

Appendix C – Cooperation and Alignment Strategy

South Downs Local Plan Review

Cooperation and Alignment Strategy

November 2024

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I. Introduction

- 1.1. 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.
- 1.2. Our existing South Downs Local Plan was adopted on 2nd 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”.
- 1.3. The existing Local Plan was 5 years old on 2nd 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 existing planning system rather than the new one 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. A consultation was carried out in July-September 2024 on a revised NPPF which proposed changes to guidance on the duty to cooperate. Once this NPPF has been finalised this Strategy will be updated to reflect the relevant changes.

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.
- o Regulation 18 Consultation January-March 2025
 - o Regulation 19 Consultation January to March 2026
 - o Submission of Local Plan for Examination Summer 2026
 - o Independent Examination Autumn to Winter 2026/27
 - o 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) <i>(previously the PFSH Water Quality Working Group)</i>	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.
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.

Name of group/meeting	A brief summary of what the group/meeting is about
Sussex LNRS: Local Authority Network	As above for LNRSs being led by East Sussex (with Brighton & Hove City Council) and West Sussex County Councils
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, Brighton & Hove City Council 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 1 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
- Safeguarded Aerodromes
- 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.

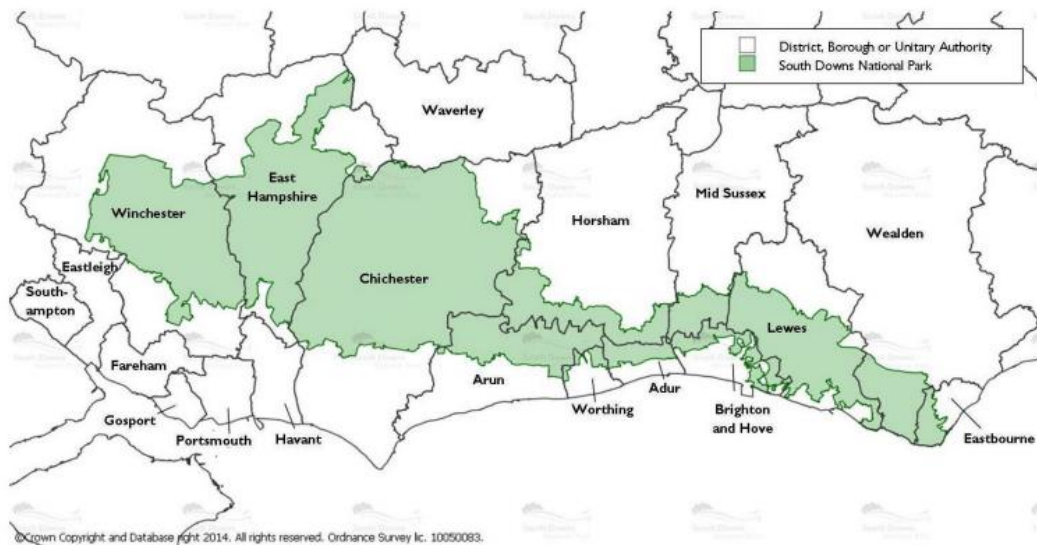
Prescribed bodies

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
Co-located Authorities			
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 th 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 th March 2018 and 1 st October 2020 (G&T)

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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 th 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)	

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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 th March 2018 Draft SCG for signing in 2024
Horsham District Council*#	Water Neutrality Housing Shoreham Cement Works Biodiversity Restoration and Green & Blue Infrastructure (Wilder Horsham) Gypsy and Traveller Accommodation Needs	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 th April 2018, updated 2021
Lewes District Council*#	Housing Ashdown Forest SPA/SAC Gypsy and Traveller Accommodation Needs	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 th April 2018

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
Mid Sussex District Council*	Water Neutrality Ashdown Forest SPA/SAC Housing Gypsy and Traveller Accommodation Needs	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 th February 2018
Wealden District Council*	Housing Ashdown Forest SPA/SAC Gypsy and Traveller Accommodation Needs	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 th 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 nd March 2018

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
Worthing Borough Council*	Housing Shoreham Cement Works Gypsy and Traveller Accommodation Needs	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 th 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 th February 2018

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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 nd 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 rd April 2018
Neighbouring Authorities			
Crawley Borough Council	Water Neutrality	Water Neutrality Chief Executive Group, Lead Officer Group & Policy Officer Group Sussex-Air Partnership	

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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	

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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	
Other Organisations			
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	
Active Travel England		Involvement in the Transport Study and Green Infrastructure	

Partner Organisation	Strategic Issues	Mechanisms for Cooperation	Outcomes
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.

