POSITION STATEMENT of the South Downs National Park Authority

MATTER 2 – Strategy

DATE: October 2018

Is the Development Strategy for the SDNP and its Town and Village Centres, put forward by Policy SD25 of the Plan, appropriate and justified by robust evidence, with respect in particular to:

  a. the choice which has been made between alternative approaches to development distribution,

  b. the functional relationships between communities inside and outside the SDNP boundary,

  c. the identified settlements,

  d. the identified town centres,

  e. the redevelopment of previously developed land outside settlements?

KEY DOCUMENTS for cross-reference:

  – Development Strategy Background Paper (SDNPA, 2017) (TSF 02)
  – Sustainability Appraisal Report (AECOM, 2018) (SDLP 04)
  – Supply of Homes Background Paper (SDNPA, 2018) (TSF 07)
  – Sites and Settlements Route Map (SDNPA, 2018) (SS 02)
  – South Downs Retail Evidence Study (Nexus, 2016) (TSF 31)

1. <u>Introduction</u>

1.1 This Position Statement responds to the Inspector's invitation to submit a statement in relation to matters to be discussed at the hearing sessions (INSP.4). In the case of Matter 2, reliance is chiefly placed on the Background Papers and core documents of which the key ones are listed above. The specific issues that the South Downs National Park Authority (SDNPA) consider may benefit from further detail are issues a, b, d and e as set out in INSP.4 and duplicated below, to explain how the most appropriate strategy has been selected by the SDNPA.

<u>Is the Development Strategy for the SDNP and its Town and Village Centres, put forward by Policy SD25 of the Plan, appropriate and justified by robust evidence, with respect in particular to:</u>

2. <u>Issue a. – the choice which has been made between alternative approaches to development distribution</u>

2.1 Please refer in the first instance to the Development Strategy Background Paper (TSF 02), in particular paragraphs 4.1 to 4.9. In essence, public and stakeholder feedback from consultation on Options (see LP 01 and LP 02), and then the Sustainability Appraisal (SA) (SDLP 04) arrived at a **spatial strategy**, which is **a medium level of growth dispersed across the towns and villages of the National Park**. Pursuant to this, the **development strategy** (i.e. which settlements to focus growth at), and then the **supply of homes policy** (i.e. the precise distribution of homes and other development within those settlements), flows directly from the spatial strategy. This outcome reflects the Local Plan's Vision and Objectives.

2.2 Essentially, the development strategy has been shaped both by strategic-level ('top-down') drivers (which has arrived at a spatial strategy of medium dispersed growth as explained below) and local-level ('bottom-up') evidence (which identifies specific settlements). The two key strategic-level evidence documents are the Strategic Housing Market Assessment (SHMA) / Housing and Economic Development Needs Assessment (HEDNA) (TSF 08 & 09) and the Sustainability Appraisal (SA) (TSF 04), which respectively set the objectively assessed need, and test different growth scenarios against sustainability objectives.

2.3 The SA contains a thorough assessment of the five reasonable alternative growth strategies identified. SA sections 2.1 and 2.2 (pp 15 - 44) sets this out. Table 2.5 of the SA shows the distribution of development to the settlements of the National Park based on these 5 alternatives. The detailed appraisal tables are shown in Appendix C of the SA. The rationale for the identification of the dispersed medium growth option is set out in the SA section 2.2.5. In short, it was found that:

- Option 1: '<u>dispersed-high</u>', i.e. a high level of growth spread across a large number of settlements, would have significant detrimental impacts on landscape and townscape in and surrounding the settlements of the National Park. It scored poorly across a number of the environmental objectives;

- Option 2: 'dispersed-medium +60%', i.e. an intermediate option between 'dispersed-medium' and 'dispersed-high', would have similar impacts, albeit to a lesser extent, as the 'dispersed-high' option;

- Option 3: 'concentrated-medium', i.e. restricting development to the largest five settlements, would have unacceptable impacts in particular on Lewes and Midhurst due to a lack of suitable sites, leading to adverse impacts on character, cultural heritage and a sense of place. It would also risk failing to deliver the sustainable development required by smaller developments in the National Park;

- Option 4: 'dispersed-medium' was considered to do the most to provide a balance between promoting the vitality of settlements and supporting the rural economy, and protecting and enhancing the special qualities of the National Park. This is the option that informed the apportionment of housing provisions to the settlements listed in Local Plan Policy SD26.

- Option 5: 'dispersed-medium transport', i.e. giving priority to allocations in settlements with established sustainable transport infrastructure, was found to have merit, but raised issues over the availability of sites to meet the levels of development envisaged. It also raised doubts about the level of benefit realistically afforded by rural bus services in respect of altering travel patterns and behaviors overall.

2.4 There are two key local-level evidence documents. The first is the Strategic Housing Land Availability Assessment (SHLAA) (TSF 10), which assesses the landscape capacity of each site and considers each site's overall suitability, availability and achievability. The second is the Settlement Facilities Assessment (TSF 01) which considers the level of local facilities available to support (and be supported by) development. These, together with feedback from consultation with local communities, has led to refinement of the settlement specific figures, as explained in the Supply of Homes Background Paper (TSF 07) and the Sites and Settlements Route Map (SS 02).

3. Issue b. – the functional relationships between communities inside and outside the SDNP boundary

3.1 It is firstly important to recognise that planning for a National Park is markedly different to planning in non-National Park areas. Landscape and communities have a strong relationship, for example National Park settlements in a river corridor generally have shared characteristics and direct transport interconnections, and are similarly linked to riverside settlements just outside the National Park. Paragraph 3.4 of the Plan's spatial portrait strongly acknowledges the many interdependencies and connections that exist across the National Park's boundary. This is also graphically shown in Figure 3.4 (Conceptual Spatial Diagram), which shows gateway settlements just outside the boundaries of the National Park, and main rail and road networks linking the main settlements within and around the park boundary. Landscapes do not respect administrative boundaries: the broad areas and river corridors do not end at the boundary of the National Park.

3.2 There are many policies throughout the Plan that benefit local communities outside the National Park as well as those inside the boundary. For example the Local Plan

Chapter 6: People Connected to Places promotes sustainable transport infrastructure improvements to connect all communities to each other, irrespective of the National Park boundary. Equally Chapter 7j: Green Infrastructure recognises that the green infrastructure network extends beyond the National Park's boundaries into the wider sub-region (see in particular paragraphs 7.244 and 7.245).

3.3 The Local Plan also recognises and celebrates the close relationship the National Park has with several 'gateway' towns and cities to the National Park. These gateway settlements lie just outside the boundary of the National Park, but have good bus, ferry or rail links the wider region and beyond, and bus and cycle links into the National Park. The gateway settlements are shown on Figure 3.4 in the Local Plan (Conceptual Spatial Diagram) and picked up throughout the Spatial Portrait.

3.4 Chapter 1: Introduction sets out clear cross-boundary strategic issues which form a framework for the duty to cooperate (paragraphs 1.25 to 1.30). These go beyond simply housing numbers and strategic transport, but also recognise the cross-boundary dimensions of natural beauty, biodiversity, tourism and local economies, which filter down to local community level. The South Downs, along with the other protected landscapes, form the 'green heart' of the sub-region, providing much needed and much valued green infrastructure for the growing urban areas.

3.5 However it must also be recognised that the statutory duty which governs the socio-economic approach of the National Park Authority is specific to the local communities within the National Park, and does not extend to wider housing markets or economies. Therefore the development strategy does not seek to address wider strategic housing needs arising from settlements outside of the National Park boundary. Also, a key reason for the National Park boundary being drawn as it is, is to prevent further urban development on settlement edges which intrude into the National Park.

3.6 The SDNPA works with local communities on neighbourhood development plans in parishes bisected by the National Park boundary. In such cases, the SDNPA requests that new development should be focused in areas outside of the National Park, and only exceptionally considered on sites outside the settlement boundary and within the National Park (in line with Policy SD25 part 3). Wider strategic development needs are expected to be met outside the National Park boundary, in line with national policy.

4. <u>Issue c. – the identified settlements</u>

4.1 Please refer to the Development Strategy Background Paper (TSF 02), in particular paragraphs 5.3 to 5.5. In addition the Supply of Homes Background Paper (TSF 07) sets out in paragraphs 6.4 to 6.9 the process for determining settlement specific housing numbers.

5. <u>Issue d. – the identified town centres</u>

5.1 The strategic approach to town and village centres in the National Park is set out in Chapter 7g of the Local Plan, and is consistent with the NPPF paragraph 23. The

Local Plan fully recognises the role of town and village centres as the heart of their communities, and defines a network and hierarchy of centres. It is important to recognise that these centres serve a much wider area than the towns within which they reside, including smaller communities both within and outside of the National Park. All the town and village centres identified in Policy SD36: Town and Village Centres are located in settlements where the principle of development is accepted in Policy SD25: Development Strategy.

5.2 The Partnership Management Plan (Core 03) recognises that the majority of National Park residents live in the market towns of Lewes, Petersfield, Midhurst and Petworth. These market towns are, by their historical nature, established service and commercial centres which continue to thrive. They are therefore defined in Local Plan Policy SD36.

5.3 In addition to the four towns, the Settlement Facilities Assessment identified Liss as being one of the highest scoring settlements in the National Park for services and transport accessibility. Liss is one of the largest villages in the National Park, and has a small number of national multiples which are typical of the nature of a small town. It is the only village in the East Hampshire part of the National Park with a centre that is categorised as a 'local centre' in Policy CP8 of the East Hampshire Joint Core Strategy (EX 01). It is therefore defined in Local Plan Policy SD36 as the only Larger Village Centre, and has the same status as the Market Town Centres for the purposes of Local Plan Policy SD37: Development in Town and Village Centres.

5.4 Policies SD36 and SD37 take forward Local Plan Objective 8: 'To protect and provide for the social and economic wellbeing of the National Park communities supporting local jobs, affordable homes and local facilities.' They reflect the findings of the Retail Evidence Study (TSF 31). In summary, this supports enhancing and protecting the existing retail centres to provide for day-to-day needs, whilst recomending a net additional 1,200 square metres net of new convenience goods floorpsace in the Midhurst/Petworth area, where there is an unmet demand.

5.5 It is therefore considered that there is robust justification and evidence for the strategic approach taken in the Local Plan to town centres.

6. <u>Issue e. – the redevelopment of previously developed land outside settlements</u>

6.1 Policy SD25 part 2(d) allows the appropriate re-use of a previously developed site outside a defined settlement boundary, excepting residential gardens, provided that development conserves and enhances the special qualities of the National Park. This reflects NPPF paragraph 111 which states planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed, provided that it is not of high environmental value.

6.2 It should be noted that the NPPF definition of previously developed land specifically excludes land occupied by agricultural or forestry buildings. Therefore development on such sites would generally be resisted aside from that complying with Policies SD40: Farm and Forestry Diversification, or Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings.

7. Summary

7.1 The evidence presented in the Authority's background papers and various studies referred to represent a robust evidence base to justify the most appropriate development strategy and approach to town and village centres. The above response provides clarification of the Authority's position with respect to the issues raised in INSP.4 Matter 2, in addition to evidence previously published.