

Agenda Item 15
Report PC25/26-10

Report to	Planning Committee
Date	10 July 2025
By	Director of Planning
Title of Report	Local Plan Review Update
Purpose of Report	To inform Members about the feedback received through the Regulation 18 consultation of the Local Plan Review and to approve a revised Local Development Scheme.

Decision

Recommendation: The Committee is recommended to:

- 1. Receive and consider the summary of feedback received through the Regulation 18 consultation on the Local Plan Review set out in Appendix 1.**
 - 2. Approve the revised Local Development Scheme in Appendix 2.**
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Executive Summary

- The Regulation 18 consultation saw a nearly fivefold increase in responses compared to 2015/16, driven by the online consultation platform and well-attended events.
- We received extensive and robust feedback: 1,900 respondents submitted over 3,700 comments, with high levels of agreement for nature recovery, climate, and core policies. Housing policies saw more division.
- Site allocations drew lots of attention: Over 2,000 comments focused on proposed site allocations; 28 new sites were suggested and 38 previously rejected sites promoted for reconsideration.
- A proposed revised Local Plan Review timetable shifts key milestones later in 2025–26 by approximately three months to allow more time for evidence gathering, site assessment, and member input while still meeting the government’s December 2026 submission deadline.
- The risks identified and short delay in the timetable stem from high consultation response volumes, planning reform uncertainty, new housing need calculations, and emerging national policy updates which will require additional officer work and coordination.

I. Background

- I.1** The Authority agreed in May 2022 to review the South Downs Local Plan. The existing SDLP was adopted in 2019, and we are required to review local plans every five years. The timetable was agreed by NPA in December 2022 and reconfirmed by NPA in November 2024.
- I.2** Significant progress on the Local Plan Review has been made. In December 2024, the Authority approved the consultation document for the first public consultation. Public consultation took place for 8 weeks between 20 January and 17 March 2025.

- 1.3 The Local Plan Review is being prepared in the context of major changes to national legislation and policy. Some of which are forthcoming such as new National Development Management Policies expected in Summer 2025 or are currently being consulted upon by government and a report on Planning Reforms is on this agenda. Other changes have a taken place, such as the changes to the way that planning authorities must calculate their housing needs.
- 1.4 This report will give an overview of the consultation and feedback received and will proposes a revised timetable for the remaining milestones of the Local Plan Review.

2. Regulation 18 Consultation

Approach to Regulation 18 Consultation

- 2.1 In line with our approved Community Involvement Plan consultation took place for 8 weeks between 20 January and 17 March 2025. **Appendix I** sets out in detail who and how people were invited to respond to the consultation, which included notifying all those on the Local Plan contact database, press releases, radio coverage, publicity on the SDNPA website, promotional video, social media and publicity through regular SDNPA newsletters. Parish and Town Councils were also encouraged to promote the consultation through their regular communications, and leaflets / posters were provided to display in local venues. Copies of the consultation documents were made available to view at the South Downs Centre, Seven Sisters Country Park and at local libraries within and at key settlements on the edge of the National Park.
- 2.2 A series of 20 consultation events ran between January to March 2025. These included public exhibitions and bespoke meetings for democratic representatives (Parish/Town, District & County Councillors) and other stakeholder groups (e.g. Agents Forum, Farmers Breakfast and Local Access Forum). The events attracted a lot of interest, with over 1,000 people attending. An online exhibition and webinar were also available on the SDNPA website for those who could not attend the events in person.
- 2.3 People were invited to respond to the consultation using the Commonplace consultation platform: [South Downs National Park Authority's Local Plan Review](#) Here they could view the consultation documents and comment on draft policies, site allocations, the Integrated Impact Assessment and other evidence studies. They could also subscribe for updates on the Local Plan Review. 10,431 people visited the Commonplace platform during the consultation. Alternative means to respond were also available, via email, paper response form and letter.

Overview of Consultation Feedback

- 2.4 In total, 1,900 individuals and organisations responded to the consultation, making over 3,700 individual comments. **Appendix I** provides a breakdown of the types of respondents, by demographic characteristics and relationship to the National Park. 50 Parish / Town Councils responded to the consultation. Whilst over 900 people responded directly using the consultation platform, over 1000 responses were received via email (and a small number by letter) which led to delays in collating and undertaking analysis of the feedback.
- 2.5 The consultation feedback included 1,491 comments on the draft policies. Table I of **Appendix I** sets out feedback sentiment for each policy. On the **Core Policies**, there were high levels of agreement with Policies SD1 Sustainable Development and SD2 Ecosystem Services. There was slightly more disagreement with Policy SD3 Major Development (36% disagree or strongly disagree) and SD25 Development Strategy (29% disagree or strongly disagree). The **Landscape and Heritage** policies all received high levels of agreement (over 50% agree or strongly agree). There was some disagreement with Policy SD5 Design (18% disagree or strongly disagree) and Policy SD13 Listed Buildings (22% disagree or strongly disagree). Policies on **Nature Recovery** received strong approval, with policies SD9 Biodiversity & Geodiversity, SD10 International Sites and SD11 Trees, Woodlands & Hedgerows, all rated over 60% agree or strongly agree. The **Climate Action** policies also received high levels of agreement with 77% of respondents agreeing or strongly agreeing with Policy SD48 Climate Change & Sustainable Use of Resources. Policies on

Water and Pollution received good levels of agreement (all over 50%). There were some points of disagreement with Policy SD18 The Open Coast (17%). Feedback on policies regarding **Homes** in the National Park was more varied. Whilst there were high levels of agreement with Policy NEW1 Accessible Homes and Policy SD32 Rural Worker's Dwellers, opinions were more divided on Policy SD26 Supply of Homes and Policy SD33 Gypsies and Travellers. Overall, there was agreement with proposed policies on the **Local Economy**, although opinions on Policy NEW8 Viticulture, Winemaking and Wine Tourism were divided (51% agree or strongly agree and 38% disagree or strongly disagree). Policies on **Open Space** and **Communities Facilities** received good agreement levels. Sentiment towards **Transport** and **Infrastructure** was largely neutral.

- 2.6 During the consultation, people were asked to comment on proposed amendments to existing site allocations, which will be retained in the Local Plan, and comment on proposed new site allocations. In total, 2,135 comments were made on site allocations. These were spread across the National Park as follows; Hampshire - 415 comments, West Sussex – 1,390 comments, and East Sussex – 330 comments. Table 2 of **Appendix I** sets out the number of comments received on each site allocation. The most commented on sites were: MI014 Land East of Lodge Lane, Hassocks (398 comments), HO037-38 East Street Farm, Amberley (126 comments) and CH236 Land West of Village Hall, Rogate (120 comments). In response to the consultation, 28 new sites were put forward to the Authority to consider for development. In addition to this, further information was submitted regarding 38 sites the Authority has previously excluded or rejected in the Land Availability Assessment.
- 2.7 All comments received during the consultation are available to view on the Commonplace platform at: <https://sdnpalocalplanreview.commonplace.is/>. In addition, short summaries of the consultation feedback by policy and site allocation have been prepared with AI assisted technology. These summaries are presented in Appendix I and will be available on the Local Plan Review web page with the intention to communicate widely the main concerns and key issues raised in the consultation feedback. All the comments submitted at Regulation 18 have been read and continue to be considered by officers in preparing the next stage of the Local Plan Review process.

Conclusions on the Regulation 18 Consultation

- 2.8 The first formal public consultation on the Local Plan Review attracted significant public engagement, with attendance at events and the digital consultation platform contributing to a nearly fivefold increase in responses compared to the previous equivalent Local Plan consultation in 2015/16. While nearly half of the responses were submitted via the consultation platform, processing the remainder—despite partial automation—required considerable administrative effort. Insights from this experience will be essential to maintain momentum and meet the 2026 local plans submission deadline.

3. Revised Local Development Scheme

Current timetable

- 3.1 The timetable for the Local Plan Review was agreed by NPA in December 2022 and reconfirmed by NPA in March 2024 as below:
 - First public consultation (Regulation 18) - Jan-Mar 2025
 - Second public consultation (Regulation 19) - Jan-Mar 2026
 - Submission for Examination - July-September 2026
 - Adoption - April-June 2027
- 3.2 The deadline for submitting local plans under the existing planning system (rather than a new one proposed through the Levelling Up and Regeneration Act) has been extended to end of **December 2026**. For a number of reasons we do need to hit this deadline.

Risks to timetable

- 3.3 As explained in paragraph 2.4 of this report, the Regulation 18 consultation generated a lot of public interest with over 3,700 individual comments. More than half did not use the consultation platform and these comments have largely been added manually. AI assistance has been helpful however it has taken longer than originally anticipated to log comments and produce summary reporting. As demonstrated by the summaries of the representations received, there are matters raised in comments that will require further work by officers to inform the next iteration of the Plan.
- 3.4 Due to (a) the number of sites to consider in the Land Availability Assessment (LAA) plus (b) the uncertainties of government planning reform, the Regulation 18 document was more of a combination of 'Issues and Options' and a 'Draft Plan' rather than a full 'Draft Plan'. This means there is additional work to undertake between Regulation 18 and Regulation 19 consultations, alongside work already programmed in for this period.
- 3.5 Changes to the way that planning authorities must calculate their housing needs has resulted in significant increase in needs figures for the surrounding planning authorities. In Regulation 18 representations, and other communications, we have seen some challenge to the SDNPA to provide more homes to reduce pressure on our neighbours. Further work is being undertaken (a) between ourselves and neighbouring authorities and (b) between ourselves and the other NPAs on the calculation of housing needs. This will be a key matter for the examination and soundness of the plan. We can expect that more resource will be required for this work and associated duty to cooperate activities to assist us in having the best possible chance for a sound plan.
- 3.6 In light of the above, and whilst always important, ensuring we have a robust evidence base regarding the housing allocations proposed is even more necessary. We have had a greater number of wholly new or resubmitted sites for consideration than anticipated, details set out in paragraph 2.6 of this report.
- 3.7 National Development Management Policies and another revised National Planning Policy Framework (NPPF) are currently expected to be published in Autumn 2025 which could replace or significantly affect some of our thematic policies. Unless delayed further by government, it will be important to address the direction of travel on these policies in our Local Plan to avoid delay later.
- 3.8 In light of all the above, we want to give Members longer to absorb and provide a steer on the quite substantial information and potential changes that will be made to the pre-submission plan for Regulation 19 consultation. We also want to talk to affected Parish Councils about any proposed changes to proposed allocations.

Proposed Update to the Local Development Scheme

- 3.9 Appendix 2 of this report sets out the proposed revised Local Development Scheme. This proposed a short delay of approximately three months to the remaining stages of plan preparation. For ease of comparison, the current and proposed timings for the Local Plan Review milestones are set out in the table below.

Local Plan Review Milestone	Current Local Development Scheme	Proposed Local Development Scheme
First public consultation (Reg 18)	January – March 2025	January – March 2025
Planning Committee for second public consultation (Reg 19) approval	November 2025	February 2026
Full National Park Authority meeting for	December 2026	March 2026

second public consultation (Reg 19) approval		
Second public consultation (Reg 19)	January – March 2026	May – July 2026
Submission for Examination	July – September 2026	October – November 2026
Examination & Adoption	2027	2027

3.10 The proposed timetable:

- Provides for additional time to undertake necessary work for SDNPA to be in the best position possible to achieve a sound plan, and for the plan to be as good as possible to inform the first round of spatial development strategies;
- Meets the key deadline for submission by the end of December 2026 to ensure the plan proceeds under the current planning system;
- Provides for additional time for members to absorb and provide a steer on the quite substantial information and potential changes that will be made to the pre-submission plan for Regulation 19 consultation, and to talk to affected parish councils about any proposed changes to proposed allocations;
- Increases opportunity to absorb more from the consultation of the Partnership Management Plan and the final iteration of the Partnership Management Plan which is expected to be adopted in December 2025.

3.11 The next steps for public engagement are:

- Publishing the updated LAA in September so that everyone can see our assessments of the additional and revised sites;
- Talking to affected Parish Councils about any proposed changes to proposed allocations in the autumn;
- Directing the public towards the Regulation 19 consultation as their opportunity to comment on the revised Plan; and
- Discussing with Members the outcome of the Regulation 19 consultation and any proposed modifications we could put forward to the Inspector.

4. Other implications

Implication	Yes/No
Will further decisions be required by another committee/full authority?	If yes, please outline the timetable here
Does the proposal raise any Resource implications?	No, budget is as agreed.
How does the proposal represent Value for Money?	The proposal presents value for money by avoiding abortive work and progressing the project in a timely way taking account of the changing national context.

Implication	Yes/No
Which PMP Outcomes/ Corporate plan objectives does this deliver against	All corporate priorities and PMP outcomes as relevant to the planning system.
Links to other projects or partner organisations	Review of the Partnership Management Plan.
How does this decision contribute to the Authority's climate change objectives	The Local Plan Review will include policies and potentially allocations which will support the Authority's climate change objectives.
Are there any Social Value implications arising from the proposal?	N/A
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	Yes
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	None
Are there any Data Protection implications?	None

5. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
If members do not agree with the recommendation to amend the timetable for the Local Plan Review there will be insufficient time to undertake necessary additional work to ensure SDNPA is in the best possible position for sound	Possible 3	Major	Member approval of the revised Local Development Scheme as set out in this report and Appendix 2.

Risk	Likelihood	Impact	Mitigation
plan.			

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South Downs National Park Authority

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Appendices
 1. Regulation 18 Consultation Summary
 2. Local Development Scheme

SDNPA Consultees
 Chief Executive; Director of Countryside Policy and Management;
 Director of Planning; Chief Finance Officer; Monitoring Officer;
 Legal Services,

External Consultees
 None

Background Documents
[Project Initiation Document - South Downs National Park Authority](#)
[Draft Revised Local Plan \(download\) - South Downs National Park Authority](#)
[Community Involvement Plan: First Public Consultation \(Regulation 18\)](#)

