

Report to	<b>Planning Committee</b>
Date	<b>14 November 2024</b>
By	<b>Director of Planning (Interim)</b>
Title of Report	<b>Local Plan Review: Summer Engagement and Project Management Documents</b>
Purpose of Report	<b>The purpose of this report is for Planning Committee to note the outcomes of the summer consultation and agree the revised Project Initiation Document for the Local Plan Review, the revised Local Development Scheme, and the revised Statement of Community Involvement.</b>

#### **Decision**

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**Recommendation: The Committee is recommended to:**

- 1. Note the outcomes of the summer engagement (Appendix 1);**
  - 2. Approve the revised Project Initiation Document for the South Downs Local Plan Review (Appendix 2);**
  - 3. Approve the revised Local Development Scheme (Appendix 3) and**
  - 4. Approve the revised Statement of Community Involvement (Appendix 4);**
  - 5. Delegate to the Director of Planning any minor and presentational changes to the documents approved in recommendations 2-4.**
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#### **Executive Summary**

The South Downs Local Plan Review commenced in May 2022 and is progressing in accordance with the timetable agreed as part of the Local Development Scheme in December 2022. This envisages:

- Regulation 18 public consultation January-March 2025;
- Regulation 19 publication of the proposed submission Plan January-March 2026;
- Submission to the Planning Inspectorate for examination July-September 2026; and
- Subject to a successful examination, adoption April-June 2027.

In March 2024 Planning Committee agreed to carry out an additional 'early participation' consultation on the scope of the Local Plan Review and how people wished to be involved in it. This included consulting on the Project Initiation Document for the Local Plan Review, the Local Development Scheme and the Statement of Community Involvement. This consultation was carried out between 8 July and 16 September 2024.

The purpose of this report is to report back on the summer engagement on the Local Plan Review, explain the consequent changes to the Project Initiation Document, Local Development Scheme and Statement of Community Involvement, and for Planning Committee to agree the final versions of these documents.

## 1.0 National Context

- 1.1 The South Downs Local Plan Review is being prepared during a time of significant changes in the national planning system. The Levelling Up and Regeneration Act 2023 (LURA) sets out the framework for a new plan-making system which will be introduced via secondary legislation. The transition date to this new system was initially any Local Plans submitted to the Planning Inspectorate after 30<sup>th</sup> June 2025, but Government recently consulted on moving this date back to December 2026. This transition date is crucial to whether the South Downs Local Plan Review needs to accord with the existing plan-making system or the new one proposed in the LURA. Part of the reason for carrying out the consultation in summer 2024 was to comply with the requirements of the new system so that the Plan could be resilient to these changes in legislation. If the December 2026 transition date is confirmed in the final NPPF, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system.
- 1.2 Further details of the national context are provided in the following report on this agenda. Some of this is relevant to the representations made to the consultation, and to the SDNPA responses, but in the interests of brevity is not repeated in this report.

## 2.0 **Summer Engagement**

- 2.1 An ‘early participation’ consultation on the Local Plan Review was undertaken from the 8<sup>th</sup> July to 16 September 2024. The purpose of the consultation was to:
- Gather feedback on the scope of the Local Plan Review and the key issues for it to address, as set out in the Project Initiation Document (PID);
  - Identify ways in which the Local Plan Review can contribute to delivering the existing 2050 Vision for the National Park;
  - Provide people with information on the Local Plan Review timetable (as set out in the PID and LDS); and
  - Gather information on how people want to be engaged in subsequent stages of the process including consulting on the revised Statement of Community Involvement (SCI).
- 2.2 Publicity of the consultation included:
- Email / letter notifications sent to Local Plan consultee database (176 Parish Councils, other statutory consultees and over 700 contacts);
  - Articles in digital South Downs Newsletter (12,200 subscribers), South Downs Planning Newsletter (1,200 subscribers);
  - Press release on 19 August 2024;
  - Social media posts (weekly posts on SDNP Instagram account, Twitter posts and notifications to local Facebook groups);
  - Posters & postcards distributed to 15 town /parish halls, 20+ visitor destinations, 40 libraries and leisure centres within & near the SDNP and Midhurst Rother College;
  - Attendance at: Petersfield Climate Action Fair, South Downs ReNature Festival, Stanmer Park, Jalsa Salana, Alton and Seven Sisters Country Park.
- 2.3 People were invited to submit their feedback using an online consultation hub. The consultation hub included project information and project documents to comment on, as well as short surveys to answer, including a bespoke survey for young people, and an opportunity to add comments to a map of the National Park. People could also register to receive updates on the Local Plan Review using the consultation hub. Feedback could also be submitted by email or post to the Planning Policy team. Over 95% of feedback was submitted using the consultation hub.
- 2.4 **Appendix I** provides a report of the consultation feedback. Over 1,200 comments were received during the consultation from 706 individuals or organisations. Most of these

responses were to the surveys and comments on the SDNP map. An overview of feedback is set out below.

- 2.5 Using an online consultation platform at this stage demonstrated the effectiveness of such a platform and similar software is being commissioned to support the Regulation 18 Local Plan Review consultation. Feedback from the summer engagement also indicated the desire for in-person events which are included in the Community Involvement Plan for Regulation 18 consultation (see Report PC24/25-14).

### Survey Results

- 2.6 Respondents were asked to answer a short survey on the scope of the Local Plan Review. This included questions on what issues people felt were important for the Review to address, the Vision for the National Park and how planning can contribute to achieving this and how people would like to be consulted on the draft Local Plan Review. There were 635 responses to the survey. Headline results were:

- The key issues for the Local Plan Review of most importance to respondents were protecting the landscape, biodiversity loss and water quality (followed by climate change).
- Development should include measures for nature recovery, support farmers diversify whilst protecting the landscape and provide opportunities to access the SDNP, and be net zero in carbon emissions. The provision of a high proportion of affordable homes was considered less important in this part of the survey.
- The Local Plan can contribute to the Vision by:
  - Integrated biodiversity measures in new development
  - Measures to address light pollution
  - Measures to repair landscape harm e.g. undergrounding overhead powerlines
  - Better cycling provision
  - Measures to protect the setting of the National Park
  - Measures to support and manage tourism pressures in the National Park
- Development should be located on Brownfield land (outside of settlements) or within or extensions to primary settlements, or small scale development on edge of villages.
- 85% of respondents were neutral, satisfied or happy with the existing 2050 vision for the National Park. Those unhappy with it made the following comments:
  - Not enough on climate change & net zero emissions (most frequently cited reason)
  - Too much emphasis on development & new homes
  - Not enough on homes for local people.
  - Not specific enough to the South Downs – could be anywhere in the SE
  - Language of vision – too long-winded
  - Not enough on the nature crisis
  - Needs to be more supportive for traditional farming. Concerns about impacts of tourism
  - Tries to cover too much
  - No mention of public rights of way, needs more on active travel, horse riding not mentioned
  - No mention of preserving Downland habitat
- Respondents were asked how they would spend £1 million on the National Park. Highest priority was given to nature recovery, followed by adapting to climate change, affordable housing and walking and cycling routes. Other suggestions included various

access measures (bridleways, parking), climate mitigation / net zero projects and facilities at visitor hotspots.

- In terms of how people wanted to be engaged in the Local Plan Review, the most popular methods were email, online survey, public meeting, Local Plan newsletter and in-person exhibitions.

2.7 There was also a bespoke survey for young people aged 13 to 25 years old, with the opportunity to enter a prize draw for a £50 gift voucher. The youth survey repeated the themes of the general survey and was co-designed with SDNP Youth Ambassador to appeal to younger audiences. There were 62 responses to the youth survey. Differences in the results compared to the general survey were:

- The top 3 issues for young people were cleaner rivers, more biodiversity and zero carbon development.
- Young people were also asked how they would spend £1 million on the National Park. As with the general survey, highest priority was given to nature recovery, followed by adapting to climate change, walking and cycling routes and affordable homes. Other suggestions included improvements to footpaths and investment in community infrastructure.
- In terms of how they wanted to be engaged in the Local Plan Review, most popular choices for young people were online surveys, Instagram and online exhibitions.

### Map Comments

2.8 260 comments were made using the online map. People could place a pin anywhere in the National Park and say what they like / dislike about the place and what changes they would like to see.

2.9 Positive comments included those related to locations that were valued for their beauty, views, nature and for their peace and tranquillity. Positive comments were also made about facilities within urban areas although caveated by the need to maintain and improve them.

2.10 Negative comments included unsafe roads or crossing points, the cost of car parking and closure of some car parks, difficulties with managing visitor hotspots (traffic, coaches, litter), flooding, aircraft noise, empty shops and planning decisions (overdevelopment and lack of infrastructure).

2.11 Suggestions for improvements included more nature, balancing visitor needs and measures for wildlife, improved access and maintenance of active travel connections between settlements, better equestrian access, the need for traffic regulation orders to prevent motorised vehicles, better maintenance, dog bins, mountain bike facilities, stronger dark skies policies and a “strategic gap” between settlements.

### Project Initiation Document

2.12 72 comments were made on the PID. A mixture of views were expressed, some considering the PID to be too detailed and complex, others felt it was not detailed enough. In response, amendments to the PID include explaining the scope of the Local Plan Review and those aspects of the adopted Plan that are working well and are not proposed for change. Additional local issues to be added include transport, sustainable settlements, active travel for all (including equestrian), tourism and the visitor economy, employment, energy infrastructure and the Glover Review. Minor amendments have also been made to the Design Guide Scope, Risk Register and Alignment and Cooperation Strategy to reflect representations and factual updates.

2.13 Seven Parish Councils commented on the PID. Whilst there was no single common theme to the responses, the implications of national planning reforms were frequently referred to. In response, the PID has been updated to clarify the references to planning reforms and acknowledge the delayed implementation of these. Detailed responses to representations and proposed actions are set out in the tables attached to **Appendix I** and reflected as tracked changes to the PID in **Appendix 2**.

## Local Development Scheme

- 2.14 26 comments were made on the LDS. Several of the comments noted the challenging timetable and uncertainty around publication of the new NPPF. Some felt the document is too wordy and difficult to understand. An executive summary has been provided with the updated LDS. Updates have also been made in reference to progress made on the joint Waste Plan Review and clarification on the route forward for any future Design Code. Detailed responses to representations and proposed actions are set out in the tables attached to **Appendix I** and reflected as tracked changes to the Local Development Scheme in **Appendix 3**.

## Statement of Community Involvement

- 2.15 43 comments were made on the proposed changes to the SCI. Overall, feedback was supportive of the proposed changes to the Statement of Community Involvement, including the proposed key consultation principles and preparation of bespoke Community Involvement Plans. In response to feedback received during the consultation, clarification has been given on the implications of national planning reforms, and commitments made to monitor the reach of consultation activities and endeavour to provide non-technical summaries for complex evidence-base documents. The list of common material considerations has also been expanded to include impacts on public rights of way.
- 2.16 Comments from Parish Councils included ensuring sufficient length of consultation periods and avoiding holiday periods. The need to reach those with limited or no internet access was emphasised. These points will be addressed in bespoke Community Involvement Plans, and may include promoting consultations via parish communications, local radio, and providing hard copies of consultation documents on request via the post. Updates have also been made to the Local Plan consultee database following the feedback received. Detailed responses to representations and proposed actions are set out in the tables attached to **Appendix I** and reflected as tracked changes to the Statement of Community Involvement in **Appendix 4**.

## 3.0 Conclusion

- 3.1 As set out in paragraph 1.1, the summer engagement was carried out in part to comply with the requirements of the new planning system so that the Local Plan Review could be resilient to the changes to the plan-making system in the LURA. The subsequent Government consultation indicates that the likelihood is that the Local Plan Review will come under the existing plan-making system because it is proposed to move the transition date back to submission for examination by December 2026. However, it is still possible that this date will change or that other circumstances mean that we are unable to submit the Plan for examination by this date, so the need for flexibility and resilience to legislative changes remains.
- 3.2 In addition, this consultation has provided us with a lot of useful feedback which will inform both the content of the Local Plan Review and how we engage people in it moving forward. It also gave us the opportunity to experiment with the use of an online consultation platform, making us more informed clients for the procurement of a platform to use for the Regulation 18 consultation.
- 3.3 Finally, the feedback from the consultation has enabled us to refine the Project Initiation Document, the Local Development Scheme and the Statement of Community Involvement. Subject to agreement of the Committee, these documents can be finalised and used to inform the Local Plan Review and other planning policy workstreams.

<b>Implication</b>	<b>Yes*/No</b>
Will further decisions be required by another committee/full authority?	No.
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 progressing the project in a timely way taking account of the changing national context.
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, in particular the Statement of Community Involvement seeks to involve all members of the community in planning decisions taking into account the Authority's equality duty.
Are there any Human Rights implications arising from the proposal?	No
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	No
Are there any Data Protection implications?	No

**9. Risks Associated with the Proposed Decision**

<b>Risk</b>	<b>Likelihood</b>	<b>Impact</b>	<b>Mitigation</b>
If members do not agree with the recommendations - delay to Local Plan Review as this must be progressed in compliance with these documents.	Possible 3	Major	Member approval of the documents as set out in this report and its appendices

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- Appendices
1. Outcomes of the summer engagement
  2. Project Initiation Document for the Local Plan Review
  3. Local Development Scheme
  4. Statement of Community Involvement

Background Papers (links): None

SDNPA Consultees Director of Planning (Interim); Legal Services

External Consultees None

Background Documents None

