



South Downs Local Plan Review

Draft Project Initiation Document

November 2024

Contents

Executive Summary	3
1. Introduction	5
2. Scope of the Local Plan Review	8
3. Timetable.....	19
4. Project Governance	22
5. Stakeholders and Engagement.....	24

Appendix A – Design Code Scope

Appendix B – Risk Register

Appendix C – Alignment and Cooperation Strategy

Appendix D – LPR Engagement Strategy

Executive Summary

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

- Regulation 18 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

Purpose of this document

- 1.1 This 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 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 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 LURA. 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 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 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.

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, economic impacts arising from the COVID-19 pandemic, 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. 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, 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 that are adaptable and suitable over our lifetime, for older people and people with disabilities. Provision of a range of different types of homes, supports 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 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 applies to the South Downs National Park Authority, our neighbouring Local Planning Authorities, as well as other 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.

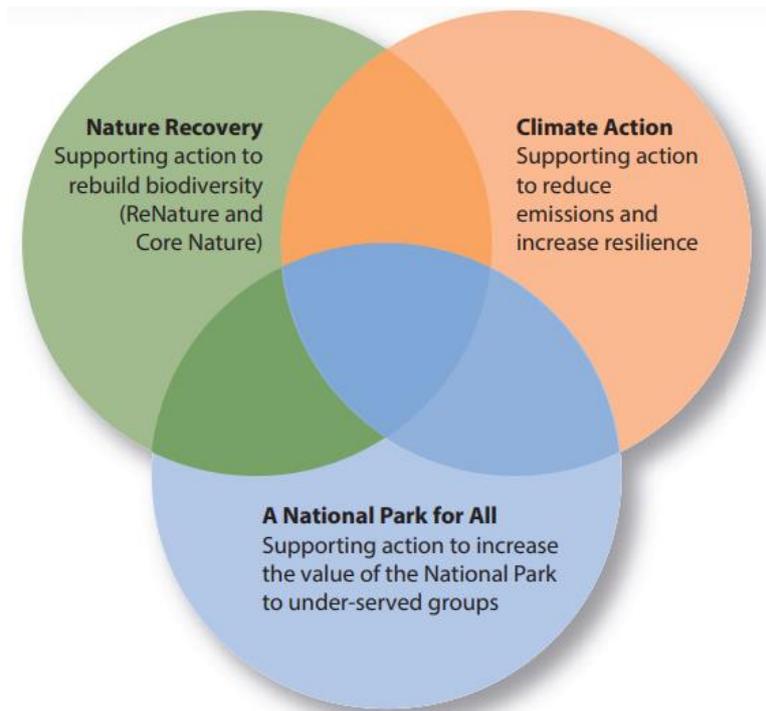


Figure 1: SDNPA Corporate Priorities

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. 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 (IIA) Scoping Report** – IIA includes Sustainability Appraisal (SA), Strategic Environmental Assessment, Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA) and is a key part of Local Plan preparation. The aim of IAA 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 IIA 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 2024. 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
 - Regulatory Assessments (IAA (including SA, SEA, EqIA and HIA, HRA)
 - 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.
- Integrated Impact Assessment (IIA) – Commissioned and in progress.
- Habitats Regulations Assessment – Commissioned 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 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 is 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 Timetable

	23-24	24-25				25-26				26-27				27-28	
	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2
Local Plan Review															
Evidence gathering & preparing a draft Plan															
Early participation Summer 2024															
Regulation 18 Member Consideration															
Regulation 18 Consultation															
Revisions to the Plan															
Regulation 19 Member Consideration															
Regulation 19 Consultation															
Prepare the Plan for Submission															
Submit the Plan															
Examination															
Main Modifications Consultation															
Adoption															

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 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 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.

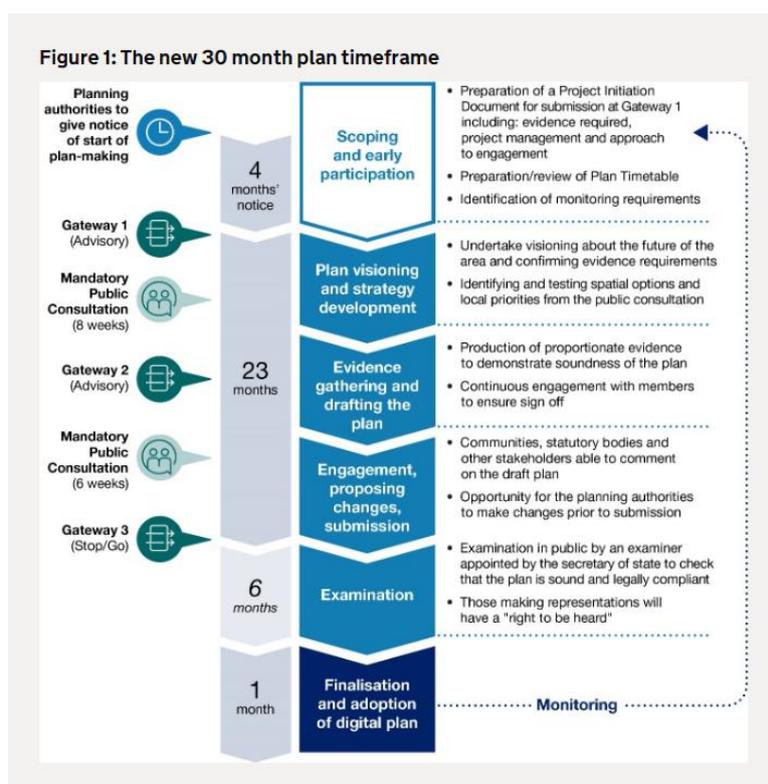


Figure 3: The proposed new plan-making system

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 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.

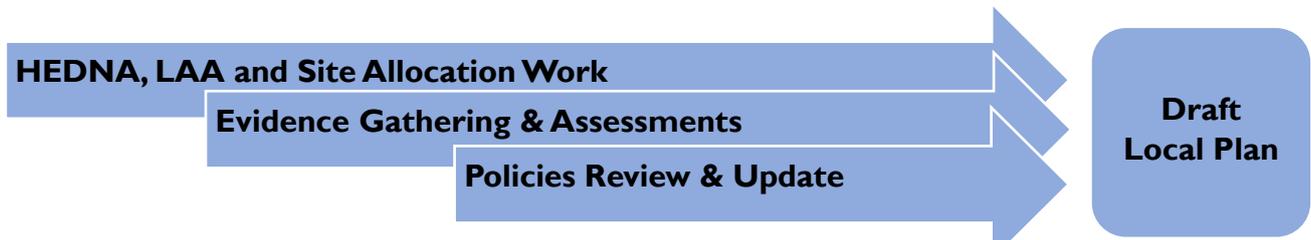


Figure 4: Draft Plan Preparation Workstreams Timing

Early Participation

- 3.6 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 9th February 2025, 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

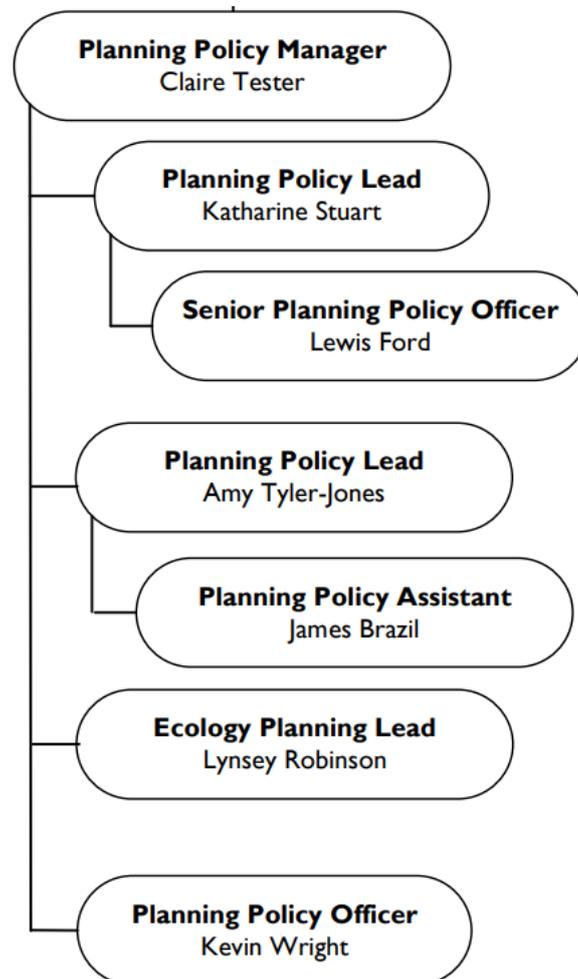


Figure 5: Planning Policy Team Structure

- **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.

Risks

- 4.7 A risk register is set out in Appendix B and will support Project Management and the Project Plan of the Local Plan Review. Risks and scores may change during the Local Plan Review process as issues arise and mitigation applied.

5. Stakeholders and Engagement

- 5.1 Appendix C sets out the **Alignment and Cooperation Strategy** for engagement with partners.
- 5.2 Appendix D sets out the **Local Plan Review Engagement Strategy** with community and stakeholders.