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SOUTH DOWNS LOCAL PLAN REVIEW

First Public Consultation (Regulation 18) January 2025

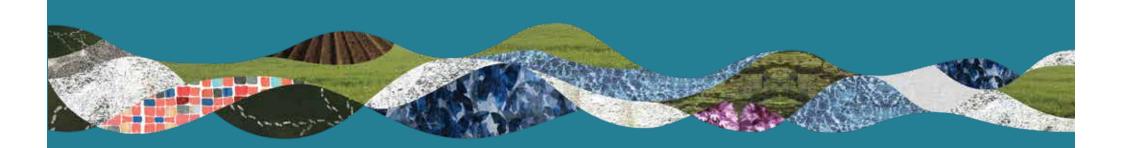
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Cover: Cycling on the Downs Link and South Downs Way near the River Adur © SDNPA

The language used in this consultation has been kept as simple as possible, but some technical terms are unavoidable. A full Glossary is provided at the end of the existing South Downs Local Plan at www.southdowns.gov.uk/wp-content/uploads/2018/06/Glossary.pdf



FOREWORD

This is a hugely important year for the South Downs as we plan for the future of this vibrant and much-loved National Park through a review of our Partnership Management Plan which will set out our priorities for the next five years

The Local Plan Review is a cornerstone of this planning for the future, deciding how and where development takes place in the National Park right up until 2042.

Landscapes and communities are continually evolving and changing, and our award-winning South Downs Local Plan is being reviewed to ensure it is up-to-date and addresses important issues such as nature recovery, climate change, affordable housing and helping local communities thrive.

The Local Plan Review is an opportunity to protect and enhance the things we all love most - our landscapes, communities, cultural heritage, dark skies, wildlife, water courses and more.

This public consultation is your main opportunity to have your say and shape the final Plan.

We want the National Park to continue to inspire, restore and welcome all who live, work and visit here. Ultimately, it's about ensuring the South Downs remains nature-rich and thriving - for everyone, for generations to come.

This Local Plan Review is a chance for everyone to have a say on what matters most to them. Every comment counts, and we're looking forward to hearing what people have to say, both online and in-person at our upcoming engagement events.

This important consultation will run until 17 March, and I invite you to get involved and have your say.

You can find out more here: southdowns.gov.uk/local-plan-review



VANESSA ROWLANDS, CHAIR, SOUTH DOWNS NATIONAL PARK AUTHORITY



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THE SOUTH DOWNS NATIONAL PARK

- 1.1 The South Downs was established as a National Park in 2010. The South Downs National Park Authority became the local planning authority for the National Park in 2011, meaning that it has overall responsibility for planning matters within the National Park area. In some cases, it has delegated the determination of planning applications to other bodies known as 'host authorities' (Lewes and Eastbourne Councils, Winchester City Council, and Chichester and East Hampshire District Councils). However, it retains direct responsibility for producing Local Plans and other policy documents for the National Park area.
- **1.2** The statutory purposes and duties for National Parks are specified in the National Parks and Access to Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023, as below.

The National Park purposes are:

- 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
- 2) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

The National Park Authority also has 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.

All relevant authorities (including statutory undertakers, local councils and Government departments and agencies) have a duty to seek to further the purposes of National Parks, and if it appears that there is a conflict between those purposes, must attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area comprised in the National Park (the Sandford Principle).

WHAT IS THE SOUTH DOWNS LOCAL PLAN AND WHY DOES IT NEED A REVIEW?

1.3 National planning policy says that the planning system should be genuinely plan-led, and that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other

economic, social and environmental priorities; and a platform for local people to shape their surroundings. They must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. Local Plans must be based on an up-to-date and proportionate evidence base about these strategic issues, and the policies and allocations for addressing them must be informed by a Sustainability Appraisal which assesses them against economic, social and environmental objectives. The Circular for English National Parks and the Broads says that, in developing and implementing policies for the planning and management of their areas, Authorities should document and clearly express the special qualities of the Park and the status and condition of these qualities. Authorities are expected to continue to seek to ensure the conservation of the natural beauty of the area for which they are responsible.

- 1.4 The existing South Downs Local Plan was adopted in July 2019 and sets out the planning policies and allocations for the South Downs National Park. All planning applications for development within the National Park are judged against these adopted Local Plan policies, as well as against any made Neighbourhood Development Plans and adopted Minerals and Waste Local Plans as appropriate to the location and type of development (collectively known as the 'Development Plan').
- 1.5 Local Plans are required to be reviewed every five years, and the review of the South Downs Local Plan commenced in May 2022, with the timetable being updated in December 2022. The timetable included this first public consultation (Regulation 18) in early 2025, the second public consultation (Regulation 19) in early 2026 and submission for examination by the Planning Inspectorate in summer 2026. Adoption of the Plan is anticipated summer 2027.

WHAT HAS BEEN DONE SO FAR?

- **1.6** The Local Plan Review commenced with the updating of the evidence base, including a 'call for sites' in summer 2022 to inform a Land Availability Assessment and the publication of the Housing and Economic Needs Assessment in November 2023. Other key evidence base studies are:
- Transport
- Renewable Energy
- Water (Flood Risk and Water Infrastructure)
- Gypsy and Traveller Accommodation Assessments

- Local Green Space and Open Space Assessments
- Settlement Facilities
- 1.7 There is also a legislative requirement to carry out the following Assessments:
- Habitats Regulations Assessment
- Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/ SEA)
- Equalities Impact Assessment (EqIA)

In addition, a Health Impact Assessment (HIA) is also recommended under the East Sussex Health & Wellbeing Engagement Process & Protocol. The Integrated Impact Assessment incorporates the SA/SEA, the EqIA and the HIA. All the above assessments and studies can be viewed at www.southdowns.gov.uk/planning-policy/south-downs-local-plan-review/

- 1.8 Early engagement has been carried out with town and parish councils from February 2023, including encouraging them to prepare 'parish priorities statements' to set out their own local evidence about their areas. These are available to view at www.southdowns.gov.uk/planning-policy/neighbourhood-planning/parish-priorities-statements/ At its meeting on 14th March 2024 the South Downs National Park Authority's Planning Committee agreed to have regard to the contents of these parish priorities statements when preparing the Local Plan Review.
- 1.9 Also, at the 14th March 2024 Planning Committee Meeting it was agreed to carry out an additional 'early participation' public engagement to reflect the requirements of the new plan-making system being introduced under the Levelling Up and Regeneration Act 2023. This engagement took place 8th July 16th September 2024 with the intention to:
- Gather feedback on the scope of the Local Plan Review and the key issues for it to address;
- 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 preparation timetable;
 and
- Gather information on how people want to be engaged in subsequent stages of the process.

The outcomes of this consultation can be found at www.southdowns.gov. uk/planning-policy/the-south-downs-local-plan-review/previous-engagement/summer-2024/

RELATIONSHIP WITH OTHER PLANS

- 1.10 As set out above, the South Downs Local Plan forms part of the statutory Development Plan which also includes Minerals and Waste Local Plans and Neighbourhood Development Plans. There are 45 'made' Neighbourhood Development Plans in the National Park and several more at earlier preparation stages. These are prepared by Town and Parish Councils, and in some areas Neighbourhood Forums, and provide policies and allocations which complement the Local Plan. They currently plan for about half of the site allocations in the National Park. Other documents of relevance to planning decisions in the National Park include Supplementary Planning Documents such as the South Downs Design Guide and Village or Parish Design Statements, Technical Advice Notes, which provide guidance on how to implement Local Plan policies, and Parish Priorities Statements, which set out what is important to parishes and what improvements they would like to see.
- 1.11 Alongside the Local Plan Review the National Park Authority is also reviewing its South Downs Partnership Management Plan which sets out the long-term vision and objectives for the National Park. The remit of the Partnership Management Plan is wider than just planning covering land management and other activities and it is a plan for all those partners whose actions affect the National Park, not just the National Park Authority. However, the planning system is a delivery vehicle for many of the Partnership Management Plan objectives so it is important that the two documents align with and support each other.
- **1.12** The National Park Authority also produces a Corporate Plan every five years to set out its priorities as an organisation. The priorities for 2020-2025 are nature recovery, climate action and a National Park for All. These priorities are being reflected in the preparation of the Local Plan Review.

WHAT IS THIS CONSULTATION ABOUT?

1.13 This First Consultation Document and draft Policies Map represents the formal Regulation 18 stage of the Town and Country Planning (Local Planning) (England) Regulations 2012, where the local planning authority notifies stakeholders of its

intention to produce a local plan and invites them to make representations about what the plan should contain. This is the main opportunity for people to get involved in shaping the content of the Local Plan Review. Whilst there will be a second consultation before the Plan is submitted for examination, at that stage the grounds for making representations are limited by the legislation and comments are sent on to the Planning Inspectorate to be considered as part of the examination. It is important therefore that people engage fully with this earlier consultation so that their comments can be taken into account by the Authority and used to influence what goes into the Local Plan Review.

- **1.14** The proposals seek to update and evolve the existing South Downs Local Plan while retaining its award-winning and innovative approach to planning in a National Park. The elements that remain unchanged are:
- The landscape-led approach which requires development to reflect a thorough understanding of its context and sense of place;
- The ecosystems services approach which requires development to support the services that the natural environment provides us such as clean air and water and healthy soils; and
- A development strategy of medium dispersed growth.
- Much of the supporting text in the existing Local Plan will also be retained or updated, including the Spatial Portrait in Chapter 3 and the explanatory text adjacent to each policy and allocation. This is not included in this consultation but will be updated before the plan is finalised later in 2025.
- 1.15 The Project Initiation Document for the Local Plan Review (www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/project-documents/project-initiation-document/) sets out the scope of the Review, the issues it needs to address, and the evidence base requirements. This was informed by representations received during the 'early participation' engagement in the summer of 2024. In summary these issues are:
- Forthcoming changes to national policy and to the plan-making system, including National Development Management Policies.
- The climate emergency and the biodiversity crisis.
- Economic challenges, including ongoing impacts from the Covid-19 pandemic and EU Exit.

- Social issues, including health, access to nature, and affordable and good quality homes.
- 1.16 This First Consultation Document includes the following:
- The vision and objectives of the Local Plan Review, identifying where these are different to the existing Local Plan;
- Policies with proposed amendments to existing Local Plan policies and some suggested additional policies;
- Existing site allocations in the Local Plan which have yet to be implemented, and are proposed to be carried over into the Local Plan Review, including some amendments to these allocations; and
- Proposed new site allocations. These are sites proposed for housing, employment or other development.
- Settlement Maps showing the proposed allocations in combination with existing Local Plan and Neighbourhood Plan allocations.
- 1.16 The Local Plan Review is being prepared in the context of significant changes to the national planning system. In December 2024 the Government published a new National Planning Policy Framework and updated the Planning Practice Guidance. Some of the changes to the NPPF and PPG could have significant impacts on the content of the Local Plan Review, including the way that housing need figures are calculated. The introduction of National Development Management Policies during 2025 could mean that some of the policies currently proposed in the Local Plan Review would not be necessary or would have to be changed to be in line with the national policies.
- 1.17 However, Government also sent a strong message that Local Planning Authorities should not slow down plan-making, and that its ambition is to have complete coverage of the country by up-to-date Local Plans by the end of this Parliament (2029). The National Park Authority has therefore decided to proceed with this Regulation 18 consultation and address any changes in national policy and legislation in time for the Second Public Consultation Document.

WHAT ARE THE NEXT STAGES?

1.18 Following this consultation all the responses received will be collated, analysed and taken into account alongside the evidence base and other considerations, such as

national policy and guidance, to produce the Second Public Consultation Document (Regulation 19). This will be a full version of the Local Plan Review as the National Park Authority intends to submit for examination. The Second Public Consultation Document is currently programmed for early 2026 followed by the submission of the Local Plan Review to the Planning Inspectorate (on behalf of the Secretary of State), which will appoint an Inspector to carry out an examination of the plan, including consideration of representations submitted in the second public consultation.

HOW TO RESPOND TO THIS CONSULTATION

1.19 The consultation is open for 8 weeks from Monday 20 January to Monday 17 March 2025. Responses to the consultation can be made in the following ways:

Online: Using the consultation platform to view and give feedback on the draft revised Local Plan at https://sdnpalocalplanreview.commonplace.is/

Email: planningpolicy@southdowns.gov.uk

In writing: Planning Policy Team, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH



2.1 The Vision for the South Downs National Park was set out in the first Partnership Management Plan (2014-2019). This Vision describes where we want to be in 2050 and it is the overarching vision for the adopted South Downs Local Plan. It applies across the whole National Park, but the ways in which it could be achieved will vary from area to area based on the characteristics and opportunities in that area.

By 2050 in the South Downs National Park:

The iconic English lowland landscapes and heritage will have been conserved and greatly enhanced. These inspirational and distinctive places, where people live, work, farm and relax, are adapting well to the impacts of climate change and other pressures.

People will understand, value, and look after the vital natural services that the National Park provides. Large areas of high-quality and well-managed habitat will form a network supporting wildlife throughout the landscape.

Opportunities will exist for everyone to discover, enjoy, understand and value the National Park and its special qualities. The relationship between people and landscape will enhance their lives and inspire them to become actively involved in caring for it and using its resources more responsibly.

Its special qualities will underpin the economic and social wellbeing of the communities in and around it, which will be more self-sustaining and empowered to shape their own future. Its villages and market towns will be thriving centres for residents, visitors and businesses and supporting the wider rural community.

Successful farming, forestry, tourism and other business activities within the National Park will actively contribute to, and derive economic benefit from, its unique identity and special qualities.

2.2 A number of strategic objectives, based on the National Park purposes and duty (see 1.1), outline the direction that the South Downs Local Plan took in order to achieve the vision within the remit of the Local Plan and consideration of planning applications. The thematic and allocation policies were intended to deliver these objectives.

- 1. To conserve and enhance the landscapes of the National Park
- 2. To conserve and enhance the cultural heritage of the National Park
- 3. To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape
- 4. To achieve a sustainable use of ecosystem services thus enhancing natural capital across the landscapes of the National Park and contributing to wealth and human health and wellbeing
- 5. To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities
- 6. To adapt well to and mitigate against the impacts of climate change and other pressures
- 7. To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses
- 8. To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities
- To protect and provide for local businesses including farming, forestry and tourism that are broadly compatible with and relate to the landscapes and special qualities of the National Park
- 2.3 During the 'early participation' engagement in the summer of 2024 we asked people whether they thought the vision for the National Park was still right and should be retained in the Local Plan Review. 85% of respondents were either neutral, satisfied or happy with the existing 2050 vision for the National Park. Those unhappy with it made suggestions about how it could be improved which are summarised in the Consultation Report at . www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/previous-engagement/summer-2024/.