

South Downs Local Plan Review

Draft Project Initiation Document

June 2024

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I. Introduction

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

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 impacts arising from the Covid-19 pandemic including increased remote and flexible working, increased demand for online services.
- **Social issues**: Health, including both mental and physical health, access to nature, and quality homes and social impacts from the Covid-19 pandemic such as awareness and value of gardens, public open space and other access to nature. 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.

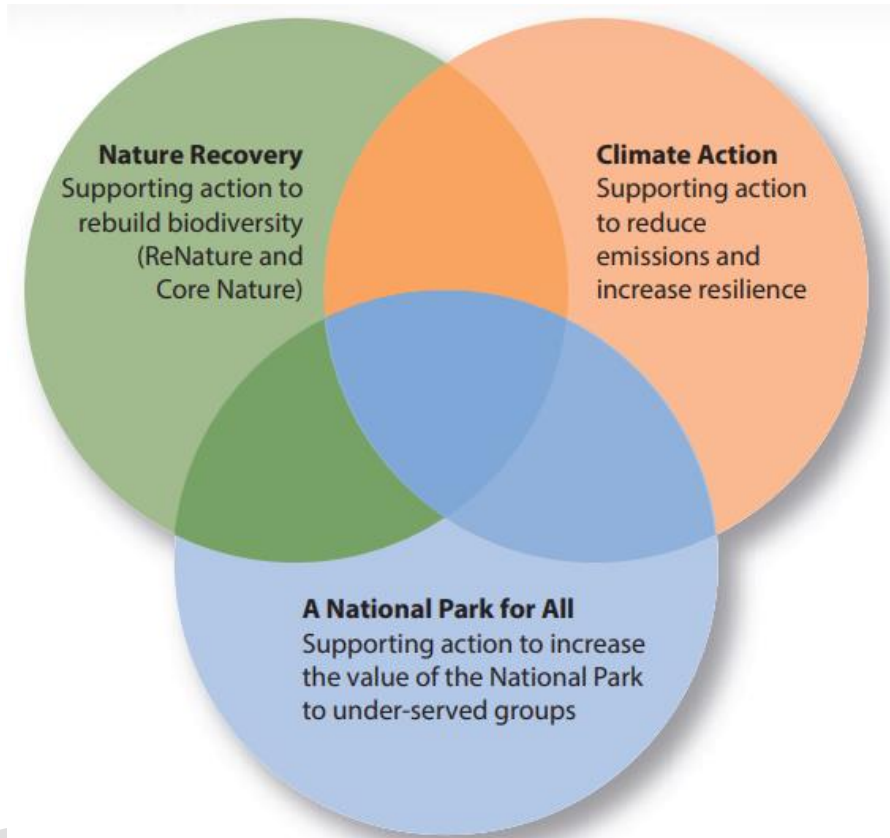


Figure 1: SDNPA Corporate Priorities

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
Local Plan Review															
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															
Design Code															
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

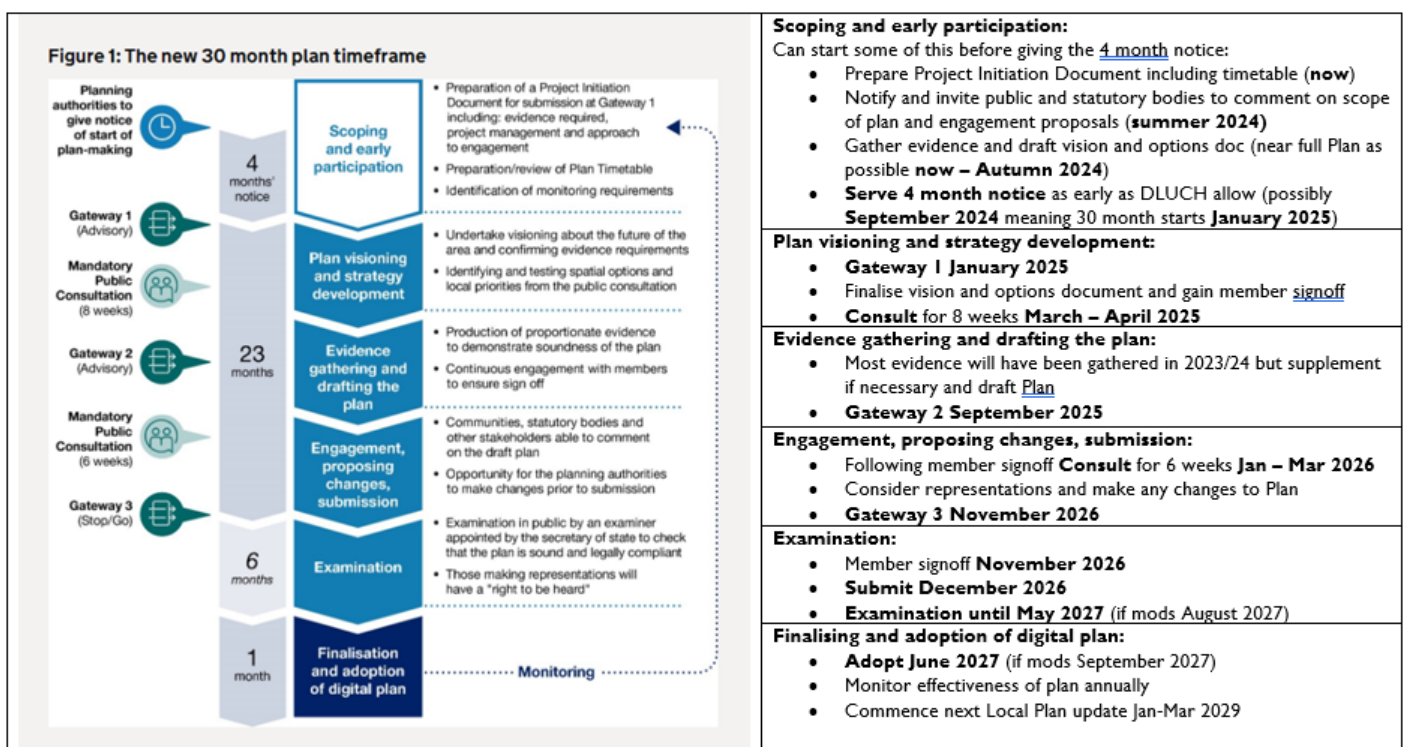


Figure 3: The proposed new plan-making system alongside a potential LPR timetable under this system

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.

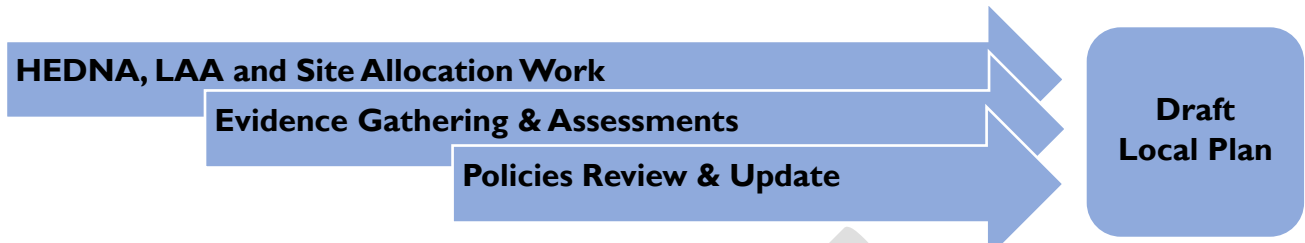


Figure 4: Draft Plan Preparation Workstreams Timing

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.

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

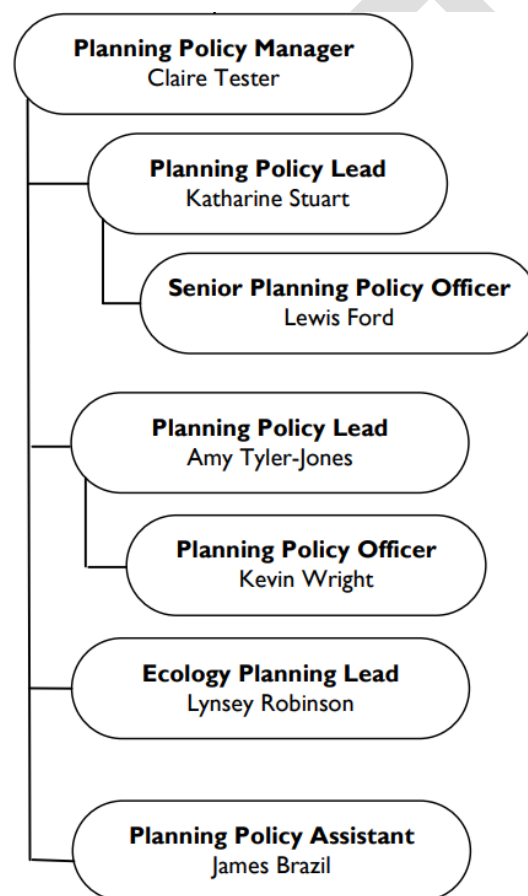


Figure 5: Planning Policy Team Structure

- **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.

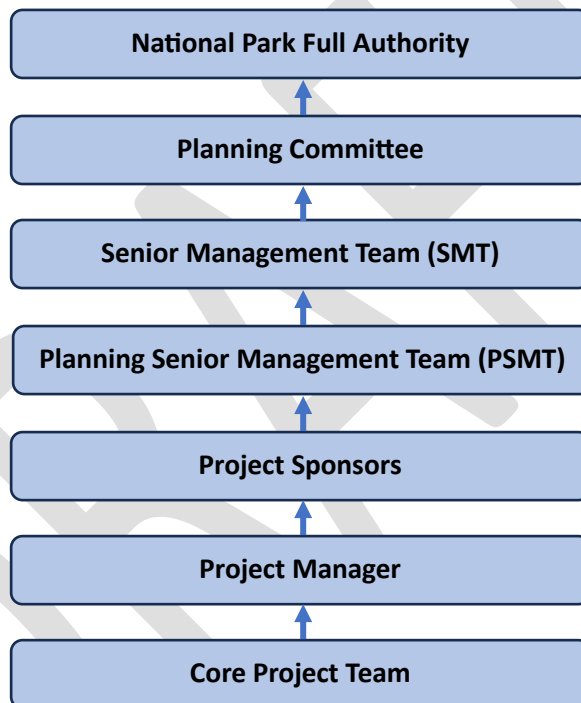


Figure 6: Governance Pathway

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

- 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.