.1. The South Downs National Park Authority (SDNPA) is committed to co-operating with other bodies on strategic planning matters. We have a history of working together with neighbouring authorities and stakeholders on plan making and other cross-boundary issues such as transport infrastructure and internationally protected habitats.
- I.2. Our existing South Downs Local Plan was adopted on 2<sup>nd</sup> July 2019 and covers the period to 2033. Paragraph 33 of the National Planning Policy Framework September 2023 (NPPF) says:  
*“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary . Reviews should be completed no later than 5 years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every 5 years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”.*
- I.3. The existing Local Plan will be 5 years old on 2<sup>nd</sup> July 2024 so work has commenced on a Local Plan Review covering the period 2024 to 2042. The assumption is that this Review will be undertaken under the new planning system being introduced under the Levelling Up and Regeneration Act 2023. Under this Act the duty to cooperate under Section 110 of the Localism Act 2011 will be replaced by an ‘Alignment Test’ as part of the test of soundness of the Plan. However, at present no further details have been released about the Alignment Test so this Strategy assumes that these will be similar to the previous duty to cooperate requirements. Once the details of the Alignment Test have been released this Strategy will be reviewed to ensure that it meets these requirements.

## 2. Planning in and around the South Downs National Park

- 2.1. The National Parks and Access to the Countryside Act 1949, as amended by section 245 of the Levelling Up and Regeneration Act 2023, requires all relevant authorities, including local authorities, to seek to further the purposes of national parks. These are:
- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
  - To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- 2.2. As a National Park and Local Planning Authority, plan making for the South Downs National Park is subject to paragraph 11 of the National Planning Policy Framework December 2023 (NPPF) whereby Local Plans should provide for objectively assessed needs, unless policies in the NPPF provides a strong reason for restricting

development. Footnote 7 of the NPPF indicates that such policies include those relating to National Parks.

- 2.3. Furthermore, paragraph 182 of the NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks which, along with the Broads and Areas of Outstanding Natural Beauty, have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. The Planning Practice Guidance (PPG) confirms that the NPPF policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.
- 2.4. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads makes clear that the Government recognises that the Parks are not suitable locations for unrestricted housing and does not, therefore, provide general housing targets for them.

### **3. What is this Strategy?**

- 3.1. This Strategy explains in broad terms who we will seek to cooperate with, when we will cooperate and what cooperation mechanisms we will put in place. We will make every effort to seek cooperation on cross-boundary and strategic planning matters in a focused, positive and structured way. At the same time, we will continue to work constructively with nearby planning authorities on their own local plan preparation.
- 3.2. This Strategy outlines how we will co-operate and engage on strategic matters when reviewing our Local Plan. Paragraphs 24-27 of the NPPF state that strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans; emphasises that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy; and that they should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.
- 3.3. The Strategy sets out the co-operation and engagement arrangements which the prescribed bodies (see Appendix 1) and nearby planning authorities (see Appendix 2) can expect from us on strategic planning matters.
- 3.4. The Strategy aims to:
  - Ensure proactive, on-going, focused and constructive co-operation on cross-boundary planning matters
  - Achieve legally compliant and 'sound' Local Plans, and
  - Facilitate effective strategic planning in the region.

- 3.5. Strategic matters are defined in the Localism Act 2011 as:
- (a) Sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and
  - (b) Sustainable development or use of land in a two-tier area if the development or use - (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 3.6 The estimated timetable for reviewing our Local Plan is set out within our Local Development Scheme (LDS) and summarised below.
- Regulation 18 Consultation January-March 2025
  - Regulation 19 Consultation January to March 2026
  - Submission of Local Plan for Examination Summer 2026
  - Independent Examination Autumn to Winter 2026/27
  - Adoption Summer 2027.

## 4. Who is the strategy for?

- 4.1. The Strategy is to guide cooperation between neighbouring and nearby local planning authorities, county councils and a range of other prescribed bodies as defined in legislation and guidance. These are listed in Appendices 1 and 2. These prescribed bodies are required to cooperate with us on strategic cross-boundary planning matters of common concern.
- 4.2 The Strategy is not aimed at other Local Plan consultees such as local residents, community groups, Parish and Town Councils, landowners and developers. However, we will involve, engage and consult these people and organisations on our Local Plan Review and for other planning matters. More details are set out in our adopted Statement of Community Involvement.

## 5. The strategic issues

- 5.1. The strategic priorities and themes for the South Downs National Park include the following:
- Conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting;
  - Biodiversity restoration at all scales and making nature bigger, better and more joined up;
  - Protection and mitigation of impacts on European designated nature sites including water and nutrient neutrality.
  - Mitigation and adaptation to climate change, including nature based solutions
  - Sustainable travel into, within and across the National Park;

- The local economy and jobs particularly in land management and the visitor economy;
- New homes including accommodation for Travellers, focusing on affordable homes for local communities;
- Green and grey infrastructure serving communities in and around the National Park;

## 6. Our approach to co-operation / alignment

- 6.1. We have a history of working together with other local planning authorities and organisations to address strategic planning matters of common concern. In some cases, discussion on strategic matters will continue through existing joint working arrangements. Key existing partnerships include:

Name of group/meeting	A brief summary of what the group/meeting is about
Hampshire Planning Research Liaison Group (PRLG)	Duty to Cooperate. Share thoughts and best practice on evidence to support local plans. Membership includes all LPAs in Hampshire and Isle of Wight.
Hampshire Development Plans Group (DP group)	Duty to Cooperate. To coordinate work projects, informally share information, and assist in identifying shared strategic work priorities. There is a particular focus on understanding of, and consistency between, local plans and neighbourhood plans across Hampshire and the Isle of Wight. Membership includes all LPAs in Hampshire and Isle of Wight.
Hampshire and Isle of Wight Planning Officers Group (HIPOG)	Duty to Cooperate. Discussion, sharing of information of a wide variety of planning matters. Membership includes all LPAs in Hampshire and Isle of Wight.
East Hampshire Cross Boundary Habitats Regulations Assessment (HRA) Working Group	Duty to Cooperate. To discuss and address cross boundary HRA matters, principally relating to the Wealden Heaths SPA. Members of the group are Natural England, East Hampshire District Council, SDNPA and Waverley Borough Council.
Bird Aware Steering Group	Duty to Cooperate. Initially established to produce a strategic approach to dealing with the cross boundary HRA issue of recreational pressure on the Solent European sites arising from new development in the Solent area. This group now reviews the implementation of that strategy: The Solent Recreation Mitigation Strategy (SRMS). Membership includes all LPAs within the affected area: 5.6km zone around the Solent.
Partnership for South Hampshire (PfSH) Natural Environment Working Group (PNEG) (previously the PfSH Water Quality Working Group)	Duty to Cooperate. Established to share information and work towards a strategic solution to address the emerging HRA 'nutrient neutrality' issue. Has evolved to also cover BNG and other natural environment matters. Membership includes all LPAs in affected area: PfSH authorities, plus SDNPA, Chichester District Council and Basingstoke & Deane.



<b>Name of group/meeting</b>	<b>A brief summary of what the group/meeting is about</b>
Hampshire LNRS LPA Working Group	Duty to Cooperate and LNRS Regs requirements. The group is led by HCC who are the lead authority for the preparation of the Hampshire LNRS. The group seeks LPA / Planning input in the preparation of the LNRS.
West Sussex Planning Policy Officers Group (PPOG)	Duty to Cooperate. To coordinate work projects, informally share information, and assist in identifying shared strategic work priorities. There is a particular focus on understanding of, and consistency between, local plans and neighbourhood plans across West Sussex. Membership includes all LPAs in West Sussex plus Environment Agency.
West Sussex and Greater Brighton Partnership Board and Officers Group	Duty to Cooperate. Prepare, maintain and update a Local Strategic Statement that provides a broad strategic direction for the area and establishes areas for inter-authority cooperation on strategic issues. Currently working on production of Local Strategic Statement 3 (LSS3). Membership includes all LPAs in West Sussex and Brighton & Hove.
Water Neutrality Chief Executive Group	Duty to Cooperate. Established as the decision making group for water neutrality matters and to raise profile and coordination of the issue with key organisations.
Water Neutrality Lead Officer Group	Duty to Cooperate. Established to discuss and develop a strategy on the water neutrality HRA issue in the Sussex North Water Resource Zone area. One rep from DM and Policy from each LPA.
Water Neutrality Policy Office Group	Duty to Cooperate. Established to discuss and develop a strategy on the water neutrality HRA issue in the Sussex North Water Resource Zone area. This group is specifically to develop the detail of the strategy.
Sussex-Air Partnership	Membership includes all LPAs in Sussex.
Chichester Housing Enabling Working Group	Partnership between CDC and Hyde Housing to discuss strategy of upgrading and regeneration of affordable housing sites in Chichester district.
East Sussex Local Plan Managers Group	Duty to Cooperate. To coordinate work projects, informally share information, and assist in identifying shared strategic work priorities. Establishment of a common evidence base for local plans, as appropriate. Membership includes all LPAs in East Sussex and the Environment Agency.
East Sussex Members Group	Duty to Cooperate. To share information and identify and progress on shared strategic priorities.
Ashdown Forest Working Group (AFWG)	Duty to Cooperate. To discuss and address the cross boundary HRA issue of in combination air quality issues arising from transport on Ashdown Forest SAC.

6.2. Other mechanisms may need to be established and any new authorities and bodies will need to be proactively engaged, in addition to the existing bodies and networks, depending on the strategic matters of common concern.

- 6.3. Throughout the Local Plan preparation process, we will keep the list of strategic matters and opportunities for joint working under review, which will in turn influence our engagement and co-operation activities. We are proposing the following co-operation arrangements and events:
- Joint Officer and Member meetings, committees and working groups
  - Technical stakeholder meetings
  - Issue or location focused workshops where appropriate
  - Commissioning of joint evidence base studies and reports
  - Memorandums of Understanding as a framework for co-operation
  - Capturing key decisions from other authorities/bodies in Statements of Common Ground which we will maintain and update throughout the Local Plan review.
- 6.4 We will carry out these arrangements in addition to statutory Local Plan and planning application consultations, and general correspondence that we issue.
- 6.5 We will monitor and report on co-operation and engagement activities as appropriate and use them to update our annual Authority Monitoring Report.

## **Appendix I Prescribed and Other Bodies**

### Specific Consultees

- County Councils (Hampshire, West Sussex, East Sussex) and Brighton and Hove Unitary Authority
- Adjoining Local Planning Authorities (LPAs)
- Town and Parish Councils both within and adjoining the South Downs National Park
- The Environment Agency (EA)
- Natural England
- Historic England
- National Highways
- The Marine Management Organisation
- Relevant telecommunications companies
- NHS Trusts & Integrated Care Boards
- Active Travel England
- Relevant electricity and gas companies
- Relevant sewerage and water undertakers
- Civil Aviation Authority
- Government Departments
- Network Rail Infrastructure Limited
- Secretary of State for Transport
- The Coal Authority
- The Homes and Communities Agency

### General Consultees

Voluntary bodies some or all of whose activities benefit any part of the authority's area;

Bodies which represent the interests of different racial, ethnic or national groups in the authority's area;

Bodies which represent the interests of different religious groups in the authority's area;

Bodies which represent the interests of disabled persons in the authority's area; and

Bodies which represent the interests of persons carrying on business in the authority's area.

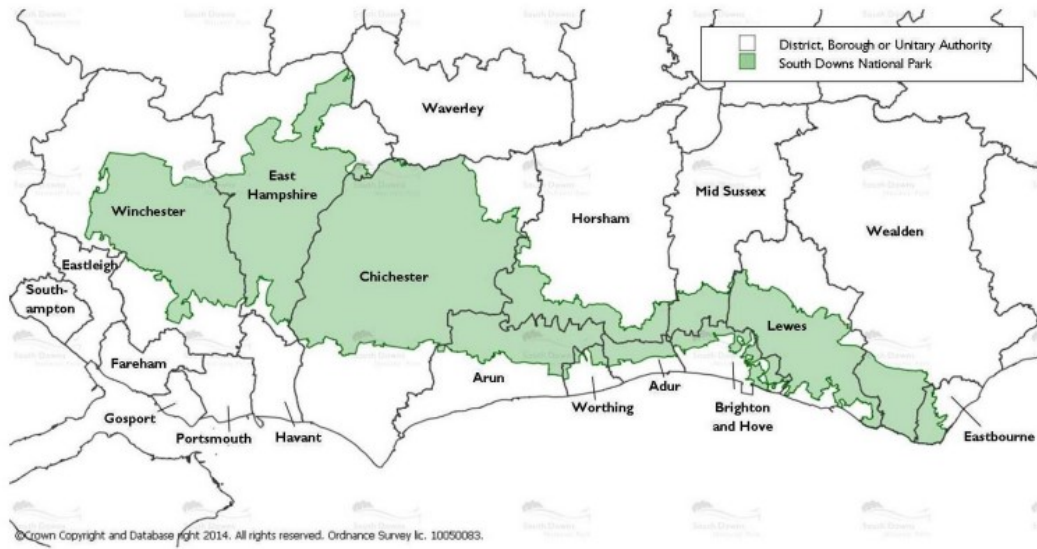
### Prescribed bodies

Where not already listed above, there are prescribed bodies under the Duty to Cooperate, including:

Each Local Enterprise Partnership

Each Local Nature Partnership

## Appendix 2 Map of adjoining or nearby planning authorities



### Appendix 3 Table of Planned Cooperation and Alignment

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
<b>Co-located Authorities</b>			
Adur Borough Council*	Housing Shoreham Cement Works	West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Sussex-Air Partnership	Statement of Common Ground on SDLP between Adur, Worthing & SDNPA signed 18 <sup>th</sup> March 2018
Arun District Council*	Housing Employment Infrastructure Mitigation Pagham Harbour Gypsies and Travellers Biodiversity Restoration and Green & Blue Infrastructure (Arun Bat / Wildlife Corridor)	West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Sussex-Air Partnership	Statements of Common Ground 15 <sup>th</sup> March 2018 and 1 <sup>st</sup> October 2020 (G&T)

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Chichester District Council*#	Water Neutrality Nutrient Neutrality Solent SPA Housing Biodiversity Restoration and Green & Blue Infrastructure (Chichester Wildlife Corridors)	Bird Aware Steering Group West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Water Neutrality Chief Executive Group, Lead Officer Group & Policy Officer Group Sussex-Air Partnership Chichester Housing Enabling Working Group PfSH Natural Environment Group (PNEG) – previously PfSH water Quality Working Group	Statement of Common Ground for SDLP signed 5 <sup>th</sup> April 2018  Draft SCG to be signed early 2024
Eastbourne Borough Council*#		East Sussex Local Plan Managers Group East Sussex Members Group Sussex-Air Partnership Ashdown Forest Working Group (AFWG)	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
East Hampshire District Council*#	Nutrient Neutrality Housing Gypsies and Travellers Wealden Heaths SPA Solent SPA	Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) East Hampshire Cross Boundary Habitats Regulations Assessment (HRA) Working Group Bird Aware Steering Group PFSH Natural Environment Group (PNEG) Hampshire LNRS LPA Working Group	Statement of Common Ground for SDLP signed 6 <sup>th</sup> March 2018  Draft SCG for signing in 2024
Horsham District Council*#	Nutrient Neutrality Housing Shoreham Cement Works Biodiversity Restoration and Green & Blue Infrastructure (Wilder Horsham)	West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Water Neutrality Chief Executive Group, Lead Officer Group & Policy Officer Group Sussex-Air Partnership	Statement of Common Ground for SDLP signed 10 <sup>th</sup> April 2018, updated 2021  Draft SCG to be circulated by HDC in 2024
Lewes District Council*#	Housing Ashdown Forest SPA/SAC	East Sussex Local Plan Managers Group East Sussex Members Group Ashdown Forest Working Group (AFWG) Sussex-Air Partnership	Statement of Common Ground for SDLP signed 24 <sup>th</sup> April 2018

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Mid Sussex District Council*	Water Neutrality Ashdown Forest SPA/SAC Housing	West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Water Neutrality Chief Executive Group, Lead Officer Group & Policy Officer Group Ashdown Forest Working Group (AFWG) Sussex-Air Partnership	Statement of Common Ground for SDLP signed 7 <sup>th</sup> February 2018
Wealden District Council*	Housing Ashdown Forest SPA/SAC	East Sussex Local Plan Managers Group East Sussex Members Group Sussex-Air Partnership Ashdown Forest Working Group (AFWG)	Statement of Common Ground for SDLP signed 26 <sup>th</sup> April 2018
Winchester City Council*#	Nutrient Neutrality Housing Gypsies and Travellers	Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Bird Aware Steering Group PfSH Natural Environment Group (PNEG) Hampshire LNRS LPA Working Group	Statement of Common Ground for SDLP signed 22 <sup>nd</sup> March 2018



<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Worthing Borough Council*	Housing Shoreham Cement Works	West Sussex Planning Policy Officers Group (PPOG) West Sussex and Greater Brighton Partnership Board and Officers Group Sussex-Air Partnership	Statement of Common Ground on SDLP between Adur, Worthing & SDNPA signed 18th March 2018
Brighton & Hove City Council*+§	Transport Health Housing Gypsies and Travellers Education	West Sussex and Greater Brighton Partnership Board and Officers Group East Sussex Local Plan Managers Group East Sussex Members Group Sussex-Air Partnership Involvement in the Transport Study	Statement of Common Ground on SDLP 25 <sup>th</sup> April 2018
East Sussex County Council +§	Transport Health Flooding Education Housing & Employment Biodiversity Restoration (LNRS)	East Sussex Local Plan Managers Group East Sussex Members Group Sussex-Air Partnership Ashdown Forest Working Group (AFWG) Involvement in the Transport Study and Water Cycle Study	Statement of Common Ground for SDLP signed 16 <sup>th</sup> February 2018

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Hampshire County Council +\$	Transport Health Flooding Education Housing & Employment Biodiversity Restoration (LNRS)	Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Partnership for South Hampshire (PFSH) Involvement in the Transport Study and Water Cycle Study Hampshire LNRS LPA Working Group	Statement of Common Ground for SDLP signed 2 <sup>nd</sup> March 2018
West Sussex County Council +\$	Transport Health Flooding Education Housing & Employment Shoreham Cement Works Biodiversity Restoration (LNRS)	West Sussex Planning Policy Officers Group (PPOG) Sussex-Air Partnership Involvement in the Transport Study and Water Cycle Study	Statement of Common Ground for SDLP signed 3 <sup>rd</sup> April 2018
<b>Neighbouring Authorities</b>			
Crawley Borough Council	Water Neutrality	Water Neutrality Chief Executive Group, Lead Officer Group & Policy Officer Group Sussex-Air Partnership	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Havant Borough Council		Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Partnership for South Hampshire (PfSH) Natural Environment Group (PNEG) Bird Aware Steering Group	
Portsmouth \$		Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Partnership for South Hampshire (PfSH) Natural Environment Group (PNEG) Bird Aware Steering Group	
Southampton \$		Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Partnership for South Hampshire (PfSH) Natural Environment Group (PNEG) Bird Aware Steering Group	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Eastleigh		Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) Natural Environment Group (PNEG) Bird Aware Steering Group	
Waverley			Statement of Common Ground for SDLP signed
New Forest National Park Authority \$		Hampshire Planning Research Liaison Group (PRLG) Hampshire Development Plans Group (DP group) Hampshire and Isle of Wight Planning Officers Group (HIPOG) National Parks Planning Policy Officers Group Natural Environment Group (PNEG) Bird Aware Steering Group Hampshire LNRS LPA Working Group	
<b>Other Organisations</b>			
Environment Agency	Flood Risk	Individual meetings and involvement in the Water Cycle Study and Sustainability Appraisal	Position Statement on SDLP signed 19th March 2018
National Highways	Road transport	Involvement in the Transport Study	
Transport for the South East	Transport	Involvement in the Transport Study	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Active Travel England		Involvement in the Transport Study and Green Infrastructure	
Historic England	Cultural Heritage	Individual meetings and involvement in Sustainability Appraisal	
Marine Management Organisation	Coastal impacts		
Natural England	Biodiversity and landscape Natural capital and green infrastructure	Individual meetings and involvement in Habitats Regulations Assessment and Sustainability Appraisal	Statement of Common Ground on SDLP signed 3th December 2018

\* These Local Authorities have non-planning powers and responsibilities for part of the National Park such as housing and waste collection.

# These Local Authorities deal with planning applications on behalf of the National Park Authority under a sec 101 Agency Agreement.

+ These Local Authorities have responsibility for upper tier functions such as highways, rights of way, public health authority and lead flood authority within the National Park.

\$ These Authorities work jointly with the South Downs National Park Authority on minerals and waste plans.



# Appendix D Local Plan Review - Overall approach to community & stakeholder engagement

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## 1. Purpose

- 1.1 The Government's proposals for a new planning system include removing the requirement to prepare a Statement of Community Involvement (SCI), and there will be a need to outline our overall ambitions and approach to engagement and consultation for the Local Plan Review (LPR) in the Project Initiation Document (PID). In the interim, this strategy sets out our approach to engagement on the LPR at a high level as an appendix of the draft PID. More detailed Community Involvement Plans (CIP) will be prepared for each stage of participation and consultation.

## 2. Principles to engagement

- 2.1 The SCI currently sets out how the SDNPA will consult with all stakeholders, including local communities, businesses and public bodies, on planning matters. In anticipation of changes to the planning system, revisions to the SCI are proposed to introduce bespoke CIP for each stage of plan consultation to reach audiences as widely as possible. The following key principles are intended to guide all engagement and consultation activity:

- **Timely** engagement and consultation – allowing early and ample opportunity to engage in policy formulation.
- **Inclusive** engagement and consultation – which is accessible to all those who want to take part including additional outreach to engage with underrepresented groups.
- **Effective and efficient** for both those responding to a consultation and for the SDNPA processing and analysing responses.
- **Clear results and accountability**

## 3. LPR specific engagement requirements

### Current regulations

- 3.1 Town and Country Planning (Local Planning) (England) Regulations 2012 set two formal consultation periods for Local Plans:

- Regulation 18: Preparation of a Local Plan
- Regulation 19: Publication of a Local Plan (Pre-Submission)

### New planning system

- 3.2 The Levelling Up and Regeneration Act (LURA) 2023 introduces reforms to the plan-making process which will determine formal consultation periods for Local Plans, these are set to comprise:

- Early participation – new requirement to 'notify' and 'invite' participation at the start of the plan-making process
- First mandatory consultation (8 weeks)
- Second mandatory consultation (6 weeks)

#### 4. **When we will engage and consult on the LPR**

- June/July 2024 (min 8 weeks)
- Jan - March 2025 (min 8 weeks)
- Jan - March 2026 (min 8 weeks)

#### 5. **What we will consult on**

- Summer 2024: scoping & early participation stage on the LPR (scope of LPR, local issues relevant to the plan, preferred ways of being involved)
- Jan - March 2025: draft LPR (Reg 18) including draft policies, allocations (map based)
- Jan – March 2026: preferred approach (Reg 19) policies, allocations and policies map

#### 6. **Who we will engage and consult with**

- 6.1 Existing regulations require LPAs to notify specific and general consultees, local residents and business as appropriate, inviting representations on the content of local plan documents. The current list of specific and general consultees is listed in Appendix 3 of the SCI.
- 6.2 As set out in the overarching principles, there is a commitment to inclusive engagement and consultation which is accessible to all those who want to take part. This will mean undertaking additional outreach to engage with groups typically underrepresented in Local Plan consultations. Additional measures may include bespoke consultation materials (content and language), bespoke events; both in-person or online and providing a range of ways to respond (e.g. in writing, via online surveys or by transcribed voice notes).

#### 7. **How we will engage and consult on the Local Plan Review**

- 7.1 We will be **flexible in our approach** to engagement and consultation on the LPR according to the stage of plan-making. Bespoke Community Involvement Plans (CIP) will be prepared for individual engagement and consultation exercises. These will use the key principles of the SCI, will further the aim to engage underrepresented groups and incorporate, as appropriate, best practice in consultation techniques (e.g. the Government digital toolkit when this becomes available).
- 7.2 We will take a **hybrid approach** to engagement and consultation providing both online and in-person opportunities for people to hear about and make comments on the Local Plan Review. We will make use of digital consultation software to extend our reach, provide an easy-to-use platform to comment on and which simplifies and speeds up the analysing stage for officers. We will also hold in-person events and provide paper copies of documents and surveys for those who do not have access to the internet.
- 7.3 We will be **efficient in our approach**, making use of existing in-person events to extend our reach and align with other Authority engagement activity wherever feasible, for example on the future Partnership Management Plan.