



# South Downs Local Plan Review

## Draft Project Initiation Document

October 2024 (Post Consultation Version)

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## Executive Summary

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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 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 a draft of this Project Initiation Document. This consultation was carried out between 8th July and 16th September 2024.

More information on timetable and governance arrangements are set out in Chapter 3 and 4.

### Planning Reforms

The Local Plan Review is being undertaken at a time of considerable change to the planning system. The transition date to this new system was initially any Local Plans submitted to the Planning Inspectorate after 30th 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 Levelling Up and Regeneration Act. If the December 2026 transition date is confirmed, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system. The approach taken to this Local Plan Review is to progress it in a way that would work under both systems as far as possible, 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 Project Initiation Document, such as the timetable, may need to be revised.

### Scope of the Local Plan Review

Various aspects of the adopted SDLP are working well. It is intended for the Local Plan to keep the landscape led approach, ecosystem services and the development strategy of a medium level of development dispersed across the towns and villages of the National Park.

There is a need to review development needs and provision numbers both at a National Park level and for individual settlements, to ensure the Plan delivers on SDNPA corporate priorities on Nature Recovery, Climate Action and a National Park for All, addresses changes in national policies, and reviews and amends certain policies where they have been problematic to implement. It is also agreed to incorporate policy development on Shoreham Cement Works.

Key new, emerging or evolving issues have been identified that will inform the Local Plan Review. These include the climate emergency and biodiversity crisis, health & wellbeing, changes in legislation regarding nature, the emerging concept of regenerative design, thriving resilient communities in the National Park, housing delivery including affordable housing, sustainable transport and active travel and the economy including the visitor economy and viticulture sector. More information is set out in Chapter 2.

### Appendices

- Appendix A sets out the emerging scope for a Design Code, should this be required by Regulations.

- Appendix B sets out the Risk Register for the Local Plan Review. The key risk is delay or change required due to planning reforms and change in national planning policy.
- Appendix C sets out the Alignment and Cooperation Strategy. This explains how we will work with the local authorities and other prescribed bodies. It sets out 8 strategic priorities and themes for the South Downs National Park.
- Appendix D sets out the overall approach to engagement and public consultation for the Local Plan Review.

# 1. Introduction

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## Purpose of this document

- 1.1 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.
- 1.2 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

- 1.3 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

- 1.4 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~~ **October** 2024, there are a total of **62** areas designated for the purposes of neighbourhood planning and **45** NDPs made part of the development plan.
- 1.5 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 1 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 1 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](#).

- 1.8 At Planning Committee on 14 March 2024 Members approved an additional 'early participation' consultation. Consultation was carried out between 8th July and 16th 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;
  - 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; 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.

Papers from the Planning Committee meeting on 14 March 2024 can be viewed by clicking this [link](#). Minutes from the Planning Committee meeting on 14 March 2024 can be viewed by clicking this [link](#).

## National Planning Reforms

- 1.9 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. 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 was expected during 2024 is expected later this year with the intention of the new planning system commencing in Autumn 2024, however this has since been delayed. 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.
- 1.10 The transition date to this new system was initially any Local Plans submitted to the Planning Inspectorate after 30th 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, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system.
- 1.11 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 of the uncertainties regarding planning reforms, 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.
- 1.12 National planning reforms and changes to national planning policy are discussed further in Chapter 2 on the scope of the Local Plan Review, Chapter 3 on the timetable of the Local Plan Review, and the Risk Register in Appendix B.

## Finalising the PID

- 1.13 Feedback on a draft of the PID was sought as part of the 'early participation' consultation carried out between 8th July and 16th September 2024. 72 comments were made on the PID. 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 are added including 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 Code Scope, Risk Register, and the Alignment and Cooperation Strategy. This document is a draft PID. It will be updated and finalised following public engagement in summer 2024.

## 2. Scope of the Local Plan Review

### Introduction

- 2.1 This chapter defines the scope of the Local Plan Review. It:
- Provides an overview of the scope, including aspects of the South Downs Local Plan (SDLP) that are working well and are intended to remain,
  - Flags key new and evolving issues for the Local Plan Review to consider and address
  - Lists the documents that will be produced,
  - Lists the evidence studies that will be produced, and
  - Provides the overall project objectives.
- 2.2 A Local Plan covers a wide range of matters, and there are a wide range of new, emerging and evolving considerations, therefore, inevitably, the scope that is defined here is not exhaustive but provides an overview of the key matters and drivers that will shape this Local Plan Review.

### Overview

#### National Park Purposes & Duty, Special Qualities, and role of the NPPF and Vision & Circular

- 2.3 The issues below continue to remain key for the preparation of a Local Plan in a National Park context and for the scope of the Local Plan Review.
- 2.4 The statutory purposes and duty of for National Parks are set out in the National Parks and Access to Countryside Act 1949 as amended by the Environment Act 1995.

#### **The National Park purposes 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.

The National Park Authority also had a duty when carrying out the purposes: To seek to foster the economic and social well-being of the local communities within the National Park.

In addition, Section 245 of the Levelling Up and Regeneration Act 2023 also requires all relevant authorities, including statutory undertakers and other public bodies, to seek to further these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires The Sandford Principle to be applied, and the first purpose of the National Park will be given priority.

- 2.5 The South Downs National Park is a living, working and ever-changing landscape, shaped by its underlying geology and its human history. It has many special qualities which together define its sense of place and attract people to live and work in the area and visit the National Park. The seven special qualities reflect both the engagement with stakeholders of the National Park and technical evidence.
1. Diverse, inspirational landscapes and breathtaking views,
  2. A rich variety of wildlife and habitats including rare and internationally important species,
  3. Tranquil and unspoilt places,



4. An environment shaped by centuries of farming and embracing new enterprise,
  5. Great opportunities for recreational activities and learning experiences,
  6. Well-conserved historical features and a rich cultural heritage, and
  7. Distinctive towns and villages, and communities with real pride in their area.
- 2.6 The National Planning Policy Framework is a key document in the preparation of the Local Plan Review. At the time of writing, the latest NPPF was published in December 2023. Chapter 3 sets out the requirements for plan-making. Paragraph 35 explains that Local Plans will be examined to assess whether they are legally compliant and sound. Four tests of soundness are set out. Plans are ‘sound’ if they are:
- Positively prepared,
  - Justified,
  - Effective, and
  - Consistent with national policy.
- 2.7 Paragraphs 182 and 183 afford National Parks with the highest landscape status, and states that great weight should be given to conserving and enhancing landscape and scenic beauty, wildlife and cultural heritage, and the scale and extent of development is ‘limited’. Permission should be refused for major development (defined by taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated) other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.
- 2.8 The Government has recently consulted on changes to the NPPF. An updated NPPF is currently expected towards the end of 2024 and is discussed further in the ‘Strategic Matters’ and ‘Local Matters’ sections of this Chapter and the timetable in Chapter 3.
- 2.9 Alongside the NPPF, the [English national parks and the broads: UK government vision and circular 2010](#) provides important policy guidance on the English National Parks and the Broadlands (‘the Parks’). The Vision and Circular covers matters such as the purposes and duty, sustainable development, major development, vibrant communities, tourism and provision of affordable housing.

### Broad scope of the Local Plan Review

- 2.10 In May 2022, the National Park Authority agreed key principles for the scope of the Local Plan Review. It was agreed that this would be a review of the adopted SDLP, and not a brand-new plan. Various aspects of the adopted SDLP are working well and it was agreed that the Local Plan would keep the landscape led approach, ecosystem services and the development strategy of a medium level of development dispersed across the towns and villages of the National Park.
- 2.11 It was agreed that there is a need to review development needs and provision numbers both at a National Park level and for individual settlements, a need to ensure the Plan delivers on corporate priorities on Nature Recovery, Climate Action and a National Park for All, a need to address changes in national policies, and an opportunity to review and amend certain policies where they have been problematic to implement. It was also agreed to incorporate policy development on Shoreham Cement Works.

2.12 Since May 2022, national planning reforms and national planning policy has continued to evolve. It will be necessary to monitor these changes and address these as necessary through the Local Plan Review. These, and other new, emerging and/or evolving issues relevant for the Local Plan Review are highlighted below.

### Key **new, emerging and/or evolving** issues for the Local Plan Review

#### Environment, Social and Economic Overview

2.13 **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. **At COP15 a total of 188 governments, including the UK, agreed to the adoption of the Kunming-Montreal Global Biodiversity Framework (GBF). The GBF contains four overarching goals and 23 targets, including the '30 by 30' target: the effective conservation and management of at least 30% of the world's lands, inland waters, coastal areas and oceans, with emphasis on areas of particular importance for biodiversity and ecosystem functioning and services, by 2030.** 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 2.21 below.

2.14 **Economic Challenges:** **A variety of challenges are noted. These include inflation, supply chains / UK EU Exit, including economic impacts arising from the COVID-19 pandemic, including such as increased remote and flexible working, increased demand for online services, and changes in the tourism sector such as increased domestic tourism. New industries emerging and growing, for example viticulture in the South Downs National Park.**

2.15 **Health, Wellbeing and Social Issues:**

- **The benefits of access to nature and quality homes on health (physical and mental) are well documented and the recent COVID-19 pandemic highlighted the importance and value of gardens, public open spaces and access to other nature assets. 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.
- **Public Health England (2017) identifies five aspects of the built environment in relation to health and wellbeing from their report: [Spatial planning for health: an evidence resource for planning and designing healthier places](#). These are neighbourhood design, housing design, healthier food, green and blue spaces, and transport.**
- **Provision of housing is a key issue, including affordability of homes in general, and homes for those on low incomes living in the National Park, and opportunities for**

downsizing. A key matter also includes the availability of types/designs of homes and design of homes for that are adaptable and suitable over our lifetime, including for older people and people with disabilities. Provision of a range of different types of homes, and supports maintaining diverse and vibrant communities.

- 2.16 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, health/wellbeing/social and economic matters.

### Strategic Matters

- 2.17 **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 1.9-1.12 above. In addition to the changes and implications mentioned in paragraph 1.9-1.12 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, carrying the same weight as Local Plan policies and trumping them where there is any conflict. 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. These are likely to have a significant impact on the scope and content of Local Plan policies.
  - **Potential Loss of Supplementary Planning Documents (SPDs)** – It is indicated that these would fall away once a Local Plan is adopted unclear what would happen to SPDs 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 Chapter 3 and 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.
- 2.18 **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 applies to the South Downs National Park Authority, our neighbouring Local Planning Authorities, as well as other public statutory bodies, including the Planning Inspectorate.

2.19 **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. In December 2023 the then Conservative Government revised the National Planning Policy Framework (NPPF) to be more flexible about Local Plans meeting housing need figures. In July 2024 the new Labour Government published a consultation concerning further proposed revisions to the NPPF reversing these changes and strengthening the requirement for Local Plans to meet housing need figures and work cooperatively with neighbouring authorities to address any unmet needs. The consultation also proposed a new 'standard method' for calculating those housing need figures which significantly increased them. The changes to the NPPF are still draft, and a finalised version is expected by the end of 2024. However, the Written Ministerial Statement accompanying the proposals in July 2024 is a material consideration and clearly sets out the Government's agenda for growth, including the aspiration to deliver 1.5 million homes during this Parliament. Importantly, it should be noted that the proposed changes to the NPPF do not weaken the protections for National Parks in paragraphs 182 and 183.
- The new [National Design Guide](#) and [National Model Design Code](#).
- [First Homes](#).
- An updated Use Class Order.
- Various changes to Permitted Development Rights.

2.20 These national planning policy changes will be considered in the Local Plan Review alongside emerging national planning reforms as appropriate.

2.21 **Changes in legislation and national policy regarding nature**, including:

- The [25 Year Environment Plan](#) and its first revision the [Environmental Improvement Plan 2023](#). The 25 Year Environment Plan committed the Government to exploring the potential for a wider environmental net gain (ENG). ENG is an approach to development that leaves both biodiversity and the environment in a measurably better state than prior to development. Natural England (NE) have jointly published an 'Environmental Benefits from Nature' tool – Beta version 2021. This builds on a previous version of the Metric for Biodiversity Net Gain, using these outputs alongside wider environmental information to highlight ecosystem services losses and gains. The approach remains under development.
- The [Environment Act 2021](#) which sets a range of new requirements, notably for [Local Plan making](#), [Local Nature Recovery Strategies](#) and [Biodiversity Net Gain](#), among other matters.
- [Local Nature Recovery Strategy \(LNRS\) Regulations](#) and guidance: In this area, the Government has appointed Hampshire, West Sussex and East Sussex County Councils (covering Brighton & Hove) to be the Responsible Authority to produce LNRS for their respective areas. The SDNPA is a Supporting Authority in the preparation of these LNRS. Preparation of these is in progress, with consultations on draft LNRS expected to occur during 2025. Guidance is awaited from the Government on how Local Plans will be required to take account of LNRS.
- [Biodiversity Net Gain \(BNG\) Regulations](#), national policy, and guidance: The Environment Act 2021 established the required for development to achieve a minimum of 10% biodiversity net gain. The regulations, national policy and guidance set the framework and provide more detail on how this legislative requirement is implemented. Guidance does allow for Local Plans to set a BNG percentage requirement beyond the statutory minimum, where supported by evidence.

- The Landscapes review: National Parks and AONBs 2021 (The Glover Review): The review focused on five areas: Landscapes alive for nature and beauty, Landscapes for everyone, Living in landscapes, More special places and New ways of working. A series of proposals were identified including a renewed mission to recover and enhance nature and proposals to support health & wellbeing and access to and experience of National Parks.

These will be addressed as appropriate through the Local Plan Review to ensure, **at a minimum, legal compliance is met.**

**2.22 Regenerative Design** – The emerging concept of ‘Regenerative Design’. Regenerative Design is defined as a holistic approach in which human systems are designed to co-exist and co-evolve over time with the natural system of which we are part. This is in contrast with green design which focuses on reducing harm, and sustainable design which is about restoring equilibrium. Regenerative design goes a step further – seeking to restore and repair the damage done to date. It’s three principles are:

- Nature-led – place-based design that enhances and emulates natural systems.
- Systemic – relationships, exchanges and flows of materials and resources that restore, protect and replenish.
- Equitable – collective change, co-creation and collaboration that ensures inclusivity and social justice.

**2.23 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.

**2.24 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

**2.25 SDNPA Corporate Priorities** - The Corporate Plan for the South Downs National Park Authority shows how the organisation sets its own priorities and delivers the outcomes in the Partnership Management Plan. The current Corporate Plan covers the period 2020—2025 and the latest Corporate Plan Action Plan covers a two year period (2023-25); this uses a single set of high-level targets. The Local Plan Review will consider how choices in strategy, **site** allocations, and topic based / park-wide policy requirements can contribute to achieving these corporate priorities and associated targets.

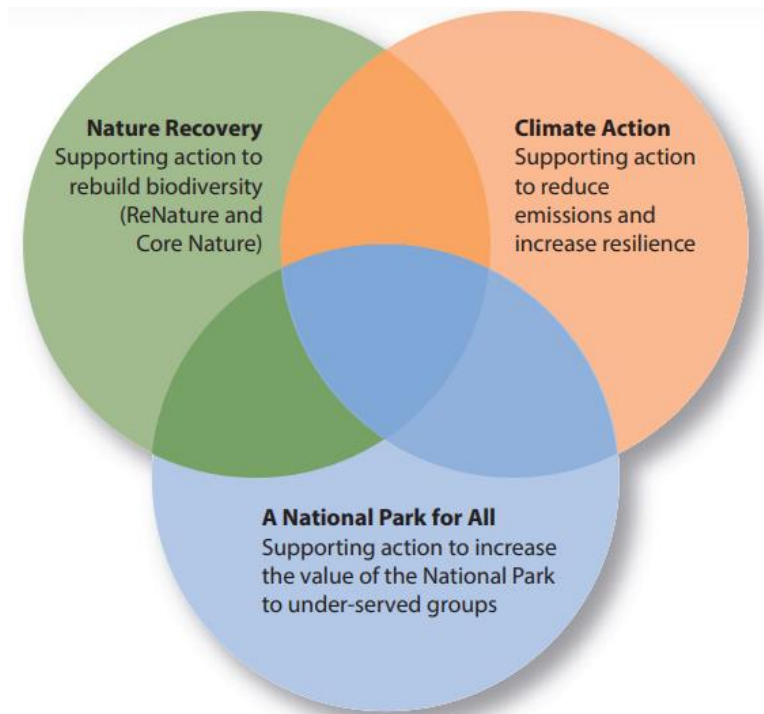


Figure 1: SDNPA Corporate Priorities

### 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

2.26 **The Partnership Management Plan Review (PMP)**– The 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.

- 2.27 **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, **site allocations** and topic-based policies, **such as on sustainable construction and renewable energy**, can address these targets and objectives, **including associated matters such as electricity infrastructure requirements and potential landscape impacts**. Improving the sustainability of existing housing will be important to achieve national carbon reduction targets, however this issue is often outside the scope of the planning system.
- 2.28 **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.
- 2.29 **Nature and Climate requirements, standards or targets** – the setting of locally specific requirements will be explored through the Local Plan Review process. For example, SDNPA will consider a policy requirement for Biodiversity Net Gain that goes beyond the statutory minimum of 10%.
- 2.30 **Thriving and resilient communities** in the SDNP – Communities are a vital part of the thriving living landscape of the National Park. Key matters include mitigation and adaptation to climate change and support for nature as discussed above. Sustainable travel, supporting the economy of the SDNP and provision of new homes, particularly smaller homes, affordable homes, and homes that are adaptable over our lifetimes are also important part of supporting our communities to thrive and be resilient and are discussed further below.
- 2.31 **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. **The Local Plan Review will need to set a new housing provision figure. It does this by establishing the housing needs of the National Park and then seeking to meet these needs where this is compatible with the statutory purposes of the National Park. Planning Practice Guidance says that says that NPPF policies for protecting National Parks 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. The basis for establishing the housing needs of the**

National Park is currently uncertain because the Government is proposing a new way of calculating housing need (known as the standard method). This method produces a figure for each District, Borough and Unitary Council area, but does not say how or if the method should be applied to National Park Authority areas (which in the case of the South Downs includes parts of 13 such Council areas).

- 2.32 **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**. This is a national issue, with challenges including Registered Providers (mainly Housing Associations) needing to spend more on existing housing stock to improve safety and standards; increases in construction and ongoing management costs; and the removal of Government grants for sites where affordable housing is provided as a proportion of market housing (s106 sites).
- 2.33 **Sustainable transport, active travel and access** – The South Downs National Park has a mixture of well-connected places, such as our largest towns of Lewes and Petersfield, and more rural communities that can be less well-connected. Sustainable transport and active travel access is important to support sustainable communities by supporting living locally, health and wellbeing, reducing carbon emissions, and supporting the economy such as tourism. Active travel, includes walking and wheeling (such as mobility vehicles), cycling and equestrian travel.
- 2.34 **Supporting the Economic Sectors in the SDNP** – The Housing and Economic Development Needs Assessment (September 2023) establishes the need for employment land. An Employment Land Review is being undertaken to identify employment land supply in the SDNP during the plan period.
- 2.35 **Viticulture** as an emerging and growing industry, particularly in and around the SDNP. Viticulture is a form of agriculture as defined in the Town and Country Planning Act 1990 (Section 336). If land is in agricultural use, then planning permission is not required to cultivate the land, plant grapes, grow grapes or install trellising as these activities are not defined as “development”. Other aspects of viticulture, such as where wineries process grapes on behalf of other growers, may require planning permission. Wine tourism is also growing. The Sussex Wine Tourism Growth Plan 2023 states that Sussex is at the forefront of the industry and ready for significant tourism growth. It has a vision to expand wine tourism, provide high-quality experiences, and support low carbon transition.
- 2.36 **The Visitor Economy** is an important sector for the South Downs National Park. The South Downs Economic Profile 2018 (Updated 2020) explains that the visitor economy is one of four priority sectors in the National Park’s largely rural economy. It is an important part of people experiencing the National Park and its special qualities and supports the communities and businesses of the National Park to thrive. Together with the other National Parks, the SDNPA promotes sustainable tourism (minimising negative impacts). UK National Parks are now going a step further through the adoption of ‘Regenerative Tourism’ (requiring net positive benefits). The Regenerative Tourism Vision is:
- Champion and support tourism development that contributes to the enhancement and regeneration of the places and communities in which it operates.



- Support tourism activity that helps reduce carbon emissions and increases nature-recovery, whilst ensuring National Parks are relevant to everyone's needs.

2.37 **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.

2.38 **Integrated Impact Assessment Sustainability Appraisal (IIA) Scoping Report** – IIA includes Sustainability Appraisal (SA), including Strategic Environmental Assessment, Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA) and is a key part of Local Plan preparation. The aim of SIAA 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 SIAA 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 was initially produced for SA and SEA and was subject to consultation with statutory consultees in 2023. Since then it was decided to broaden the scope to include EqIA and HIA, rather than produce these as separate and overlapping documents. A Scoping Report for the IIA 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<sup>4</sup>. The document was amended following feedback and the [Scoping Report is now published](#).

### What will the LPR include

2.39 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 Regulatory~~ Assessments (IAA (including SA, SEA, EqIA and HIA)/EOR, HRA)
- ~~Equalities Impact Assessment~~
- Supporting evidence
- Infrastructure Delivery Plan

2.40 **If the LPR proceeds under the new planning system, a Design Code (see Appendix A Design Code Scope) will also be produced.**

### Evidence required

2.41 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 (LGS) 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 (WCS) – Commissioned and in progress.
- Strategic Flood Risk Assessment (SFRA) Level 1 – Commissioned and in progress. Level 2 may be commissioned if required.
- Sequential Test – Internal and will be undertaken following the SFRA Level 1. An Exception Test will be undertaken if required.
- Settlement Study – Internal and in progress.
- Open Space Study – Internal and in progress.
- Viability Report – To be commissioned.
- Sustainability Appraisal / Environmental Outcomes Report Integrated Impact Assessment (IIA) – Commissioned and in progress.
- Habitats Regulations Assessment – Commissioned and in progress.
- ~~Equalities Impact Assessment – Internal and in progress.~~

2.42 The Local Plan Review will also be informed by evidence from external stakeholders, partners, and produced by other teams here at the SDNPA, where relevant and appropriate.

### Project Objectives

- 2.43 The objective for the Local Plan Review is to deliver an up-to-date Local Plan and Policies Map (and Design Code ~~should this be a legal requirement~~) 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.
  - Seeks to meet the objectively assessed housing and other development needs of the area where this is compatible with furthering the National Park purposes.
  - 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 ~~relevant any~~ local nature recovery strategies.
  - Is prepared in a way that makes efficient use of resources.
  - Is evidence based.
  - Is legally compliant and sound.

### 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 1 below. The statutory milestones for the Local Plan Review are set out in the updated Local Development Scheme (9th Revision).

Table 1: 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
<b>Local Plan Review</b>															
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															

#### National Planning Reforms

3.2 The timetable above is subject to the progress of the national planning reforms. 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 30th 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, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system.

- 3.3 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, and whether the requirements in the LURA for area-wide Design Codes are brought in through Regulations. If the delay to the transitional arrangement deadlines are delayed confirmed 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. If a Design Code is required, this PID and the LDS will be updated with a timetable for its production.
- 3.4 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.

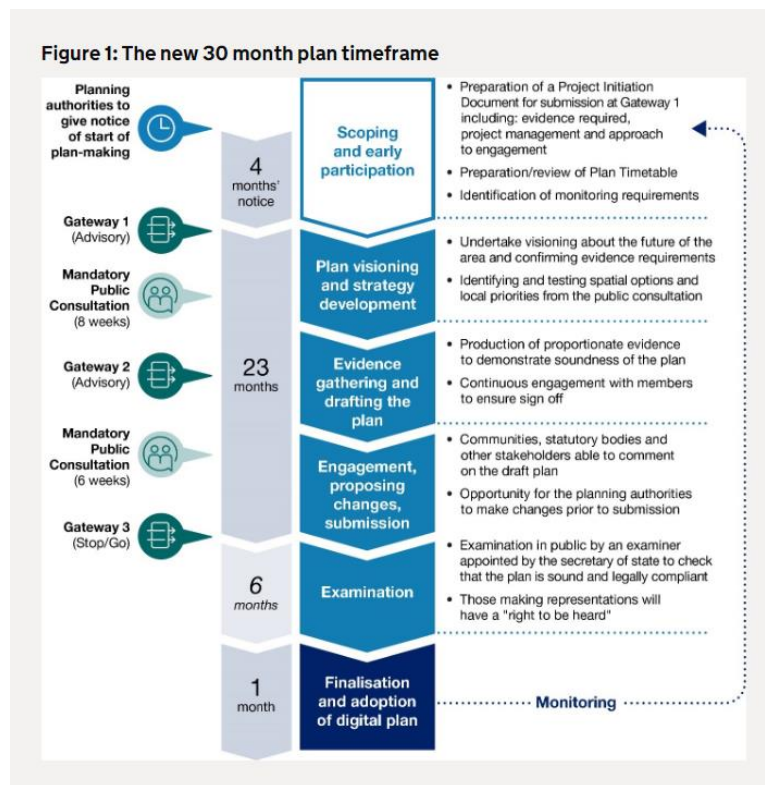


Figure 3: The proposed new plan-making system alongside a potential LPR timetable under this system

### 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 Regulation 18 consultation 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. Now planning reforms have been delayed, a similar phased approach is likely to be followed in the preparation of the Regulation 19 Pre-Submission Local Plan.

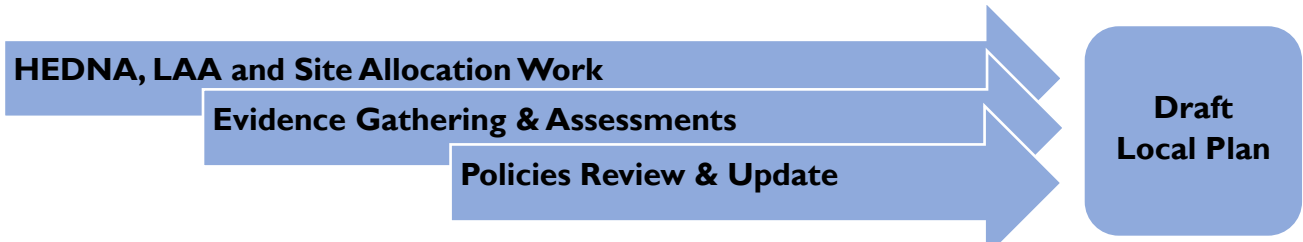


Figure 4: Draft Plan Preparation Workstreams Timing

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) until 25<sup>th</sup> November 2024, and then Tim Slaney, Director of Planning and Claire Tester, Planning Policy Manager
- **Project Manager** – Katharine Stuart, Planning Policy Lead
- **Core Project Team** – Planning Policy Team

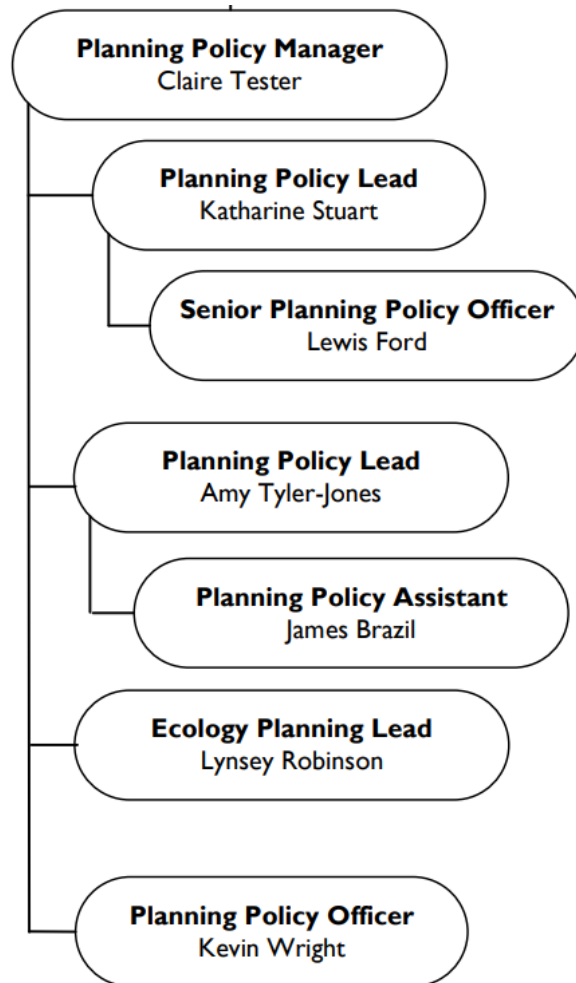


Figure 5: Planning Policy Team Structure

- **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

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- 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.



## Appendix A - SDNPA Design Code Scoping

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### Legislative Basis

1. 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.
2. Section 15F (1) of the Levelling Up and Regeneration Act 2023 Schedule 7—Plan making requires a local planning authority to produce a design code for the whole of its area that “includes requirements with respect to design that relate to development, or development of a particular description, which the authority consider should be met for planning permission for the development to be granted”. This does not have to include every type of development or every aspect of design.
3. The Local Plan timetable required for every local planning authority (15B) must include how it intends to meet the requirements of 15F to produce a design code. The Secretary of State has the power to issue a direction if a local planning authority does not comply with these requirements.
4. The Design Code is a ‘supplementary plan’ (15CC), and is the only one that can be prepared on an area-wide rather than a site specific basis. The Secretary of State will make regulations about the preparation of supplementary plans, which must require a proposed supplementary plan to be the subject of consultation with the public.
5. The transition date to this new system was initially any Local Plans submitted to the Planning Inspectorate after 30th 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. If the December 2026 transition date is confirmed, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system, and the production of a Design Code would not be required. It would also not be required if Government decides not to introduce Regulations to bring Section 15F(1) into force.

### Emerging Planning Reform - Plan-making Consultation September 2023

6. The following are extracts from the Levelling-up and Regeneration Bill: consultation on implementation of plan-making reforms launched July 2023. These provide a direction of travel from the government regarding Design Codes.
  - 176. ... local planning authorities will also be able to use supplementary plans to discharge the new Bill requirement to produce an authority-wide design code which will be used to provide, or reinforce an authority’s overarching design vision, setting out high level strategic design parameters to apply to development.
  - 178. The reforms will remove the role of Supplementary Planning Documents and Area Action Plans... Supplementary plans will have the same weight as a local plan and other parts of the development plan. They will therefore also be subject to consultation and an independent examination.

- 183. The Bill states that all supplementary plans must be designed to secure that the development and use of land in the authority's area contribute to the mitigation of, and adaptation to, climate change, so far as the relevant plan-making authority consider appropriate, having regard to the subject matter of the supplementary plan.
- 184. Supplementary plans will also benefit from wider reforms mentioned in this consultation document. These include ensuring evidence base requirements are proportionate and plan preparation processes and plans themselves are digital, transparent, understandable and map-based.
- 185...supplementary plans will not have a defined preparation time such as the 30 months proposed for local plans and minerals and waste plans...
- 186. The Bill sets out that supplementary plans must be in general conformity with a relevant operative spatial development strategy and the relevant plan-making authority must have regard to any other part of the development plan which has effect for the area or a site to which the plan relates when preparing a supplementary plan (including the local plan and its local vision for growth, and any neighbourhood plans). However, they can be prepared prior to the adoption of a new style local plan.
- 190. Depending on content, supplementary plans may be subject to Environmental Assessment (or subsequent Environmental Outcomes Reports) obligations. We expect planning authorities to use an environmental screening approach for supplementary plans similar to that used for neighbourhood plans.
- 194... The Bill ensures that regulations must require a proposed supplementary plan to be the subject of consultation with the public. We intend to set out in regulations that supplementary plans should have a minimum of one formal consultation stage, the timeframe for which will be set out in the local plan timetable or minerals and waste plan timetable.
- 195. The Bill's approach to the independent examination of supplementary plans is broadly modelled upon the existing arrangements for neighbourhood plans (which already form part of the development plan once brought into force).
- 196. The general rule is that the independent examination is to take the form of written representations. However, the examiner must cause a hearing to be held for the purposes of receiving oral representations if the examiner considers that the consideration of oral representations is necessary to ensure adequate examination of an issue or that a person has a fair chance to put a case.
- 197. The Bill provides two options for the independent examination of supplementary plans. Plan-making authorities may submit their draft supplementary plan to the Secretary of State, for the examination to be carried out by a person appointed by the Secretary of State, or to an examiner of the authority's choosing who is an independent, impartial person and who is suitably qualified.
- 204. ...SPDs will remain in force until planning authorities adopt a new style local plan or minerals and waste plan.

## Proposed reforms to the National Planning Policy Framework and other changes to the planning system – Consultation July-September 2024

7. Further changes were consulted on in the summer of 2024. Chapter 3, paragraph 12 says  
 "... Rather than district-wide design coding, we want to focus local planning authority efforts on the preparation of localised design codes, masterplans and guides for areas of most change and most potential – including regeneration sites, areas of intensification, urban extensions and the development of large new communities".
8. This indicates that Government is considering not introducing Regulations to bring Section 15F(1) of the LURA into force. This would mean that it is not mandatory to produce an area-wide Design Code. In this event the National Park Authority will not be progressing such a Code and will instead continue to rely on its award-winning Design Guide SPD.

### Baseline documents

- Design Guide SPD (2022)
- Sustainable Construction SPD (2020)
- Habitats Regulations Assessments TAN (2021)
- Dark Skies TAN (2021)
- Ecosystem Services TAN (2019)
- Extensions and Replacement Dwellings TAN (2023)
- Camping & Glamping TAN (2021)
- Viticulture TAN (2021)
- Biodiversity Net Gain TAN (2022)
- Scale-Scale Renewable Energy TAN (2022)
- Equestrian Development TAN (2023)
- Landscape Character Area Assessments
- Roads in The South Downs
- Nationally Described Space Standards

Village and Parish Design Statements adopted across the South Downs National Park also provide locally specific design information.

### Precedent Document

- Lake District Design Code

### Document Scope (subject to potential change as work progresses)

1. How to Use the Design Code (Checklists?)
2. Landscape Led (Contextual) Design Approach
3. All Development
  - Character (content distilled from Design Guide SPD and LCAs)
  - Site Context (new content, starting with Lake District context study)

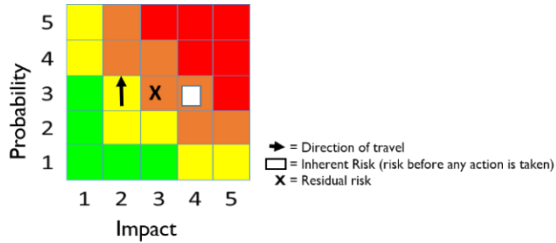
- Settlement pattern (content distilled from Design Guide SPD + new map-based evidence)
  - Orientation (content distilled from Design Guide SPD)
  - Placemaking (content distilled from Design Guide SPD)
  - Access (content distilled from Design Guide SPD)
  - Legibility (content distilled from Design Guide SPD)
  - Active frontages (content distilled from Design Guide SPD)
  - Scale (Grain and Mass) (content distilled from Design Guide SPD)
  - Street Design (content distilled from Design Guide SPD)
  - Natural surveillance (content distilled from Design Guide SPD)
  - Materials (content distilled from Design Guide SPD + new map-based evidence)
  - Building Design (content distilled from Design Guide SPD)
  - Hard Landscaping (content distilled from Design Guide SPD)
  - Ecosystem Services (content distilled from ES TAN)
  - Biodiversity (content distilled from BNG TAN, HRA TAN and updated)
  - Blue and Green Infrastructure (content distilled from Design Guide SPD)
  - Flood Risk and Sustainable Drainage Systems (SuDS) (content distilled from Design Guide SPD)
  - Sustainable Construction (new content detailing requirements for new LP sustainable policy)
  - Built Heritage (content distilled from Design Guide SPD updated for sustainable retrofitting measures)
  - Dark Skies (content distilled from DNS TAN)
  - Rural Roads (content distilled from Design Guide SPD + new map-based evidence)
4. **New Homes** (content distilled from Design Guide SPD)
    - Affordable Housing (content distilled from AH SPD)
    - Countryside/settlement edge (content distilled from Design Guide SPD and new content)
    - Single Dwellings (content distilled from Design Guide SPD)
    - Perimeter blocks (content distilled from Design Guide SPD)
    - Density (content distilled from Design Guide SPD)
    - Accessibility (content distilled from Design Guide SPD)
    - Parking (content distilled from Design Guide SPD and Parking SPD)
    - Residential Amenity (content distilled from Design Guide SPD)
    - Daylight and Sunlight (new content based on BRE guidance)
  5. **Space Standards** (content distilled from Design Guide SPD)
  6. **House Extensions and Alterations** (content distilled from Design Guide SPD and Extensions and Replacement Dwellings TAN)
  7. **Conversions** (new content)
  8. **Rural Holiday Accommodation** (content distilled from Design Guide SPD Extensions and Replacement Dwellings TAN)
  9. **Farmstead Development** (content distilled from Design Guide SPD)
  10. **New Agricultural Buildings** (content distilled from Design Guide SPD)
  11. **Older Peoples' Accommodation** (content distilled from Design Guide SPD updated for daylight/sunlight/dementia friendly)
  12. **Non-residential Development**
    - Viticulture (content distilled from Viticulture TAN)

- Commercial development (content distilled from Design Guide SPD reviewed and updated)
  - Shopfronts (content distilled from Design Guide SPD and reviewed)
13. Equestrian Development (content distilled from Equestrian TAN)
14. Small-Scale Renewable Energy (content distilled from S-SRE TAN)
15. Lifespan – Management Plan, Participation, Community Involvement

Supporting Information

Glossary

# Appendix B – South Downs Local Plan Review Risk Register



Risk Number	Risk	Inherent risk (Probability/Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/Likelihood x Impact) (risk score after mitigations applied)
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<p>R1</p>	<p><b>Delay or changes to Government’s National Planning Reforms.</b>          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 intention was for the new planning system to commence in Autumn 2024 however this has been delayed. In addition, the transition date to the new system was initially any Local Plans submitted to the Planning Inspectorate after 30th June 2025, but the 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. If the December 2026 transition date is confirmed, and the Local Plan Review meets its agreed timetable, then it will be submitted and examined under the existing plan-making system. Submitting under the current system would present less risk than submitting under the new system, where much of the detail is yet to be made available. The probability of the new Planning System being implemented increased by Government consultation in September 2023. However, the expected consultation on National Development Management Policies (NDMPs) has not yet occurred. The expectation of an announcement of a general election in the next year may also impact progression of planning reforms. Timings are overall not certain as they are subject to various required legislation and policy changes and processes.</p>	<p>4x4 (16)</p>	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies.</li> <li>• Jointly raising concerns with other LPAs about relevant aspects of planning reforms.</li> <li>• Maintaining momentum on the Local Plan Review so we are ready to respond to any changes to transitional arrangements.</li> <li>• Starting with aspects of the Local Plan Review least likely to be substantially affected by the Planning Reforms – starting with land availability assessment, site allocations, development need, and other key pieces of evidence or assessments. Starting national park-wide thematic policy review later in the process to respond to any steer on NDMPs.</li> </ul>	<p>4x3 (12)</p>
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Risk Number	Risk	Inherent risk (Probability/Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/Likelihood x Impact) (risk score after mitigations applied)
	Impact could be significant as existing Local Plan will be over five years old in July 2024 and its weight will start to diminish especially if the 5-year housing land supply is not maintained.			

<p>R2</p>	<p><b>Other changes to national policy or legislation.</b>          In December 2023 the then Conservative Government revised the National Planning Policy Framework (NPPF) to be more flexible about Local Plans meeting housing need figures. In July 2024 the new Labour Government published a consultation concerning further proposed revisions to the NPPF reversing these changes and strengthening the requirement for Local Plans to meet housing need figures and work cooperatively with neighbouring authorities to address any unmet needs. The consultation also proposed a new 'standard method' for calculating those housing need figures which significantly increased them. The changes to the NPPF are still draft, and a finalised version is expected by the end of 2024. However, the Written Ministerial Statement accompanying the proposals in July 2024 is a material consideration and clearly sets out the Government's agenda for growth, including the aspiration to deliver 1.5 million homes during this Parliament. Importantly, it should be noted that the proposed changes to the NPPF do not weaken the protections for National Parks in paragraphs 182 and 183. Various changes to the plan-making system have been proposed and sit within a period of many amendments to the planning system. Various other changes to the planning system have been proposed such as changes to PD rights. There has also been Government interest in legislation and policy changes which may impact the planning system, such as proposed changes regarding nutrient neutrality and the Habitats Regulations.</p>	<p>4x4 (16)</p>	<ul style="list-style-type: none"> <li>• Monitor national government consultations, statements and any new proposals and policies. This will assist in being ready to respond to any actions required in relation to relevant national policy or legislation changes and reduce the impact on the Local Plan Review and its timetable.</li> </ul>	<p>4x3 (12)</p>
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Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
	Various national policy or legislative changes that impact the Local Plan review are possible. Whilst these are likely to be topic specific compared with the overarching planning reforms referenced above, they could cause significant delay, especially if arising at later stages of the plan making process.			
R3	<b>Delays in completion of evidence studies and assessments.</b> Either internal studies or those being undertaken by consultants commissioned.	3x4 (12)	<ul style="list-style-type: none"> <li>• Communication of the Local Plan Review timetable and specific evidence studies.</li> <li>• Regular check ins on progress of evidence studies to identify delays and address these.</li> </ul>	2x3 (6)
R4	<b>New or changing topics / key issues arising for the Local Plan Review to address.</b> Arising from evidence studies, cross boundary working, or otherwise raised. For example, a new or changing Habitats Regulations Assessment matter that requires further evidence and/or a policy position in the Local Plan. These are likely to be relatively focused and topic specific matters. If this arises through evidence studies at the relatively early stages of plan making, then these can be more straightforwardly addressed without significant delay. <b>There is greater risk. However, if such matters were to arise at the later stages of the plan-making process which</b> could cause significant delay.	3x4 (12)	<ul style="list-style-type: none"> <li>• Taking an appropriate balance in the timing of commissioning evidence – early enough to allow sufficient time for plan-making responses, but not too early to be incomplete or out of date.</li> </ul>	3x3 (9)

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
R5	<p><b>Changes in Members and associated direction of travel of corporate priorities.</b> This could result in revisions to policies and/or changes or new evidence studies after they have been completed. Some change in Members may occur (and is usual) but the extent of any changes or their implications are unknown. No significant local elections are expected</p>	<p>2x3 (6)</p>	<ul style="list-style-type: none"> <li>• Induction of new members to the issues identified for the Local Plan, and early understanding of any changes in direction of travel on priorities.</li> </ul>	<p>2x2 (4)</p>
R6	<p><b>Staff resourcing changes.</b> (a) Changing officers in the core project team or supporting the Local Plan Review process. (b) Reduction in staff resource</p>		<p>(a) Appropriate staff and budget resources are in place to deliver the Local Plan Review.</p>	
R7	<p><b>Significant <span style="color: red;">delays in response</span> or objections from Statutory Consultees.</b> Comments from Statutory Consultees have significant weight in the plan-making process. However statutory consultees are also under significant resource pressure and may have limited or variable capacity to engage and input through the plan-making process.</p>	<p>3x4 (12)</p>	<ul style="list-style-type: none"> <li>• Best efforts to engage with statutory consultees either directly or through existing officer groups to share information and receive input on the approach taken in the Local Plan Review. This may assist in reducing the likelihood and impact of any objections.</li> </ul>	<p>2x3 (6)</p>
R8	<p><b>Planning Inspectorate (PINS) delays following submission of the Plan.</b> This could result in a delay in the examination process and eventual adoption of the Local Plan. PINS are likely to be navigating a period of transition in planning reforms which could result peaks and logjams in the examination process.</p>	<p>4x4 (16)</p>	<ul style="list-style-type: none"> <li>• Communication with PINS in regards the timetable of the Local Plan Review and in regards any actions SDNPA can take to support an efficient examination process.</li> </ul>	<p>3x3 (9)</p>

Risk Number	Risk	Inherent risk (Probability/ Likelihood x Impact) (where 1 is low and 5 high)	Mitigations	Residual Risk (Probability/ Likelihood x Impact) (risk score after mitigations applied)
R9	<p><b>Devolution.</b> Local Authorities across Hampshire, West Sussex and East Sussex are exploring options for devolution. This could result changes to the governance structures which we will engage with during the Local Plan Review, and could result in new priorities or strategies for these areas.</p>	<p>3x3 (9)</p>	<ul style="list-style-type: none"> <li>• Keep a watching brief of devolution proposals and progress locally.</li> <li>• Engage with relevant parties to ensure understanding of any changing priorities.</li> </ul>	<p>3x2 (6)</p>

KEY TO PROBABILITY / LIKELIHOOD AND IMPACT

LIKELIHOOD

Almost certain – 5  
Likely – 4  
Possible – 3  
Unlikely -2  
Almost impossible – 1

IMPACT

Catastrophic - 5  
Significant – 4  
Moderate – 3  
Minor – 2  
Insignificant - 1

OVERALL SCORE FOR SEVERITY

1-3 - Insignificant  
4-6 - Moderate  
7-12 - Significant  
13-25 - High

## **Appendix C**

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# **South Downs Local Plan Review**

# **Cooperation and Alignment Strategy**

**February November 2024**

## Contents

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## I. Introduction

- I.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.
- I.2. Our existing South Downs Local Plan was adopted on 2<sup>nd</sup> 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”.*
- I.3 The existing Local Plan ~~will be~~ was 5 years old on 2<sup>nd</sup> 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 ~~new~~ 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. so this Strategy assumes that these will be similar to the previous duty to cooperate requirements. Once the details of the Alignment Test have been released this Strategy will be reviewed to ensure that it meets these requirements.~~

## 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.

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

Name of group/meeting	A brief summary of what the group/meeting is about
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.
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 I 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.

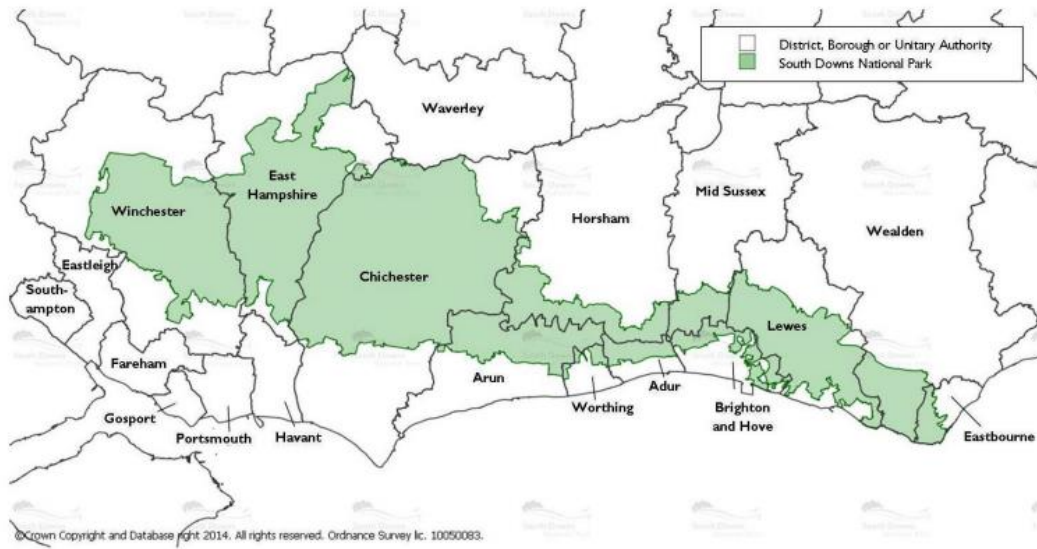
### Prescribed bodies

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
<b>Co-located Authorities</b>			
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 <sup>th</sup> 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 <sup>th</sup> March 2018 and 1 <sup>st</sup> October 2020 (G&T)



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

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>nd</sup> March 2018

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

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

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
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	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
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	
<b>Other Organisations</b>			
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	

<b>Partner Organisation</b>	<b>Strategic Issues</b>	<b>Mechanisms for Cooperation</b>	<b>Outcomes</b>
Active Travel England		Involvement in the Transport Study and Green Infrastructure	
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.



## Appendix D – Local Plan Review - Overall approach to community & stakeholder engagement

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### 1. Purpose

- 1.1 The Government's proposals for a new planning system include removing the requirement to prepare a Statement of Community Involvement (SCI), and there will be a need to outline our overall ambitions and approach to engagement and consultation for the Local Plan Review (LPR) in the Project Initiation Document (PID). In the interim, this strategy sets out our approach to engagement on the LPR at a high level as an appendix of the draft PID. More detailed Community Involvement Plans (CIP) will be prepared for each stage of participation and consultation.

### 2. Principles to engagement

- 2.1 The SCI currently sets out how the SDNPA will consult with all stakeholders, including local communities, businesses and public bodies, on planning matters. In anticipation of changes to the planning system, revisions to the SCI are proposed to introduce bespoke CIP for each stage of plan consultation to reach audiences as widely as possible. The following key principles are intended to guide all engagement and consultation activity:
- **Timely** engagement and consultation – allowing early and ample opportunity to engage in policy formulation.
  - **Inclusive** engagement and consultation – which is accessible to all those who want to take part including additional outreach to engage with underrepresented groups.
  - **Effective and efficient** for both those responding to a consultation and for the SDNPA processing and analysing responses.
  - **Clear results and accountability**

### 3. LPR specific engagement requirements

#### Current regulations

- 3.1 Town and Country Planning (Local Planning) (England) Regulations 2012 set two formal consultation periods for Local Plans:
- Regulation 18: Preparation of a Local Plan
  - Regulation 19: Publication of a Local Plan (Pre-Submission)

#### New planning system

- 3.2 The Levelling Up and Regeneration Act (LURA) 2023 introduces reforms to the plan-making process which will determine formal consultation periods for Local Plans, these are set to comprise:
- Early participation – new requirement to 'notify' and 'invite' participation at the start of the plan-making process
  - First mandatory consultation (8 weeks)
  - Second mandatory consultation (6 weeks)

### 4. When we will engage and consult on the LPR

- June/July 2024 (min 8 weeks)

- Jan - March 2025 (min 8 weeks)
- Jan - March 2026 (min 8 weeks)

5. **What we will consult on**

- Summer 2024: scoping & early participation stage on the LPR (scope of LPR, local issues relevant to the plan, preferred ways of being involved)
- Jan - March 2025: draft LPR (Reg 18) including draft policies, allocations (map based)
- Jan – March 2026: preferred approach (Reg 19) policies, allocations and policies map

6. **Who we will engage and consult with**

- 6.1 Existing regulations require LPAs to notify specific and general consultees, local residents and business as appropriate, inviting representations on the content of local plan documents. The current list of specific and general consultees is listed in Appendix 3 of the SCI.
- 6.2 As set out in the overarching principles, there is a commitment to inclusive engagement and consultation which is accessible to all those who want to take part. This will mean undertaking additional outreach to engage with groups typically underrepresented in Local Plan consultations. Additional measures may include bespoke consultation materials (content and language), bespoke events; both in-person or online and providing a range of ways to respond (e.g. in writing, via online surveys or by transcribed voice notes).

7. **How we will engage and consult on the Local Plan Review**

- 7.1 We will be **flexible in our approach** to engagement and consultation on the LPR according to the stage of plan-making. Bespoke Community Involvement Plans (CIP) will be prepared for individual engagement and consultation exercises. These will use the key principles of the SCI, will further the aim to engage underrepresented groups and incorporate, as appropriate, best practice in consultation techniques (e.g. the Government digital toolkit when this becomes available).
- 7.2 We will take a **hybrid approach** to engagement and consultation providing both online and in-person opportunities for people to hear about and make comments on the Local Plan Review. We will make use of digital consultation software to extend our reach, provide an easy-to-use platform to comment on and which simplifies and speeds up the analysing stage for officers. We will also hold in-person events and provide paper copies of documents and surveys for those who do not have access to the internet.
- 7.3 We will be **efficient in our approach**, making use of existing in-person events to extend our reach and align with other Authority engagement activity wherever feasible, for example on the future Partnership Management Plan.



South Downs National Park  
Local Development Scheme  
(Ninth Revision) (post consultation)  
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Post Consultation Version

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The Local Development Scheme is also available on the SDNPA website:  
[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

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