



South Downs
National Park Authority

SOUTH DOWNS LOCAL PLAN

ADOPTED 2 JULY 2019 (2014–33)

SOUTH DOWNS
NATIONAL PARK

4.1 The core policies set out in this chapter provide the overarching framework for evaluating all development proposals in the National Park. These core policies will be used in the assessment of all planning applications and thereby avoids the need for duplicating criteria in other policies. The core policies apply equally across the National Park. The three core policies relate to sustainable development, ecosystem services and major development.

4.2 These core policies are relevant to all the Local Plan objectives.

MANAGING DEVELOPMENT IN THE NATIONAL PARK

INTRODUCTION

4.3 The *NPPF* sets out how the presumption in favour of sustainable development is a golden thread running through both plan-making and decision-making. This means that local planning authorities should positively seek opportunities to meet the development needs of their area. They should also take a positive approach when deciding planning applications. Core Policy SD1 and its supporting text reflects these principles, within the context of the National Park's statutory purposes and duty. The supporting text also provides general guidance to clarify on the development management process.

Core Policy SD1: Sustainable Development

1. When considering development proposals that accord with relevant policies in this Local Plan and with National Park purposes, the Authority will take a positive approach that reflects the presumption in favour of sustainable development. It will work with applicants to find solutions to ensure that those development proposals can be approved without delay, unless material planning considerations indicate otherwise.
2. The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.
3. When determining any planning application, the Authority will consider the cumulative impacts of development.
4. Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally:
 - a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and
 - b) There is substantial compliance with other relevant policies in the development plan.

4.4 The purpose of this policy is to reflect the three guiding principles of this Local Plan. The three principles are reflected in the policies that appear throughout the Local Plan. These are:

- Firstly, the presumption in favour of sustainable development set out in the *NPPF*;
- Secondly, the statutory duty of the Authority to have regard to National Park purposes when determining planning applications; and
- Thirdly, the great weight to be attached, in the determination of planning applications, to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

NATIONAL PARK PURPOSES AND DUTY

4.5 The Authority will seek to achieve the right balance between conservation and recreation in the National Park when delivering the purposes of the National Park. However, at times this can cause conflict. To help national park authorities make decisions relating to conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as ‘*The Sandford Principle*’. This principle was included in the *Environment Act 1995 (as amended)* which states that: “*If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area*”.

4.6 The *Environment Act 1995 (as amended)* states that a national park authority, in pursuing the purposes, shall seek to foster the economic and social well-being of local communities within the national park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the national park.

CUMULATIVE IMPACTS OF DEVELOPMENT

4.7 It is important to consider the impact of cumulative development in the National Park. Cumulative impacts can be defined as the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments.

DETERMINATION OF PLANNING APPLICATIONS

4.8 On adoption, the *South Downs Local Plan* will form part of the statutory development plan for the whole of the National Park, along with the minerals and waste plans and ‘made’ (adopted) NDPs. It is important that the Local Plan should be read as a whole because all relevant policies apply to all planning applications. Decisions on planning applications must be taken in accordance with the development plan unless material planning considerations indicate otherwise. It is implicit within Criterion 1 of Policy SD1 that if a development proposal does not comply with key policies in the development plan, then it will be contrary to the development plan, and may therefore be refused. The Authority is committed to working with applicants to find solutions where they are seeking to conserve and enhance the landscapes of the National Park in accordance with the development plan.

4.9 The application of planning policies will be proportionate to the nature and scale of development proposals, and the combination of policies will depend on the details of the development proposal.

4.10 A material planning consideration is one which is relevant to making the planning decision in question, and will generally be concerned with ensuring that the land use is in the public interest. The weight attached to material considerations in reaching a decision is a matter of judgement for the decision-maker.

4.11 The National Park Authority will work positively and in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes. *Section 62 of the Environment Act 1995* requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes.

ECOSYSTEM SERVICES

INTRODUCTION

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ECOSYSTEM SERVICES

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benefits we get from nature, value them and build them into planning, decision making and management. In Chapter 1, Figure 1.3 – The Four Aspects of Ecosystem Services illustrates how the landscapes of the South Downs provide a multitude of ecosystem services. Figure 4.1 illustrates the inter-relationships between ecosystem services and people's enjoyment and understanding of the National Park. Figure 4.2 provides further detail on ecosystem services within the National Park.

4.13 The National Park Authority adopted an ecosystems approach to the *PMP*²³, and this is embedded into the Local Plan. This has been achieved in three main ways:

- Firstly, there is a core policy on ecosystems services (SD2)
- Secondly, an assessment has been made of all the strategic and development management policies, to identify those that make a positive contribution to a significant number of ecosystem services; these are identified with the icon ★

- Thirdly, consideration was given to the site allocations, the settlements within which they sit and the ability to deliver multiple ecosystem services. Symbols and site specific development requirements relating to specific ecosystem services indicate how these sites in particular are expected to contribute. These symbols are set out in Figure 9.1 and throughout Chapter 9: Sites and Settlements

4.14 A GIS based tool (EcoServ GIS) has been developed to provide supporting evidence for the Local Plan on ecosystem services. The EcoServ models and maps have been used to map and understand the delivery of ecosystem services within the National Park in spatial terms. EcoServ maps have been generated, which have informed the spatial portrait and all the allocations in the Local Plan. Further details are set out in the evidence based study *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*²⁴.

²³ Partnership Management Plan: Shaping the Future of Your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

²⁴ Mapping of Ecosystem Services Within the South Downs National Park Using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

FIGURE 4.1: 'PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE



FIGURE 4.2: THE FOUR ASPECTS OF ECOSYSTEM SERVICES IN THE SDNP

There are four main categories of ecosystems services, namely, supporting, provisioning, regulating and cultural services. The natural environment is a dynamic system and these four services cannot be viewed in isolation from one another. They are ecologically and functionally interdependent.

Supporting services offered by flora and fauna and micro-organisms are essential for healthy soils, habitats and nutrient cycling, which underpin the environment's natural goods and services which benefit people. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality.

Provisioning services relate to the products and productivity of the natural environment. Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. Approximately 25 per cent of the National Park is wooded, which contributes renewable fuel like biomass. The chalk hills, which sweep across the National Park, filter and store fresh water, providing us with high-quality drinking water.

Regulating services are the controls from the natural environment. For example, rivers which help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere support habitats and biodiversity. Enhancing species like bees and other pollinators are vital for food crops as well as other plants and wildflowers. Woodland also prevents soil erosion and is an important resource for carbon storage which helps to mitigate climate change. These services also regulate pollution in the air, water and on land. These include regulating carbon dioxide and air quality from cars and industry, chemicals from the treatment of agricultural fields or viticulture or surface water run-off and percolation from the urban environment into rivers and ground water.

Cultural services relate to people's enjoyment of the National Park and its special qualities. The distinctive landscape of the Western Weald, the chalk ridge, scarp and dip slopes and the dramatic Seven Sisters cliffs are of inspirational value through their sense of place and tranquillity, including dark night skies. Embedded in the landscape is important cultural heritage which is rich in arts and literature, archaeological remains, traditional historic towns and villages and architecture. These special qualities and an extensive network of bridleways and footpaths enhance people's health and wellbeing.

All of these ecosystem services can be utilised and enhanced to provide for sound growth within properly understood limits. The services described above are assets that should guide all growth, hence their thinking underpins this core policy. Through careful management of development, the various provisions of ecosystem services can be used to ensure that the multiple benefits they give to society are supported and protected.

Core Policy SD2: Ecosystem Services

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.
2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

4.15 The purpose of this policy is to embed a holistic approach to managing our natural resources sustainably for the future. Its criteria encapsulates the ecosystem services that the natural environment contributes to people. This integrated approach is important because development can have multiple effects across these services. Development proposals should take a positive

approach to the delivery of ecosystem services and take adequate account of the economic benefit of enhancing ecosystem services. There are many ways to deliver on these criteria. These should be delivered on a site by site basis with reference to the aspects of ecosystem services set out in Figure 4.2.

4.16 All planning applications should be accompanied by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services. The preparation of the statement should be proportionate to the impact. Use should be made of the EcoServe GIS maps, and other evidence that can be sourced from a variety of sources such as the *Habitat Connectivity Study* and the *Strategic Flood Risk Assessment (SFRA)*, when available. Two technical advice notes²⁵ have been produced by the National Park Authority, which provide checklists and further guidance to help applicants meet the requirements of Policy SD2.

4.17 This core policy should not be read in isolation but instead linked to all other Local Plan policies. For example, Criterion (d) of Policy SD2 is about managing and mitigating the risk of flooding and is linked to the ecosystem services of water flow and flood. The relevant Local Plan Policies are SD45: Green Infrastructure, SD17: Protection of the Water Environment and SD48: Climate Change and Sustainable Use of Resources. It should be noted that where more detailed applicable criteria are contained in other policies within the Plan, SD2 should be read as supporting that detailed criteria. Site specific development requirements linked to ecosystem services are set out in allocation policies as appropriate.

MAJOR DEVELOPMENT

INTRODUCTION

4.18 The *NPPF (Paragraph 116)* sets out the approach local planning authorities should take to development in national parks. The *NPPG* states that: "Whether a proposed development in these designated areas should be treated as a major development, to which the policy in Paragraph 116 of the

²⁵ Ecosystem Services and Householder Planning Applications Technical Advice Note (South Downs National Park Authority, 2018) and Ecosystem Services Technical Advice Note (Non-householder) (South Downs National Park Authority, 2018)

★ Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
 - a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
 - b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
 - c) They will safeguard the experiential and amenity qualities of the landscape; and
 - d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.
2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the *Historic England Register of Historic Parks and Gardens*) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.
4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.
5. The restoration of landscapes where features have been lost or degraded will be supported where it contributes positively to landscape character.

5.6 The purpose of Policy SD4 is to set out how development proposals will be expected to conserve and enhance landscape character in the National Park.

5.7 Landscape character is what make an area unique, resulting from the action and interaction of natural and/or human factors. Landscape character is the combination of distinct, recognisable and consistent pattern of elements and features as set out in Figure 5.1 including, for example, the landform, historic landscape or 'time depth', and a variety of perceptual and aesthetic qualities.

UNDERSTANDING OF LANDSCAPE CONTEXT AND CHARACTER

5.8 The ability of proposals to meet the requirements to enhance landscape character in Policy SD4 will be considered in proportion to the size, scale and likely impacts of the proposals.

5.9 It is important that proposals are based on a meaningful understanding of the context and character of an area and those positive characteristics which define local distinctiveness. The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Therefore, this policy is closely linked to Policy SD5: Design, and they need to be read together.

5.10 Proposals should be informed by the *SDILCA*, community-led/local landscape character assessments and appropriate site-based investigations. Local landscape character assessments may include Community, Parish or Village Design Statements and other community planning documents. However, references to these will not be a substitute for appropriate professional site based assessment and research.

5.11 Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in accordance with the *Guidelines for Landscape and Visual Impact Assessment*²⁹ and successor documents. If the proposals require a full Environmental Impact Assessment (EIA) then a Landscape and Visual Impact Assessment (LVIA) undertaken by a Chartered Landscape Architect will be required. Most applications will be likely to require a bespoke Landscape Appraisal. Applicants are advised to consult the

²⁹ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEMA, 2013)

Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the *Landscape and Biodiversity Baseline Checklist* which is available on the Authority's website in the first instance. Further study may be required following on from completion of the checklist which the Authority would advise on.

5.12 The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many heritage features in the landscape and these contribute to local distinctiveness reflecting the time depth which is present in the landscape.

DESIGN AND LAYOUT

5.13 The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

DESIGNED LANDSCAPES

5.14 There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the *Historic England Register of Historic Parks and Gardens*³⁰, for example, Petworth Park, designed by Capability Brown. In addition, there are many other sites which are identified as being designed landscapes, but not included on the

Historic England list. These are identified in the *Historic Landscape Character Assessments*³¹ for the National Park and are important cultural heritage assets.

5.15 Policy SD12: Historic Environment, sets relevant requirements for heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts, which are independent charities engaged in caring for gardens and designed landscapes.

5.16 Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed landscape. This process should ensure that development will enhance the designed character of the landscape.

THE INDIVIDUAL IDENTITY OF SETTLEMENTS

5.17 The gaps between settlements protect the individual character and identity of towns and villages. They retain the open nature and the physical and, either real or perceived, visual separation between settlements. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Public RoW can often provide access to these areas and connections to the open landscape of the National Park beyond.

GREEN AND BLUE CORRIDORS

5.18 Green and blue corridors are areas or linear features which connect habitat and wildlife populations and can provide opportunities for walking and cycling, and also facilitate the movement of wildlife. Green and blue corridors are an essential component of the National Park's GI, and can provide benefits for people and wildlife at both the landscape scale and more local scale. More information is provided under Policy SD45: Green Infrastructure.

³⁰ Link to the Historic England website to view/search the Historic Parks and Gardens Register: <https://historicengland.org.uk/listing/the-list/>

³¹ Link to the Sussex Historic Landscape Characterisation study: www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/; the Historic Landscape Assessment of Hampshire is underway

LANDSCAPE FEATURES

5.19 Natural and historic features such as trees, woodlands, hedgerows, field boundaries, historical water systems, chalk pits and sandpits, should be conserved and enhanced through design. The restoration of degraded characteristic landscape features is supported.

Strategic Policy SD5: Design

1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:
 - a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
 - b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect GI;
 - c) Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern;
 - d) Create high-quality, clearly defined public and private spaces within the public realm;
 - e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances GI, and is consistent with local character;
 - f) Utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
 - g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;

- h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
- i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
- j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
- k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

5.20 Landscape features have a time depth and contribute to ecological richness and shared cultural heritage. Reference should be made to the *Pan Sussex Historic Landscape Characterisation*, the *Hampshire Historic Landscape Characterisation* and other appropriate research material to identify the relevant natural and historic key features that should be used to inform development proposals.

5.21 The purpose of Policy SD5 is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park. Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future. The definition of landscape encompasses all types and forms, including the historic landscape character and also townscape. Townscape refers to areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.

A LANDSCAPE-LED APPROACH

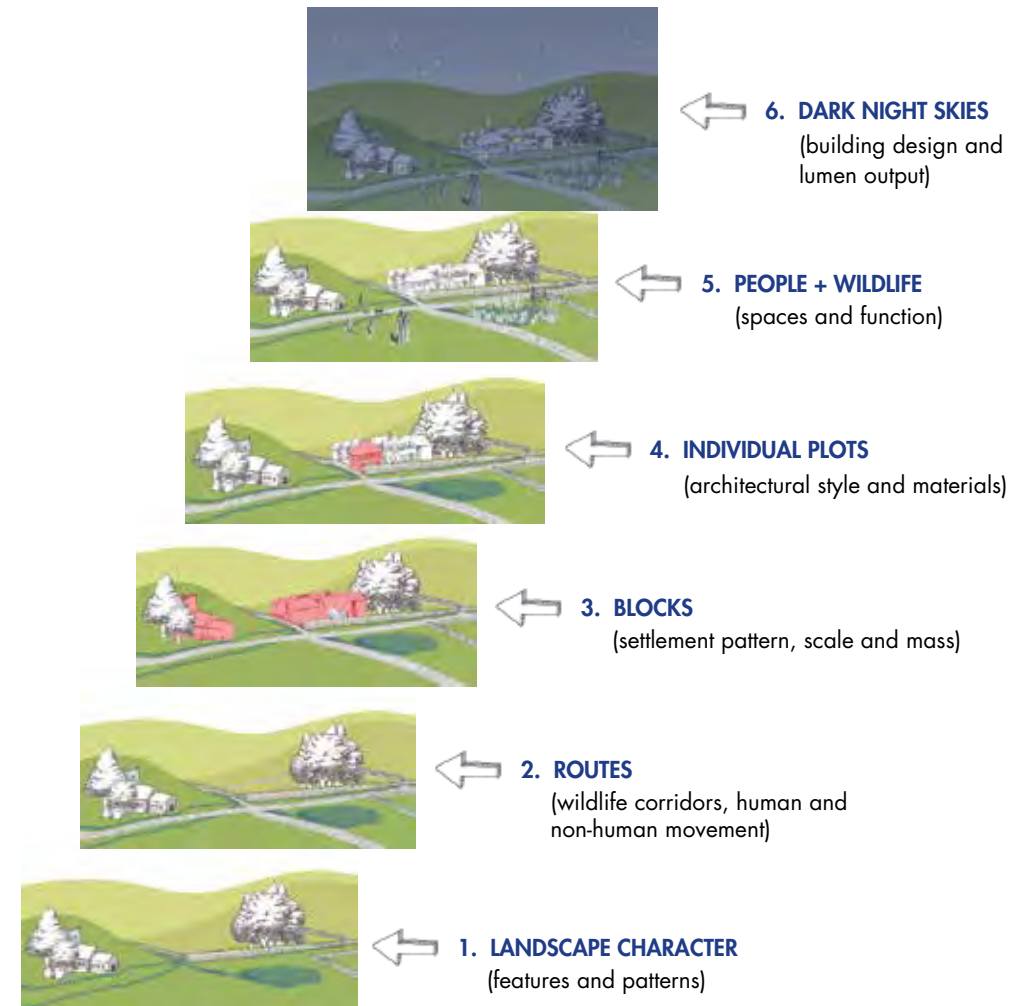
5.22 Development should enhance, respect and reinforce the landscape through a landscape-led design approach, informed by contextual analysis of the local landscape character and built character, as set out in Figure 5.3. This contextual analysis should include considerations, as relevant, of topography,

landscape features, historic landscape features, the water environment, biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportions, pattern, and vernacular architecture and materials. The surrounding mix of uses should also inform proposals. Appropriate study areas and methodology would be determined in discussion with the Authority and will be dependent on the size, height and location of proposals.

5.23 Individual design elements, such as use of materials and detailing of elements such as windows, are critical to the success of the overall design and should be considered once the character of the area has been assessed.

5.24 Supporting information accompanying planning applications should be proportionate to sensitivity of the location and the scale of what is being proposed. The Authority will engage with applicants and agents to offer advice on what is required. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Some schemes may be asked to go through the *National Park Authority's Design Review Panel Process*. Depending on the scale of development, a comprehensive masterplan outlining the principles for a site should address all of these elements and any other site-specific issues, to achieve an exemplary design.

FIGURE 5.3: A LANDSCAPE-LED APPROACH TO DESIGN



STARTING WITH THE LANDSCAPE

space/amenity space. Careful consideration should be given to the siting, use/function and materials used. Spaces should be defined through use of suitable landscaping, such as boundary treatments, planting and varied use of materials, which differentiate between private and public areas. The use of hard and soft landscaping should be consistent with local character and enhance GI. Existing landscape features such as trees, hedges and walls which are characteristic of the streetscape and local area should be retained. The long term maintenance of landscape features should be addressed, for example through a legal agreement.

5.29 Development should comply with design policies set out in NDPs, and take into account village and town design statements.

ADAPTABLE, DURABLE, AND SUSTAINABLE DESIGN

5.30 New housing needs to be appropriate for the widest range of households and should therefore be adaptable, accessible and durable over time to accommodate people of all ages and abilities, without diminishing overall appearance and function.

5.31 Development should maximise sustainable technologies. The sourcing and performance of materials, and construction methods, should maximise energy and resource efficiency. The wood fuel economy is one example of this. Dwellings which utilise local sustainable wood fuel schemes support the local economy, repurpose what would otherwise be a waste product and can support reductions in fuel poverty. This should be undertaken in accordance with Policy SD48: Climate Change and Sustainable Use of Resources.

5.32 Development should be durable and adaptable to change. The ongoing management and long term maintenance of the scheme, including all design elements, should be addressed.

AMENITY AND FUNCTIONAL NEEDS

5.33 It is important that all types of development meet the day-to-day functional needs of its users, and of those responsible for its servicing. Internal space should have internal proportions that allow quality of experience for its occupiers and users. High quality, accessible, secure and where

possible integrated on site storage should be available for the storage of transport equipment which includes bicycles, mobility scooters, push chairs and wheelchairs. Refuse and recycling storage should take account of the operational requirements of refuse collection services.

5.34 High quality garden, terrace or balcony space should be provided for residential occupiers, of a size and nature that befits future occupiers' needs, for example families with children. Other uses may need to provide outdoor space for staff and/or visitors depending on the use and context.

5.35 In addition, the privacy and amenity of existing neighbours and future occupiers should be respected. Proposals should ensure good natural light for new and, where relevant, existing buildings and their occupiers. Proposals affecting residential properties in particular should not be unduly overbearing, or compromise others' reasonable privacy, unless outweighed by innovative design solutions that mitigate these impacts.

5.36 Reference should also be made to Policies SD30 and SD31 on Replacement Dwellings and Extensions to Existing Dwellings and Provision of Annexes and Outbuildings.

Strategic Policy SD6: Safeguarding Views

1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.
2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the *Viewshed Characterisation & Analysis Study*:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the *Viewshed Characterisation & Analysis Study*, heritage assets (either in view or the view from) and biodiversity features.
3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

5.37 The purpose of Policy SD6 is to ensure that development does not harm views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

space/amenity space. Careful consideration should be given to the siting, use/function and materials used. Spaces should be defined through use of suitable landscaping, such as boundary treatments, planting and varied use of materials, which differentiate between private and public areas. The use of hard and soft landscaping should be consistent with local character and enhance GI. Existing landscape features such as trees, hedges and walls which are characteristic of the streetscape and local area should be retained. The long term maintenance of landscape features should be addressed, for example through a legal agreement.

5.29 Development should comply with design policies set out in NDPs, and take into account village and town design statements.

ADAPTABLE, DURABLE, AND SUSTAINABLE DESIGN

5.30 New housing needs to be appropriate for the widest range of households and should therefore be adaptable, accessible and durable over time to accommodate people of all ages and abilities, without diminishing overall appearance and function.

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5.33 It is important that all types of development meet the day-to-day functional needs of its users, and of those responsible for its servicing. Internal space should have internal proportions that allow quality of experience for its occupiers and users. High quality, accessible, secure and where

possible integrated on site storage should be available for the storage of transport equipment which includes bicycles, mobility scooters, push chairs and wheelchairs. Refuse and recycling storage should take account of the operational requirements of refuse collection services.

5.34 High quality garden, terrace or balcony space should be provided for residential occupiers, of a size and nature that befits future occupiers' needs, for example families with children. Other uses may need to provide outdoor space for staff and/or visitors depending on the use and context.

5.35 In addition, the privacy and amenity of existing neighbours and future occupiers should be respected. Proposals should ensure good natural light for new and, where relevant, existing buildings and their occupiers. Proposals affecting residential properties in particular should not be unduly overbearing, or compromise others' reasonable privacy, unless outweighed by innovative design solutions that mitigate these impacts.

5.36 Reference should also be made to Policies SD30 and SD31 on Replacement Dwellings and Extensions to Existing Dwellings and Provision of Annexes and Outbuildings.

Strategic Policy SD6: Safeguarding Views

1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.
2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the *Viewshed Characterisation & Analysis Study*:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the *Viewshed Characterisation & Analysis Study*, heritage assets (either in view or the view from) and biodiversity features.
3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

5.37 The purpose of Policy SD6 is to ensure that development does not harm views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

Strategic Policy SD8: Dark Night Skies

1. Development proposals will be permitted where they conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core as shown on the Policies Map.
2. Development proposals must demonstrate that all opportunities to reduce light pollution have been taken, and must ensure that the measured and observed sky quality in the surrounding area is not negatively affected, having due regard to the following hierarchy:
 - a) The installation of lighting is avoided; and
 - b) If lighting cannot be avoided, it is demonstrated to be necessary and appropriate, for its intended purpose or use:
 - i. Any adverse impacts are avoided; or
 - ii. If that is not achievable, then adverse impacts are mitigated to the greatest reasonable extent.³⁵
3. Lighting which is proposed to be installed must meet or exceed the level of protection appropriate to the environmental zone, as shown on the Policies Map, as set out in the table below.

Location	Requirements for level of protection				
Dark Sky Zone description	ILP guidance ³⁵	Landscape impact	Maximum Lux level (suggested 10 Lux)	Preferred lights-off curfew	Astronomical darkness curfew
E0 Dark Sky Core and areas outside this zone with a SQM ³⁶ of 20.5+	✓	✓	✓		✓
E1(a) 2km Buffer Zone and areas outside this and the above zone which are of intrinsic rural darkness with a SQM range of 20 to 20.5	✓	✓	✓	✓	
E1(b) Transition Zone and areas outside this and the above zones with a SQM range of ~15 to 20	✓	✓	✓		
E3/4 Urban zone with an SQM of <15	✓	✓			
4. Outdoor lighting proposals are required to provide a statement to justify why the proposed lighting is required.					

³⁵ Institute of Lighting Professionals (ILP) guidance GN01:2011 Guidance Notes for the Reduction of Obtrusive Light

³⁶ Sky Quality Measurement (SQM). The latest version of the Sky Quality Measurement map should be used as the reserve is subject to ongoing measurement

5.48 The purpose of Policy SD8 is to ensure that development does not harm the quality of dark night skies. It also encourages enhancement of the dark night skies of the National Park, for the benefit of people and wildlife. The policy seeks to do this by ensuring that proposed lighting is necessary, and by reducing the unnecessary light spill that is often a result of poor design, in order to minimise the overall impact of light.

5.49 Policy SD8 applies across the International Dark Sky Reserve which covers the entirety of the National Park. It applies to any proposals which involve the installation of external lighting and where the design of developments may result in light spill from internal lighting. It will also apply to specific lighting schemes which require planning permission or listed building consent, including installing:

- A lighting scheme of such nature and scale that it would represent an engineering operation³⁷;
- Lighting such as the floodlighting of sports pitches, car parking or manèges; and
- A lighting scheme on a listed building that would significantly affect its character.

DARK SKY ZONES

5.50 Mapping has been undertaken of the quality of dark skies across the entire National Park, as set out in the *South Downs Dark Night Skies Lighting Technical Advice Note*³⁸. These measurements have been used to categorise the National Park into a number of dark sky zones which reflect the quality of the dark night skies overhead and the level of street lighting. These zones are:

- E0 Dark Sky Core – these are large areas which have skies that can be classified as intrinsically dark. These areas form a continuous dark sky core (and 2km Buffer Zone) to the International Dark Sky Reserve, as

shown on the Policies Map, which contain some of the darkest areas of the National Park

- E1 (a) 2km Buffer Zone and (b) Transition Zone – areas that lie between the larger urban settlements and the surrounding darker skies notably vulnerable to light pollution. These areas are generally in the buffer zones and rural transition areas. Generally this will be where the sky quality changes from poor to the edge of an intrinsic dark sky zone typically with SQM³⁹ values of 10 Lux
- E3/4 Urban – larger settlements of the National Park have substantially lower quality of dark night sky, primarily due to street lighting and light spill from buildings

5.51 Although some areas of the National Park are outside of the core and buffer zones; this policy is looking to conserve and enhance all areas of intrinsic dark sky within the National Park.

HIERARCHY OF LIGHTING

5.52 In order to ensure that dark night skies are protected and enhanced, the hierarchy as set out in Criterion (2) is applied across the National Park. Installation of lighting should be avoided and, where lighting is demonstrated to be necessary, the design and installation should be such that adverse impacts are avoided or, if not achievable, mitigated to the greatest possible extent. The hierarchy should be applied in conjunction with the requirements for protection for the relevant dark sky zone as set out in Criterion (3) of this policy.

5.53 In the darkest areas, where control is more important, the overall impact of the lighting should not harm the continuity of the dark landscape and ideally not be visible in any direction or in any form such as glare, skyglow, spill and reflection. It also should not reduce the measured and observed quality of easily visible astronomical features such as the Milky Way and Andromeda Galaxy.

5.54 In some circumstances it may be possible to reduce the impact of existing lighting by removal in return for new lights.

³⁷ such as requiring a separate structure and typically be undertaken by specialist lighting engineers

³⁸ South Downs Dark Night Skies Lighting Technical Advice Note (South Downs National Park Authority, 2017)

³⁹ A Sky Quality Meter measures the brightness of the night sky in magnitudes per square arcsecond

REQUIREMENTS AND GUIDANCE FOR PROPOSED LIGHTING IN DARK SKY ZONES

5.55 Much of the rural landscape is part of the Dark Sky Core, but this should be checked prior to an application. In the preparation and determination of development proposals, the latest version of the Sky Quality Measurement Map should be used as the reserve is subject to ongoing measurement. To provide some indication of sky quality and zoning:

- An intrinsic dark zones is where the Milky Way can be seen with the naked eye and in an area with no street lighting
- If there is a provision of highways authority street lighting, the zoning will usually be E3

5.56 In addition to the application of the lighting hierarchy and avoidance and mitigation measures which may be required with regard to impacts on landscape and habitat, development proposals will be subject to particular requirements at a level of protection appropriate to the dark sky zone, as set out in Policy SD8, which is based on the measured sky quality.

5.57 Proposals within the Dark Sky Core and 2km Buffer Zone will be subject to maximum protection using the full weight of mitigation options, with a relaxation as light quality decreases further into urban areas.

5.58 Any Dark Sky that measures 20.5 Lux and above, should be considered as core quality, irrespective of whether it is within or outside the Dark Sky Core. In general, lighting under the best quality skies should cease on the onset of astronomical darkness, in addition to basic principles of good lighting (ILP) and appropriate rural illuminance levels. The time of astronomical darkness varies throughout the year, but marks the point at which dark skies are defined. In intrinsic skies, 20 to 20.5 Lux, an evening curfew should be set, for example, 9pm.

5.59 The Authority will encourage further reductions, for example towards the limits of an E0 Dark Sky Zone, or by removing below or near horizontal light paths from fixtures. Often this can be achieved with little further disruption. Examples of how this can be done include:

- Lighting should be subject to control measures to reduce unnecessary light pollution. Examples include:
 - ‘Curfews’ or automatic timers;
 - Proximity ‘PIR’ sensors, timers or any additional shielding or coving, including angling the front surface of lights to the horizontal;
 - Different surface types to reduce the amount of reflectivity;
 - Appropriate use of glazing to reduce light transmittance; and
 - Screening or shielding to reduce the impact of reflectivity.

LIGHTING ASSESSMENTS

5.60 Proposals should take due consideration of the overall visual impact that the lighting will have on the landscape. This may include ground surface reflectivity, the number of lights, the daytime intrusion and the general overall footprint of the lighting. It is also necessary to consider the visibility of the lights from the surrounding landscape particularly from viewpoints in accordance with Policy SD6: Safeguarding Views.

5.61 The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Consequently, it is important to control the lighting coming from these types of developments. The design of buildings should reduce the impact of light spill from internal lighting or suitable mitigation measures should be put in place.

5.62 Habitats, particularly woodlands, should not be considered as a ‘natural shield’ to lighting, because of the impact on an unlit habitat. Lighting that would spill into sensitive habitats should be shielded or removed particularly if nocturnal species are present. Direct illumination of bat roosts must be avoided.

5.63 Where a proposal involves outdoor lighting, a statement will be required to justify why the proposed lighting is required for its intended use and that shows every reasonable effort has been made to mitigate skyglow and light intrusions. This should be accompanied by a computer calculation indicating task luminance, uniformity, horizontal values of overspill beyond the property line and vertical luminance values of light intrusion on adjacent property windows. Any statement should be proportionate to the size and likely impacts of the scheme.

5B. BIODIVERSITY

INTRODUCTION

5.64 This section of the Local Plan includes three policies relating to the wildlife of the National Park. Strategic Policy SD9: Biodiversity and Geodiversity relates to the conservation and enhancement of biodiversity and geodiversity across the National Park and sets out a hierarchy for designated sites. Strategic Policy SD10: International Sites provides further specific requirements for particular International Nature Conservation Designations. Development Management Policy SD11: Trees, Woodland and Hedgerows provides further detail regarding these assets. These policies all relate to the first purpose of the National Park.

5.65 The term biodiversity includes all species, communities, habitats and ecosystems, whereas the term geodiversity includes all features of geological and geomorphological interest including rocks, fossils, landforms and natural processes which create them.

5.66 The biodiversity and underlying geodiversity of the National Park directly provide or underpin many ecosystem services that people depend on. Together, these include the filtering and storage of water for clean water supplies, water management and flood alleviation, and also the provision of soils in which we grow our food and other produce, such as timber. In addition, biodiversity also underpins air quality regulation, pollination and pest control. The geology of the National Park provides aggregates and stone for building and other material uses. These local materials contribute to the economy of the National Park and have had a strong influence on the built vernacular.

5.67 The combination of geology and micro-climates has created a diverse mosaic of habitats that supports many rare and important wildlife species. Many of these are recognised through various international, national and local nature conservation designations. They form essential components of 'ecological networks', helping species to adapt to the impacts of climate

change and other pressures; evidence for this is provided in the *Habitat Connectivity Report*⁴⁰. Designated sites within the National Park are shown on the Policies Map and more information on the types of designations is set out in the Glossary.

5.68 Wildlife habitats are subject to a range of pressures, including those from development, and are often degraded and fragmented. A landscape-scale approach is needed to conserve, restore and reconnect habitats across the National Park. As well as causing direct loss of wildlife habitats and geodiversity, development can have a wide range of other negative impacts, for example, housing developments can result in disturbance to wildlife on sensitive sites by dogs and cats as well as increased recreational pressure from the local population; evidence for this is set out in the *Access Network and Accessible Natural Greenspace Study*⁴¹.

5.69 Important geological features can be lost through burial, damage and scrub encroachment. The impact on and conservation of geological features, landforms and processes is a crucial consideration when planning for minerals extraction, coastal defences and re-engineering of river catchments.

5.70 Development can have a positive impact on biodiversity and geological features. For example, by supporting positive management of geomorphological features, and also by restoring an interconnected network of wildlife sites and achieving net gains in biodiversity, species will be more resilient to adapt to pressures such as climate change. Urban habitats such as gardens, parks and buildings can act as 'stepping stones' and 'wildlife corridors' to enable wildlife to move from one place to another. If development

⁴⁰ Habitat Connectivity and Habitat Opportunity Mapping Report (Thomson Ecology, 2015)

⁴¹ *Access Network and Accessible Natural Greenspace Study (South Downs National Park Authority, 2014)*

is planned and delivered with these in mind, it can conserve and even enhance biodiversity and geodiversity.

5.71 International sites support populations of species that are particularly threatened and/or vulnerable to disturbance. Under the *Habitats Regulations*, the Authority is required to demonstrate that proposals for new development avoid or adequately mitigate against impacts on these sites. A *Habitat Regulations Assessment (HRA)*⁴² of the *Preferred Options Local Plan* was prepared in 2015, and its recommendations have been taken into account in this version of the Local Plan. A *HRA* of the Local Plan was published in 2017.

5.72 Trees, woodland and hedgerows are distinctive features of the National Park. Non-woodland trees, including those in hedgerows and street trees, make an important contribution to landscape character, the historic environment and ecosystem services. Hedgerows, in particular, have an important role, by providing connections between habitats, and these need to be managed and maintained. Trees and woodland are important for adaption to the impacts of climate change. For example, trees in urban areas moderate summer temperatures and new tree planting in well-chosen locations can stabilise slopes and reduce the impacts of flooding.

★ Strategic Policy SD9: Biodiversity and Geodiversity

1. Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals:
 - a) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;
 - b) Identify and incorporate opportunities for net gains in biodiversity;
 - c) Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks;
 - d) Protect and support recovery of rare, notable and priority species;
 - e) Seek to eradicate or control any invasive non-native species present on site;
 - f) Contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by supporting the delivery of GI and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas (BOA); and
 - g) Comply with the mitigation hierarchy as set out in national policy.

⁴² South Downs National Park Authority Local Plan Habitats Regulations Assessment (AECOM, 2015, 2017 and 2018)

2. The following hierarchy of site designation will apply in the consideration of development proposals:

- a) **Internationally Protected Sites**, as shown on the Policies Map (SPAs, SACs and Ramsar Sites, or candidate and formally proposed versions of these designations):
 - i. Development proposals with the potential to impact on one or more international sites(s) will be subject to a HRA to determine the potential for likely significant effects. Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment
 - ii. Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured
- b) **Nationally Protected Sites SSSI**, NNRs, MCZ as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an EIA
 - ii. Development proposals should avoid impacts on these nationally protected sites. Development proposals where any adverse effect on the site's notified special interest features is likely and which cannot be either avoided or adequately mitigated will be refused, unless the benefits of the development, at this site clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites

- c) **Irreplaceable Habitats** (including ancient woodland as shown on the Policies Map, and veteran trees): Development proposals which result in the loss or deterioration of irreplaceable habitats, including ancient woodland and veteran trees will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists
- d) **Locally Protected Sites** (Sites of Nature Conservation Importance (SNCI)/Local Wildlife Sites (LWS)/Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR and Local Geodiversity Sites (LGS)) as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment (EclA)
 - ii. Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the adverse effects are clearly demonstrated
- e) **Outside of designated sites**
 - i. Development proposals should identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies where possible.

5.73 The purpose of Policy SD9 is to set out a positive strategy to ensure the conservation and enhancement of biodiversity and geodiversity across the National Park. It also sets out the hierarchy of designated sites.

5.74 The aim is to achieve a 'net gain' in biodiversity by encouraging all opportunities to enable conservation and enhancement as part of development proposals, planning at landscape-scale and taking opportunities to improve connections between habitats and designated sites.

5.75 All applications for development must ensure that sufficient and up to date information is provided regarding the wildlife sites or species or

geodiversity sites that may be affected by a proposal prior to determination of the development proposals. A landscape and ecology management plan must be provided which includes mechanisms for management in the long term.

THE MITIGATION HIERARCHY

5.76 The mitigation hierarchy is set out in the *NPPF*. It requires that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Avoidance of adverse impacts to biodiversity as a direct or indirect result of development must be the first consideration. Avoidance measures may include either locating development on an alternative site with less harmful impact, or locating development within the site to avoid damaging a particular habitat feature. Compensation is only considered after all other options have been explored and strictly as a last resort.

PROTECTED AND PRIORITY SPECIES

5.77 Some species have special protection under international and national legislation (such as the *Wildlife and Countryside Act 1981 (as amended)* and the *Conservation of Habitats and Species Regulations 2017*). Legally protected species which are prominent in the National Park and which could be affected by new developments include but are not restricted to all wild birds, all native species of bat, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and licenses to be sought where necessary.

5.78 Action is required for the protection of *UK Biodiversity Action Plan* priority species in the *Biodiversity 2020 Strategy*. These priority species are identified under *Section 41 of the Natural Environment & Rural Communities (NERC) Act* as of principle importance for the purpose of conserving biodiversity in England. The Sussex Biodiversity Records Centre and Hampshire Biodiversity Information Centre also hold information for rare, scarce and notable species in the National Park.

DESIGNATED SITES

5.79 The National Park has a very high density of sites designated for their wildlife and geodiversity value. This includes the following types of designation:

INTERNATIONAL DESIGNATIONS

5.80 Under the *Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)* the Authority has a duty to give these areas⁴³ the strongest protection against damaging development. If a development proposal is assessed to be likely to have a significant effect on one of these sites, either alone or in combination with other plans or projects, an Appropriate Assessment is required to establish the implications of the scheme for the identified nature conservation interests of the site.

5.81 Normally, the Authority cannot consent to plans or projects without first having ascertained that they will not have an 'adverse effect on the integrity' of the site. *Article 6(4) of the Habitats Directive* provides an exemption which would allow a plan or project to be approved in very limited circumstances even though it would or may have an 'adverse effect on the integrity of a European site'. A plan or project can only proceed provided three sequential tests are met (see *Article 6(4)*)⁴⁴. These tests must be interpreted strictly and can only be formally considered once an appropriate assessment has been undertaken.

5.82 Applicants should work with the Authority in the screening and assessment process and provide the necessary information for the Authority to make a determination. To avoid any damage to the integrity of these areas and the species they support, mitigation measures or contributions to such measures from new development may be required.

⁴³ International nature conservation designations covered by the Habitats Directive include: SACs, SPAs, Sites of Community Importance (SCI), and candidate SACs. As a matter of Government policy, possible SACs, potential SPAs and listed and proposed Ramsar sites and sites identified or required for compensatory measures for adverse effects on such sites are also treated as internationally designated sites

⁴⁴ European Commission (1992) 92/43/EEC Habitats Directive

Development Management Policy SD11: Trees, Woodland and Hedgerows

1. Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.
2. Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Ecological Survey, Arboricultural Method Statement and associated Tree Protection Plan, and include a management plan.
3. The removal of protected trees, groups of trees woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.
4. Development proposals must provide adequate protection zones and buffers around hedgerows and other woodland and trees to prevent damage to root systems and taking account of future growth. A minimum buffer of 15 metres will be required between the development and ancient woodland or veteran trees.
5. A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required.
6. Development proposals must demonstrate that appropriate protection measures are in place prior to any work on site throughout the development process as part of a comprehensive landscaping plan, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated.
7. Opportunities should be identified and incorporated for planting of new trees, woodlands and hedgerows. New planting should be suitable for the site conditions, use native species and be informed by and contribute to local character, and enhance or create new habitat linkages.

This policy should also be considered alongside policies SD4: Landscape Character, SD9: Biodiversity and Geodiversity and SD10: International Sites. A technical advice note will be produced by the National Park Authority to provide further guidance to applicants on technical matters related to the protection of existing trees and planting of new trees.

5.102 The South Downs is the most wooded national park in England and Wales. The trees and woodland are significant features of the landscape, with a high proportion of ancient and veteran trees. Trees and woodland are a significant asset with regard to ecosystem services, contributing to many supporting, provisioning, regulating, and cultural ecosystem services, including for example carbon storage, biodiversity, air quality, and tranquillity. Hedgerows are a priority habitat and provide an important function as wildlife corridors. They have an important role for ecosystem services such as genetic dispersal and should be protected from severance.

5.103 All development must be undertaken in line with the *British Standard 5837* and all tree works must be carried out in accordance with *British Standard 3998*⁴⁸. Ancient woodland is recognised as an irreplaceable habitat – please see sub-heading ‘ancient woodland and veteran trees’ below and Policy SD9.

5.104 Forestry is one of the key sectors of the National Park’s economy, supplying the provisioning ecosystem services of sustainable timber and wood fuel. *The South Downs National Park Renewable and Low Carbon Energy Study* highlights the potential and importance of supporting the biomass/wood fuel market, and recommends that development of this market should be supported in principle. Policy requirements and guidance on these matters are primarily addressed through policies SD4 (Landscape Character), SD5 (Design), SD39 (Agriculture and Forestry) and SD51 (Renewable Energy).

5.101 The purpose of Policy SD11 is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting is realised.

⁴⁸ British Standards Institute (2010 and 2012) BS5837:2012 Trees in relation to design, demolition and construction—recommendations; and BS3998:2010 Tree Work Recommendations

BUFFER ZONES

5.105 It should be clearly demonstrated how development proposals will avoid any potential adverse impact on trees, woodland and hedgerows. Where development is permitted, mitigation measures may be sought and secured through condition and/or planning obligation. Mitigation of impacts may include the use of a buffer zone of semi-natural habitat between any significant development and an area of woodland with amenity or biodiversity value. What is an appropriate buffer will depend on the local circumstances, the species and size of trees, the form and nature of the trees or woodland and the type of development. This buffer zone should not normally include residential gardens and will require appropriate management after the completion of the development. The height of development should allow adequate sunlight to reach the buffer zone.

ANCIENT WOODLAND AND VETERAN TREES

5.106 Ancient woodland and veteran trees are irreplaceable habitats – please see Policy SD9. Development is expected to, in the first instance, avoid any negative effects on ancient woodland or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. To mitigate negative impacts, a buffer zone of a minimum of 15 metres, consisting of semi-natural habitat should be employed between the development and the ancient woodland or veteran tree. Compensation measures will only be considered as a last resort. Further detailed guidance for applicants on ancient woodland and veteran trees is found in the *Forest Commission and Natural England Joint Standing Advice*.

PLANTING NEW TREES

5.107 The Authority will support all suitable opportunities for new planting of trees, woodland and hedgerows as part of development schemes, and protection of new trees via Tree Preservation Orders, where appropriate⁴⁹. Species selection should be appropriate for the site conditions such as soil type and micro climate, and there is a presumption in favour of native species. Responsibly sourced provenances and other species that are shown to offer enhanced ecosystem services, without being detrimental to the local environment, may also be acceptable in planting schemes. When selecting species and sources of trees, due regard must be had to the expected impacts of climate change, genetic variability and disease. New planting should be appropriate to and contribute to the character of the location and should also support and enhance green links and ecological networks, maximising opportunities for net gains for biodiversity. Policies SD4: Landscape Character, SD5: Design, SD9: Biodiversity and Geodiversity and SD45: Green Infrastructure should also be considered with regard to new planting as part of development schemes.

⁴⁹ Sections 197 and 198 of the 1990 Planning Act

5.132 The purpose of Policy SD15 is to set out more detailed criteria for development proposals within or affecting conservation areas. Reference to character zones relates to the discrete character areas described within some individual conservation area appraisals.

5.133 Some historic settlements within the National Park are small or diffuse in nature. The conservation area boundaries of these diffuse settlements may not reflect the broader heritage interest of their surrounds. Policy SD15 reflects the importance of setting and extends consideration to such locations.

5.134 More information on trees within conservation areas is provided in the introductory text for Policy SD11: Trees, Woodland and Hedgerows.

Development Management Policy SD16: Archaeology

1. Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance.
2. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance.
3. Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm/loss, also meet the following requirements:
 - a) There is no less harmful viable option; and
 - b) The amount of harm has been reduced to the minimum possible.

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required.

5.135 The purpose of Policy SD16 is to set out more detailed criteria for development proposals affecting heritage assets with archaeological interest. Archaeological sites are finite, irreplaceable and fragile resources which are

vulnerable to damage, either from specific works or from gradual degradation over time. Archaeology is not just the ancient remains of early people but also includes the recent evidence of industry and housing.

5.136 When considering archaeological resources, the Authority will consider advice from the relevant curatorial/development management archaeologist for that purpose.

SIGNIFICANCE OF ARCHAEOLOGICAL HERITAGE ASSETS

5.137 The most significant known archaeological heritage assets are usually designated as scheduled monuments, and are of national or international importance. It is widely recognised that there are sites which have an equal significance, but which are non-designated heritage assets. If the significance of such sites have been demonstrated, they will be treated in the same way as scheduled monuments. In addition, there are many other archaeological sites which do not have such a great significance but which form a valuable part of the National Park's historic environment. These may also be referred to as non-designated heritage assets. The relevant HER is the definitive record of all known archaeology, including such sites. The nature of the archaeological record also means that there are many sites of which nothing is presently known, which may be revealed during development works.

5.138 Planning decisions will take account of the significance of remains, including the wider benefits that conservation of the historic environment can bring. Development proposals potentially affecting known or suspected archaeological resources will be required to include a Heritage Statement.

5.139 The level of detail required in a Heritage Statement should be proportionate to the heritage asset's importance. It may comprise a desk-based assessment, using the known archaeology recorded in the HER, but it can also extend to various forms of field evaluation.

IN-SITU ARCHAEOLOGICAL HERITAGE ASSETS

5.140 Preservation of archaeological assets in situ is the preferred position. In respect of scheduled monuments or non-designated heritage assets of

equivalent significance, the preservation of the archaeological remains in situ and undisturbed will usually be required. In some cases this can be achieved by avoiding sensitive areas. It should be noted that development which affects a scheduled monument and its setting will require permission from the Secretary of State.

5.141 If a development cannot preserve archaeological assets in situ, the significance of those assets should be established through a desk-based assessment, and where necessary field evaluation including geophysical survey and/or trial trenching. From this a series of mitigating measures can be identified. The scope of these mitigation works will be set out in a Written Scheme of Investigation in accordance with the professional standards of the Chartered Institute for Archaeologists (CIfA). Information from this investigation and recovered archaeological assets should be made available as appropriate, for public understanding and appreciation.

WRITTEN SCHEME OF ARCHAEOLOGICAL INVESTIGATION

5.142 Any projects where significant archaeological interest has been established, such as projects involving major infrastructure, and/or within

historic urban centres (particularly those which are the subject of an extensive urban survey), may require a programme of archaeological work. The details must be set out in the *Written Scheme of Investigation*. This will include a programme which promotes a wider understanding and appreciation of the site's archaeological heritage in a local and regional context.

5.143 The *Written Scheme of Investigation* must provide for the deposition of the record created by any investigation or recording in a publicly accessible institution such as a Record Office or accredited museum. It must also provide for the publication and dissemination of the information gathered through the *Written Scheme of Investigation*.

5.144 In addition to direct physical impacts on archaeology, development can potentially impact on the setting of archaeological sites and this will be assessed. Where there is evidence of deliberate neglect or damage to archaeology, its deteriorated state will not be taken into account in any decision.

5.145 The Authority will require all archaeological works to be undertaken to proper professional standards, as defined by the CIfA.

6A. SUSTAINABLE TRANSPORT

INTRODUCTION

6.3 This section of the Local Plan contains two strategic policies and two development management policies. The first strategic policy, SD19: Transport and Accessibility, seeks to minimise the traffic impacts of new development and facilitate improvements to public transport. The second strategic policy, SD20: Walking, Cycling and Equestrian Routes, is focussed on the protection and enhancement of the PRoW network and the safeguarding of land for new routes. The first development management policy, SD21: Public Realm, Highway Design and Public Art, is about the protection of the existing public realm especially historic rural roads and ensuring that new developments provide good quality public spaces. Finally, Policy SD22: Parking Provision, covers new public vehicle parks and parking on private developments.

6.4 Effective planning policies on transport routes and the public realm are essential to fulfilling the National Park purposes and duty. Firstly, our transport policies will facilitate developments that make it easier for people to travel to and around the National Park by sustainable means. Secondly, transport policies can help support the National Park Authority's duty to communities, by focussing growth in the most sustainable locations, so it best meets the needs

of residents and businesses while protecting the special qualities. Thirdly, most visitors experience the National Park's special qualities mainly whilst travelling. Therefore the public realm (such as roads, pavements, public rights of way and open access land) needs to be conserved and enhanced, to improve people's experience of it.

6.5 There are a number of studies supporting the transport policies in the Local Plan. The *Transport Study Phase 1*⁵⁴ provides an inventory of existing available data in relation to transport issues and an overview of the issues affecting the National Park. The *Local Plan Transport Assessment*⁵⁵ looks at the impact of the Local Plan's proposed development in Petersfield, Liss, Midhurst and Petworth, and at the former Syngenta site, on traffic flows through key junctions in the National Park. The *Site Allocations Highways Assessment* looks at all the housing allocations set out in Chapter 9⁵⁶. Finally, *Roads in the South Downs*⁵⁷ provides a resource and reference point for emerging best practice in rural and urban highway design, drawing on experience gained in other UK National Parks.

⁵⁴ SDNPA Transport Study – Phase 1 Report (MTRU, 2013)

⁵⁵ Transport Assessment of the South Downs Local Plan (Hampshire Services, 2017)

⁵⁶ Site Allocations Highways Assessment (Hampshire Services, 2017)

⁵⁷ Roads in the South Downs (Hamilton-Baillie Associates Ltd, 2015)

Strategic Policy SD19: Transport and Accessibility

1. Development proposals will be permitted provided that they are located and designed to minimise the need to travel and promote the use of sustainable modes of transport.
2. Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres, public transport routes, main roads and, where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.
3. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.
4. The following improvements to transport infrastructure will be supported:
 - a) Public transport waiting facilities, particularly those with reliable and accessible information;
 - b) Infrastructure supporting the transfer of freight from road to rail and water;
 - c) Improvements to walking, cycling and bus connectivity at all transport interchanges; and
 - d) Improvements to the quality and provision of cycle parking at railway stations and key bus stops.
5. In town and village centres, development will be permitted which appropriately provides for improved footways and cycle routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic on historic streets.

6.6 The purpose of Policy SD19 is to encourage development towards the most sustainable locations in transport terms. All new development will be expected to be located and designed so as to minimise the need to travel, and to maximise the availability of relevant sustainable transport options, so that growth in private vehicle use is kept to a minimum.

6.7 Information to support a planning application will include a design and access statement stating the likely vehicle movements to be generated by the development, and, for some developments, transport assessments.

TRANSPORT ASSESSMENTS AND TRAVEL PLANS

6.8 A Transport Assessment (TA), Transport Statement (TS), Transport Report (TR) and/or Travel Plan (TP) will be required on development that generates significant amounts of traffic movement. This requirement will be determined in accordance with the relevant guidance and thresholds produced by the local highway authority for the area where the development takes place, whilst having strong regard to the environmental sensitivity of the National Park. The TA, TS and/or TP must set out mitigation measures that are necessary to ensure that development is sustainable and deliverable, and to prevent harm to the special qualities. They must also demonstrate the continued safe and efficient operation of the relevant strategic and local road networks.

6.9 TAs, TSs and TPs will be secured by condition or legal agreement. They must be agreed with the Authority at the earliest opportunity, with appropriate input from the local highway authority and Highways England if required. The impact of traffic generated from a development should be considered cumulatively by taking into account all committed development in the area including, where relevant, outside the National Park.

6.10 The HRA identified that some traffic movements may have the potential to impact on internationally designated nature conservation sites. This should be duly taken into account when considering the transport impact of new development. Further information is set out in Policy SD9: Biodiversity and Geodiversity and its supporting text.

PROVISION OF PUBLIC TRANSPORT

6.11 There is potential to improve the role of railway and bus stations as hubs by improving bus interchanges, cycle parking and other infrastructure. The provision of more sympathetically designed and located bus shelters can make public transport a more attractive proposition. Connectivity and signage to walking routes into the countryside will also be supported and facilitated

where possible through the planning process. Freight transport by railway and water will also be encouraged, since any reduction in the movement of freight via the road network would be beneficial to the environment.

TOWN AND VILLAGE CENTRES

6.12 The centres of the National Park's towns and villages provide opportunities for developments to take advantage of better public transport connectivity and encourage walking and cycling. However, vehicle traffic has been identified as having a major negative impact on the environment in some settlements. The Authority will seek opportunities to reduce negative impacts from traffic, and to give priority to the safe movement of walkers and cyclists, including through planning decisions.

STRATEGIC ROADS

6.13 Policy SD42: Infrastructure deals with projects relating to strategic roads.

Strategic Policy SD20: Walking, Cycling and Equestrian Routes

1. Development proposals will be permitted provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the National Park.
2. The following disused railway line routes within the National Park, as shown on the Policies Map, are safeguarded for existing, and potential future use as non-motorised travel routes. Development proposals that facilitate such use will be permitted. Development proposals that adversely affect their future potential as non-motorised transport routes will be refused:
 - a) Bordon to Bentley;
 - b) Petersfield to Pulborough (via Midhurst);
 - c) Chichester to Midhurst (Centurion Way);
 - d) Wickham to Alton (Meon Valley Trail);
 - e) Guildford to Shoreham-by-Sea (Downs Link);
 - f) Liss to Longmoor;
 - g) Devil's Dyke Route; and
 - h) New Alresford to Kingsworthy (Watercress Way).
3. The following corridors, as shown on the Policies Map, are safeguarded for future restoration to their respective historic uses. Development proposals will not be permitted where they would adversely affect their future potential for such restoration. Proposals for restoration to their historic uses will be supported:
 - a) The original course of the former Lewes – Uckfield railway line; and
 - b) The Wey and Arun Canal.

where possible through the planning process. Freight transport by railway and water will also be encouraged, since any reduction in the movement of freight via the road network would be beneficial to the environment.

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3. The following corridors, as shown on the Policies Map, are safeguarded for future restoration to their respective historic uses. Development proposals will not be permitted where they would adversely affect their future potential for such restoration. Proposals for restoration to their historic uses will be supported:
 - a) The original course of the former Lewes – Uckfield railway line; and
 - b) The Wey and Arun Canal.

4. Development proposals will be permitted provided they protect and enhance existing crossings provided for non-motorised travel routes across major roads, railways and watercourses. Proposals for sensitively designed new crossings, and proposals to upgrade the safety of existing crossings, will be supported.
5. Development proposals will be permitted provided they incorporate attractive, accessible public links through the site, which are suitable for pedestrians, cyclists, mobility scooters and equestrians as appropriate, which connect to the nearest convenient point on the public rights of way network and/or local footway network.
6. Development proposals will be permitted provided that they:
 - a) Maintain existing public rights of way; and
 - b) Conserve and enhance the amenity value and tranquillity of, and views from, non-motorised travel routes and access land.

6.14 The purpose of Policy SD20 is to safeguard and enhance the extensive network of routes across the National Park, which provide motor traffic-free travel and recreational opportunities. These non-motorised travel routes include public rights of way, for example footpaths, bridleways and restricted byways, as well as permissive rights of way, designated cycle routes and quiet, very lightly-trafficked lanes.

6.15 These routes are a valued asset to many types of user, including cyclists, walkers, horse riders and users of mobility aids. They are a fundamental element of Purpose 2, and greatly valued by local communities and visitors to the National Park alike. Being so close to many urban areas, the National Park should also be easily accessible from those areas by non-motorised transport routes. The National Park Authority will work to increase accessibility by public rights of way and other non-motorised routes, and also take opportunities to increase connectivity between the rights of way network and public transport, whilst avoiding harm to the special qualities.

DISUSED RAILWAY LINES

6.16 There are a number of former railway lines running through the National Park which present outstanding opportunities for new non-motorised user paths. These are defined as routes for pedestrians, cyclists and horse-riders for leisure and/or commuting. The use of electric powered vehicles may be permissible in some circumstances, for example pedelecs (low-powered electric bicycles) and Class 2 mobility scooters or any updated equivalent. Some of these routes are already partly converted to non-motorised user paths, and development to extend the network is underway. The safeguarding of these routes will protect them from any development that would prevent future proposals to convert them to non-motorised user paths.

6.17 In many cases, the exact route of development for these schemes is not yet established; some diversions from the original railway line route may well ultimately be necessary. If a site along one of the safeguarded routes is proposed for redevelopment or conversion then the route of the former railway must be protected within the proposed development.

6.18 In instances where the line passes in or close to designated wildlife sites or where a survey reveals protected species, regard must be had to relevant policies in the development plan particularly Policy SD9: Biodiversity and Geodiversity. A diversionary route may prove to be more appropriate.

6.19 Development of a recreational transport route within the Singleton & Cocking Tunnels SAC will not be permitted and this section is left out of the safeguarding of the Chichester to Midhurst railway line route. Likewise, the section of the Liss – Bordon Railway which runs through Longmoor and Woolmer Forest is not suitable for development; the only safeguarded section of this route is that between Liss and Longmoor, which already operates as a non-motorised transport route.

6.20 Wherever possible, development proposals on disused railway lines should retain existing structures and features connected with railway use.

RESTORATION OF ABANDONED ROUTES

6.21 The National Park Authority supports restoration of the short sections of the Lewes – Uckfield railway (near Hamsey) and the Wey and Arun Canal to railway and canal use respectively, and will safeguard these routes. Proposals for such restoration should provide suitable routes for non-motorised travel alongside the new railway or canal, wherever feasible. Should proposals for a non-motorised transport route (as described in Criterion 2) come forward on the route of the Lewes – Uckfield railway, before it is restored to railway use, these will also be supported.

CROSSING MAJOR ROADS AND RAILWAYS

6.22 Major roads and railways can often create breaks and safety hazards in the network of public rights of way and non-motorised routes. The result is that some leisure users may be discouraged from accessing the National Park. Proposals for developments to reduce the severance effect of major roads and railways will generally be supported. Policies SD4: Landscape Character, SD5: Design and SD9: Biodiversity and Geodiversity will be of particular relevance in considering such applications. Existing crossing points, including existing bridges across watercourses, will be protected, and their safety conserved and enhanced where possible, including through Section 106 contributions. Enhancement may include the introduction of speed limits, signage or a change of surface or levels. Wherever new crossing places are installed, they should be well-signed, of a high quality and locally distinctive design, respecting their setting and convenient and safe for all non-motorised users who may legitimately wish to use them.

CONNECTIONS FROM NEW DEVELOPMENT

6.23 Where new development takes place, it should provide opportunities for new or enhanced connections for pedestrians, cyclists and horse riders. This should be achieved on-site, and where appropriate off-site. Wherever possible, development proposals with potential to generate footfall, for example residential development, employment uses, and development open to the public, should provide the appropriate infrastructure to link routes on site to the

nearby public rights of way network, footways and, where relevant, the routes listed in Criterion 2 of Policy SD20.

PROTECTING THE AMENITY OF PUBLIC RIGHTS OF WAY, OTHER NON-MOTORISED ROUTES AND ACCESS LAND

6.24 The rights of way network, together with access land, non-motorised user paths and permissive paths, are some of the National Park's most important assets in attracting visitors, and the Authority will protect the quality of experience enjoyed by users. Development which harms views from, or is otherwise detrimental to the amenity value, character and tranquillity of public rights of way and other non-motorised user routes, will not be permitted. This includes development that would increase vehicular traffic on the network, for example, on a public right of way that follows the line of a private driveway, to the detriment of its enjoyment by walkers, cyclists and horse riders. Developments that are likely to generate significant additional pressure on the surrounding rights of way network will be required to provide a mitigation contribution to the local transport authority (LTA) towards enhancing the local network.

6.25 Developments affecting PRoW must refer to the *Rights of Way Improvement Plan* for the local area, and any relevant LTA design standards applicable to rights of way. A commuted sum may be required to cover future maintenance. The historic alignment of rights of way should be safeguarded. In exceptional circumstances it may be appropriate to make minor diversions to rights of way, providing the amenity value and convenience for their users is not harmed; such changes will also be subject to application for a *Public Path Order*.

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Development Management Policy SD21: Public Realm, Highway Design and Public Art

1. Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, *Roads in the South Downs*, or any future replacement.
2. Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.
3. Site layout must be designed to protect the safety and amenity of all road users. The design and layout of new development must give priority to the needs of pedestrians, users of mobility aids, cyclists and equestrians. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.
4. Street design and management proposals must be context-sensitive, responding to the specific character, activities, heritage, built form and layout, materials and street furniture of the location. Highway design must pay particular attention to the role and location of buildings, doors and entry points.
5. Appropriately designed and located new public art will be supported, in particular within settlements. New public art should be site specific, reflecting and respecting the site and its context.

6.26 The purpose of Policy SD21 is to protect and enhance the public realm and street scene in the National Park, for the benefit of all users and in support of Purpose 2 of the National Park in particular.

ROADS IN THE SOUTH DOWNS

6.27 The guidance document *Roads in the South Downs* developed by the local highways authorities and the National Park Authority, sets out broad principles and procedures which should be followed by all developments involving changes to the public realm and the creation of new public spaces

and highways. Development proposals will not be permitted where they do not protect highway safety whilst following the principles of context-specific design set out in *Roads in the South Downs*. Development will be expected to contribute to the adaptation of existing highways so that standardised road infrastructure can be minimised in a way consistent with highway safety.

HISTORIC RURAL ROADS

6.28 Historic rural roads are defined as those roads outside towns shown on the *second edition of the Ordnance Survey*⁵⁸, which have not undergone significant widening or straightening in the intervening period. 'Roads' in this context refer to the highway itself as well as any associated pavements or cycle paths, verges, banks, ditches and boundary features.

6.29 Both development proposals themselves, and their off-site traffic impacts, may impact on historic rural roads. Physical impacts may include the removal of portions of hedgerows and banks for new access points, or the construction of new kerbs and signage. Development proposals involving physical alterations to roads and their immediate setting should identify whether the roads in question are historic rural roads and if so, demonstrate that the historical significance, ecological, landscape and recreational value and character of those roads are conserved and enhanced. The integrity of banks, hedges, walls and roadside trees must be maintained.

6.30 A Design and Access Statement should demonstrate that Policy SD21 is complied with, covering both physical changes arising from the development and impacts on traffic levels. The level of detail required in the statement should be proportionate to the expected impact. As a guideline, any development proposal outside Lewes, Petersfield, Midhurst, Petworth and Liss which comprises at least one net additional dwelling, or the addition or change of use of 100m² or more of floorspace, will generally be required to specifically address the matters set out in Policy SD21.

⁵⁸ Ordnance Survey 2nd edition, Six-inch to the mile, England and Wales, 1891 – 1914: accessible online through various providers including National Library of Scotland, <http://maps.nls.uk/os>

6.31 Firstly, the statement must detail the expected traffic flows arising from the development and whether any routes leading to or from the site are likely to experience a traffic increase of approximately 10% or more on existing hourly vehicular traffic as a result. Where this applies, the assessment should check whether these routes meet the definition of historic rural roads given above. If that is the case it must be demonstrated that the changes to traffic levels and patterns arising from the development would conserve and enhance the ecological, landscape and recreational value of those roads. Cumulative impact must be taken into account.

6.32 Current levels of agriculture and forestry related traffic are part of the rural character of the National Park. Whilst this policy applies equally to agricultural and forestry developments where planning permission is required, there may be circumstances where benefits to the purposes of the National Park from specific agricultural or forestry operations outweigh a negative impact of traffic increases arising from those operations that would otherwise be unacceptable.

STREET LAYOUT

6.33 This policy, specifically covering areas within the public realm, must be read in close conjunction with Policy SD5: Design, which discusses the design of new development more broadly.

6.34 *Roads in the South Downs* and the national guidance documents *Manual for Streets*⁵⁹, *Manual for Streets 2*⁶⁰ and the *Design Manual for Roads and Bridges*⁶¹ provide useful guidance in relation to site layout, design and the safety of all users. Street clutter should be minimised and removed where safe to do so. Formal traffic calming measures can be inappropriate; good design at the outset should limit the need for further physical measures. New and amended road layout and design in rural areas should take account of

the movement of large vehicles and machinery associated with agriculture and forestry.

6.35 Given the ageing population of the local area and the importance of visitors from this demographic group to the National Park's economy, it is especially important that the needs of disabled users of the public realm be factored into the design of new development at an early stage. A locally distinctive and easily legible and navigable environment is particularly important for people with visual impairments and those with dementia.

SENSITIVITY TO CONTEXT

6.36 Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of towns and villages. *Roads in the South Downs* and the Historic England document, *Streets for All: South East*⁶² provide guidance on this.

6.37 New street lighting may be considered inappropriate in areas of the National Park due to the need to protect dark night skies. Detail on street lighting is contained in Policy SD8 (Dark Night Skies).

PUBLIC ART

6.38 Public art is generally more characteristic of towns, villages and designed landscapes than of the broader countryside. The principle of new public art will be supported within settlement boundaries, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. Proposals for new public art outside settlement boundaries, where it is subject to the planning process, will be assessed on a case by case basis according to the policies contained in this Local Plan.

⁵⁹ *Manual for Streets* (Department for Transport, 2007)

⁶⁰ *Manual for Streets 2: Wider Application of the Principles*, (Chartered Institution of Highways and Transportation, 2010)

⁶¹ *Design Manual for Roads and Bridges* (Highways England, last updated 2017)

⁶² *Streets for All: South East* (Historic England, last updated April 2018)

Development Management Policy SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:
 - a) There is evidence that overriding traffic management or recreation management benefits can be achieved;
 - b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
 - c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the PRoW network.
2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.
3. All new private and public parking provision will:
 - a) Be of a location, scale and design that reflects its context; and
 - b) Incorporate appropriate sustainable drainage systems.
4. All new public parking provision will comply with the following:
 - a) Wherever feasible, electric vehicle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters; and
 - b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

6.39 New parking areas will be expected to contribute to a range of ecosystem services while protecting the landscape, and their distribution will contribute to the spatial strategy for the National Park.

NEW PUBLIC CAR PARKS

6.40 Roadside car parking is a problem at various locations, causing damage to verges and reducing road capacity. However, the ability of the National Park's road network and car parks to accommodate an increasing number of visitors' cars is limited. It is not practicable, nor would it be desirable in landscape terms, to cater for peak demand. The Authority will direct new public car parking provision to locations in or adjacent to the settlements listed in Policy SD25 (Development Strategy), where it will maximise benefits to the local economy and minimise harm to the landscape.

6.41 The construction of new public car parks should always be justified as part of an overall traffic management scheme whose primary focus is increasing access to the site by public and non-motorised transport. Large scale car parks with supporting infrastructure such as lighting can be particularly obtrusive in the landscape. Development proposals for significant new car parks may be classed as major development within the meaning set out in Policy SD3.

6.42 Traffic Regulation Orders (TROs) can be a means of improving access and preventing inconsiderate parking in towns and villages, and may be necessary in some cases to mitigate the impact of development. Associated street clutter should be avoided and additional signage kept to a minimum.

6.43 There are many existing visitor attractions in the countryside away from settlements related to the National Park purposes, which may wish to expand or relocate their parking facilities. Policy SD22: Criterion 1 only applies to parking areas whose primary purpose is to serve the visitor attraction in question.

PARKING STANDARDS FOR RESIDENTIAL AND NON-RESIDENTIAL DEVELOPMENTS

6.44 The provision of vehicle and cycle parking for new development should be in accordance with the local parking guidance applicable to that area.

DESIGN, LOCATION AND LAYOUT OF NEW VEHICLE PARKING

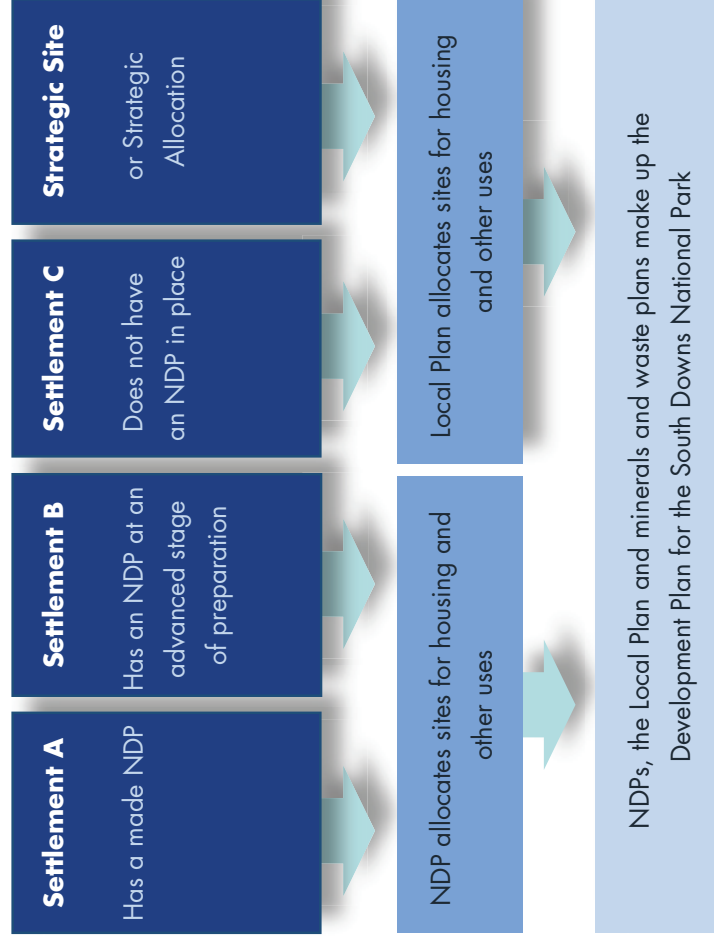
6.45 New vehicle parking areas, whether public or private, can negatively impact on landscape, the local environment, biodiversity and drainage when inappropriately sited and designed. The cumulative impact of changes on biodiversity and surface water run-off will be given particular consideration when deciding applications for the loss of existing garden space to car parking.

6.46 Permeable parking surfaces should be used in preference to impermeable surfaces unless there are overriding reasons that render their use unsuitable. Materials should be selected which are appropriate to the site context and predicted levels of use. Usage should be made of existing and proposed buildings, landscape features and planting to successfully integrate

the parking area within its surrounding landscape context and avoid negative impacts on local character. Changes to existing parking areas to bring them into line with the principles of *Roads in the South Downs* will be supported.

6.47 The type of parking provided must be accessible to all and resilient to future changes. All new public car parks should therefore deliver a proportion of parking spaces for disabled people/blue badge holders, cyclists and motorcyclists which are compliant with the relevant national and local guidelines for the area. Public parking should address the needs of mobility scooter users, and accommodate horse boxes, in line with the National Park's Purpose 2 and duty. Electric vehicle charging facilities must be provided for in all new parking areas, including residential developments and public car and cycle parks, unless it can be demonstrated that this is not viable or that adequate connections to the electricity grid are not available.

FIGURE 7.2: NEIGHBOURHOOD DEVELOPMENT PLANS AS PART OF THE DEVELOPMENT PLAN



Strategic Policy SD25: Development Strategy

1. The principle of development within the following settlements, as defined on the Policies Map*, will be supported, provided that development:
 - a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context;
 - b) Makes best use of suitable and available previously developed land in the settlement; and
 - c) Makes efficient and appropriate use of land.

Western Downs

- Chawton
- Cheriton/Hinton Marsh
- Itchen Abbas
- Farringdon (Lower and Upper)
- Stroud

Western Weald

- Binsted
- Easebourne
- Fernhurst
- Fittleworth
- Greatham
- Liss (including Liss Forest and West Liss)
- Lodsworth
- Midhurst
- Milland
- Northchapel
- Petersfield
- Petworth
- Rogate
- Sheet
- South Harting
- Stedham

Scarp Slope <ul style="list-style-type: none">■ Buriton■ Bury■ Cocking■ Ditchling■ East Meon■ Graffham	<ul style="list-style-type: none">■ Poynings■ Selborne■ Steep■ Washington■ West Meon
Dip Slope <ul style="list-style-type: none">■ Compton■ Corhampton and Meonstoke■ Droxford■ East Dean and Friston■ Findon■ Hambledon	<ul style="list-style-type: none">■ Owslebury■ Pyecombe■ Singleton■ Slindon■ Twyford
Coastal Plain <ul style="list-style-type: none">■ Funtington■ Lavant (including Mid Lavant and East Lavant)	<ul style="list-style-type: none">■ West Ashling
River Arun Corridor <ul style="list-style-type: none">■ Amberley■ Coldwaltham	<ul style="list-style-type: none">■ Watersfield
River Ouse Corridor <ul style="list-style-type: none">■ Kingston near Lewes■ Rodmell	<ul style="list-style-type: none">■ Lewes
River Cuckmere Corridor <ul style="list-style-type: none">■ Alfriston	

2. Exceptionally, development will be permitted outside of settlement boundaries, where it complies with relevant policies in this Local Plan, responds to the context of the relevant broad area or river corridor, and:
- a) It is allocated for development or safeguarded for the use proposed as part of the Development Plan; or
 - b) There is an essential need for a countryside location; or
 - c) In the case of community infrastructure, there is a proven need for the development that demonstrably cannot be met elsewhere; or
 - d) It is an appropriate reuse of a previously developed site, excepting residential gardens, and conserves and enhances the special qualities of the National Park.
3. In considering development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to the following:
- a) The development proposals are part of a Whole Estate Plan that has been endorsed by the National Park Authority; and
 - b) The development proposals deliver multiple benefits in line with the purposes and the special qualities of the National Park and in regard to ecosystem services.

*Additionally, a portion of the Arundel settlement boundary is shown on the Policies Map. Other settlements not listed in Policy SD25 may also be shown on the Policies Map if an NDP has allocated, designated or safeguarded sites or areas within the National Park.

PRINCIPLES OF DEVELOPMENT

7.7 The purpose of Policy SD25 is to identify towns and villages across the broad areas and river corridors of the National Park that are able to accommodate growth of a scale and nature appropriate to the their character and function. These have been identified in line with two principle criteria:

- The future sustainability of the settlement, in terms of its facilities and services; and
 - The form and character of the settlement within its landscape context.
- 7.8** Evidence to support the inclusion of these settlements includes the SDILCA⁶⁸, and the *Settlement Facilities Assessment*⁶⁹, which form part of the Local Plan evidence base.

SETTLEMENT BOUNDARIES

7.9 Settlement boundaries are defined on the Policies Map. They have all been comprehensively reviewed as part of the Local Plan process unless this was done through an NDP. The methodology for determining the boundaries is set out in the *Settlement Boundary Review: Methodology Paper*⁷⁰, which forms part of the Local Plan evidence base. Policy SD25 sets a clear distinction between land within a settlement boundary and open countryside. Within the settlement boundary, the principle of further development is established subject to other policies in this Plan. Outside of settlement boundaries, land will be treated as open countryside. Settlements that are more scattered or diffuse in their form have not been given settlement boundaries, and will be treated as open countryside for the purposes of Policy SD25.

⁶⁸ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

⁶⁹ Settlement Facilities Assessment (South Downs National Park Authority, 2015)

⁷⁰ Settlement Boundary Review: Methodology Paper (South Downs National Park Authority, 2015 and updated 2017)

EXCEPTIONAL DEVELOPMENT OUTSIDE SETTLEMENTS

7.10 Policy SD25 acknowledges exceptional circumstances whereby development outside settlements may be acceptable. For example, particular uses of land relating to agriculture or countryside recreation may only be able to function successfully in fully rural locations. Community uses that are crucial for sustaining thriving communities, such as extensions to schools or health centres, may only be achievable through minor incursion into the countryside. Other exceptions to the development strategy are set out in other policies in this Local Plan, for example Policies SD23: Sustainable Tourism and SD29: Rural Exception Sites. Robust evidence will need to be provided to support applications for such developments to demonstrate that an exceptional approach is fully justified.

DEVELOPMENT ON PREVIOUSLY DEVELOPED LAND

7.11 In order to conserve wider landscape character and minimise the footprint of development, it is important to focus development on previously developed land (PDL), which is often referred to as ‘brownfield’ land. Therefore the Authority will expect developers to make best use of PDL within settlement boundaries, subject to other locational and physical constraints. Policy SD25 also provides some limited flexibility, in exceptional circumstances, to allow ‘brownfield’ development outside settlement boundaries, where demonstrably necessary to meet the wider objectives of this Local Plan. An example would be where development necessary to uphold the purposes of the National Park can be provided on previously developed land as an alternative to encroaching on undeveloped countryside.

7.12 However all development on PDL must always be within the context of a ‘landscape first’ approach whereby previously developed sites will not automatically be the best in landscape terms. Any proposal for re-use of PDL outside settlement boundaries must have full regard to Purpose 1 and the special quality of an environment shaped by centuries of farming. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.

EFFICIENT USE OF LAND

7.13 Throughout the National Park, development pressures are great, whilst availability of land suitable for development is scarce. Furthermore, many of its villages and towns are characterised by relatively densely clustered, small buildings. Therefore it is important to make efficient use of land that does become available and is suitable for development. This approach is likely to encourage a design of new development that respects traditional patterns of built form, whilst reducing demand for additional land supply to meet local communities' needs.

7.14 It is equally important to recognise that efficient use of land does not translate to overdevelopment of sites in the context of the surrounding area and setting. In some contexts, a more diffuse built form may be more appropriate. Principles and criteria relating to design and mix of housing are set out elsewhere in this Local Plan.

WHOLE ESTATE PLANS AND LARGE FARM PLANS

7.15 Estates, institutions and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD25 recognises that Whole Estate Plans may be able to demonstrate particular material considerations, relating to the purposes and special qualities of the National Park that justify development outside of settlement boundaries. The Authority will only give weight to such plans where they have been endorsed by the National Park Authority, in line with the *Whole Estate Plans Guidelines*⁷¹.

7.16 Where new dwellings are proposed as part of a Whole Estate Plan, these should meet the priority housing needs of the local area, hence should be affordable homes, or accommodate full-time, rural workers as defined by Policy SD32 and its supporting text. An exception may be made where to do so would make the delivery of multiple benefits to ecosystem services and the special qualities of the park unviable, provided clear evidence is provided in the endorsed Estate or Farm Plan.

⁷¹ Whole Estate Plans Guidelines (South Downs National Park Authority, 2015 and updated 2016), available on the SDNPA website

7B. HOMES (STRATEGIC POLICIES)

INTRODUCTION

7.17 This sub-section of the Local Plan includes two strategic policies namely SD26: Supply of Homes and SD27: Mix of Homes.

7.18 Provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to conserve and enhance the villages and market towns as thriving centres for residents, visitors and businesses, whilst conserving and enhancing the landscape of the National Park. Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise by providing homes for local workers. However, the provision of housing should not be at the expense of a nationally protected landscape. The *NPPF* cites national parks as areas where development should be restricted and objectively assessed need not met.

7.19 The Local Plan determines the level of housing provision and types of homes to be delivered. To inform this, the National Park Authority commissioned a Housing and Economic Development Needs Assessment (*HEDNA*)⁷² which forms part of the evidence base for this Local Plan. This updated the *Strategic Housing Market Assessment (SHMA)* to incorporate new national population projections and new household projections. Over the 19 year period 2014 – 2033, the *HEDNA* identifies an objectively assessed need of 447 homes per year and separately identifies a need for 293 affordable homes per year. Policy SD25: Development Strategy provides the starting point with regards to settlements considered. Policy SD26 sets out the overall housing provision for the National Park along with specific figures for the market towns and a number of villages.

7.20 The Local Plan incorporates the overall levels of housing proposed within the adopted Joint Core Strategies, updated where relevant by made

NDPs. For example, the housing figure for Petersfield is based on the *East Hampshire Joint Core Strategy* and the *Petersfield Plan*. This Local Plan meets the commitment in the *East Hampshire Joint Core Strategy* to deliver a total of 1,694 dwellings in that part of East Hampshire within the National Park. This equates to approximately 100 dwellings per annum until the *East Hampshire Joint Core Strategy* end date of 2028.

7.21 National policy states that the Local Plan should plan for a mix of housing based on current and future demographic trends, market trends, and the need for different groups in the community. The *HEDNA* and *SHMA* identify a need for a mix of dwelling sizes across the National Park, with a much greater level of need for small and medium-sizes homes, and limited need for larger houses of 4 or more bedrooms. Consultation on this Local Plan has indicated that local communities favour a policy that ensures a good mix of dwelling sizes to meet local needs.

Strategic Policy SD26: Supply of Homes

1. The National Park Authority will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033.
2. These will be delivered through:
 - i) The development of strategic sites and the allocation of land for housing in the Local Plan and NDPs;
 - ii) The implementation of planning permissions; and
 - iii) The development of land previously unallocated or identified (windfall).
3. Approximately the following levels of housing are provided for, in addition to extant planning permissions granted prior to 1st April 2015 and windfalls, through sites either:
 - Allocated in this Local Plan or in Neighbourhood Development Plans, or
 - Substantially completed at the time of Local Plan submission:

⁷² Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Settlement	Housing provision
Alfriston	15
Amberley	6
Binsted	11
Buriton	10
Bury	6
Cheriton/Hinton Marsh	14
Coldwaltham	28
Corhampton and Meonstoke†	18
Ditchling	15
Droxford	26
Easebourne	50
East Dean and Friston (East Sussex)†	11
East Meon	17
Fernhurst (including Syngenta*)	220 (*200)
Findon	28
Fittleworth	6
Greatham (Hampshire)	38
Itchen Abbas	9
Kingston near Lewes	11
Lavant (including Mid Lavant and East Lavant)	20
Lewes (including North Street Quarter*)	875 (*415)
Liss (including West Liss and Liss Forest)	150
Midhurst	175
Petersfield	805
Petworth	150

Settlement	Housing provision
Pyecombe†	8
Rogate	11
Selborne	6
Sheet	16
South Harting	13
Stedham	16
Steep	10
Stroud	28
Twyford	20
West Ashling	16
West Meon	11

4. Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan.

† At the time of Local Plan submission, the housing provision figures for Corhampton and Meonstoke, East Dean and Friston (East Sussex) and Pyecombe have been met through sites allocated in the *Pre-Submission South Downs Local Plan* having been subsequently built out. These sites therefore no longer require an allocation policy.

THE AMOUNT OF HOUSING

7.22 The purpose of this policy is to set out figures for how many new homes will be provided in town and villages across the National Park in line with the spatial strategy for the Local Plan.

7.23 The process for determining the amount of housing to be delivered starts with the identification of the ‘objectively assessed need’ for housing. This is followed by consideration of the extent to which meeting need within the National Park can be reasonably met. The Local Plan must first and foremost reflect the purposes of the National Park, and is therefore capacity-based. Pursuant to the purposes, the Local Plan must also reflect the duty of the National Park Authority, and therefore should seek to foster the economic and social wellbeing of local communities.

7.24 Policy SD26 sets a level of new housing provision which totals 4,750 over the Plan period, representing a net increase of 250 homes per year. This is informed by the evidence from the *HEDNA*⁷³, including the great need for affordable housing to meet locally generated housing needs. It is equally informed by a robust body of evidence on constraints and opportunities, which includes the *SHLAA*⁷⁴ (incorporating site-specific landscape assessments), and the *Settlement Facilities Assessment*. These evidence based studies form part of the Local Plan evidence base.

THE LOCATION OF HOUSING

7.25 Policy SD26 sets out set out figures for how many new homes will be provided in individual settlements. This approach provides clarity to local communities on the amount of development to be provided, which will be of particular importance in designated neighbourhood plan areas. The starting point for the housing provision figures is the spatial strategy for a medium level of dispersed growth across the National Park. A further key driver is the estimated capacity of each settlement to provide for growth, whilst

safeguarding Purpose 1. Key evidence includes the *SHLAA* incorporating site-specific landscape assessments and the *Settlement Facilities Assessment*, which form part of the Local Plan evidence base. Levels of local growth have additionally been informed by consultation with local communities, in particular with parish and town Councils.

7.26 The housing provision figures have been calculated firstly taking account of opportunities and constraints, primarily landscape context, then settlement facilities, and secondly the estimated supply of suitable and available housing land. The figures are approximate, and actual delivery in individual settlements may vary should the land supply position change. Nevertheless, it is expected that the National Park Authority, parish and town councils and other partners will work together to deliver at least these numbers.

ALLOCATION OF STRATEGIC SITES AND HOUSING SITES

7.27 An important element of housing delivery in the National Park is the allocation in the Local Plan of strategic sites to include provision of housing, and a number of smaller sites in settlements across the National Park.

7.28 There are two previously developed strategic sites allocated in chapter 8 of this Local Plan: North Street Quarter in Lewes, and the former Shoreham Cement Works in Upper Beeding. The former Syngenta site is allocated as a strategic site in the *Fernhurst NDP*. North Street Quarter and Syngenta will deliver a considerable number of homes as part of mixed use development schemes. There are two strategic housing allocations in Chapter 9 namely Old Mallings Farm, Lewes and the former Brickworks and West Sussex County Council Depot in Midhurst.

7.29 Non-strategic Local Plan housing site allocations are being made in areas of the National Park where there is currently no emerging NDP, or where the NDP does not allocate land for housing in line with Policy SD26. In areas where NDPs are emerging or have been made, these are expected to allocate sites sufficient to meet the settlement level housing provision figures set out in Policy SD26.

⁷³ Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

⁷⁴ Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

7.30 The allocation of land in an NDP which will deliver a greater number of homes than is specified in Policy SD26 will be supported, where it meets an identified local housing need in that settlement or locality and is supported locally.

7.31 A list of made and emerging NDPs can be viewed on the National Park Authority's website.

WINDFALL ALLOWANCE

7.32 The development of previously unallocated or unidentified land, known as 'windfall sites', will count towards the Local Plan housing provision figure. This is known as a 'windfall allowance', and is not attributable to particular settlements. Therefore windfall sites will not count towards settlement-specific housing provision figures. A review of past planning permission implementation, using dwelling completion records, has provided strong evidence that there has been consistent delivery on windfall sites as a proportion of total dwellings built; therefore allowance of a modest element of windfall housing supply is justified. However, in the context of a national park, it is appropriate to adopt a conservative allowance. The windfall allowance is calculated as 51 dwellings per year for the National Park area, based on an analysis of past trends, whilst taking into account the emphasis on future growth taking place primarily within tightly drawn settlement boundaries, generally in the form of infill development.

Strategic Policy SD27: Mix of Homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.
 - a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:

1 bedroom dwellings:	35%*
2 bedroom dwellings:	35%
3 bedroom dwellings:	25%
4 bedroom dwellings:	5%
 - b) Proposals for market housing should provide the following mix of units:

1 bedroom dwellings:	at least 10%
2 bedroom dwellings:	at least 40%
3 bedroom dwellings:	at least 40%
4+ bedroom dwellings:	up to 10%
 2. Planning permission will be granted for an alternative mix provided that:
 - a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or
 - b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.
 3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult home care requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.
- * 1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

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- * 1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

MEETING THE NEEDS OF LOCAL HOUSEHOLDS

7.33 The purpose of this policy is to ensure that development proposals provide a mix of homes that reflects the need and community aspiration for small and medium-sized homes.

7.34 The precise mix of homes within each proposal should be informed by the latest evidence of strategic and local needs, including the currently published *HEDNA* or future reviews as relevant. However, given clear evidence in the *HEDNA* of future household needs, it is important that new housing development focuses on providing smaller and medium size dwellings, to reflect the National Park duty to foster the well-being of the local communities.

7.35 The mix of dwellings set out in Policy SD27 is in line with the recommendations of the *SHMA* (and confirmed by the *HEDNA*), which is based on detailed modelling of housing market trends up until 2033. The *SHMA* and *HEDNA* recommend that market housing, in particular, should be explicitly focused on delivering smaller family housing for younger households. This approach also complements Policies SD30: Replacement Dwellings and SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings, which similarly seek to retain smaller dwellings.

7.36 It is recognised that many housing sites are small and in such instances it may not be possible to achieve the exact proportions set out in Policy SD27. Nevertheless the requirements should be broadly met. For all proposals for standard occupancy housing, the onus will be on providing smaller homes, some of which should be suitable for families with children.

7.37 Affordable 1 bedroom dwellings may be substituted with 2 bedroom dwellings, in recognition that 2 bedroom dwellings are more adaptable to changing needs, for example, where a couple have children whilst living there.

7.38 For avoidance of doubt, any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

ALTERNATIVE MIX OF HOMES

7.39 The Authority recognises that future development will need to respond appropriately to local needs. Policy SD27 therefore allows for regard to be had to bespoke local housing need evidence relating to the parish. This would normally be in the form of a local (parish) housing needs assessment. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development. Where a made NDP proposes an alternative housing mix based on robust local evidence, this should be used in place of the mix proposed in Policy SD27.

7.40 Exceptionally, the effect of unit types and sizes on a scheme's financial viability may be a material consideration, where this has been clearly evidenced through independent viability appraisal. For avoidance of doubt, the overall proportion of affordable housing with tenure mix to reflect Policy SD28: Affordable Homes will be prioritised, if exceptionally necessary, over the normal mix of market housing.

7.41 The delivery of each element of supply will be subject to ongoing monitoring.

OLDER PEOPLE'S HOUSING

7.42 The evidence from the *SHMA*, and confirmed by the *HEDNA*, demonstrates the importance of making provision for older people's housing. Furthermore, providing smaller homes suitable for older people encourages 'downsizing' which in turn frees up larger dwellings more suited to larger households.

7.43 The National Park has a higher than average proportion of its population within the 'older person' category of 55 years old or over, with further growth in this age demographic predicted. In particular, there is predicted to be strong growth in the 85+ age category.

7.44 The *HEDNA* identifies an indicative demand for some 90 homes per annum suitable to meet the needs of older people. This represents some 20% of the total objectively assessed housing need. Figure 7.3 indicates the different



types of older people's housing need. There is a particular need for more sheltered housing in future.

FIGURE 7.3: ESTIMATED NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE, 2014 – 33

	Affordable		Market		Total	
	2014-33	Per annum	2014-33	Per annum	2014-33	Per annum*
Sheltered	506	27	758	40	1,264	67
Enhanced sheltered	81	4	121	6	202	11
Extra-care	101	5	152	8	253	13
Total	688	36	1,031	54	1,719	90

*Note total differs from sum of rows due to rounding

Source: South Downs Housing & Economic Development Needs Assessment (GL Hearne, Sep 2017)

7.45 All proposals for new residential development should include smaller homes that are designed to meet the living requirements of older people, for example, allowing step-free access to and within the home. Proposals of 5 or more dwellings are considered most likely to provide opportunity to achieve this. Sites that can reasonably accommodate a comprehensive mix of housing types should demonstrate that opportunities for specialist older people's accommodation have been fully investigated and, where appropriate, incorporated into the development. This should be of a type which reflects local or strategic needs, including affordability.

OTHER HOUSING NEEDS

7.46 The National Park Authority recognises that there are other specialist housing needs that exist in local communities. People with disabilities may have particular requirements in respect of how their homes are designed to function, that is, the need for 'accessible and adaptable homes'.

7.47 The national requirements and advice in respect of addressing such needs are set out in *statutory building regulations (Approved Document Part M)*. The Authority is supportive of proposals that go beyond meeting the statutory minimum standards.

Strategic Policy SD28: Affordable Homes

1. Development proposals for new residential development will be permitted that maximise the delivery of affordable housing to meet local need, and provided that, as a minimum, the following are met:

- a) On sites with gross capacity to provide 11 or more homes, a minimum of 50% of new homes created will be provided as affordable homes on-site, of which a minimum 75% will provide a rented affordable tenure.
- b) On sites with gross capacity to provide between 3 and 10 homes, a proportion of affordable homes will be provided in accordance with the following sliding scale, applied to new homes created:

3 homes	Meaningful financial contribution, to be negotiated case-by-case
4 – 5 homes	1 affordable home
6 – 7 homes	2 affordable homes, at least 1 of which is a rented affordable tenure
8 homes	3 affordable homes, at least 1 of which is a rented affordable tenure
9 homes	3 affordable homes, at least 2 of which is a rented affordable tenure
10 homes	4 affordable homes, at least 2 of which is a rented affordable tenure

Development proposals of 4 to 10 net dwellings will provide affordable housing on-site. Exceptionally, at the discretion of the Authority, financial contributions in lieu will be accepted.

- 2. Where, exceptionally, provision of affordable housing which complies with Part 1 of this policy is robustly shown to be financially unviable, priority will be given to achieving the target number of on-site affordable homes over other requirements set out in this policy.
- 3. Development proposals will be permitted provided that affordable housing units are integrated throughout the development, are indistinguishable in design and materials from the market housing on the site, and, where feasible, will remain affordable in perpetuity.
- 4. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.
- 5. Developers may not circumvent this policy by artificially subdividing sites.

APPLYING POLICY SD28 TO RESIDENTIAL DEVELOPMENT

7.55 The purpose of Policy SD28 is to maximise the delivery of affordable homes across the National Park as part of market-led housing schemes.

7.56 All development falling within Use Class C3 is subject to Policy SD28, including any retirement or assisted living accommodation within this use class. The policy applies to all developments of 3 or more new homes, and applies to all residential units on the site that have been created by building new structures or converting existing structures.

AMOUNT OF AFFORDABLE HOUSING

7.57 Policy SD28 sets out a sliding scale of requirement for developments to provide affordable housing. This recognises the greater challenges that exist for small site developers in making such provision. These requirements have been tested for viability, taking account of the different market circumstances across the National Park. Where the calculation of the on-site affordable housing requirement results in a fraction of a unit, the requirement will be rounded up to the nearest whole number. Applications proposing a lower proportion of affordable home provision should present robust evidence to demonstrate constrained viability or other exceptional circumstances.

MIX OF AFFORDABLE HOUSING TENURES

7.58 The SHMA, as confirmed by the HEDNA recommends that 75% of new affordable homes should be either social rented or affordable rented tenure to reflect evidence of need, with the remaining 25% being provided as intermediate forms of housing, such as shared or low-cost ownership. However the SHMA also recognises that different communities within the National Park have different needs and aspirations.

7.59 Policy SD28 reflects the SHMA strategic tenure mix (as confirmed by the HEDNA) as a requirement for new housing development, whilst allowing flexibility to reflect local need. Evidence of local need can include, but is not limited to: local (parish) housing needs assessment, relevant housing market assessment published by a local authority, and housing registers (waiting lists). If a tenure mix is proposed which departs from the strategic tenure mix set out in Policy SD28, robust evidence must be provided, which is supported by the relevant housing enabler.

7.60 The National Park Authority considers that social rent tenures are the most affordable to those in greatest need, and should be prioritised over other forms of rented tenure. Levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.

LOCAL CONNECTIONS

7.61 Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. Rural local connection criteria, which is linked to parishes, will take precedent over other needs.

7.62 Local connections will be determined by the Authority, parish council and relevant housing authority, having primary regard to the relevant housing register allocations policy. Where a CLT is to be the managing body for the homes provided, regard will be given to the CLT's objectives and strategy. The Authority will also have regard to evidence of local need which is specific to a rural estate or large farm, particularly where this is set out in a Whole Estate Plan that has been endorsed by the National Park Authority.

VIABILITY

7.63 The *South Downs Whole Plan and Affordable Housing Viability Study*⁷⁵ demonstrates that for the great majority of sites, the requirements of Policy SD28 can be achieved. The *Vision and Circular on English National Parks and the Broads*⁷⁶ states that new housing should be focused on affordable housing requirements, and support local employment opportunities and key services. Insufficient affordable housing provision which runs contrary to Policy SD28 will be a significant factor weighing against approval, irrespective of any viability barriers.

7.64 In exceptional cases where viability is a genuine barrier to delivery, the Authority will require the applicant to demonstrate this by submitting a robust viability appraisal. This should show that the cost of land reflects the existing value of land in its current use, plus a reasonable, but not excessive, uplift which provides an incentive for the land to be sold. The Authority will not accept a land cost assumption that factors in 'hope' value. It will expect

⁷⁵ South Downs Whole Plan and Affordable Housing Viability Study (BNP Paribas, 2017)

⁷⁶ Vision and Circular on English National Parks and the Broads (DEFRA, 2010)

also that land purchase/sale negotiations have ensured due diligence, and have fully taken into account the whole cost of development, including all adopted and emerging development plan policies, CIL, and any abnormal costs reasonably identifiable ahead of development, as a prerequisite for development potential. Affordable housing provision and other planning obligations should therefore result in reduced residential land values which reflect these factors.

7.65 In cases where viability is, having had regard to the above, still an issue, developers will be expected to contribute as fully as possible to mixed and balanced communities, by assessing development options in accordance with the following cascade:

- i) Firstly, reduce the proportion of rented affordable tenure homes in favour of intermediate housing that best reflect local need;
- ii) Secondly, reduce the overall percentage of housing provided as affordable units; and
- iii) Thirdly, provide a financial contribution for affordable housing to be delivered off-site.

7.66 The viability appraisal must be done on an independent and open-book basis, and must be undertaken by a professionally qualified member of the Royal Institution of Chartered Surveyors (RICS) to establish the appropriate form and level of contribution. Where the Authority does not agree that the appraisal has been undertaken robustly and fairly, it must be independently audited at the cost of the developer and subsequently reviewed if necessary.

7.67 Where a lower proportion of affordable housing is accepted by the Authority as an exception, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions, up to the requirement in Policy SD28, if market conditions improve before the completion of development.

7.68 The National Park Authority will publish guidance on viability matters in due course.

PROVIDING FOR AFFORDABLE HOUSING ON-SITE

7.69 Affordable homes should be provided on-site. The options for achieving this should be discussed in full with both the Authority and the relevant housing enabler.

7.70 Exceptionally, off-site provision or a financial contribution of broadly equivalent value to the normal on-site provision may be justified. Only when all options for on-site provision are shown to have been reasonably explored, without success, will a financial contribution to provide affordable housing off-site be accepted. On larger sites of 11 or more homes, this will usually be due to a lack of financial viability, ascertained by working through the cascade set out under 'Viability' above. On smaller sites of 10 or fewer homes, there may on occasion be other site-specific practical constraints that make on-site provision of a policy-compliant mix of housing tenures unfeasible.

7.71 Financial contributions secured in lieu of affordable housing must directly address local needs within the National Park, and support achievement of mixed and balanced communities. In such cases, a legal agreement will be required that sets out the terms of payment, and that limits its spending to relate only to schemes that address local needs. The calculation of financial contributions will be based on the most up-to-date policy or guidance published or used by the local housing authority within which the site is located. The National Park Authority will publish its own guidance on this matter in due course, which will supersede other guidance.

7.72 In some cases, the Authority may be willing to accept serviced plots as payment-in-kind, either on the application site, or on an equivalent site that equally addresses local need and is in other respects suitable and deliverable. This, together with any additional payment necessary, should represent a value equivalent to the financial contribution which would otherwise be calculated and paid to the Authority in the absence of acceptance of the serviced plot.

DESIGN AND MIX

7.73 Affordable homes must be integrated throughout the development and be of visually indistinguishable design. They should be located throughout the site in a manner that supports integration but can also be managed efficiently by the relevant housing association. The mix of dwelling types and standards of design for affordable housing are considered under other development management policies alongside all other types of housing.

ARTIFICIAL SUBDIVISION OF SITES

7.74 The Authority will not accept the artificial subdivision of sites where an obvious consequence of doing so would be to fall under the relevant policy threshold requiring either on-site provision of affordable housing, or a financial contribution proportionate to the total sum of development. For the purposes of housing provision, the Authority will consider a site to be a single site if the current arrangements, in either functional and/or legal land ownership terms, can be considered part of a wider whole.

AFFORDABLE HOUSING DELIVERY

7.75 Affordable housing provision will be secured at the granting of planning permission by a Section 106 legal agreement. The National Park Authority will work in close partnership with the relevant Local Housing Authority to ensure that affordable housing is delivered effectively. Affordable housing should remain as such in perpetuity.

7.76 CLTs provide an opportunity for local community ownership of land for long-term affordable housing provision. Affordable housing provided by CLTs and most housing associations are exempt from the “Right to Buy”, allowing affordable housing to remain affordable in perpetuity.

Strategic Policy SD29: Rural Exception Sites

1. Proposals for new residential development of 100 per cent affordable housing outside of settlement boundaries as shown on the Policies Map will be permitted, provided that the following are met:

- a) Affordable housing is provided in perpetuity;
 - b) The site selection process has considered all reasonable options, and the most suitable available site in terms of landscape, ecosystem services and overall sustainability has been chosen;
 - c) The scale and location relates well to the existing settlement and landscape character; and
 - d) It is shown that effective community engagement has fed into the design, layout and types of dwellings proposed.
2. The size (number of bedrooms), type and tenure, (for example, social and affordable rented, intermediate, shared ownership or older people’s housing) of affordable homes for each proposal will be based on robust and up-to-date evidence of local community need.
3. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.

7.77 The purpose of Policy SD29 is to encourage the delivery of rural exception sites. These sites provide a critical source of affordable housing in perpetuity to meet local needs, which are not served by the market, on land that would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

2.1 The Vision for the South Downs National Park (the National Park) is set out in the *Partnership Management Plan (PMP)*¹². This Vision describes where we want to be in 2050 and it is the overarching vision for the 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.

FIGURE 2.1: A VISION FOR THE NATIONAL PARK

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.

¹² Partnership Management Plan: Shaping the future of your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

ACHIEVING THE VISION FOR THE NATIONAL PARK

2.2 A number of strategic objectives, based on the National Park purposes and duty (Figure 1.1), outline the direction that the Local Plan will take in order to achieve the vision. These objectives deliver the vision within the remit of the Local Plan and consideration of planning applications. The core, strategic, development management and allocation policies will deliver these objectives.

FIGURE 2.2: LOCAL PLAN OBJECTIVES

1. To conserve and enhance the landscapes of the National Park
2. To conserve and enhance the cultural heritage¹³ 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 services¹⁴ 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
9. 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

¹³ The reference to 'cultural heritage' encompasses the historic environment

¹⁴ 'Ecosystem services' are the benefits people and society get from the natural environment

3

SPATIAL PORTRAIT AND SPATIAL STRATEGY

INTRODUCTION

3.1 This chapter of the Local Plan introduces the spatial portrait, which is a new way of looking at the South Downs National Park (the National Park) as a single entity, arising from its geology, geography and settlement pattern. This is illustrated by the spatial diagram set out in Figure 3.4. The spatial strategy is also explained in this chapter and is summarised in Figure 3.1.

FIGURE 3.1: SUMMARY OF SPATIAL STRATEGY

Having regard to the landscape and five broad areas and river corridors, the spatial strategy for the *South Downs Local Plan* is for a medium level of growth dispersed across the towns and villages of the National Park.

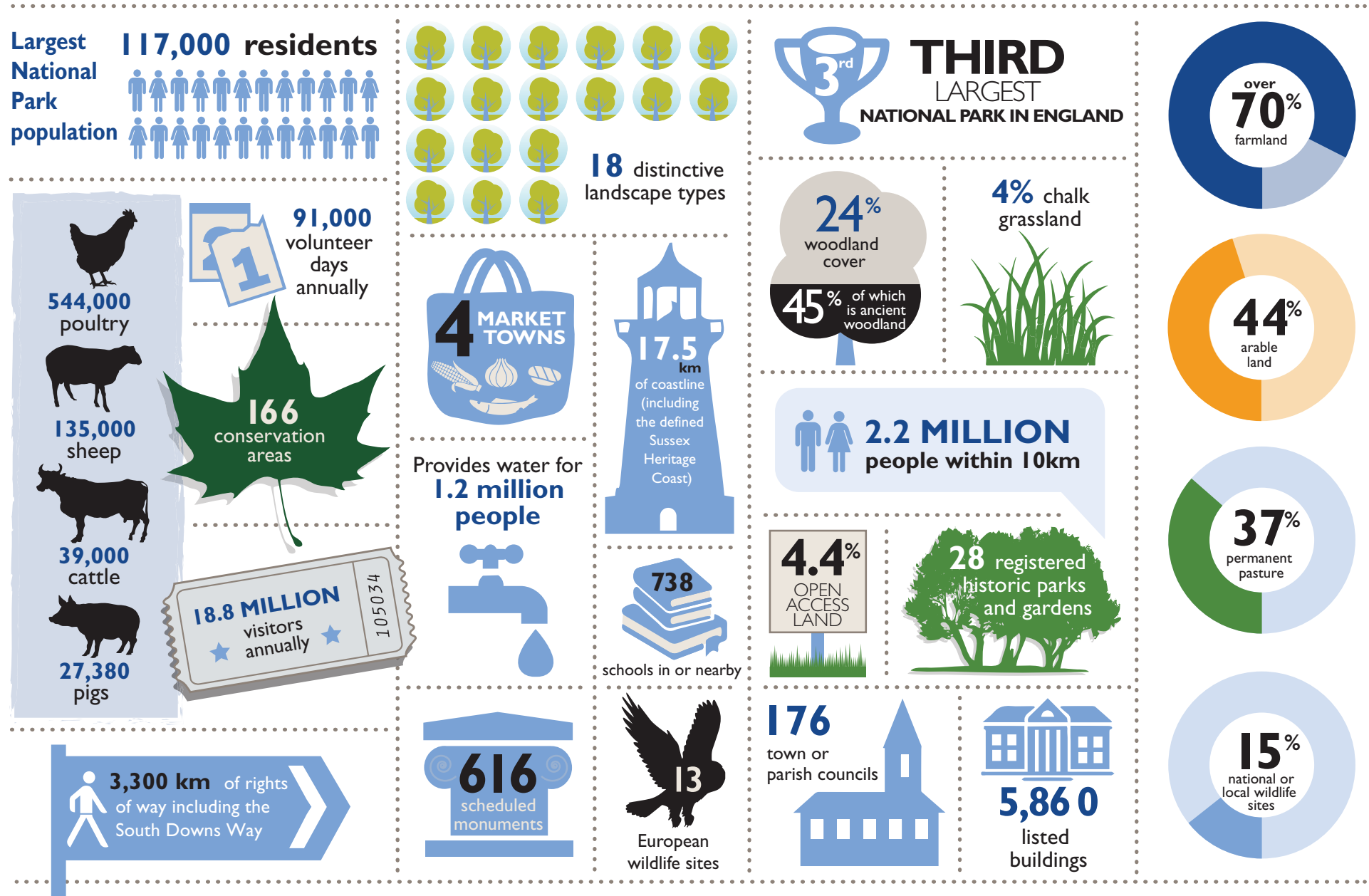
THE NATIONAL PARK TODAY

3.2 Figure 3.2 is a map showing key features of the National Park. The National Park has a population of about 112,000, and approximately 2 million people live within 5 kilometres of its boundary. Figure 3.3 is a snapshot of the South Downs National Park today.

FIGURE 3.2: THE SOUTH DOWNS NATIONAL PARK



FIGURE 3.3: A SNAPSHOT OF THE SOUTH DOWNS NATIONAL PARK



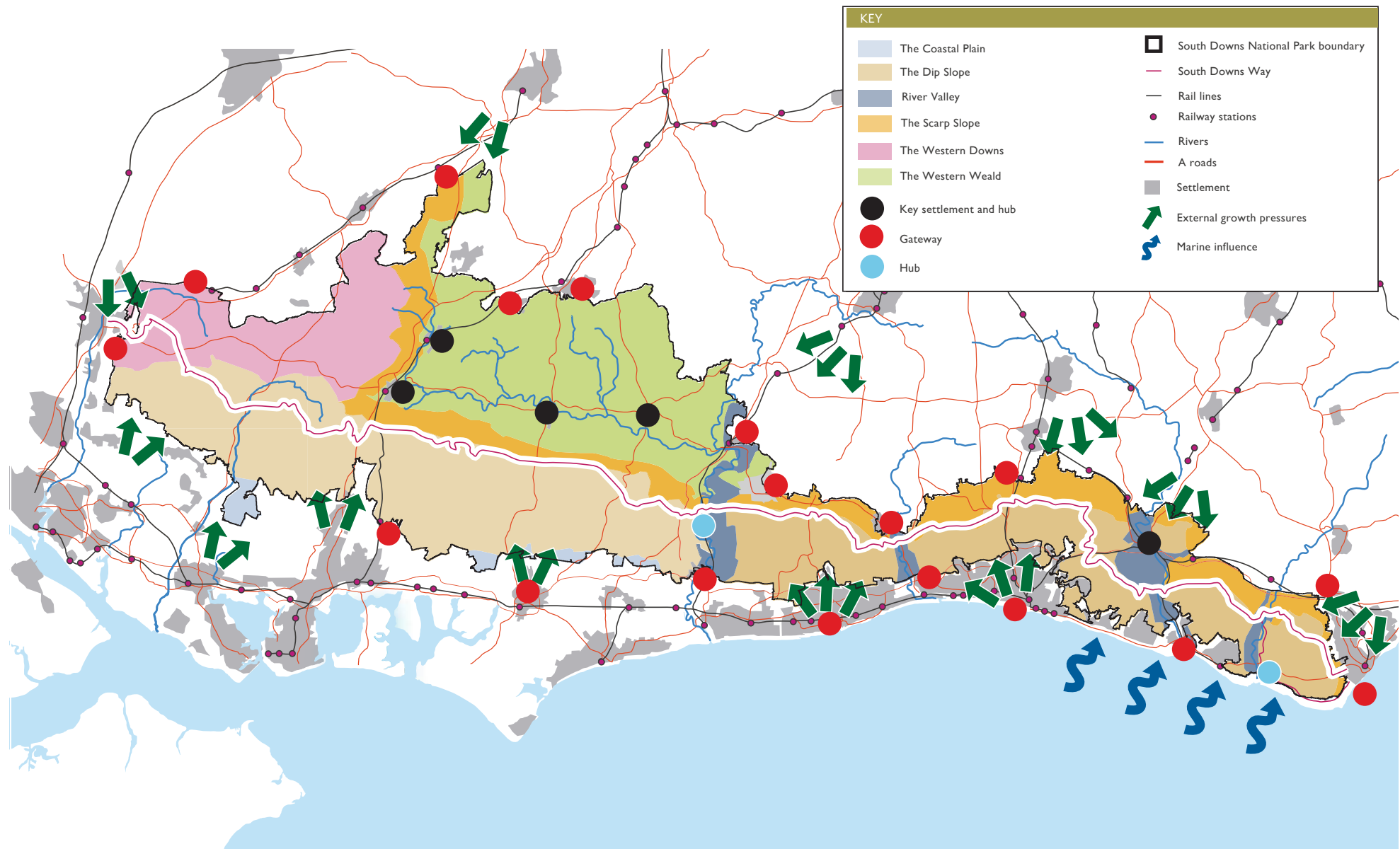
THE SPATIAL PORTRAIT

3.3 This Local Plan introduces a new way of looking at the South Downs National Park as a single entity, arising from its geology, geography, and hydrology and settlement pattern. This is illustrated in the spatial diagram set out in Figure 3.4. The spatial portrait is based on five broad areas and four river corridors. These are the Western Downs, the Western Weald, the Scarp Slope, the Dip Slope and the Coastal Plain broad areas and the Arun, Adur, Ouse and Cuckmere river corridors. The four river corridors highlighted all flow north to south bisecting the National Park; there are several other important rivers in the National Park such as the Itchen, Meon and Rother whose whole catchment area lies within the National Park. The spatial portrait:

- Is informed by the characteristics of the different landscapes, as defined in the *South Downs Integrated Landscape Character Assessment* (SDILCA) and the historic patterns of development. For example, the springline villages that run along the Scarp Slope from east to west face common challenges and opportunities, which are different to those faced by communities in the Western Weald

- Seeks to recognise the ecosystem services and special qualities that exist in different 'amounts' and provide opportunities for multiple benefits stemming from development, as well as constraints to growth
- Combines this with the reality of a long, relatively thin protected landscape which is strongly influenced by the areas around it

3.4 The spatial portrait stretches beyond the National Park's boundary, and acknowledges the many interdependencies and connections that exist across the boundary. For example, the Coastal Plain only covers the southern fringes of the National Park but extends southwards down to the coast. The spatial portrait and strategy have informed the National Park Authority's approach to the *Duty to Cooperate*.

FIGURE 3.4: CONCEPTUAL SPATIAL DIAGRAM OF THE SOUTH DOWNS NATIONAL PARK AND SURROUNDING AREA

3.5 Each of the broad areas and river corridors are now discussed in greater detail under the following sub-headings:

- Special qualities: describes how the special qualities are expressed within that area (**SQ references in bold**)
- Towns and villages
- Gateways: settlements outside the South Downs with good bus, ferry or rail links to the wider region and beyond, and bus and cycle links into the National Park
- Hubs: settlements in the National Park that have public transport links, accommodation and hospitality businesses and tourist information points
- Ecosystem services: benefits people and society get from the natural environment. Most ecosystem services are provided Park-wide, but the stock of natural capital from which these services flow does vary spatially between the different areas. This differentiation is particularly clear with 'provisioning services,' which are the goods or products obtained from ecosystems such as food crops and timber. Ecoserv¹⁵ maps have been produced for the whole National Park and its different areas, and are explained in more detail in the next chapter. They have been compiled into the document *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*¹⁶, which is part of the core document library and will be updated as new data becomes available (**main type of ecosystem service in bold**)
- Challenges and issues: identifies distinctive challenges and opportunities for individual broad areas

3.6 The settlements, strategic sites, gateways and hubs for the broad areas and river corridors are listed in Appendix 1. The *Settlement Context Study*¹⁷ provides a strategic overview of the landscape context of the settlements in the National Park.

¹⁵ EcoServ – GIS Toolkit V2

¹⁶ Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

¹⁷ Settlement Context Study: Report and User Guide (South Downs National Park Authority, 2017)

THE WESTERN DOWNS

3.7 This broad area is located in the north west of the National Park and is close to the historic city of Winchester where the South Downs Way starts.

SPECIAL QUALITIES

3.8 The Western Downs are characterised by large-scale open farmland dotted with the remnants of ancient woodland. In terms of **landscapes (SQ1)** there is Open Downland to the west. Downland Mosaic covers the central and eastern part of this area, which is intersected by Clay Plateau in places. The Western Downs contain some of the most **tranquil (SQ2)** areas and darkest night skies in the National Park. However, it also contains some areas of relatively low tranquillity, for example, the area surrounding the city of Winchester.

3.9 In terms of its **wildlife (SQ3)**, this area has a rich variety of habitats, which support a variety of rare and internationally important species. These include ancient woodland, chalk grassland fragments, and the River Itchen, within the north-western boundary of the National Park. This is a chalk stream which is designated both as a Special Area of Conservation (SAC) and a Site of Special Scientific Interest (SSSI) due to its high-quality habitats, which support a range of protected species including the water vole and otter.

3.10 In this area, **farming and new enterprise (SQ4)** takes the form of larger, diversified holdings such as the Rotherfield Estate which include arable, managed woodland, shoots and fisheries. Nationally important watercress production occurs in the Itchen Valley.

3.11 Opportunities **for access (SQ5)** are more dispersed than in some of the other areas where the National Park is narrower with a larger population close at hand. Winchester is linked to its adjacent downland by the South Downs Way, and there are other hotspots, such as Cheesefoot Head.

3.12 This broad area also has a rich **cultural heritage and historical features (SQ6)**, including the site of the Battle of Cheriton (English Civil War battle of 1644) and the National Trust house and garden at Hinton Ampner.

3.13 Picturesque villages, many with literary links, are situated in the Western Downs, such as Chawton, which was home to Jane Austen. These **distinctive settlements (SQ7)** are more scattered than in other areas of the National Park as they are less strongly influenced by the drainage pattern and the proximity of rivers or springlines.

TOWNS AND VILLAGES

3.14 There are no market towns in this area of the National Park. Villages in the Western Downs are clustered along the northern boundary of the National Park and relate most closely to the gateway towns, along the A31 corridor.

GATEWAYS

3.15 The city of Winchester is the main western gateway to the National Park and is the county town of Hampshire. Alton and Alresford are smaller gateways to the north.

HUBS

3.16 There are no hubs within this sparsely populated area of the National Park.

ECOSYSTEM SERVICES

3.17 Food provision in the Western Downs is of national importance with extensive areas of arable production including fodder crops for livestock. The chalk rivers and streams in this area are among the finest in the world, providing high-quality water for domestic, agricultural and commercial uses including paper mills, fish farms and water cress beds (**provisioning services**). The high relative tranquillity and sense of isolation in this area provides a **cultural service** to visitors and locals.

CHALLENGES AND OPPORTUNITIES FOR THE WESTERN DOWNS

3.18 Parts of the Western Downs are easily accessible from more densely populated areas around the National Park, such as Winchester and Alton, and there are opportunities to create better multi-user routes and circular itineraries based on railway stations.

3.19 A specific challenge in this area lies with the need to safeguard the important habitats and species of the Itchen and to reconcile these with the commercial imperatives of watercress production by finding more sustainable methods of cultivation and processing.

THE WESTERN WEALD

3.20 The Western Weald runs from the northernmost point of the National Park at Alice Holt Forest down to the market town of Petersfield, and east along to Petworth and Pulborough.

SPECIAL QUALITIES

3.21 The Western Weald is made up of wooded hills, deep valleys and open heaths linked by sandy sunken lanes. It includes Black Down, which is the highest point in the National Park.

3.22 This area is made up of a diverse range of types of **landscapes (SQ1)**, including the following SDILCA areas – Scarp Footslopes, Greensand Terrace, Mixed Farmland and Woodland Vale, Wealden Farmland and Heath Mosaic, Sandy Arable Farmland, Greensand Hills, Low Weald and Major Scarp. It has some of the most **tranquil (SQ2)** areas and darkest night skies in the National Park, such as Ambersham Common. However, it also contains some areas of relatively low tranquillity, for example, along the northern boundary and around the towns of Petersfield, Midhurst and Petworth.

3.23 The area has a rich variety of **wildlife (SQ3)**. This includes the river Rother, which is unusual in that it flows through chalk and greensand, large areas of ancient semi-natural woodland and a chain of lowland heathland sites. Internationally important woodland sites include Ebernoe Common NNR/SAC and The Mens SAC. Heathlands are of considerable international biodiversity importance and home to a large number of rare plants, insects, birds, amphibians and reptiles. Designated sites and priority sites include Woolmer Forest SAC and the Wealden Heaths (Phase II) SPA.

3.24 The thin sandy soils in the majority of the Western Weald provide very poor agricultural land for **farming and new enterprise (SQ4)** and instead there is a large amount of heathland and woodland. However, there are areas of

Grade 3 and Grade 2 agricultural land; the most fertile soils being found in the north and alongside the River Rother in Hampshire. Ancient, species-rich and ecologically important coppice woodlands, traditionally intensively managed for fuel and timber, are a feature, and the area is home to a number of wineries.

3.25 There are particular opportunities for **access (SQ5)** to activities based on the special qualities of the National Park. These include large areas of open access land and accessible woodland. Examples include Alice Holt Forest, Black Down, Iping Common, Woolbeding Common and the Serpent Trail.

3.26 There are **rich cultural heritage and historical features (SQ6)** in the area, including Cowdray Park and Petworth Park, and the historic market towns of Petersfield, Midhurst and Petworth. There are a number of large ponds, representing hammerponds associated with the Wealden iron industry or later mill ponds, and the most significant Bronze Age barrow cemetery in the National Park is on Petersfield Heath.

TOWNS AND VILLAGES

3.27 Four of the National Park's five main settlements are located in the Western Weald, namely Petersfield, Liss, Midhurst and Petworth. These settlements serve a wide rural hinterland. Petersfield lies well-hidden from longer views in the valley of the Rother, with a historic core and medieval market square. It is well connected, situated on the A3 and a mainline railway line between London and Portsmouth. Liss is sometimes known as the 'hidden village' located in the wooded valley of the River Rother. It is also well connected by road and rail to London and the south coast. Midhurst and Petworth are smaller market towns than Petersfield located in the heart of the National Park. The historic town of Midhurst is located on a key junction of the A272 and A286 and on the River Rother; it is located close to Cowdray House and Park and the home to the ruin of the Tudor Cowdray House. Petworth is the centre of a nationally significant antiques trade. It is home to the 17th century Petworth House situated on the edge of town, with high walls surrounding the house and Capability Brown designed gardens.

GATEWAYS

3.28 Liphook, Haslemere and Pulborough all provide easy access to the National Park from their train stations and have direct services to London.

HUBS

3.29 Petersfield, Liss, Midhurst and Petworth all provide a variety of services for visitors to the National Park.

ECOSYSTEM SERVICES

3.30 The heavily wooded Western Weald has one of the highest densities of ancient woodlands in England and provides a number of **provisioning services** particularly timber from commercial plantations on the larger estates. It is a mixed farming area producing significant amounts of cereals and arable crops and is important for livestock including sheep, pigs and cattle. Vineyards are increasingly a feature on the south facing slopes. This broad area forms part of a sandstone aquifer, which has an important role in maintaining springs and base flows into rivers. The woodlands and heaths of the Western Weald provide **regulating services**, for example, through carbon sequestration and storage. The woods at Alice Holt provide **cultural services** to children and young people with school field trips and forest schools.

CHALLENGES AND OPPORTUNITIES FOR THE WESTERN WEALD

3.31 There are opportunities to improve facilities in the three market towns.

3.32 The redevelopment of the former Syngenta site in Fernhurst provides an opportunity for an exemplar sustainable development of a strategic scale.

3.33 Heathlands are very vulnerable to rapid loss and degradation, for example, through neglect, and require careful management.

3.34 There is a risk of creeping urbanisation encroaching on the hills, which would dilute the hidden character of most of the larger settlements.

THE SCARP SLOPE

3.35 The Scarp Slope runs from Butser Hill in the west to Eastbourne in the east and is the steep, largely north facing aspect of the South Downs. It also runs north from Petersfield to mark the edge of the Western Downs. There are many picturesque springline settlements at the foot of the chalk Scarp Slope.

SPECIAL QUALITIES

3.36 The escarpment provides sweeping views north across the Weald. Distinctive sunken lanes link the Western Weald with the scarp slopes emerging on open commons such as Noar Hill, known for its wild flowers and rare butterflies like the brown hairstreak.

3.37 This area is made up of a diverse range of inspirational **landscapes (SQ1)** as defined in the SDILCA. The Major Scarp, Greensand Terraces and Scarp Foothills run from Petersfield in the west to Eastbourne in the east and north towards Alton.

3.38 This broad area has a rich variety of **wildlife (SQ3)**. Designated sites and priority habitats include Old Winchester Hill NNR, Butser Hill SAC/NNR, Ashford Hangers NNR and which is also part of East Hampshire Hangers SAC, Rook Cliff SAC, Duncton to Bignor Escarpment SAC, Lewes Downs (Mount Caburn) NNR and Lewes Downs SAC, together with many other fragments of chalk grassland and deciduous woodland.

3.39 In terms of **farming and new enterprise (SQ4)**, the steep topography in much of this area has meant that conversion of grassland to arable has been less prevalent as has wholesale intensive forestry despite the heavily wooded nature of the central downs. However, less livestock has meant many important habitats have been under grazed. More intensive arable cultivation is the norm on the clay soils below.

3.40 There are particular opportunities for **access (SQ5)** and overnight stays linked to the South Downs Way. Along the route there are a number of landmarks and key visitor attractions, including Butser Hill, Chanctonbury Ring, Devil's Dyke and Ditchling Beacon. This broad area also has a rich **cultural heritage and historical features (SQ6)**, including Charleston Farmhouse,

Roman villas such as at Bignor, Iron Age hill forts and Parham House and Gardens.

3.41 At the foot of the chalk slopes and hangers are a number of springline villages including the village of Selborne, which was the home to the 18th century 'father of ecology' Gilbert White.

TOWNS AND VILLAGES

3.42 Villages are distributed along this broad area as far east as Ditchling. The strongest relationships are mainly with towns outside the broad area such as Midhurst and Petersfield in the Western Weald.

GATEWAYS

3.43 There are a number of gateways that lie just outside the National Park and cover both the scarp and dip slopes such as Worthing, Brighton & Hove, Eastbourne, Polegate, Storrington, Steyning and Hassocks.

HUBS

3.44 There are no notable hubs on the scarp slope.

ECOSYSTEM SERVICES

3.45 The lowland calcareous grassland that covers the Scarp Slope has been called the European equivalent of tropical rainforest as up to 45 species of flowering plants can be found within one square metre of this habitat. This is part of a **supporting service** that helps to maintain the other ecosystem services. The breath-taking views from the top of the Scarp Slope from, for example, Butser Hill and Ditchling Beacon are a form of **cultural service** from which people derive happiness and inspiration. The sheep that graze the steep Scarp Slope are an important source of local and regional food and provide a **provisioning service**. The underlying chalk aquifers act as a storage reservoir forming the principle source of water for all of the settlements in and around the South Downs ridge. This in turn provides **regulating services** with the chalk geology acting as a natural filtering system, which helps to maintain the chemical and ecological status of water bodies in and around the Dip Slope.

CHALLENGES AND OPPORTUNITIES FOR THE SCARP SLOPE

3.46 Flooding is the major challenge for the springline villages that run along the bottom of the scarp slope. There is great potential for these communities to benefit from being access points and gateways for visitors coming to the National Park. There is also a need for more good-quality, low-cost accommodation for users of the South Downs Way. The challenge, given the small size of most settlements, the narrow roads and the scarcity of parking, is to provide facilities and routes which encourage more walkers and cyclists and fewer cars. There is also a need to spread visits across a wider area to reduce pressure on hotspots such as Devil's Dyke.

3.47 The views out from the Scarp Slope are one of the reasons so many people visit this area. These views of the surrounding landscapes are vulnerable to development, such as creeping urbanisation on the lower scarp slope, which has the potential to create intrusion and alter the scale of views due to urbanising and incongruous elements.

THE DIP SLOPE

3.48 The Dip Slope extends along the entire length of the South Downs ending in the east at the spectacular sheer white cliffs of the Sussex Heritage Coast. This broad area includes villages such as Twyford, Singleton and Findon, and parts of country estates such as Uppark and Goodwood. Along with the Scarp Slope, it includes the downland part of the Brighton and Lewes Downs Biosphere Reserve, one of six areas (including the Isle of Man) in the United Kingdom recognised by UNESCO.

SPECIAL QUALITIES

3.49 In terms of **landscapes (SQ1)**, the south-facing chalk Dip Slopes are intersected by river valleys, until the eastern end where the Dip Slope ends dramatically at the white cliffs of the Seven Sisters and Beachy Head.

3.50 The Dip Slope includes parts of the following landscape types defined in the SDILCA – Chalk Valley Systems (associated with the Rivers Itchen, Meon

and Lavant), Downland Mosaic, Wooded Estate Downland, Upper Coastal Plain and Open Downland.

3.51 The area has a rich variety of **wildlife (SQ3)**. There are extensive areas of deciduous and coniferous woodland, such as Queen Elizabeth Country Park, Houghton and Friston Forests. Other designated sites and priority habitats include Kingley Vale National Nature Reserve (NNR) and Special Area of Conservation (SAC), one of Europe's finest yew forests, areas of outstanding south facing Dip Slope chalk grassland such as at Castle Hill NNR/SAC near Brighton and Lullington Heath NNR.

3.52 To the west, the River Meon is a high quality chalk stream which supports a range of protected species including the water vole and otter. To the east there are important coastal, marine and estuarine habitats, including the chalk sea cliffs which are home to breeding colonies of seabirds such as kittiwakes and fulmars. A Marine Conservation Zone (designated in 2013) protects the chalk reef offshore and runs from Brighton Marina to Beachy Head, providing a valuable habitat supporting species such as the Short-snouted Seahorse.

3.53 The majority of the Dip Slope is Grade 3 agricultural land (**farming and new enterprise (SQ4)**). However, there are pockets of Grade 2, some of the most fertile soils in the National Park. The farmed south-facing slopes provide for a range of food and drink production, including arable, grazing, vineyards such as those at Hambledon and Alfriston, and breweries such as those at Dundridge and Lewes.

3.54 The Dip Slope has many **access (SQ5) opportunities with Rights of Way (RoW)** linking the coast to the crest of the South Downs, long-distance footpaths such as the Monarch's Way and large areas of accessible woodland and estates open to the public. This broad area also has a rich **cultural heritage and historical features (SQ6)**, including West Dean Estate, Weald and Downland Open Air Museum and Goodwood.

TOWNS AND VILLAGES

3.55 The villages on the Dip Slope are nearly all situated in southern-oriented valleys and have relationships of varying strength with towns beyond

the southern boundary of the National Park. The exceptions are Twyford in Hampshire and East Dean in East Sussex, at either end of the National Park, which look across the chalk ridge towards Winchester and Eastbourne respectively.

GATEWAYS

3.56 There are a number of gateways that lie just outside the National Park and cover both the scarp and dip slopes such as Worthing, Brighton & Hove, Eastbourne, Polegate, Storrington, Steyning and Hassocks. Shawford is a western gateway providing convenient access to the Itchen Way and the village of Twyford.

HUBS

3.57 Stanmer is an important hub on the Dip Slope located close to Falmer Station and with cycle links both into Brighton and the South Downs.

ECOSYSTEM SERVICES

3.58 The gently sloping, south facing Dip Slope provide many of the **provisioning services** within the National Park. This includes viticulture, cereal production, sheep grazing and both beef and dairy cattle. The underlying chalk aquifers provide the same **regulating and provisioning services** described for the Scarp Slope. There are a number of notable attractions on the Dip Slope that provide world famous **cultural services** such as Glyndebourne, home to the world famous opera festival.

CHALLENGES AND OPPORTUNITIES FOR THE DIP SLOPE

3.59 The Dip Slope is easily accessible from the densely populated Coastal Plain and so similar challenges and opportunities arise in ensuring that extra visitor pressure does not damage the special qualities. Improving the RoW network as a whole and providing new off-road multi-user routes can also relieve the pressure on very sensitive sites such as Kingley Vale.

3.60 Areas of more fertile soil on these warm south-facing slopes, coupled with the effects of climate change, mean there are particular opportunities for viticulture and wine production. As this is one of the most productive

areas agriculturally, the incentive for more intensive production and related agricultural developments is higher than in other areas, and over time more sustainable ways to farm on the thin chalk soils may be found which provide benefits in terms of carbon sequestration and reducing soil erosion alongside crop production. The potential fragmentation of the remaining Dip Slope chalk grassland habitats is a key challenge for the National Park.

3.61 The undeveloped coast is an important aspect of the National Park landscape. The boundary of the National Park was intentionally drawn to include several narrow locations in addition to the Heritage Coast where settlements do not extend across the coastline. These areas are subject to particular developmental and recreational pressures from surrounding urban settlements.

THE COASTAL PLAIN

3.62 The northernmost part of the Coastal Plain is located within the National Park. The entire Coastal Plain extends southwards from the South Downs to the Solent and the English Channel and includes large towns and cities such as Southampton, Portsmouth and Chichester.

SPECIAL QUALITIES

3.63 The fragments of this broad area that lie within the National Park include Wooded Claylands, Upper Coastal Plain and Shoreline **landscapes (SQ1)**.

3.64 Due to the proximity of large urban areas to the south, much of this area is relatively less **tranquil (SQ2)** than others in the National Park, and light pollution is more prevalent; this makes the parts that are quieter and have darker skies particularly special.

3.65 In terms of **farming & new enterprise (SQ4)**, this broad area and the adjacent Dip Slope to the north, include some of the most fertile soils in the National Park, which has led to a larger proportion than elsewhere of intensively farmed Grade 2 agricultural land.

3.66 The proximity of the coastal towns and the largely gentle topography means there are particular opportunities to provide **access (SQ5)**, for example, to areas of accessible woodland such as West Walk in the Forest of Bere.

3.67 There are rich **cultural heritage and historical features (SQ6)** in the Coastal Plain area, which has been settled from prehistoric times forward.

3.68 The part of the Coastal Plain located within the National Park is sparsely populated with small hamlets and valley villages (**distinctive towns and villages (SQ7)**), such as Lavant. Many of these are relatively well connected to settlements beyond the southern boundary, on which they rely for many essential services.

TOWNS AND VILLAGES

3.69 The villages within the fragment of the Coastal Plain within the National Park are all closely related to the city of Chichester.

GATEWAYS

3.70 Chichester is the main gateway into the Coastal Plain within the National Park.

HUBS

3.71 There are no notable hubs on the Coastal Plain within the National Park.

ECOSYSTEM SERVICES

3.72 It is mainly provisioning services that are provided here, with highly fertile soils covering the river flood plains; this broad area also overlies chalk aquifers.

CHALLENGES AND OPPORTUNITIES FOR THE COASTAL PLAIN

3.73 There is very significant development pressure on this southernmost broad area because of the growth of housing to the north of the coastal towns and along the A27. The A27 itself forms a noisy and congested barrier to people from the south accessing the National Park. As the population of the

wider Coastal Plain grows, the thin strip within the National Park provides opportunities for family days out, hiking, cycling, dog walking and other leisure activities. Managing this increased pressure so that visitors can discover, enjoy, understand and value the National Park without damaging its special qualities is a challenge. As the first point of entry from the south, this area can play a part by providing good facilities at gateway points which orientate visitors, raise awareness of the importance of the landscapes and encourage more sustainable travel choices and behaviour.

3.74 Significant parts of this broad area are at a relatively higher risk from coastal, groundwater and/or fluvial flooding. To ensure these areas are adapting well to the impacts of climate change will involve using natural processes such as changes in cultivation and land-use in flood sensitive zones rather than major engineering solutions more suited to urban areas.

RIVER ARUN CORRIDOR

3.75 The source of the River Arun lies outside the National Park to the east of Horsham. It flows north-south across the National Park from Pulborough to Arundel and enters the English Channel at Littlehampton. Its main tributary is the River Rother.

SPECIAL QUALITIES

3.76 In terms of **landscapes (SQ1)**, the River Arun flows through Major River Floodplains and Major Valley Sides.

3.77 The Arun Valley area has a rich variety of **wildlife (SQ3)** and is designated partly as an SAC, SPA and Ramsar site and partly as a Local Wildlife Site. Pulborough Brooks is an RSPB reserve that can be accessed from the gateway village of Pulborough. The Wildfowl and Wetlands Trust reserve at Arundel is also at a gateway location. Both sites are important in providing managed **access (SQ5)** to the sensitive wildlife of the valley.

3.78 The Arun Valley has many rich **cultural heritage and historical features (SQ6)** including the Castle Park of Arundel, which forms a southern gateway, the industrial museum at Amberley, the painted church at Hardham, and the

route of the Wey and Arun Canal north of Pulborough. The villages of Bury and Burpham have literary connections.

TOWNS AND VILLAGES

3.79 The villages of Bury, Amberley, Coldwaltham and Watersfield are located in the Arun Valley.

GATEWAYS

3.80 Arundel and Pulborough are important gateways into the National Park.

HUBS

3.81 Amberley Station forms a small hub in this river corridor.

ECOSYSTEM SERVICES

3.82 The principal ecosystem services provided by all the river corridors are **regulating services** particularly the regulation of water timing and flows. However, the River Arun has lost much of its flood storage capacity through land drainage and conversion for agriculture. In terms of **provisioning services** highly fertile soils cover the river flood plains and significant areas have been drained and converted to intensive agriculture. There are extensive areas of brooks and flood plain grazing marshes on the lower stretches of the River Arun at Amberley. There are also **cultural services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

CHALLENGES AND OPPORTUNITIES FOR THE RIVER ARUN CORRIDOR

3.83 The principal challenge for all the river corridors relate to flooding. The principal opportunities relate to recreational opportunities along the river.

RIVER ADUR CORRIDOR

3.84 The River Adur is formed at the confluence of the western Adur and eastern Adur just west of Henfield. It flows north to south across the National Park from Coombes Farm and through a gap in the South Downs near Lancing College where it is fed by the Ladywell Stream. It travels past the strategic

site of Shoreham Cement Works and leaves the National Park just north of Shoreham-by-Sea. It enters the English Channel at Shoreham-by-Sea.

SPECIAL QUALITIES

3.85 In terms of **landscapes (SQ1)**, the River Adur flows through Major River Floodplains and Major Valley Sides.

3.86 Coombes Farm gives visitors an insight into the **farming way of life (SQ4)** of the South Downs.

3.87 The **historic buildings (SQ6)** of Bramber village and Lancing College mark the northern and southern entrances to the section of valley in the National Park.

3.88 The Downs Link non-motorised travel route runs along the Adur Valley, providing opportunities for **access (SQ5)**.

TOWNS AND VILLAGES

3.89 There are no notable settlements in that part of the National Park within the Adur Valley.

GATEWAYS

3.90 Shoreham-by-Sea is an important gateway to the south of the National Park.

HUBS

3.91 There are no notable hubs in this river corridor although Shoreham Cement Works does offer opportunities to become an important hub for the National Park.

ECOSYSTEM SERVICES

3.92 The main ecosystem services provided by all the river corridors are **regulating services** particularly the regulation of water timing and flows. The Adur's floodplain and wetlands retain water, which can decrease flooding and reduce the need for engineered flood control infrastructure. There are

also **cultural services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

CHALLENGES AND OPPORTUNITIES FOR THE RIVER ADUR CORRIDOR

3.93 The principal challenge for all the river corridors relates to flooding. The principal opportunities relate to recreational opportunities along the river and in the case of the River Adur these principally lie at Shoreham Cement Works. The river corridors are all substantially tidal, which limits their recreational use.

RIVER OUSE CORRIDOR

3.94 The River Ouse rises near Lower Beeding and then travels eastwards into East Sussex. It flows into the National Park near Hamsey and through the town of Lewes where it is crossed by Willey's Bridge, the Phoenix Causeway next to North Street Quarter, and Cliffe Bridge. It flows on past the villages of Glyde, Rodmell and Southease and leaves the National Park just south of Piddinghoe. It enters the English Channel at Newhaven.

SPECIAL QUALITIES

3.95 In terms of **landscapes (SQ1)**, the River Ouse flows through Major River Floodplains and Major Valley Sides.

3.96 In terms of its **distinctive towns and villages (SQ7)**, Lewes is considered to be one of the best preserved small market towns in England, with significant artistic and **cultural heritage (SQ6)** making it a popular tourist destination. Springline settlements lie at the foot of the chalk scarp, including the village of Rodmell, which has literary connections with Virginia Woolf.

3.97 A large part of the floodplain is designated as Lewes Brooks SSSI for its nationally important **wildlife and habitats (SQ3)**, notably in the ditches that criss-cross the area.

3.98 The South Downs Way crosses the River Ouse at the small hamlet of Southease, which has a railway station served by trains direct from Brighton, and from London via Lewes. The construction of the Egrets Way multi-user route

along the river provides an opportunity to improve **access (SQ5)** to the valley for walkers, cyclists, mobility scooters and, in places, horse-riders.

TOWNS AND VILLAGES

3.99 The historic market town of Lewes is located in the River Ouse corridor and is the county town of East Sussex. The villages of Kingston-near-Lewes and Rodmell also lie on the valley sides.

GATEWAYS

3.100 Newhaven, with its ferry service, is a gateway into the National Park from the continent.

HUBS

3.101 Lewes is also an important hub within the National Park providing a full and varied range of services and attractions to visitors.

ECOSYSTEM SERVICES

3.102 The principal ecosystem services provided by all the river corridors are **regulating services** particularly the regulation of water timing and flows. The Ouse's floodplain and wetlands retain water, which can decrease flooding and reduce the need for engineered flood control infrastructure. In terms of **provisioning services** highly fertile soils cover the river flood plains and significant areas have been drained and converted to intensive agriculture. There are extensive areas of brooks and flood plain grazing marshes at Lewes Wild Brooks. There are also **cultural services** with people enjoying both recreational pursuits and the aesthetic qualities of this major river.

CHALLENGES AND OPPORTUNITIES FOR THE RIVER OUSE CORRIDOR

3.103 A key challenge for the town of Lewes is flooding as it is located on a stretch of the River Ouse where it flows southwards through a narrow gap in the South Downs. Restoring the natural capacity of the floodplain to the north of the town to absorb floodwater also brings opportunities in terms of wildlife and access. The redevelopment of the North Street Quarter of Lewes offers major regeneration opportunities for the town and the wider area.

RIVER CUCKMERE CORRIDOR

3.104 The River Cuckmere rises near Heathfield, flows across the Weald and enters the National Park just north of Alfriston. The Cuckmere Valley Nature Reserve is located on the lower estuary stretch of the river and it flows into the English Channel on the Sussex Heritage Coast at Cuckmere Haven.

SPECIAL QUALITIES

3.105 In terms of **landscapes (SQ1)**, the River Cuckmere flows through Major River Floodplains and Major Valley Sides. The meanders of the River Cuckmere are an iconic feature of the National Park.

3.106 Multiple opportunities exist for **access (SQ5)**, with Berwick station nearby, the Seven Sisters Country Park and footpaths along the river.

3.107 Alfriston is a **distinctive, historic settlement (SQ6, SQ7)** that is a magnet for visitors to the area.

3.108 The southern part of the valley is designated as an SSSI for its **wildlife (SQ3)**, in particular for its plants and birds. The Cuckmere is one of few undeveloped estuaries along this stretch of coastline.

TOWNS AND VILLAGES

3.109 The picturesque and historic village of Alfriston is located on the River Cuckmere.

GATEWAYS

3.110 There are no notable gateways into the River Cuckmere Corridor.

HUBS

3.111 The Seven Sisters Country Park at Exceat forms a small hub next to the river.

ECOSYSTEM SERVICES

3.112 The principal ecosystem services provided by all the river corridors are **regulating services**, particularly the regulation of water timing and flows. The Cuckmere Valley provides **supporting services** in terms of biodiversity and

regulating services in relation to water flow. In terms of **cultural services** there is a sense of relative remoteness and wildness associated with the undeveloped heritage coast and Cuckmere Haven.

CHALLENGES AND OPPORTUNITIES FOR THE RIVER CUCKMERE CORRIDOR

3.113 The principal challenge for all the river corridors relate to flooding. The principal opportunities relate to recreational opportunities along the river and in the case of the River Cuckmere these opportunities can be accessed at the Seven Sisters Country Park hub at Exceat.

THE SPATIAL STRATEGY

3.114 The spatial strategy seeks to deliver the vision and objectives of the Local Plan. It guides how the National Park will evolve and develop over the plan period (2014 – 2033). **Having regard to the landscape and five broad areas and river corridors, the spatial strategy for the South Downs Local Plan is for a medium level of growth dispersed across the towns and villages of the National Park.** This starts from the following key principles:

- The Local Plan must first and foremost reflect the purposes of the National Park, and is therefore based on the capacity of the landscape to accommodate growth (landscape-led); and
- Pursuant to this, the Local Plan must reflect the duty of the National Park, and should therefore seek to foster the economic and social wellbeing of local communities, across the breadth of the National Park.

3.115 The spatial strategy therefore seeks to ensure that our towns and villages remain vibrant centres, whilst conserving and enhancing the special qualities.

3.116 There are several hundred settlements in the National Park, ranging from a collection of a few buildings, to large market towns. However, the spatial strategy of dispersed growth is limited to the 53 settlements listed in Policy SD25: Development Strategy of this Plan. These are the settlements for which there are defined boundaries, and where the principle of growth is accepted.

LEVEL AND DISTRIBUTION OF HOUSING GROWTH

3.117 The level and distribution of growth is informed by a robust evidence base and engagement exercise that incorporates the results of informal and formal consultations on the Local Plan. The proposed **level** of housing growth is a matter that has been carefully considered through a wide ranging evidence base including the *Housing and Economic Development Needs Assessment (HEDNA)*¹⁸, (which builds on the *Strategic Housing Market Assessment (SHMA)*¹⁹), the *Strategic Housing Land Availability Assessment (SHLAA)*²⁰, and the *Sustainability Appraisal (SA)*²¹. The scenarios considered in the context of a landscape-led approach were:

1. **Low growth:** the minimum number of homes needed to maintain the size of the current population;
2. **Medium growth:** the number of homes to reflect the historic delivery rate in the area now covered by the South Downs National Park, for the period 2004 – 2014;
3. **Medium growth + 60%:** the number of homes to reflect the Winchester, East Hampshire and Lewes Joint Core Strategies, **and** a 60% uplift on historic delivery for settlements outside the Joint Core Strategy areas; and
4. **High growth:** projects forward population growth for the period 2013 – 2033 based on five year trends, as set out in the SHMA – this scenario fully meets the objectively assessed housing need (OAN) identified in the HEDNA.

3.118 For each of these scenarios, two high-level development strategies were initially considered: dispersed development, where development would be spread across a wide range of settlements, and a concentrated strategy, where

housing growth would be restricted to the five key settlements of Petersfield, Lewes, Midhurst, Liss and Petworth.

3.119 Some scenarios were, at an early stage, considered not to be reasonable alternatives. Low growth would have resulted in little growth occurring anywhere but the five large settlements, which would fail to meet social and economic sustainability objectives. For higher growth scenarios, a concentrated strategy would lead to such high levels of development in the larger settlements that negative landscape impacts would be inevitable.

3.120 Of the remaining options tested through the SA, it was determined that a ‘dispersed **medium**’ development strategy would do most to promote the vitality of a wide range of settlements in the National Park and support the rural economy, whilst protecting and enhancing the special qualities of the National Park. The SA also identified the sustainability benefits of encouraging development in a range of small settlements to support local services, rather than limiting growth only to locations with public transport opportunities.

3.121 A dispersed **medium** development strategy also reflects the outcome of public consultation. There has been strong community support for addressing local housing need within many settlements across the National Park. Equally, there was little appetite within the large settlements for high levels of growth over the period of the Local Plan, given their landscape setting.

OBJECTIVELY ASSESSED HOUSING NEED AND THE DUTY TO COOPERATE

3.122 The ‘objectively assessed need’ for housing (OAN) is the forecast amount of housing needed for an area to fully meet the needs of its population. Footnote 9 of the *National Planning Policy Framework (NPPF)* identifies national parks as an area where development should be restricted and OAN does not need to be met, notwithstanding the more generally applied national policy requiring local plans to meet the full OAN for housing in the housing market area. For the South Downs National Park, the HEDNA has set out a housing need of 447 new dwellings per year. The SA has confirmed that the National Park Authority would not be meeting its statutory purpose if it were to seek to fully meet the OAN within the National Park boundaries. Figure 3.5

¹⁸ Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

¹⁹ Strategic Housing Market Assessment (G.L. Hearn, 2015)

²⁰ South Downs Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

²¹ South Downs Local Plan Sustainability Appraisal (AECOM, 2014, 2015 and 2017)

sets out the overall picture of housing provision in the South Downs Local Plan, compared with the OAN range as advised in the HEDNA.

FIGURE 3.5: HOUSING PROVISION COMPARED WITH OAN

Annualised OAN in the National Park (over whole Plan period)	447 (8,493)
South Downs Local Plan housing provision (over the whole Plan period)	250 (4,750)
Annual shortfall in the National Park (over the whole Plan period)	197 (3,743)

3.123 The National Park Authority has tested all known possible housing sites for development potential through the SHLAA, and made provision for housing within a limited landscape capacity. The National Park Authority is also working with partner authorities to fully test all reasonable options for meeting unmet housing need in suitable locations outside the National Park boundaries. Chapter 1 of this Local Plan explains what the National Park Authority has done to engage positively with its neighbouring local authorities and others on cross-boundary issues, including housing. The *Duty to Cooperate Statement*²² sets out further details of how the unmet need relates to specific district, borough and city areas, and also sets out in detail the processes by which partners are seeking to address the need.

LEVEL AND DISTRIBUTION OF EMPLOYMENT AND RETAIL GROWTH

3.124 This Local Plan seeks to provide local employment and facilities primarily to address the social and economic wellbeing of local communities, and to provide for local businesses that contribute to the special qualities of the National Park. Chapter 7 sets out relevant strategic policies.

3.125 The HEDNA indicates a modest need for new employment land supply, and much of the requirement is met by extant planning permissions. Opportunities for new sites, as well as extant permissions, are focused on

larger settlements. The SA recognised that the National Park's business base is based on small businesses that do not require large scale allocations. The spatial strategy for employment is therefore to focus on safeguarding local employment sites, and modest employment growth in the main towns.

3.126 The spatial strategy for retail is focused on supporting and sustaining local settlements and the rural economy. The market town centres within the National Park are Petersfield, Midhurst, Petworth and Lewes. Liss forms a larger village centre and smaller village centres are identified at Alfriston, Ditchling, Fernhurst and Findon.

3.127 There is no provision in the spatial strategy for strategic or large scale retail development, as this would not be appropriate for a National Park.

BROAD AREAS

3.128 The spatial strategy applies across all the broad areas and river corridors and will be delivered through the policies of this Local Plan. It follows that the Local Plan policies will need to be interpreted in slightly different ways in the different areas if they are to operate effectively. For example, opportunities for agricultural diversification exist throughout, but we are likely to see more applications for development related to vineyards across the Dip Slope, and more for woodfuel supply chains in the Western Weald. The spatial portrait and spatial strategy will help to inform the preparation of further Neighbourhood Development Plans (NDP). Planning applications should reference the spatial portrait and spatial strategy as appropriate.

²² *Duty to Cooperate Statement (South Downs National Park Authority, 2017)*

4

CORE POLICIES

4.1 The core policies set out in this chapter provide the overarching framework for evaluating all development proposals in the National Park. These core policies will be used in the assessment of all planning applications and thereby avoids the need for duplicating criteria in other policies. The core policies apply equally across the National Park. The three core policies relate to sustainable development, ecosystem services and major development.

4.2 These core policies are relevant to all the Local Plan objectives.

MANAGING DEVELOPMENT IN THE NATIONAL PARK

INTRODUCTION

4.3 The *NPPF* sets out how the presumption in favour of sustainable development is a golden thread running through both plan-making and decision-making. This means that local planning authorities should positively seek opportunities to meet the development needs of their area. They should also take a positive approach when deciding planning applications. Core Policy SD1 and its supporting text reflects these principles, within the context of the National Park's statutory purposes and duty. The supporting text also provides general guidance to clarify on the development management process.

Core Policy SD1: Sustainable Development

1. When considering development proposals that accord with relevant policies in this Local Plan and with National Park purposes, the Authority will take a positive approach that reflects the presumption in favour of sustainable development. It will work with applicants to find solutions to ensure that those development proposals can be approved without delay, unless material planning considerations indicate otherwise.
2. The National Park purposes are i) to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and ii) to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. Where it appears that there is a conflict between the National Park purposes, greater weight will be attached to the first of those purposes. In pursuit of the purposes, the National Park Authority will pay due regard to its duty to seek to foster the economic and social well-being of the local communities within the National Park.
3. When determining any planning application, the Authority will consider the cumulative impacts of development.
4. Planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park unless, exceptionally:
 - a) The benefits of the proposals demonstrably outweigh the great weight to be attached to those interests; and
 - b) There is substantial compliance with other relevant policies in the development plan.

4.4 The purpose of this policy is to reflect the three guiding principles of this Local Plan. The three principles are reflected in the policies that appear throughout the Local Plan. These are:

- Firstly, the presumption in favour of sustainable development set out in the *NPPF*;
- Secondly, the statutory duty of the Authority to have regard to National Park purposes when determining planning applications; and
- Thirdly, the great weight to be attached, in the determination of planning applications, to conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park.

NATIONAL PARK PURPOSES AND DUTY

4.5 The Authority will seek to achieve the right balance between conservation and recreation in the National Park when delivering the purposes of the National Park. However, at times this can cause conflict. To help national park authorities make decisions relating to conservation and recreation, the National Parks Policy Review Committee made a recommendation in 1974, which is now known as ‘*The Sandford Principle*’. This principle was included in the *Environment Act 1995 (as amended)* which states that: “*If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area*”.

4.6 The *Environment Act 1995 (as amended)* states that a national park authority, in pursuing the purposes, shall seek to foster the economic and social well-being of local communities within the national park and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of the national park.

CUMULATIVE IMPACTS OF DEVELOPMENT

4.7 It is important to consider the impact of cumulative development in the National Park. Cumulative impacts can be defined as the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments.

DETERMINATION OF PLANNING APPLICATIONS

4.8 On adoption, the *South Downs Local Plan* will form part of the statutory development plan for the whole of the National Park, along with the minerals and waste plans and ‘made’ (adopted) NDPs. It is important that the Local Plan should be read as a whole because all relevant policies apply to all planning applications. Decisions on planning applications must be taken in accordance with the development plan unless material planning considerations indicate otherwise. It is implicit within Criterion 1 of Policy SD1 that if a development proposal does not comply with key policies in the development plan, then it will be contrary to the development plan, and may therefore be refused. The Authority is committed to working with applicants to find solutions where they are seeking to conserve and enhance the landscapes of the National Park in accordance with the development plan.

4.9 The application of planning policies will be proportionate to the nature and scale of development proposals, and the combination of policies will depend on the details of the development proposal.

4.10 A material planning consideration is one which is relevant to making the planning decision in question, and will generally be concerned with ensuring that the land use is in the public interest. The weight attached to material considerations in reaching a decision is a matter of judgement for the decision-maker.

4.11 The National Park Authority will work positively and in partnership with other local authorities to ensure that development outside of the National Park does not have a detrimental impact on its setting or otherwise prejudice the achievement of the National Park purposes. *Section 62 of the Environment Act 1995* requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes.

ECOSYSTEM SERVICES

INTRODUCTION

4.12 Ecosystem services are the benefits that people and society get from the natural environment. An ecosystems approach helps us to identify the

benefits we get from nature, value them and build them into planning, decision making and management. In Chapter 1, Figure 1.3 – The Four Aspects of Ecosystem Services illustrates how the landscapes of the South Downs provide a multitude of ecosystem services. Figure 4.1 illustrates the inter-relationships between ecosystem services and people's enjoyment and understanding of the National Park. Figure 4.2 provides further detail on ecosystem services within the National Park.

4.13 The National Park Authority adopted an ecosystems approach to the *PMP*²³, and this is embedded into the Local Plan. This has been achieved in three main ways:

- Firstly, there is a core policy on ecosystems services (SD2)
- Secondly, an assessment has been made of all the strategic and development management policies, to identify those that make a positive contribution to a significant number of ecosystem services; these are identified with the icon ★

- Thirdly, consideration was given to the site allocations, the settlements within which they sit and the ability to deliver multiple ecosystem services. Symbols and site specific development requirements relating to specific ecosystem services indicate how these sites in particular are expected to contribute. These symbols are set out in Figure 9.1 and throughout Chapter 9: Sites and Settlements

4.14 A GIS based tool (EcoServ GIS) has been developed to provide supporting evidence for the Local Plan on ecosystem services. The EcoServ models and maps have been used to map and understand the delivery of ecosystem services within the National Park in spatial terms. EcoServ maps have been generated, which have informed the spatial portrait and all the allocations in the Local Plan. Further details are set out in the evidence based study *Mapping of Ecosystem Services within the South Downs National Park using the EcoServ GIS Tool*²⁴.

²³ Partnership Management Plan: Shaping the Future of Your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

²⁴ Mapping of Ecosystem Services Within the South Downs National Park Using the EcoServ GIS Tool (South Downs National Park Authority, 2016)

FIGURE 4.1: 'PEOPLE SUPPORTING LANDSCAPE, LANDSCAPE SUPPORTING PEOPLE



FIGURE 4.2: THE FOUR ASPECTS OF ECOSYSTEM SERVICES IN THE SDNP

There are four main categories of ecosystems services, namely, supporting, provisioning, regulating and cultural services. The natural environment is a dynamic system and these four services cannot be viewed in isolation from one another. They are ecologically and functionally interdependent.

Supporting services offered by flora and fauna and micro-organisms are essential for healthy soils, habitats and nutrient cycling, which underpin the environment's natural goods and services which benefit people. The National Park has a rich variety of species, landscapes, rivers and coastline which support the other ecosystems services, such as soil and water quality.

Provisioning services relate to the products and productivity of the natural environment. Approximately 85 per cent of the National Park is farmed and its soils support it being a major producer of cereal crops, which are grown mainly on the dip slopes. These soils also support grazing and biodiversity of important native habitats and species like the Duke of Burgundy butterfly. Approximately 25 per cent of the National Park is wooded, which contributes renewable fuel like biomass. The chalk hills, which sweep across the National Park, filter and store fresh water, providing us with high-quality drinking water.

Regulating services are the controls from the natural environment. For example, rivers which help to control water flow, drainage and flooding. Rivers such as the Meon, Ouse and Cuckmere support habitats and biodiversity. Enhancing species like bees and other pollinators are vital for food crops as well as other plants and wildflowers. Woodland also prevents soil erosion and is an important resource for carbon storage which helps to mitigate climate change. These services also regulate pollution in the air, water and on land. These include regulating carbon dioxide and air quality from cars and industry, chemicals from the treatment of agricultural fields or viticulture or surface water run-off and percolation from the urban environment into rivers and ground water.

Cultural services relate to people's enjoyment of the National Park and its special qualities. The distinctive landscape of the Western Weald, the chalk ridge, scarp and dip slopes and the dramatic Seven Sisters cliffs are of inspirational value through their sense of place and tranquillity, including dark night skies. Embedded in the landscape is important cultural heritage which is rich in arts and literature, archaeological remains, traditional historic towns and villages and architecture. These special qualities and an extensive network of bridleways and footpaths enhance people's health and wellbeing.

All of these ecosystem services can be utilised and enhanced to provide for sound growth within properly understood limits. The services described above are assets that should guide all growth, hence their thinking underpins this core policy. Through careful management of development, the various provisions of ecosystem services can be used to ensure that the multiple benefits they give to society are supported and protected.

Core Policy SD2: Ecosystem Services

1. Development proposals will be permitted where they have an overall positive impact on the ability of the natural environment to contribute goods and services. This will be achieved through the use of high quality design, and by delivering all opportunities to:
 - a) Sustainably manage land and water environments;
 - b) Protect and provide more, better and joined up natural habitats;
 - c) Conserve water resources and improve water quality;
 - d) Manage and mitigate the risk of flooding;
 - e) Improve the National Park's resilience to, and mitigation of, climate change;
 - f) Increase the ability to store carbon through new planting or other means;
 - g) Conserve and enhance soils, use soils sustainably and protect the best and most versatile agricultural land;
 - h) Support the sustainable production and use of food, forestry and raw materials;
 - i) Reduce levels of pollution;
 - j) Improve opportunities for peoples' health and wellbeing; and
 - k) Provide opportunities for access to the natural and cultural resources which contribute to the special qualities.
2. Development proposals must be supported by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services.

4.15 The purpose of this policy is to embed a holistic approach to managing our natural resources sustainably for the future. Its criteria encapsulates the ecosystem services that the natural environment contributes to people. This integrated approach is important because development can have multiple effects across these services. Development proposals should take a positive

approach to the delivery of ecosystem services and take adequate account of the economic benefit of enhancing ecosystem services. There are many ways to deliver on these criteria. These should be delivered on a site by site basis with reference to the aspects of ecosystem services set out in Figure 4.2.

4.16 All planning applications should be accompanied by a statement that sets out how the development proposal impacts, both positively and negatively, on ecosystem services. The preparation of the statement should be proportionate to the impact. Use should be made of the EcoServe GIS maps, and other evidence that can be sourced from a variety of sources such as the *Habitat Connectivity Study* and the *Strategic Flood Risk Assessment (SFRA)*, when available. Two technical advice notes²⁵ have been produced by the National Park Authority, which provide checklists and further guidance to help applicants meet the requirements of Policy SD2.

4.17 This core policy should not be read in isolation but instead linked to all other Local Plan policies. For example, Criterion (d) of Policy SD2 is about managing and mitigating the risk of flooding and is linked to the ecosystem services of water flow and flood. The relevant Local Plan Policies are SD45: Green Infrastructure, SD17: Protection of the Water Environment and SD48: Climate Change and Sustainable Use of Resources. It should be noted that where more detailed applicable criteria are contained in other policies within the Plan, SD2 should be read as supporting that detailed criteria. Site specific development requirements linked to ecosystem services are set out in allocation policies as appropriate.

MAJOR DEVELOPMENT

INTRODUCTION

4.18 The *NPPF (Paragraph 116)* sets out the approach local planning authorities should take to development in national parks. The *NPPG* states that: "Whether a proposed development in these designated areas should be treated as a major development, to which the policy in Paragraph 116 of the

²⁵ Ecosystem Services and Householder Planning Applications Technical Advice Note (South Downs National Park Authority, 2018) and Ecosystem Services Technical Advice Note (Non-householder) (South Downs National Park Authority, 2018)

Framework applies, will be a matter for the relevant decision taker, taking into account the proposal in question and the local context."

4.19 The NPPF does not define major development. The National Park Authority has sought legal opinions²⁶ on what constitutes major development. These opinions are that the definition of "major development" is based on whether, prima facie, the development might potentially have adverse impacts on a national park, rather than whether, after a careful and close assessment, it will have such adverse impacts.

4.20 Major development can include various forms of both infrastructure and works associated with infrastructure projects. Development proposals should address the requirements of Policies SD3: Major Development, SD42: Infrastructure and any other specific policy relevant to that form of infrastructure.

²⁶ Legal Opinion In the Matter of the South Downs National Park Authority and in the Matter of Paragraph 22 of PPS7 (James Maurici, 2011); Legal Opinion In the Matter of the National Planning Policy Framework and In the Matter of the South Downs National Park Authority (James Maurici, 2014); Further Opinion in the Matter of the National Planning Policy Framework and in the Matter of the South Downs National Park Authority (James Maurici, 2014)

Core Policy SD3: Major Development

1. In determining what constitutes major development the National Park Authority will consider whether the development, including temporary events should they be deemed to constitute development, by reason of its scale, character or nature, has the **potential** to have a significant adverse impact on the natural beauty, wildlife or cultural heritage of, or recreational opportunities provided by, the National Park. The potential for significant adverse impact on the National Park will include the consideration of both the impact of cumulative development and the individual characteristics of each proposal and its context.
2. Planning permission will be refused for major developments in the National Park except in exceptional circumstances, and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
3. If it is considered that exceptional circumstances exist and development would be in the public interest, all opportunities to conserve and enhance the special qualities should be sought. Development proposals should be sustainable as measured against the following factors:
 - Zero Carbon
 - Zero Waste
 - Sustainable Transport
 - Sustainable Materials
 - Sustainable Water
 - Land Use and Wildlife
 - Culture and Community
 - Health and Wellbeing

4.21 The purpose of this policy is to set out how the National Park Authority will determine what constitutes major development and, if an application is deemed to constitute major development, how that application will be considered. It should be noted that this policy applies to all development proposals that require planning permission including temporary events should they be deemed to constitute development.

MAJOR DEVELOPMENT TEST

4.22 Core Policy SD3 sets out the two stages of decision making in relation to major development. Firstly, an assessment will be made to determine whether development constitutes major development. For the purposes of this policy, all of the following principles will be applied when determining whether an application constitutes major development:

- A judgement will be made in light of all of the circumstances of the application and the context of the application site
- The phrase ‘major development’ will be given its common usage, and will not be restricted to the definition of major development in the *Town and County Planning (Development Management Procedure) (England) Order 2015*, or to proposals that raise issues of national significance
- The determination as to whether the development is major development will consider whether it has the potential to have a significant adverse impact. It will not include an in-depth consideration of whether the development will in fact have such an impact
- The application of other criteria may be relevant to the considerations, but will not determine the matter or raise a presumption either way

4.23 It is important to consider the impact of cumulative development in the National Park. An individual development viewed in isolation may, in itself, constitute minor development, but when viewed with neighbouring development within the National Park could be considered to form part of a major development. In such cases the National Park Authority will apply all of the principles in Paragraph 4.22 to assess whether major development is proposed.

CONSIDERATION OF MAJOR DEVELOPMENT PROPOSALS

4.24 If the proposal is considered to be major development, then the second part of the policy will apply. It will then be assessed against the following considerations which are consistent with *Paragraph 116 of the NPPF*:

- The need for development in the location proposed. Where residential development is proposed, taking account of any local need identified by the relevant housing authority and bearing in mind that housing in the National Park should focus on the needs of its local communities;
- The possible impact on the local economy, in particular any that is specific to the site or location as opposed to general benefits such as on the construction industry;
- The cost of, and scope for, meeting the need in some other way, on the assumption that it is a local need which should ideally not be met outside the designated area (the National Park);
- Detrimental effects on the environment, including wildlife and cultural heritage, and the extent to which the effects can be moderated;
- Detrimental effects on the landscape and the extent to which the effects can be moderated; and
- Detrimental effects on recreational opportunities and the extent to which the effects can be moderated.

4.25 A consideration will then take place as to whether there is a reasonable expectation that the exceptional circumstances exist, and that it could be demonstrated that development would be in the public interest.

PRINCIPLES OF SUSTAINABLE DEVELOPMENT

4.26 The third part of the policy applies to applications for major development for which the Authority considers exceptional circumstances exist and would be in the public interest. The extent to which mitigation can overcome any detrimental effect on the environment, the landscape and recreational opportunities will be taken into account when considering proposals. Any short-term and long-term harm or adverse impact will need to be minimised and it should be clearly demonstrated how the proposals have

incorporated all opportunities to conserve and enhance the special qualities of the National Park.

4.27 The sustainability of the development proposals will be measured against the following principles of sustainable development:

- Zero Carbon – Making buildings energy efficient, supplying energy from on-site renewable sources, where possible, and seeking to deliver all energy with renewable technologies
- Zero Waste – Reducing waste generation through good design, encouraging reuse, recycling and composting and seeking to send zero waste to landfill
- Sustainable Transport – Reducing the need to travel and dependence on fossil fuel use and encouraging low and zero carbon modes of transport to reduce emissions
- Sustainable Materials – Where possible, using local, reclaimed, renewable and recycled materials in construction and products, which minimises transport emissions, encourages investment in local natural resource stocks and boosts the local economy
- Sustainable Water – Implement water use efficiency measures, reuse and recycling and minimise the need for water extraction. Designing to avoid local issues such as flooding, drought and water course pollution
- Land Use and Wildlife – Protecting and restoring biodiversity and creating new natural habitats through good land use and integration into the built environment
- Culture and Community – Celebrate, respect and revive cultural heritage including the historic environment and the sense of local and regional identity. Encourage the involvement of people in shaping their community and creating a new culture of sustainability
- Health and Wellbeing – Promote healthy lifestyles and physical, mental and spiritual well-being through design and community engagement



A THRIVING LIVING LANDSCAPE

5.1 The theme for this chapter, Thriving Living Landscape, is primarily based on the first purpose of the National Park. The policies in this chapter are divided into four sub-sections: Landscape, Biodiversity, Historic Environment and Water.

5.2 Conserving and enhancing the natural beauty of the area and the region's biodiversity, including GI, are both key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the *Duty to Cooperate*.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 1: To conserve and enhance the landscapes of the National Park

Objective 2: To conserve and enhance the cultural heritage of the National Park

Objective 3: To conserve and enhance large areas of high-quality and well-managed habitat to form a network supporting wildlife throughout the landscape

Objective 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

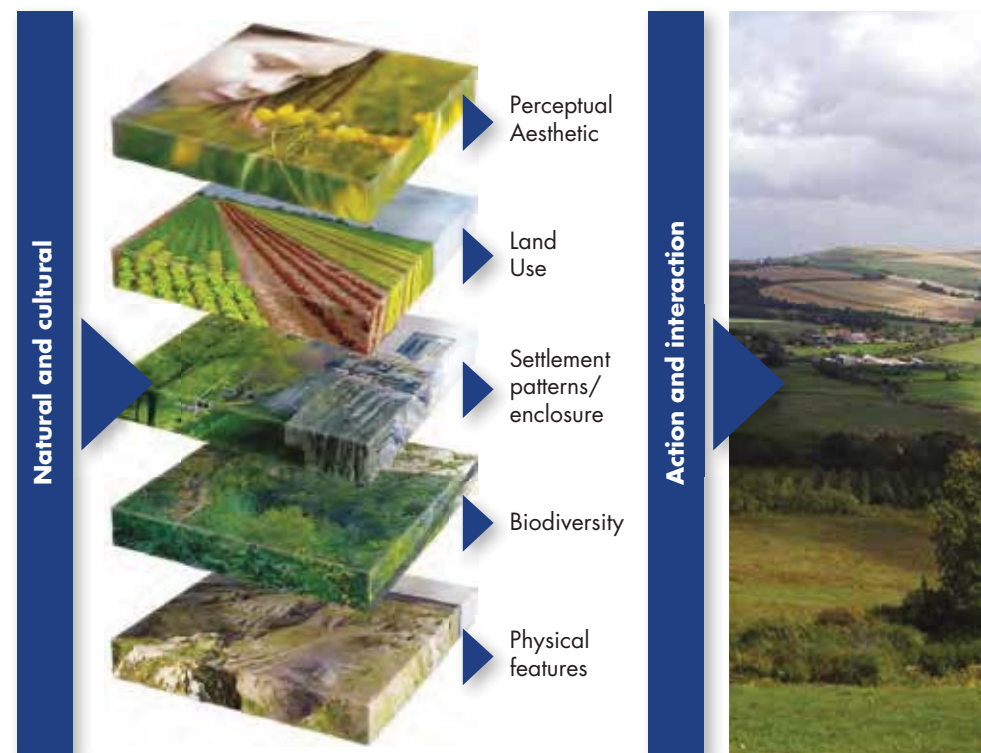
5A. LANDSCAPE

INTRODUCTION

5.3 This section of the Local Plan includes five strategic policies which relate to the landscape and associated special qualities of the National Park. These set a positive strategy for conserving and enhancing landscape character (SD4), safeguarding views (SD6), relative tranquillity (SD7) and dark night skies (SD8), and sets out a landscaped-led approach to design (SD5).

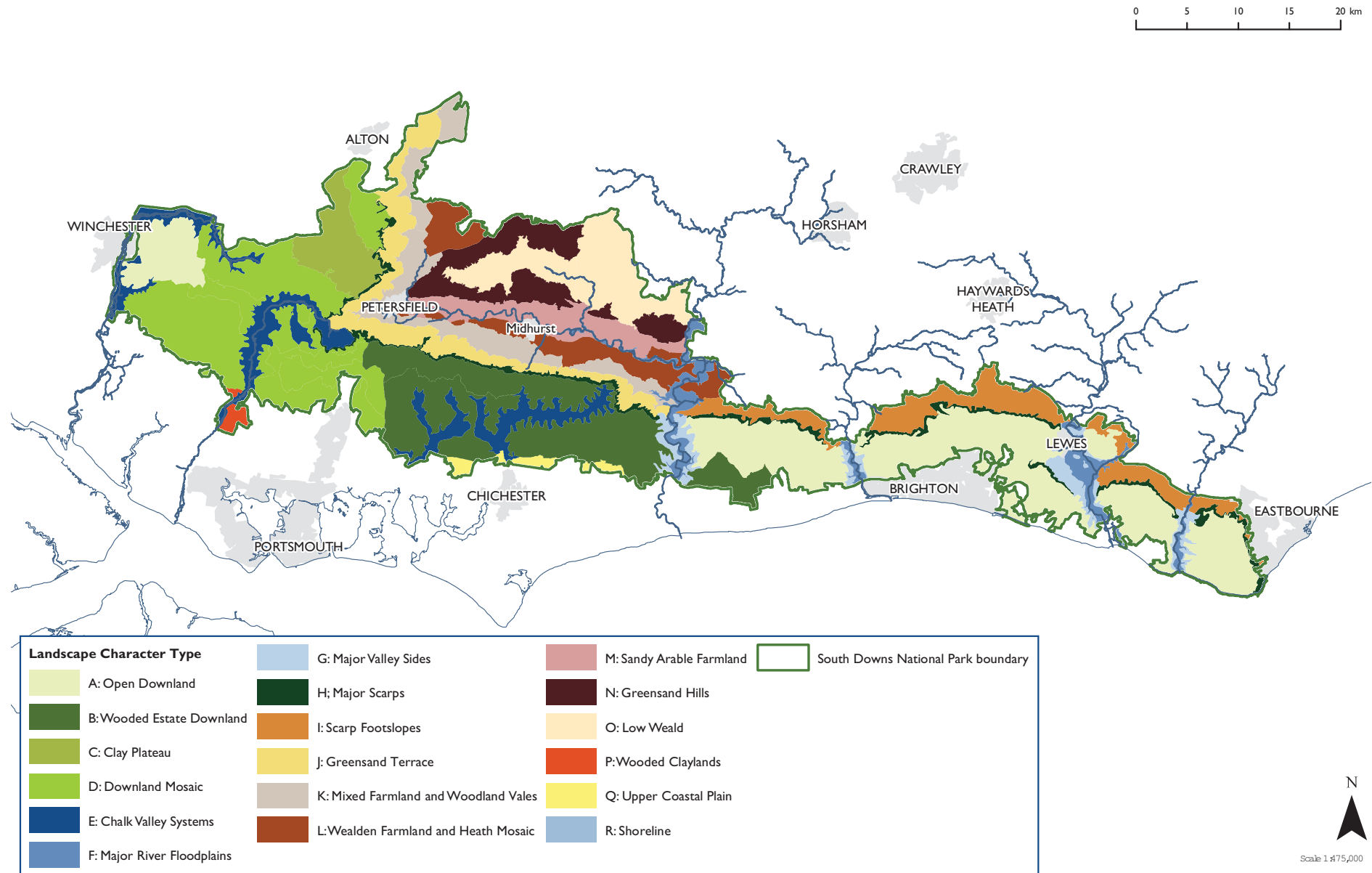
5.4 The diverse and inspirational landscapes of the National Park are defined as one of its special qualities. The landscape is also the foundation for the other special qualities of the National Park, including its views, tranquil and unspoilt places and its distinctive towns and villages. As set out in Chapter 3, Spatial Strategy and Portrait, the varied landscapes of the National Park collectively contribute to the range of ecosystem services which the National Park provides. The condition of landscape features, and their management, is therefore essential to the continued function of ecosystem services and the benefits they provide. Any development in the National Park has the potential to cause harm to the landscape both individually and cumulatively. These policies seek to ensure that development avoids having a detrimental impact on the landscape and its special qualities, and, wherever possible, enhances the landscape. Figure 5.1 explains how the landscape is formed.

FIGURE 5.1: LANDSCAPE



5.5 The *SDILCA*²⁷ divides the rich and complex landscape character of the National Park into 18 general landscape types (as shown in Figure 5.2) and 49 more place-specific 'character areas'. It identifies the features that create local distinctiveness, a 'sense of place' and is an aid to decision making.

²⁷ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

FIGURE 5.2: LANDSCAPE CHARACTER TYPES²⁸

★ Strategic Policy SD4: Landscape Character

1. Development proposals will only be permitted where they conserve and enhance landscape character by demonstrating that:
 - a) They are informed by landscape character, reflecting the context and type of landscape in which the development is located;
 - b) The design, layout and scale of proposals conserve and enhance existing landscape and seascape character features which contribute to the distinctive character, pattern and evolution of the landscape;
 - c) They will safeguard the experiential and amenity qualities of the landscape; and
 - d) Where planting is considered appropriate, it is consistent with local character, enhances biodiversity, contributes to the delivery of GI and uses native species, unless there are appropriate and justified reasons to select non-native species.
2. Where development proposals are within designed landscapes, or the setting of designed landscapes, (including historic parkscapes and those on the *Historic England Register of Historic Parks and Gardens*) they should be based on a demonstrable understanding of the design principles of the landscape and should be complementary to it.
3. The settlement pattern and individual identity of settlements and the integrity of predominantly open and undeveloped land between settlements will not be undermined.
4. Green and blue corridors will be safeguarded. Development proposals should identify and take opportunities to create and connect green and blue corridors.
5. The restoration of landscapes where features have been lost or degraded will be supported where it contributes positively to landscape character.

5.6 The purpose of Policy SD4 is to set out how development proposals will be expected to conserve and enhance landscape character in the National Park.

5.7 Landscape character is what make an area unique, resulting from the action and interaction of natural and/or human factors. Landscape character is the combination of distinct, recognisable and consistent pattern of elements and features as set out in Figure 5.1 including, for example, the landform, historic landscape or 'time depth', and a variety of perceptual and aesthetic qualities.

UNDERSTANDING OF LANDSCAPE CONTEXT AND CHARACTER

5.8 The ability of proposals to meet the requirements to enhance landscape character in Policy SD4 will be considered in proportion to the size, scale and likely impacts of the proposals.

5.9 It is important that proposals are based on a meaningful understanding of the context and character of an area and those positive characteristics which define local distinctiveness. The use of standard design solutions and features can erode local distinctiveness in urban and rural areas. Therefore, this policy is closely linked to Policy SD5: Design, and they need to be read together.

5.10 Proposals should be informed by the *SDILCA*, community-led/local landscape character assessments and appropriate site-based investigations. Local landscape character assessments may include Community, Parish or Village Design Statements and other community planning documents. However, references to these will not be a substitute for appropriate professional site based assessment and research.

5.11 Proposals should be accompanied by a Landscape Appraisal, which should be proportionate to the size and likely impacts of the scheme. Landscape Appraisals should be carried out in accordance with the *Guidelines for Landscape and Visual Impact Assessment*²⁹ and successor documents. If the proposals require a full Environmental Impact Assessment (EIA) then a Landscape and Visual Impact Assessment (LVIA) undertaken by a Chartered Landscape Architect will be required. Most applications will be likely to require a bespoke Landscape Appraisal. Applicants are advised to consult the

²⁹ Guidelines for Landscape and Visual Impact Assessment 3rd Edition (Landscape Institute & IEMA, 2013)

Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the *Landscape and Biodiversity Baseline Checklist* which is available on the Authority's website in the first instance. Further study may be required following on from completion of the checklist which the Authority would advise on.

5.12 The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many heritage features in the landscape and these contribute to local distinctiveness reflecting the time depth which is present in the landscape.

DESIGN AND LAYOUT

5.13 The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

DESIGNED LANDSCAPES

5.14 There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the *Historic England Register of Historic Parks and Gardens*³⁰, for example, Petworth Park, designed by Capability Brown. In addition, there are many other sites which are identified as being designed landscapes, but not included on the

Historic England list. These are identified in the *Historic Landscape Character Assessments*³¹ for the National Park and are important cultural heritage assets.

5.15 Policy SD12: Historic Environment, sets relevant requirements for heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts, which are independent charities engaged in caring for gardens and designed landscapes.

5.16 Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed landscape. This process should ensure that development will enhance the designed character of the landscape.

THE INDIVIDUAL IDENTITY OF SETTLEMENTS

5.17 The gaps between settlements protect the individual character and identity of towns and villages. They retain the open nature and the physical and, either real or perceived, visual separation between settlements. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Public RoW can often provide access to these areas and connections to the open landscape of the National Park beyond.

GREEN AND BLUE CORRIDORS

5.18 Green and blue corridors are areas or linear features which connect habitat and wildlife populations and can provide opportunities for walking and cycling, and also facilitate the movement of wildlife. Green and blue corridors are an essential component of the National Park's GI, and can provide benefits for people and wildlife at both the landscape scale and more local scale. More information is provided under Policy SD45: Green Infrastructure.

³⁰ Link to the Historic England website to view/search the Historic Parks and Gardens Register: <https://historicengland.org.uk/listing/the-list/>

³¹ Link to the Sussex Historic Landscape Characterisation study: www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/; the Historic Landscape Assessment of Hampshire is underway

LANDSCAPE FEATURES

5.19 Natural and historic features such as trees, woodlands, hedgerows, field boundaries, historical water systems, chalk pits and sandpits, should be conserved and enhanced through design. The restoration of degraded characteristic landscape features is supported.

Strategic Policy SD5: Design

1. Development proposals will only be permitted where they adopt a landscape-led approach and respect the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area. The following design principles should be adopted as appropriate:
 - a) Integrate with, respect and sympathetically complement the landscape character by ensuring development proposals are demonstrably informed by an assessment of the landscape context;
 - b) Achieve effective and high quality routes for people and wildlife, taking opportunities to connect GI;
 - c) Contribute to local distinctiveness and sense of place through its relationship to adjoining buildings, spaces and landscape features, including historic settlement pattern;
 - d) Create high-quality, clearly defined public and private spaces within the public realm;
 - e) Incorporate hard and soft landscape treatment which takes opportunities to connect to the wider landscape, enhances GI, and is consistent with local character;
 - f) Utilise architectural design which is appropriate and sympathetic to its setting in terms of height, massing, density, roof form, materials, night and day visibility, elevational and, where relevant, vernacular detailing;
 - g) Provide high quality, secure, accessible, and where possible, integrated storage for general and recycling waste, heating fuel, and transport related equipment;

- h) Provide high quality outdoor amenity space appropriate to the needs of its occupiers or users;
- i) Ensure development proposals are durable, sustainable and adaptable over time, and provide sufficient internal space to meet the needs of a range of users;
- j) Give regard to improving safety and perceptions of safety, and be inclusive and accessible for all; and
- k) Have regard to avoiding harmful impact upon, or from, any surrounding uses and amenities.

5.20 Landscape features have a time depth and contribute to ecological richness and shared cultural heritage. Reference should be made to the *Pan Sussex Historic Landscape Characterisation*, the *Hampshire Historic Landscape Characterisation* and other appropriate research material to identify the relevant natural and historic key features that should be used to inform development proposals.

5.21 The purpose of Policy SD5 is to ensure that all development is of the highest possible design quality which reflects and respects the exceptional quality of the natural, agricultural and built environment of the National Park. Proposals should adopt a landscape-led design approach and seek to enhance local character and distinctiveness of the area as a place where people want to live and work now and in the future. The definition of landscape encompasses all types and forms, including the historic landscape character and also townscape. Townscape refers to areas of buildings and related infrastructure, and the relationships between buildings and different types of urban greenspace.

A LANDSCAPE-LED APPROACH

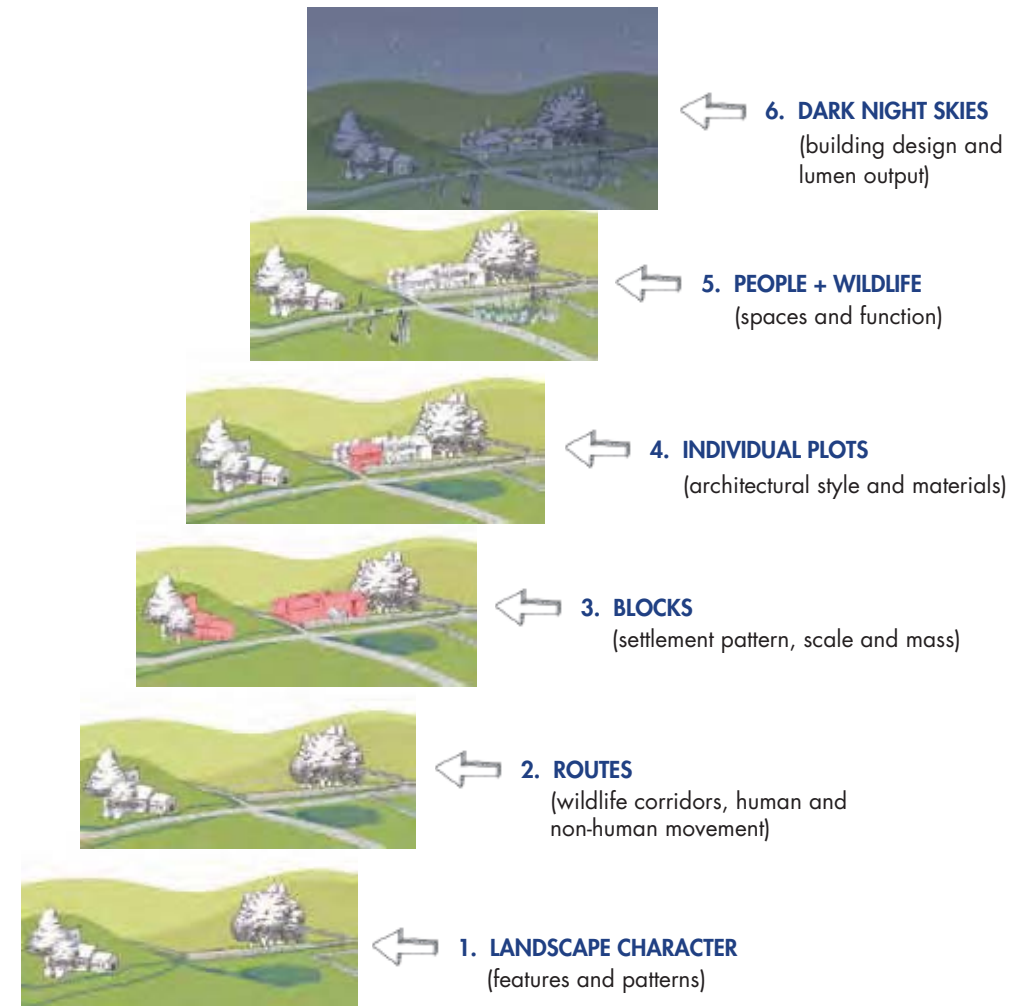
5.22 Development should enhance, respect and reinforce the landscape through a landscape-led design approach, informed by contextual analysis of the local landscape character and built character, as set out in Figure 5.3. This contextual analysis should include considerations, as relevant, of topography,

landscape features, historic landscape features, the water environment, biodiversity and other ecosystem services, key routes and street patterns, landmarks, views and vistas, the scale, proportions, pattern, and vernacular architecture and materials. The surrounding mix of uses should also inform proposals. Appropriate study areas and methodology would be determined in discussion with the Authority and will be dependent on the size, height and location of proposals.

5.23 Individual design elements, such as use of materials and detailing of elements such as windows, are critical to the success of the overall design and should be considered once the character of the area has been assessed.

5.24 Supporting information accompanying planning applications should be proportionate to sensitivity of the location and the scale of what is being proposed. The Authority will engage with applicants and agents to offer advice on what is required. It will need to demonstrate how the design has been informed through an analysis of the opportunities and constraints of the site, its context, and how it responds positively to these. Some schemes may be asked to go through the *National Park Authority's Design Review Panel Process*. Depending on the scale of development, a comprehensive masterplan outlining the principles for a site should address all of these elements and any other site-specific issues, to achieve an exemplary design.

FIGURE 5.3: A LANDSCAPE-LED APPROACH TO DESIGN



STARTING WITH THE LANDSCAPE

CONNECTIONS FOR PEOPLE AND WILDLIFE

5.25 Good design provides effective and high quality connections for people and wildlife, ensuring sustainable ease of movement. Opportunities should be identified and taken to connect GI assets and make a positive contribution to local character. The purpose of an open space, for example a playground or orchard, should be clear, otherwise it will most likely become a forgotten space which serves no purpose or benefit. Open spaces should be connected to the existing environment, for example by footpaths or cycleways. Where public open spaces are provided, there should be no restrictions, such as locked/keypad entry gates, to accessing these areas, and they should be accessible to all. Policies SD45 and SD46 set out criteria related to the provision of GI and open space, respectively.

HIGH QUALITY LANDSCAPE AND ARCHITECTURAL DESIGN

5.26 The Authority will seek the highest quality design for development proposals in line with the first purpose of the National Park. This includes truly outstanding or innovative design and contemporary design which reinforce local distinctiveness, taking reference and visual cues from the landscape and local settlement identity and character. The Authority will encourage the use of locally sourced materials to support local character and distinctiveness, and to reduce the cost both financially and environmentally of transporting materials long distances. Reference should be made to the respective strategic stone studies for each of the three counties.

5.27 The design of streets has a significant influence on the layout and setting of development, and should respect local character, and respond to the historic form and layout of existing streets. Further criteria relating to the public realm and street design is set out in Policy SD21: Public Realm, Highway Design and Public Art.

5.28 The spaces around new buildings are integral to the success of new development and should be well designed to create a high quality built environment. This includes the gaps between houses, gardens, driveways, parking areas, waste and recycling storage, street composition and open

space/amenity space. Careful consideration should be given to the siting, use/function and materials used. Spaces should be defined through use of suitable landscaping, such as boundary treatments, planting and varied use of materials, which differentiate between private and public areas. The use of hard and soft landscaping should be consistent with local character and enhance GI. Existing landscape features such as trees, hedges and walls which are characteristic of the streetscape and local area should be retained. The long term maintenance of landscape features should be addressed, for example through a legal agreement.

5.29 Development should comply with design policies set out in NDPs, and take into account village and town design statements.

ADAPTABLE, DURABLE, AND SUSTAINABLE DESIGN

5.30 New housing needs to be appropriate for the widest range of households and should therefore be adaptable, accessible and durable over time to accommodate people of all ages and abilities, without diminishing overall appearance and function.

5.31 Development should maximise sustainable technologies. The sourcing and performance of materials, and construction methods, should maximise energy and resource efficiency. The wood fuel economy is one example of this. Dwellings which utilise local sustainable wood fuel schemes support the local economy, repurpose what would otherwise be a waste product and can support reductions in fuel poverty. This should be undertaken in accordance with Policy SD48: Climate Change and Sustainable Use of Resources.

5.32 Development should be durable and adaptable to change. The ongoing management and long term maintenance of the scheme, including all design elements, should be addressed.

AMENITY AND FUNCTIONAL NEEDS

5.33 It is important that all types of development meet the day-to-day functional needs of its users, and of those responsible for its servicing. Internal space should have internal proportions that allow quality of experience for its occupiers and users. High quality, accessible, secure and where

possible integrated on site storage should be available for the storage of transport equipment which includes bicycles, mobility scooters, push chairs and wheelchairs. Refuse and recycling storage should take account of the operational requirements of refuse collection services.

5.34 High quality garden, terrace or balcony space should be provided for residential occupiers, of a size and nature that befits future occupiers' needs, for example families with children. Other uses may need to provide outdoor space for staff and/or visitors depending on the use and context.

5.35 In addition, the privacy and amenity of existing neighbours and future occupiers should be respected. Proposals should ensure good natural light for new and, where relevant, existing buildings and their occupiers. Proposals affecting residential properties in particular should not be unduly overbearing, or compromise others' reasonable privacy, unless outweighed by innovative design solutions that mitigate these impacts.

5.36 Reference should also be made to Policies SD30 and SD31 on Replacement Dwellings and Extensions to Existing Dwellings and Provision of Annexes and Outbuildings.

Strategic Policy SD6: Safeguarding Views

1. Development proposals will only be permitted where they preserve the visual integrity, identity and scenic quality of the National Park, in particular by conserving and enhancing key views and views of key landmarks within the National Park.
2. Development proposals will be permitted that conserve and enhance the following view types and patterns identified in the *Viewshed Characterisation & Analysis Study*:
 - a) Landmark views to and from viewpoints and tourism and recreational destinations;
 - b) Views from publically accessible areas which are within, to and from settlements which contribute to the viewers' enjoyment of the National Park;
 - c) Views from public rights of way, open access land and other publically accessible areas; and
 - d) Views which include or otherwise relate to specific features relevant to the National Park and its special qualities, such as key landmarks including those identified in Appendix 2 of the *Viewshed Characterisation & Analysis Study*, heritage assets (either in view or the view from) and biodiversity features.
3. Development proposals will be permitted provided they conserve and enhance sequential views, and do not result in adverse cumulative impacts within views.

5.37 The purpose of Policy SD6 is to ensure that development does not harm views or landmarks, to encourage conservation and enhancement of key view types and patterns, and to ensure development does not detract from the visual integrity, identity and scenic quality that are characteristic of the National Park.

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

5.38 The *View Characterisation & Analysis Study*³² provides baseline information about the major view types, and about possible and likely ranges of visibility within, to and from the National Park. Proposals should take into account the *View Characterisation and Analysis Study* and the *Seascape Assessment for the South Marine Plan*³³. However, representative views and landmarks set out in the *View Characterisation & Analysis Study* do not provide an exhaustive list and reference to these studies will not be a substitute for appropriate site based assessment in accordance with the *Landscape Institute & IEMA's Guidelines* for LVIA. A LVIA should be carried out in accordance with these guidelines, and should be proportionate to the size and likely impacts of the scheme. If the applicant can demonstrate to the satisfaction of the Authority that an LVIA is not required, a simple landscape assessment may be appropriate. More information on landscape assessments is available in the supporting text of Policy SD4: Landscape Character. Applicants are advised to consult the Authority on proposed viewpoint locations to inform such studies at the earliest opportunity.

5.39 The *SDILCA*, Village Design Statements, Conservation Area Character Appraisals, Conservation Area Management Plans, Local Landscape Character Assessments, Parish Plans and NDPs may provide evidence on views and should inform development proposals. This information, together with essential field and desktop studies which are undertaken at an appropriate level to the application, should be provided at the earliest possible stage in the planning application process and would form part of LVIA.

5.40 For large scale applications, it is recommended that digital Zone of Theoretical Visibility (ZTV) data is used to determine potential visibility in the surrounding landscape and to demonstrate areas of zero visibility, based on topography.

5.41 Sequential views are the series of views which we see unfold when moving through the landscape, for example, when walking along a footpath

or travelling along a road. Impacts on these views can arise frequently or occasionally, and may be generated by periodic views of the same development or by more than one development.

Strategic Policy SD7: Relative Tranquillity

1. Development proposals will only be permitted where they conserve and enhance relative tranquillity and should consider the following impacts:
 - a) Direct impacts that the proposals are likely to cause by changes in the visual and aural environment in the immediate vicinity of the proposals;
 - b) Indirect impacts that may be caused within the National Park that are remote from the location of the proposals themselves such as vehicular movements; and
 - c) Experience of users of the PRoW network and other publicly accessible locations.
2. Development proposals in highly tranquil and intermediate tranquillity areas should conserve and enhance, and not cause harm to, relative tranquillity.
3. Development proposals in poor tranquillity areas should take opportunities to enhance relative tranquillity where these exist.

5.42 The purpose of Policy SD7 is to ensure that development does not harm the relative tranquillity of the National Park and to encourage the conservation and enhancement of positive tranquillity factors.

5.43 Tranquillity is considered to be a state of calm, quietude and is associated with a feeling of peace. It relates to quality of life, and there is good scientific evidence that it also helps to promote health and well-being. It is a perceptual quality of the landscape, and is influenced by things that people can both see and hear in the landscape around them. The tranquillity scores apply specifically to the South Downs National Park; they are therefore to be considered relative to the National Park area only. They are not intended to be comparative or considered in relation to tranquillity scores for other national parks or other areas of the country.

³² South Downs National Park: View Characterisation and Analysis (LUC, 2015)

³³ South Marine Plan (Marine Management Organisation, 2016)

THE SOUTH DOWNS NATIONAL PARK TRANQUILLITY STUDY

5.44 In preparing proposals, applicants are advised to take into account the evidence of relative tranquillity in the *South Downs National Park Tranquillity Study*³⁴. For the *Tranquillity Study*, positive and negative tranquillity factors at locations across the National Park were scored on a sliding scale. The tranquillity scores from the study are shown on the map in Figure 5.4. In order to assess impacts on relative tranquillity the *South Downs Tranquillity Study* should be used as a baseline from which to assess changes in the aural and visual environment which are likely to result from the proposals, including considerations of temporary/permanent or varying nature of the impact.

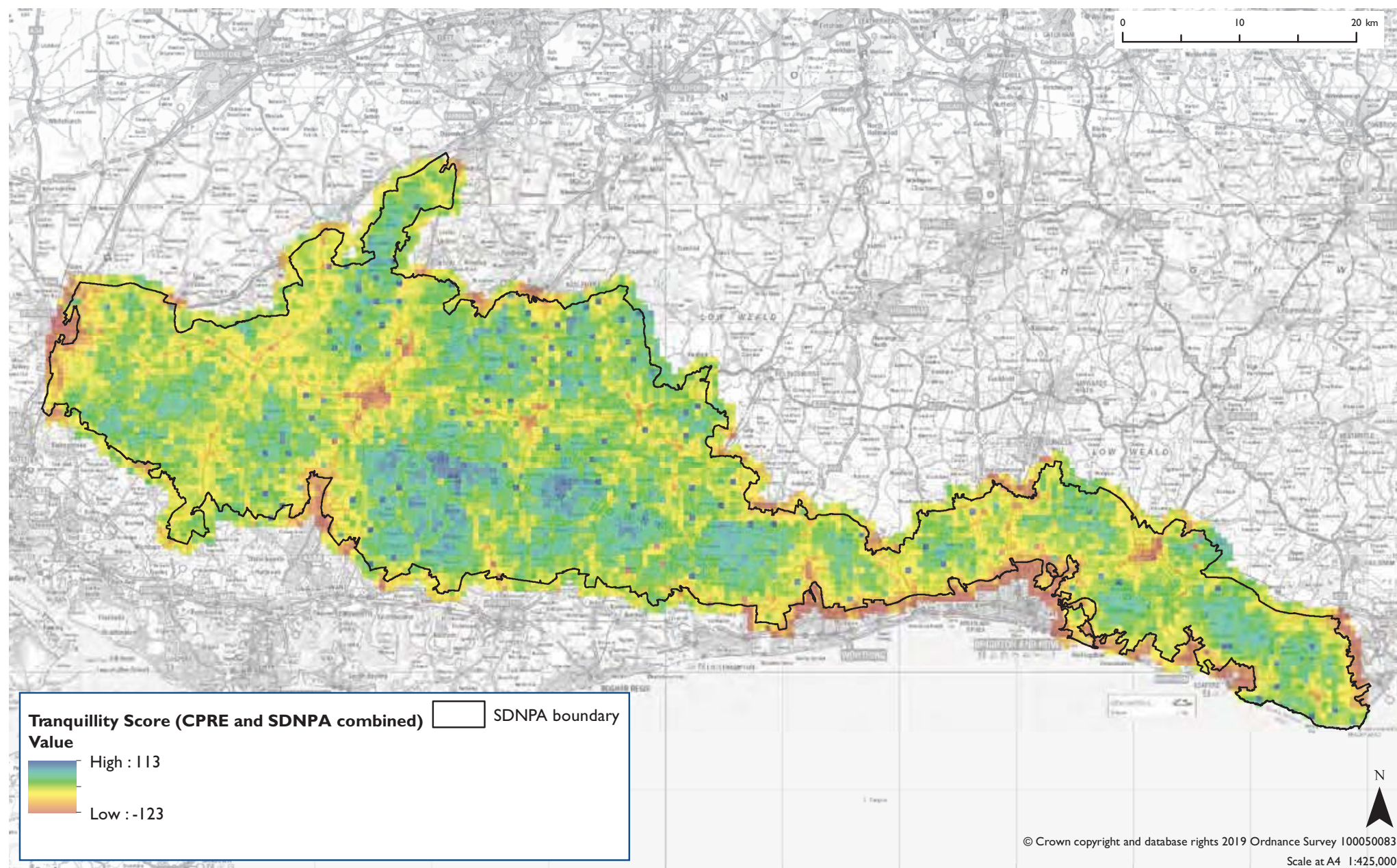
5.45 The assessment of impacts on relative tranquillity is not the same as a noise assessment, and the assessment of zero noise impact for an application will not be taken necessarily as meaning that there would be a similar impact on relative tranquillity.

5.46 The *Tranquillity Study* identified areas which are highly tranquil, of intermediate tranquillity, and those of low tranquillity. Applications for development proposals in highly tranquil areas should demonstrate that they conserve and enhance, and do not harm, relative tranquillity. Development proposals in areas of intermediate relative tranquillity are the areas which are most vulnerable to change, and should avoid further harm to relative tranquillity and take every opportunity to enhance it. Development proposals in areas of poor tranquillity are often located within or on the edge of urban areas and thus there may be limited scope for enhancing relative tranquillity in these areas; opportunities to enhance relative tranquillity should be taken wherever possible.

5.47 The extent that proposals conserve and enhance relative tranquillity will be determined by an assessment of the impact on relative tranquillity, which is proportionate to the scale and expected impact of the development in relation to the surrounding context.

³⁴ South Downs National Park Tranquillity Study (South Downs National Park Authority, 2017)

FIGURE 5.4: TRANQUILLITY SCORES IN THE NATIONAL PARK



Strategic Policy SD8: Dark Night Skies

1. Development proposals will be permitted where they conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core as shown on the Policies Map.
2. Development proposals must demonstrate that all opportunities to reduce light pollution have been taken, and must ensure that the measured and observed sky quality in the surrounding area is not negatively affected, having due regard to the following hierarchy:
 - a) The installation of lighting is avoided; and
 - b) If lighting cannot be avoided, it is demonstrated to be necessary and appropriate, for its intended purpose or use:
 - i. Any adverse impacts are avoided; or
 - ii. If that is not achievable, then adverse impacts are mitigated to the greatest reasonable extent.³⁵
3. Lighting which is proposed to be installed must meet or exceed the level of protection appropriate to the environmental zone, as shown on the Policies Map, as set out in the table below.

Location	Requirements for level of protection				
Dark Sky Zone description	ILP guidance ³⁵	Landscape impact	Maximum Lux level (suggested 10 Lux)	Preferred lights-off curfew	Astronomical darkness curfew
E0 Dark Sky Core and areas outside this zone with a SQM ³⁶ of 20.5+	✓	✓	✓		✓
E1(a) 2km Buffer Zone and areas outside this and the above zone which are of intrinsic rural darkness with a SQM range of 20 to 20.5	✓	✓	✓	✓	
E1(b) Transition Zone and areas outside this and the above zones with a SQM range of ~15 to 20	✓	✓	✓		
E3/4 Urban zone with an SQM of <15	✓	✓			
4. Outdoor lighting proposals are required to provide a statement to justify why the proposed lighting is required.					

³⁵ Institute of Lighting Professionals (ILP) guidance GN01:2011 Guidance Notes for the Reduction of Obtrusive Light

³⁶ Sky Quality Measurement (SQM). The latest version of the Sky Quality Measurement map should be used as the reserve is subject to ongoing measurement

5.48 The purpose of Policy SD8 is to ensure that development does not harm the quality of dark night skies. It also encourages enhancement of the dark night skies of the National Park, for the benefit of people and wildlife. The policy seeks to do this by ensuring that proposed lighting is necessary, and by reducing the unnecessary light spill that is often a result of poor design, in order to minimise the overall impact of light.

5.49 Policy SD8 applies across the International Dark Sky Reserve which covers the entirety of the National Park. It applies to any proposals which involve the installation of external lighting and where the design of developments may result in light spill from internal lighting. It will also apply to specific lighting schemes which require planning permission or listed building consent, including installing:

- A lighting scheme of such nature and scale that it would represent an engineering operation³⁷;
- Lighting such as the floodlighting of sports pitches, car parking or manèges; and
- A lighting scheme on a listed building that would significantly affect its character.

DARK SKY ZONES

5.50 Mapping has been undertaken of the quality of dark skies across the entire National Park, as set out in the *South Downs Dark Night Skies Lighting Technical Advice Note*³⁸. These measurements have been used to categorise the National Park into a number of dark sky zones which reflect the quality of the dark night skies overhead and the level of street lighting. These zones are:

- E0 Dark Sky Core – these are large areas which have skies that can be classified as intrinsically dark. These areas form a continuous dark sky core (and 2km Buffer Zone) to the International Dark Sky Reserve, as

shown on the Policies Map, which contain some of the darkest areas of the National Park

- E1 (a) 2km Buffer Zone and (b) Transition Zone – areas that lie between the larger urban settlements and the surrounding darker skies notably vulnerable to light pollution. These areas are generally in the buffer zones and rural transition areas. Generally this will be where the sky quality changes from poor to the edge of an intrinsic dark sky zone typically with SQM³⁹ values of 10 Lux
- E3/4 Urban – larger settlements of the National Park have substantially lower quality of dark night sky, primarily due to street lighting and light spill from buildings

5.51 Although some areas of the National Park are outside of the core and buffer zones; this policy is looking to conserve and enhance all areas of intrinsic dark sky within the National Park.

HIERARCHY OF LIGHTING

5.52 In order to ensure that dark night skies are protected and enhanced, the hierarchy as set out in Criterion (2) is applied across the National Park. Installation of lighting should be avoided and, where lighting is demonstrated to be necessary, the design and installation should be such that adverse impacts are avoided or, if not achievable, mitigated to the greatest possible extent. The hierarchy should be applied in conjunction with the requirements for protection for the relevant dark sky zone as set out in Criterion (3) of this policy.

5.53 In the darkest areas, where control is more important, the overall impact of the lighting should not harm the continuity of the dark landscape and ideally not be visible in any direction or in any form such as glare, skyglow, spill and reflection. It also should not reduce the measured and observed quality of easily visible astronomical features such as the Milky Way and Andromeda Galaxy.

5.54 In some circumstances it may be possible to reduce the impact of existing lighting by removal in return for new lights.

³⁷ such as requiring a separate structure and typically be undertaken by specialist lighting engineers

³⁸ South Downs Dark Night Skies Lighting Technical Advice Note (South Downs National Park Authority, 2017)

³⁹ A Sky Quality Meter measures the brightness of the night sky in magnitudes per square arcsecond

REQUIREMENTS AND GUIDANCE FOR PROPOSED LIGHTING IN DARK SKY ZONES

5.55 Much of the rural landscape is part of the Dark Sky Core, but this should be checked prior to an application. In the preparation and determination of development proposals, the latest version of the Sky Quality Measurement Map should be used as the reserve is subject to ongoing measurement. To provide some indication of sky quality and zoning:

- An intrinsic dark zones is where the Milky Way can be seen with the naked eye and in an area with no street lighting
- If there is a provision of highways authority street lighting, the zoning will usually be E3

5.56 In addition to the application of the lighting hierarchy and avoidance and mitigation measures which may be required with regard to impacts on landscape and habitat, development proposals will be subject to particular requirements at a level of protection appropriate to the dark sky zone, as set out in Policy SD8, which is based on the measured sky quality.

5.57 Proposals within the Dark Sky Core and 2km Buffer Zone will be subject to maximum protection using the full weight of mitigation options, with a relaxation as light quality decreases further into urban areas.

5.58 Any Dark Sky that measures 20.5 Lux and above, should be considered as core quality, irrespective of whether it is within or outside the Dark Sky Core. In general, lighting under the best quality skies should cease on the onset of astronomical darkness, in addition to basic principles of good lighting (ILP) and appropriate rural illuminance levels. The time of astronomical darkness varies throughout the year, but marks the point at which dark skies are defined. In intrinsic skies, 20 to 20.5 Lux, an evening curfew should be set, for example, 9pm.

5.59 The Authority will encourage further reductions, for example towards the limits of an E0 Dark Sky Zone, or by removing below or near horizontal light paths from fixtures. Often this can be achieved with little further disruption. Examples of how this can be done include:

- Lighting should be subject to control measures to reduce unnecessary light pollution. Examples include:
 - ‘Curfews’ or automatic timers;
 - Proximity ‘PIR’ sensors, timers or any additional shielding or coving, including angling the front surface of lights to the horizontal;
 - Different surface types to reduce the amount of reflectivity;
 - Appropriate use of glazing to reduce light transmittance; and
 - Screening or shielding to reduce the impact of reflectivity.

LIGHTING ASSESSMENTS

5.60 Proposals should take due consideration of the overall visual impact that the lighting will have on the landscape. This may include ground surface reflectivity, the number of lights, the daytime intrusion and the general overall footprint of the lighting. It is also necessary to consider the visibility of the lights from the surrounding landscape particularly from viewpoints in accordance with Policy SD6: Safeguarding Views.

5.61 The spill of lights from large open glass windows and sky lights often present a greater source of light pollution than externally mounted lights. Consequently, it is important to control the lighting coming from these types of developments. The design of buildings should reduce the impact of light spill from internal lighting or suitable mitigation measures should be put in place.

5.62 Habitats, particularly woodlands, should not be considered as a ‘natural shield’ to lighting, because of the impact on an unlit habitat. Lighting that would spill into sensitive habitats should be shielded or removed particularly if nocturnal species are present. Direct illumination of bat roosts must be avoided.

5.63 Where a proposal involves outdoor lighting, a statement will be required to justify why the proposed lighting is required for its intended use and that shows every reasonable effort has been made to mitigate skyglow and light intrusions. This should be accompanied by a computer calculation indicating task luminance, uniformity, horizontal values of overspill beyond the property line and vertical luminance values of light intrusion on adjacent property windows. Any statement should be proportionate to the size and likely impacts of the scheme.

5B. BIODIVERSITY

INTRODUCTION

5.64 This section of the Local Plan includes three policies relating to the wildlife of the National Park. Strategic Policy SD9: Biodiversity and Geodiversity relates to the conservation and enhancement of biodiversity and geodiversity across the National Park and sets out a hierarchy for designated sites. Strategic Policy SD10: International Sites provides further specific requirements for particular International Nature Conservation Designations. Development Management Policy SD11: Trees, Woodland and Hedgerows provides further detail regarding these assets. These policies all relate to the first purpose of the National Park.

5.65 The term biodiversity includes all species, communities, habitats and ecosystems, whereas the term geodiversity includes all features of geological and geomorphological interest including rocks, fossils, landforms and natural processes which create them.

5.66 The biodiversity and underlying geodiversity of the National Park directly provide or underpin many ecosystem services that people depend on. Together, these include the filtering and storage of water for clean water supplies, water management and flood alleviation, and also the provision of soils in which we grow our food and other produce, such as timber. In addition, biodiversity also underpins air quality regulation, pollination and pest control. The geology of the National Park provides aggregates and stone for building and other material uses. These local materials contribute to the economy of the National Park and have had a strong influence on the built vernacular.

5.67 The combination of geology and micro-climates has created a diverse mosaic of habitats that supports many rare and important wildlife species. Many of these are recognised through various international, national and local nature conservation designations. They form essential components of 'ecological networks', helping species to adapt to the impacts of climate

change and other pressures; evidence for this is provided in the *Habitat Connectivity Report*⁴⁰. Designated sites within the National Park are shown on the Policies Map and more information on the types of designations is set out in the Glossary.

5.68 Wildlife habitats are subject to a range of pressures, including those from development, and are often degraded and fragmented. A landscape-scale approach is needed to conserve, restore and reconnect habitats across the National Park. As well as causing direct loss of wildlife habitats and geodiversity, development can have a wide range of other negative impacts, for example, housing developments can result in disturbance to wildlife on sensitive sites by dogs and cats as well as increased recreational pressure from the local population; evidence for this is set out in the *Access Network and Accessible Natural Greenspace Study*⁴¹.

5.69 Important geological features can be lost through burial, damage and scrub encroachment. The impact on and conservation of geological features, landforms and processes is a crucial consideration when planning for minerals extraction, coastal defences and re-engineering of river catchments.

5.70 Development can have a positive impact on biodiversity and geological features. For example, by supporting positive management of geomorphological features, and also by restoring an interconnected network of wildlife sites and achieving net gains in biodiversity, species will be more resilient to adapt to pressures such as climate change. Urban habitats such as gardens, parks and buildings can act as 'stepping stones' and 'wildlife corridors' to enable wildlife to move from one place to another. If development

⁴⁰ Habitat Connectivity and Habitat Opportunity Mapping Report (Thomson Ecology, 2015)

⁴¹ *Access Network and Accessible Natural Greenspace Study* (South Downs National Park Authority, 2014)

is planned and delivered with these in mind, it can conserve and even enhance biodiversity and geodiversity.

5.71 International sites support populations of species that are particularly threatened and/or vulnerable to disturbance. Under the *Habitats Regulations*, the Authority is required to demonstrate that proposals for new development avoid or adequately mitigate against impacts on these sites. A *Habitat Regulations Assessment (HRA)*⁴² of the *Preferred Options Local Plan* was prepared in 2015, and its recommendations have been taken into account in this version of the Local Plan. A *HRA* of the Local Plan was published in 2017.

5.72 Trees, woodland and hedgerows are distinctive features of the National Park. Non-woodland trees, including those in hedgerows and street trees, make an important contribution to landscape character, the historic environment and ecosystem services. Hedgerows, in particular, have an important role, by providing connections between habitats, and these need to be managed and maintained. Trees and woodland are important for adaption to the impacts of climate change. For example, trees in urban areas moderate summer temperatures and new tree planting in well-chosen locations can stabilise slopes and reduce the impacts of flooding.

★ Strategic Policy SD9: Biodiversity and Geodiversity

1. Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Prior to determination, up-to-date ecological information should be provided which demonstrates that development proposals:
 - a) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;
 - b) Identify and incorporate opportunities for net gains in biodiversity;
 - c) Contribute to the restoration and enhancement of existing habitats, the creation of wildlife habitats and the creation of linkages between sites to create and enhance local and regional ecological networks;
 - d) Protect and support recovery of rare, notable and priority species;
 - e) Seek to eradicate or control any invasive non-native species present on site;
 - f) Contribute to the protection, management and enhancement of biodiversity and geodiversity, for example by supporting the delivery of GI and Biodiversity Action Plan targets and enhance Biodiversity Opportunity Areas (BOA); and
 - g) Comply with the mitigation hierarchy as set out in national policy.

⁴² South Downs National Park Authority Local Plan Habitats Regulations Assessment (AECOM, 2015, 2017 and 2018)

2. The following hierarchy of site designation will apply in the consideration of development proposals:

- a) **Internationally Protected Sites**, as shown on the Policies Map (SPAs, SACs and Ramsar Sites, or candidate and formally proposed versions of these designations):
 - i. Development proposals with the potential to impact on one or more international sites(s) will be subject to a HRA to determine the potential for likely significant effects. Where likely significant effects may occur, development proposals will be subject to Appropriate Assessment
 - ii. Development proposals that will result in any adverse effect on the integrity of any international site will be refused unless it can be demonstrated that: there are no alternatives to the proposal; there are imperative reasons of overriding public interest why the proposal should nonetheless proceed; and adequate compensatory provision is secured
- b) **Nationally Protected Sites SSSI**, NNRs, MCZ as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect on nationally protected sites will be required to assess the impact by means of an EIA
 - ii. Development proposals should avoid impacts on these nationally protected sites. Development proposals where any adverse effect on the site's notified special interest features is likely and which cannot be either avoided or adequately mitigated will be refused, unless the benefits of the development, at this site clearly outweigh the likely impact to the notified features of the site and any broader impacts on the network of nationally protected sites

- c) **Irreplaceable Habitats** (including ancient woodland as shown on the Policies Map, and veteran trees): Development proposals which result in the loss or deterioration of irreplaceable habitats, including ancient woodland and veteran trees will be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists
- d) **Locally Protected Sites** (Sites of Nature Conservation Importance (SNCI)/Local Wildlife Sites (LWS)/Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR and Local Geodiversity Sites (LGS)) as shown on the Policies Map:
 - i. Development proposals considered likely to have a significant effect on local sites will be required to assess the impact by means of an Ecological Impact Assessment (EclA)
 - ii. Development proposals that will result in any adverse effect on the integrity of any local site which cannot be either avoided or adequately mitigated will be refused, unless exceptional circumstances outweighing the adverse effects are clearly demonstrated
- e) **Outside of designated sites**
 - i. Development proposals should identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks. Development proposals should take opportunities to contribute and deliver on the aims and objectives of the relevant biodiversity strategies where possible.

5.73 The purpose of Policy SD9 is to set out a positive strategy to ensure the conservation and enhancement of biodiversity and geodiversity across the National Park. It also sets out the hierarchy of designated sites.

5.74 The aim is to achieve a 'net gain' in biodiversity by encouraging all opportunities to enable conservation and enhancement as part of development proposals, planning at landscape-scale and taking opportunities to improve connections between habitats and designated sites.

5.75 All applications for development must ensure that sufficient and up to date information is provided regarding the wildlife sites or species or

geodiversity sites that may be affected by a proposal prior to determination of the development proposals. A landscape and ecology management plan must be provided which includes mechanisms for management in the long term.

THE MITIGATION HIERARCHY

5.76 The mitigation hierarchy is set out in the *NPPF*. It requires that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. Avoidance of adverse impacts to biodiversity as a direct or indirect result of development must be the first consideration. Avoidance measures may include either locating development on an alternative site with less harmful impact, or locating development within the site to avoid damaging a particular habitat feature. Compensation is only considered after all other options have been explored and strictly as a last resort.

PROTECTED AND PRIORITY SPECIES

5.77 Some species have special protection under international and national legislation (such as the *Wildlife and Countryside Act 1981 (as amended)* and the *Conservation of Habitats and Species Regulations 2017*). Legally protected species which are prominent in the National Park and which could be affected by new developments include but are not restricted to all wild birds, all native species of bat, great crested newt and badger and, in rivers, water vole, brown trout, river lamprey and European eel. Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken to provide the evidence needed to allow a determination to be made and licenses to be sought where necessary.

5.78 Action is required for the protection of *UK Biodiversity Action Plan* priority species in the *Biodiversity 2020 Strategy*. These priority species are identified under *Section 41 of the Natural Environment & Rural Communities (NERC) Act* as of principle importance for the purpose of conserving biodiversity in England. The Sussex Biodiversity Records Centre and Hampshire Biodiversity Information Centre also hold information for rare, scarce and notable species in the National Park.

DESIGNATED SITES

5.79 The National Park has a very high density of sites designated for their wildlife and geodiversity value. This includes the following types of designation:

INTERNATIONAL DESIGNATIONS

5.80 Under the *Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)* the Authority has a duty to give these areas⁴³ the strongest protection against damaging development. If a development proposal is assessed to be likely to have a significant effect on one of these sites, either alone or in combination with other plans or projects, an Appropriate Assessment is required to establish the implications of the scheme for the identified nature conservation interests of the site.

5.81 Normally, the Authority cannot consent to plans or projects without first having ascertained that they will not have an 'adverse effect on the integrity' of the site. *Article 6(4) of the Habitats Directive* provides an exemption which would allow a plan or project to be approved in very limited circumstances even though it would or may have an 'adverse effect on the integrity of a European site'. A plan or project can only proceed provided three sequential tests are met (see *Article 6(4)*)⁴⁴. These tests must be interpreted strictly and can only be formally considered once an appropriate assessment has been undertaken.

5.82 Applicants should work with the Authority in the screening and assessment process and provide the necessary information for the Authority to make a determination. To avoid any damage to the integrity of these areas and the species they support, mitigation measures or contributions to such measures from new development may be required.

⁴³ International nature conservation designations covered by the Habitats Directive include: SACs, SPAs, Sites of Community Importance (SCI), and candidate SACs. As a matter of Government policy, possible SACs, potential SPAs and listed and proposed Ramsar sites and sites identified or required for compensatory measures for adverse effects on such sites are also treated as internationally designated sites

⁴⁴ European Commission (1992) 92/43/EEC Habitats Directive

5.83 The *HRA* has assessed the impacts arising from traffic movements on air quality and nitrogen deposition at a number of international nature conservation designation sites and identifies a need for monitoring. The National Park Authority will work with partners to consider the best way to monitor changes in air quality and nitrogen deposition on all these European sites. This would include long term monitoring of the main roads that fall within 200 metres of these European sites. Further information is set out in the Implementation and Monitoring chapter of this plan.

5.84 Policy SD10: International Sites, sets out specific requirements for development in relation to the following international nature conservation designations: The Mens SAC, Ebernoe Common SAC, Singleton & Cocking Tunnels SAC, Arun Valley SPA, Wealden Heaths Phase II SPA, and the Solent Coast SPAs.

NATIONAL DESIGNATIONS

5.85 These sites are designated under UK legislation as being of national importance for biodiversity or geodiversity and are afforded statutory protection due to the nationally significant wildlife features that they contain. These sites are protected from any operations likely to cause damage to the designated features. For any development to be permitted that is likely to damage these sites, the developer must demonstrate to the satisfaction of the Authority and Natural England that:

- There are no alternative solutions; and
- The reasons for the development at that site clearly outweigh the nature conservation value of the site and the national policy to safeguard the national network of such sites.

IRREPLACEABLE HABITATS

5.86 Development proposals that could impact upon irreplaceable habitats including ancient woodland and veteran trees, should note that the significance of irreplaceable habitats may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation. The term ancient woodland also includes Ancient Semi-Natural Woodland and Plantations on Ancient Woodland Sites and these should be treated equally in terms of the level of

protection afforded to ancient woodland and veteran trees. Further criteria relating to ancient woodland and veteran trees is found in Policy SD11: Trees, Woodland and Hedgerows.

LOCAL DESIGNATIONS

5.87 Locally designated geological and wildlife sites are valuable as a node or link in the local habitat network. These sites can provide valuable stepping stones as part of a wider GI network. On-going surveys can reveal new areas that warrant such protection. Policy SD9 will be applied to any new sites or extensions to existing sites.

5.88 EclA is the ecological component of EIA and is also applied outside the EIA process to identify, quantify and evaluate the potential impacts of a project on any ecosystem.

GEOLOGICAL CONSERVATION INTERESTS

5.89 The geological conservation interests of the National Park form an important part of the landscape identity and underpins the biodiversity of the National Park. For example, the river corridors and chalk which underpins the species rich chalk grassland. It is therefore important that the integrity of the natural function of these features is conserved and enhanced. Designated geological sites must be conserved and enhanced in accordance with this policy. Wider landscape geological features and their associated habitats must be conserved and enhanced in accordance with this policy and with SD4: Landscape Character.

OUTSIDE OF DESIGNATED SITES

5.90 In addition to the range of nature conservation designations outlined above, there are other areas in the National Park which are also not subject to statutory nature conservation designation or legal protection, but which form an important element of the collective nature conservation resource. These include priority habitats and non-statutory designations such as Biodiversity Opportunity Areas, the Brighton and Lewes Downs Biosphere Reserve and the South Downs Way Ahead Nature Improvement Area. The *Habitats Directive* highlights the need for effective management of linear or continuous features essential for

species migration, dispersal and genetic exchange. Such features, like rivers, mature trees and hedgerows, extend across designated and non-designated areas. These features, in particular, will provide the building blocks for achieving the Government's objective to restore and connect wildlife habitats and contribute towards a net gain for biodiversity. They are also important in providing corridors or stepping stones for species and to allow species to adapt to climate change. The maintenance and enhancement of these networks will be encouraged. Brownfield land can also be of important ecological value. These undesignated biodiversity assets are important components of GI.

5.91 Protection of UK Biodiversity Action Plan priority habitats is set out in the *Biodiversity 2020 Strategy* and under *Section 41 of the Natural Environment & Rural Communities (NERC) Act*. Priority habitats in the National Park include lowland calcareous grassland, woodland and lowland heathland, among many others.

5.92 The National Park Authority has worked closely with partners to map and identify priority habitats, habitat connectivity, and local ecological networks in and beyond its boundaries. Areas with high connectivity and/or high potential for priority habitat restoration or creation will be given due weight in the planning process. These areas are outlined in the *Habitat Connectivity Report*. The BOA maps for Hampshire and Sussex will also be considered by the National Park Authority.

★ Strategic Policy SD10: International Sites The Mens SAC, Ebernoe Common SAC and Singleton & Cocking Tunnels SAC

1. Development proposals on greenfield sites and sites that support or are in close proximity to suitable commuting and foraging habitat (including mature vegetative linear features such as woodlands, hedgerows riverine and wetland habitats) within the following ranges as shown on the Policies Map, should have due regard to the possibility that Barbastelle and Bechstein's Bats will be utilising the site. Such proposals will be required to incorporate necessary surveys and ensure that key features (foraging habitat and commuting routes) are retained, in addition to a suitable buffer to safeguard against disturbance⁴⁵.
 - a) 6.5km: Key conservation area – all impacts to bats must be considered given that habitats within this zone are considered critical for sustaining the populations of bats within the SACs; and
 - b) 12km: Wider conservation area – significant impacts or severance to flightlines to be considered.
2. Proposed use or development of the tunnels comprising the Singleton & Cocking Tunnels SAC will be required to demonstrate that there is no adverse effect on the interest features, including hibernation habitat for Barbastelle and Bechstein's Bats, or on the integrity of the site.

Arun Valley SPA

3. Development proposals on greenfield sites within 5km of the Arun Valley SPA, as shown on the Policies Map, will undertake an appraisal as to whether the land is suitable for wintering Bewick Swan. If it is suitable then surveys will be undertaken to determine whether the fields are of importance to the swan population. If so, appropriate alternative habitat would be required before development could proceed.

⁴⁵ The scale of the buffer will need to be determined on a case-by-case basis, informed by bat activity survey work and would take account of the species involved and their sensitivity to disturbance/artificial lighting and the natural screening provided by existing surrounding vegetation. It would need to be devised in consultation with the SDNPA (in addition to Natural England, as required)

Wealden Heaths Phase II SPA

4. Development proposals resulting in a net increase in residential units within 400m of the boundary of the Wealden Heaths Phase II SPA, as shown on the Policies Map, will be required to demonstrate that the need for development cannot be solely met outside of the 400m zone, and undertake a project-specific HRA.
5. Development proposals resulting in a net increase in residential units within 5km of the boundary of the Wealden Heaths Phase II SPA will be required to submit a screening opinion to the Authority for a project-specific HRA which, in consultation with Natural England, will determine whether a likely significant effect on the integrity of the site will result. Likely significant effects will be assessed through the HRA and any requirement for mitigation identified.
6. To help protect the Wealden Heaths Phase II SPA, the National Park Authority will work with relevant authorities and Natural England as part of a working group with regard to monitoring, assessment and measures which may be required. Planning permission will only be granted for development that responds to the emerging evidence from the working group, the published recommendations, and future related research.

Solent Coast SPAs

7. Development proposals resulting in a net increase in residential units, within the Solent Coast SPAs (Chichester & Langstone Harbours SPA, Portsmouth Harbour SPA and Solent & Southampton Water SPA) zone of influence shown on the Policies Map, defined as 5.6km from the boundary of these sites, may be permitted where 'in combination' effects of recreation on the Solent Coastal SPAs are satisfactorily mitigated through the provision of an appropriate financial contribution to the delivery of strategic mitigation. In the absence of a financial contribution toward mitigation, an appropriate assessment may be required to demonstrate that any 'in combination' impacts which are likely to have a significant adverse effect can be avoided or can be satisfactorily mitigated through a developer-provided package of measures.

5.93 The purpose of Policy SD10 is to set specific requirements relating to the Mens, Ebernoe Common, and Singleton & Cocking Tunnels SAC, and the Arun Valley, Wealden Heaths Phase II, and Solent Coast SPAs, as recommended by the HRA. There are many other international nature conservation designation sites in and near the National Park, and requirements for these are set out in Policy SD9: Biodiversity and Geodiversity.

HABITATS REGULATIONS ASSESSMENT

5.94 Policy SD9: Biodiversity and Geodiversity, sets out the general requirements with regard to International Nature Conservation Designations and their protection under the *Habitats Directive (2017)*. Development proposals which are likely to have significant effects on international sites are required to undergo an appropriate assessment in order to ascertain that there will not be adverse impacts on the integrity of the site.

5.95 The requirements set out in Criteria 1 – 7 of this policy seek to ensure that development will not have an adverse impact on the integrity of the relevant sites, in line with the requirements of the *Habitats Directive (2017)*.

5.96 As identified in Policy SD9 and its supporting text, the *Habitats Directive* contains an exemption to this, under very limited circumstances. The following sequential test applies:

- There must be no feasible alternative solutions to the plan or project which are less damaging to the affected European site(s)
- There must be “*imperative reasons of overriding public interest*” (IROPI) for the plan or project to proceed
- All necessary compensatory measures must be secured to ensure that the overall coherence of the network of European sites is protected

5.97 In practice it is likely that only a small minority of plans and projects will be of a nature to reach this stage of consideration.

SPECIAL AREAS OF CONSERVATION

5.98 Policy SD10 protects bat populations for which the Mens, Ebernoe Common and Singleton & Cocking Tunnels SACs are designated. In the absence of research detailing both flight lines and distances travelled by bats commuting to and from the hibernation sites at Singleton & Cocking Tunnels SAC, and buffer distances in relation to disturbance of bats for the three SACs, these parameters will need to be determined on a case-by-case basis, informed by bat activity survey work and would need to take account of the species involved and their sensitivity to disturbance/artificial lighting and the natural screening provided by existing surrounding vegetation. Surveys would need to be devised in consultation with the National Park Authority and Natural England, as required. To facilitate sustainable development within proximity of these three SACs, Natural England and the National Park Authority are producing technical advice⁴⁶ based on published data which identifies key impact assessment zones, and avoidance, mitigation, compensation and enhancement measures which should be considered and incorporated.

SPECIAL PROTECTION AREAS

5.99 A very small area of the National Park is located within the zone of influence of the Solent SPAs as identified in the Solent Recreation Mitigation Partnership (SRMP). Through work on the SRMP, it has been concluded that any net increase in residential development will give rise to likely significant effects on the Solent SPAs, either 'alone' or 'in combination' with other development proposals. All new residential development within this zone of influence will be required to mitigate the negative impact. This mitigation can be provided through financial contribution to the measures set out in the Solent Recreation Mitigation Strategy.

5.100 Consistent with the HRA undertaken for the *East Hampshire Joint Core Strategy*, the potential cumulative impact of development within 400m of the Wealden Heaths Phase II SPA is recognised. To avoid likely significant effect upon the SPA, the National Park Authority will monitor all development within

the 400m zone in liaison with East Hampshire District Council, Waverley District Council and Natural England. The SPD⁴⁷ provides guidance to applicants where development proposals in East Hampshire District, including the area that falls within the South Downs National Park, will result in a net increase in residential development within 400m of the Wealden Heaths Phase II SPA. Any development proposed within the 400 metre Buffer Zone will need to be tested through a HRA. A cross boundary working group has been established to discuss and address cross boundary HRA matters, principally relating to the Wealden Heaths Phase II SPA. The group consists of officer representatives from the National Park Authority, East Hampshire District Council, Waverley Borough Council and Natural England. The working group will continue to work together on matters relating to the Wealden Heaths Phase II SPA and the development of strategic measures as necessary.

⁴⁶ Draft Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol (Natural England, 2018)

⁴⁷ East Hampshire District Council (adopted 31st July 2018) and South Downs National Park Authority (adopted 12th July 2018) Wealden Heaths Phase II SPA SPD

★ Development Management Policy SD11: Trees, Woodland and Hedgerows

1. Development proposals will be permitted where they conserve and enhance trees, hedgerows and woodlands.
2. Development proposals that affect trees, hedgerows and woodland must demonstrate that they have been informed by a full site survey, including an Ecological Survey, Arboricultural Method Statement and associated Tree Protection Plan, and include a management plan.
3. The removal of protected trees, groups of trees woodland or hedgerows will only be permitted in exceptional circumstances and in accordance with the relevant legislation, policy and good practice recommendations. Where protected trees are subject to felling, a replacement of an appropriate number, species and size in an appropriate location will be required.
4. Development proposals must provide adequate protection zones and buffers around hedgerows and other woodland and trees to prevent damage to root systems and taking account of future growth. A minimum buffer of 15 metres will be required between the development and ancient woodland or veteran trees.
5. A proposed loss or damage of non-protected trees, woodland or hedgerows should be avoided, and if demonstrated as being unavoidable, appropriate replacement or compensation will be required.
6. Development proposals must demonstrate that appropriate protection measures are in place prior to any work on site throughout the development process as part of a comprehensive landscaping plan, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated.
7. Opportunities should be identified and incorporated for planting of new trees, woodlands and hedgerows. New planting should be suitable for the site conditions, use native species and be informed by and contribute to local character, and enhance or create new habitat linkages.

5.101 The purpose of Policy SD11 is to ensure the management, including conservation and enhancement, of existing trees, woodland and hedgerows, and to ensure that opportunities for restoration and new planting is realised.

This policy should also be considered alongside policies SD4: Landscape Character, SD9: Biodiversity and Geodiversity and SD10: International Sites. A technical advice note will be produced by the National Park Authority to provide further guidance to applicants on technical matters related to the protection of existing trees and planting of new trees.

5.102 The South Downs is the most wooded national park in England and Wales. The trees and woodland are significant features of the landscape, with a high proportion of ancient and veteran trees. Trees and woodland are a significant asset with regard to ecosystem services, contributing to many supporting, provisioning, regulating, and cultural ecosystem services, including for example carbon storage, biodiversity, air quality, and tranquillity. Hedgerows are a priority habitat and provide an important function as wildlife corridors. They have an important role for ecosystem services such as genetic dispersal and should be protected from severance.

5.103 All development must be undertaken in line with the *British Standard 5837* and all tree works must be carried out in accordance with *British Standard 3998*⁴⁸. Ancient woodland is recognised as an irreplaceable habitat – please see sub-heading ‘ancient woodland and veteran trees’ below and Policy SD9.

5.104 Forestry is one of the key sectors of the National Park’s economy, supplying the provisioning ecosystem services of sustainable timber and wood fuel. *The South Downs National Park Renewable and Low Carbon Energy Study* highlights the potential and importance of supporting the biomass/wood fuel market, and recommends that development of this market should be supported in principle. Policy requirements and guidance on these matters are primarily addressed through policies SD4 (Landscape Character), SD5 (Design), SD39 (Agriculture and Forestry) and SD51 (Renewable Energy).

⁴⁸ British Standards Institute (2010 and 2012) BS5837:2012 Trees in relation to design, demolition and construction–recommendations; and BS3998:2010 Tree Work Recommendations

BUFFER ZONES

5.105 It should be clearly demonstrated how development proposals will avoid any potential adverse impact on trees, woodland and hedgerows. Where development is permitted, mitigation measures may be sought and secured through condition and/or planning obligation. Mitigation of impacts may include the use of a buffer zone of semi-natural habitat between any significant development and an area of woodland with amenity or biodiversity value. What is an appropriate buffer will depend on the local circumstances, the species and size of trees, the form and nature of the trees or woodland and the type of development. This buffer zone should not normally include residential gardens and will require appropriate management after the completion of the development. The height of development should allow adequate sunlight to reach the buffer zone.

ANCIENT WOODLAND AND VETERAN TREES

5.106 Ancient woodland and veteran trees are irreplaceable habitats – please see Policy SD9. Development is expected to, in the first instance, avoid any negative effects on ancient woodland or veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists. To mitigate negative impacts, a buffer zone of a minimum of 15 metres, consisting of semi-natural habitat should be employed between the development and the ancient woodland or veteran tree. Compensation measures will only be considered as a last resort. Further detailed guidance for applicants on ancient woodland and veteran trees is found in the *Forest Commission and Natural England Joint Standing Advice*.

PLANTING NEW TREES

5.107 The Authority will support all suitable opportunities for new planting of trees, woodland and hedgerows as part of development schemes, and protection of new trees via Tree Preservation Orders, where appropriate⁴⁹. Species selection should be appropriate for the site conditions such as soil type and micro climate, and there is a presumption in favour of native species. Responsibly sourced provenances and other species that are shown to offer enhanced ecosystem services, without being detrimental to the local environment, may also be acceptable in planting schemes. When selecting species and sources of trees, due regard must be had to the expected impacts of climate change, genetic variability and disease. New planting should be appropriate to and contribute to the character of the location and should also support and enhance green links and ecological networks, maximising opportunities for net gains for biodiversity. Policies SD4: Landscape Character, SD5: Design, SD9: Biodiversity and Geodiversity and SD45: Green Infrastructure should also be considered with regard to new planting as part of development schemes.

⁴⁹ Sections 197 and 198 of the 1990 Planning Act

5C. HISTORIC ENVIRONMENT

INTRODUCTION

5.108 This section of the Local Plan includes five policies relating to the historic environment of the National Park. Strategic Policy SD12 sets out a positive strategy for conservation and enhancement of the historic environment. This is followed by four development management policies. Two relate to specific designated heritage assets namely listed buildings (Policy SD13) and conservation areas (Policy SD15). There are two further development management policies relating to climate change mitigation and adaptation of historic buildings (Policy SD14) and archaeology (Policy SD16).

5.109 The National Park has a rich and varied cultural heritage ranging from historic settlements and buildings to archaeological sites of all periods. It is critical that the historic environment is regarded as a positive and irreplaceable asset, valuable not only in cultural and economic terms, but as a frame and reference point for the creation of attractive places for current and future generations to enjoy.

5.110 The term cultural heritage, which is part of Purpose 1 of the National Park, includes physical features such as archaeological sites and finds, historic buildings, fields and settlements, and more hidden evidence of how people

used to live such as folk traditions, customs and work by creative people. The term 'historic environment' is used in the *NPPF* and is a more specific and relevant term when setting policies relating to heritage-related planning consents. The term 'heritage assets' refers to any buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest. Heritage assets include listed buildings, buildings on an approved local list, scheduled monuments, archaeological remains, conservation areas, historic parks and gardens and battlefields. A distinction is made between 'designated' and 'undesigned' heritage assets.

5.111 The Authority will proactively seek to conserve and enhance heritage assets by:

- Identifying heritage assets which are considered to be at risk of irreversible harm or loss;
- Encouraging owners to maintain their heritage assets; and
- The use of *Article 4* directions where the exercise of permitted development rights would undermine the aim to conserve and enhance the historic environment.

Strategic Policy SD12: Historic Environment

1. Development proposals will only be permitted where they conserve and enhance the historic environment, including through the safeguarding of heritage assets and their setting.
2. Applicants will be required to provide a Heritage Statement sufficient to allow an informed assessment of the impact of the proposed development on the significance of the heritage asset(s).
3. Development proposals which affect heritage assets (whether designated or non-designated) or their setting will be determined with regard to the significance of the asset, including the long-term conservation and enhancement of that asset.
4. Development proposals will be permitted where they enhance or better reveal the significance of heritage assets, particularly where they are considered to be at risk of irreversible harm or loss.
5. Development proposals which appropriately re-use redundant or under-used heritage assets with the optimal viable use, which secures their long-term conservation and enhancement, including of their setting, will be supported.
6. Development proposals for enabling development that would otherwise conflict with other planning policies but which would secure the future conservation of a heritage asset will be permitted provided:
 - a) The proposals will not materially harm the heritage values of the asset or its setting;
 - b) It can be demonstrated that alternative solutions have failed;
 - c) The proposed development is the minimum necessary to protect the significance of the heritage asset;
 - d) It meets the tests and criteria set out in Historic England guidance *Enabling Development and the Conservation of Significant Places*⁵⁰;
 - e) It is subject to a legal agreement to secure the restoration of the asset; and
 - f) It enables public appreciation of the saved heritage asset.

5.112 The purpose of Policy SD12 is to set out a positive strategy for the conservation and enhancement of the historic environment, including the safeguarding of heritage assets.

5.113 It is important that proposals are based on a meaningful understanding of the historic context and character of an area. Proposals should be informed by Historic Landscape Character Assessments (HLCA), *SDILCA*, Historic Environment Records (HER), conservation area character appraisals and the *Extensive Urban Survey*.

OPTIMUM VIABLE USE

5.114 Sustaining heritage assets in the long term often requires investment and putting heritage assets to a viable use is likely to enable the maintenance necessary for their long-term conservation. Certain heritage assets may have limited or no scope for new uses and indeed may be so sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

5.115 It is important that any use is viable, not just for the owner, but also the future conservation of the asset. The optimum viable use may not necessarily be the most profitable one. If there is only one viable use, that use is the optimum viable use. If there is a range of alternative viable uses, the optimum use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. Where relevant, reference should also be made to Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings. The National Park Authority will publish guidance on viability matters in due course.

SIGNIFICANCE OF HERITAGE ASSETS

5.116 Development proposals can affect the significance of heritage assets in a range of different ways. Physical impacts can range from minor alterations to the complete loss of the asset. Other impacts may not physically alter the asset but may affect its setting, which in turn may impact the significance of the heritage asset. Carefully considered changes to setting may well prove

⁵⁰ Enabling Development and the Conservation of Significant Places (English Heritage/ Historic England, 2008)

to be sympathetic and positive, but adverse impacts can create negative perceptions, a long-term decline or loss of significance, or of understanding and appreciation of that significance. In determining applications likely to have a bearing on the setting of heritage assets, guidance published by Historic England will be used to assess impact.

5.117 In order to assess significance it is essential to have a sound understanding of the original purpose, development, use and history of the historic asset. All planning applications that affect or have the potential to affect heritage assets and their setting, including sites with archaeological potential, must be supported by a Heritage Statement. The Heritage Statement should identify the significance of the asset and set out the impact of the development. The applicant should consult the relevant HERs. The level of detail required to support the application should be proportionate to the significance of the heritage asset and the impact of the development. In all but the most trivial cases, assessment of potential impact on the significance of the asset will require input from conservation professionals with appropriate qualifications and experience.

5.118 It is important to distinguish between potential harm that is 'substantial' and that which is 'less than substantial.' Substantial harm will relate to those impacts which wholly or partially destroy the significance of the heritage asset, or impinge upon the role of its setting to an extent which undermines its essential appreciation. However, it should be noted that less than substantial impacts may still prove significant, with some heritage assets being highly sensitive to change.

5.119 In cases where harm on significance is assessed to be substantial, but justified by considerations of continued use, re-use or wider public benefits, mitigation by recording will be required as a condition of consent. This can include deposition of the record including artefacts and ecofacts in a publicly accessible museum or record office, as well as the relevant HER. However, the ability to record evidence should not be a factor in deciding whether such a loss should be permitted. In instances where some degree of harm to heritage assets or the role of their setting is considered justified when balanced against public benefits, these benefits must be compelling, measurable, realistic and capable of assured delivery.

5.120 On occasion, the significance of a site or building may only become apparent when a development proposal is conceived. These discoveries at a pre-application or application stage of the development process will constitute 'non-designated heritage assets'. The lack of a previous designation will not necessarily imply lesser importance and the asset may sometimes possess great or even national historical significance. The significance of non-designated heritage assets must be carefully assessed and the desirability of their conservation will be weighed against wider public benefits as planning applications are considered and determined.

ENABLING DEVELOPMENT

5.121 The long-term conservation of a small minority of heritage assets can sometimes present particular problems. This is a result of the disparity between the costs of renovating the asset in a suitable manner and the final end value. This disparity is known as the 'conservation deficit'. In extreme cases, a recognised way of addressing this is to allow development in a location, or of a nature or form, that would normally be considered unacceptable in planning policy terms, which would generate sufficient funds to cover the shortfall in the renovation costs, and where it would bring public benefits sufficient to justify it being carried out, and which could not otherwise be achieved. This approach is known as 'enabling development.'

5.122 Enabling development should only ever be regarded as a last resort in restoring heritage assets once all other options have been exhausted. Development should constitute the minimum required to cover the conservation deficit. It should also not materially harm the heritage significance of the place (including its setting where relevant), and should produce public benefits which outweigh the dis-benefits of conflicting with other policies. Enabling development should contribute to the special qualities of the National Park and allow public appreciation of the saved heritage asset.

5.123 The Authority will use the detailed and rigorous tests set out by Historic England in order to determine planning applications that propose enabling development.

Development Management Policy SD13: Listed Buildings

1. Development proposals which affect a listed building or its setting will only be permitted and listed building consent granted where:
 - a) They preserve and enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or
 - b) Harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Authority, when appropriate mitigation measures will be expected, including archaeological investigation (including a written report) or recording.
2. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.

5.124 The purpose of Policy SD13 is to set out more detailed criteria for development proposals affecting listed buildings. This policy should also be read alongside Policy SD5: Design.

5.125 There are more than 5,000 listed buildings and structures within the National Park and these form an important part of the historic character, sense of place, and wider cultural heritage of the National Park. It is necessary to consider the character and significance of listed structures in a holistic manner; the character of their interiors can be as important as their external appearance. The protection and enhancement of all aspects of significance should be considered and great weight will be given to their preservation and, where appropriate, their restoration to optimal condition.

5.126 In instances where harm or significance is unavoidable and outweighed by public benefits, the record of lost or altered fabric or features should be deposited at the relevant County Record Office to facilitate access by the general public.

5.127 The Authority will seek solutions for assets at risk of loss or harm through decay, neglect or other threats. This will be pursued through proactive

discussion with owners and a readiness to engage with development proposals with the potential to secure repair and continued maintenance. Where appropriate the Authority may resort to the use of its statutory powers, Urgent Works or Repair Notices, to arrest decay of the asset.

Development Management Policy SD14: Climate Change Mitigation and Adaptation of Historic Buildings

1. Development proposals will be permitted, and where relevant listed building consent granted, for works to heritage assets to adapt to, or mitigate the effects of, climate change where it can be clearly demonstrated that this is consistent with all of the following:
 - a) The preservation and enhancement of the heritage asset's significance, character and appearance;
 - b) The preservation and enhancement of the heritage asset's special architectural or historic interest;
 - c) The long-term preservation of the historic built fabric; and
 - d) The setting of the heritage asset.

5.128 The purpose of Policy SD14 is to set out more detailed criteria for development proposals that seek to improve the energy efficiency or adaptation of heritage assets to adapt to or mitigate the effects of climate change. It should be read alongside Policy SD12: Historic Environment, Policy SD5: Design and SD48: Climate Change and Sustainable Use of Resources.

ASSESSMENT OF ENERGY EFFICIENCY OF HISTORIC BUILDINGS

5.129 Opportunities to reduce carbon dioxide emissions through improvements to energy efficiency of existing buildings are in principal to be welcomed. However, it is incorrect to assume that the older a building is, the less energy efficient it is. Many historic buildings perform well in terms of energy efficiency. Interventions to improve energy efficiency can have potential to adversely impact the breathability of built fabric or harm features of interest.

It should also be recognised that historic building materials are often more durable than modern replacements and more cost-effective in energy terms.

ALTERATIONS AND ADAPTATIONS OF HISTORIC BUILDINGS

5.130 Alterations to historic buildings should always be considered carefully to ensure that they do not cause buildings that were previously functioning well to fail. There are various adaptations which can improve energy efficiency of buildings or improve low carbon performance, such as insulation to walls and roofs, solar panels and alterations to windows.

5.131 These alterations and adaptations can significantly impact the features and subsequently the overall character, historic interest and integrity of built fabric historic building. Changes to specific features must be considered in assessing the significance of the historic asset. For example, traditional windows and their glazing make a hugely important contribution to the value and significance of historic areas. They are an integral part of the design of older buildings and can be important artefacts in their own right. Minor changes to windows can have a dramatic impact.

Development Management Policy SD15: Conservation Areas

1. Development proposals within a conservation area, or within its setting, will only be permitted where they preserve or enhance the special architectural or historic interest, character or appearance of the conservation area. Sufficient information to support an informed assessment should be provided on the following matters:
 - a) The relevant conservation area appraisal and management plan;
 - b) Overall settlement layout and relationship to established landscape setting;
 - c) Historic pattern of thoroughfares, roads, paths and open spaces, where these provide evidence of the historic evolution of the settlement, and the historic street scene;
 - d) Distinctive character zones within the settlement;
 - e) Mix of building types and uses, if significant to the historic evolution of the settlement;
 - f) Use of locally distinctive building materials, styles or techniques;
 - g) Historic elevation features including fenestration, or shop fronts, where applicable;
 - h) Significant trees, landscape features, boundary treatments, open space, and focal points; and
 - i) Existing views and vistas through the settlement, views of the skyline and views into and out of the conservation area.
2. Within a conservation area, development proposals which involve the total or substantial demolition of buildings or structures will only be permitted where it is sufficiently demonstrated that:
 - a) The current buildings or structures make no positive contribution to the special architectural or historic interest, character or appearance of the conservation area; and
 - b) The replacement would make an equal or greater contribution to the character and appearance of the conservation area.

5.132 The purpose of Policy SD15 is to set out more detailed criteria for development proposals within or affecting conservation areas. Reference to character zones relates to the discrete character areas described within some individual conservation area appraisals.

5.133 Some historic settlements within the National Park are small or diffuse in nature. The conservation area boundaries of these diffuse settlements may not reflect the broader heritage interest of their surrounds. Policy SD15 reflects the importance of setting and extends consideration to such locations.

5.134 More information on trees within conservation areas is provided in the introductory text for Policy SD11: Trees, Woodland and Hedgerows.

Development Management Policy SD16: Archaeology

1. Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance.
2. There will be a presumption in favour of preservation in-situ for Scheduled Monuments and other archaeological heritage assets of equivalent significance.
3. Development proposals that will result in unavoidable harm to, or loss of, an archaeological heritage asset's significance, will only be permitted where there is a clear justification in terms of public benefits arising from the development which outweigh that harm and, in the case of substantial harm/loss, also meet the following requirements:
 - a) There is no less harmful viable option; and
 - b) The amount of harm has been reduced to the minimum possible.

In these cases, preservation by record secured through an agreed Written Scheme of Archaeological Investigation will be required.

5.135 The purpose of Policy SD16 is to set out more detailed criteria for development proposals affecting heritage assets with archaeological interest. Archaeological sites are finite, irreplaceable and fragile resources which are

vulnerable to damage, either from specific works or from gradual degradation over time. Archaeology is not just the ancient remains of early people but also includes the recent evidence of industry and housing.

5.136 When considering archaeological resources, the Authority will consider advice from the relevant curatorial/development management archaeologist for that purpose.

SIGNIFICANCE OF ARCHAEOLOGICAL HERITAGE ASSETS

5.137 The most significant known archaeological heritage assets are usually designated as scheduled monuments, and are of national or international importance. It is widely recognised that there are sites which have an equal significance, but which are non-designated heritage assets. If the significance of such sites have been demonstrated, they will be treated in the same way as scheduled monuments. In addition, there are many other archaeological sites which do not have such a great significance but which form a valuable part of the National Park's historic environment. These may also be referred to as non-designated heritage assets. The relevant HER is the definitive record of all known archaeology, including such sites. The nature of the archaeological record also means that there are many sites of which nothing is presently known, which may be revealed during development works.

5.138 Planning decisions will take account of the significance of remains, including the wider benefits that conservation of the historic environment can bring. Development proposals potentially affecting known or suspected archaeological resources will be required to include a Heritage Statement.

5.139 The level of detail required in a Heritage Statement should be proportionate to the heritage asset's importance. It may comprise a desk-based assessment, using the known archaeology recorded in the HER, but it can also extend to various forms of field evaluation.

IN-SITU ARCHAEOLOGICAL HERITAGE ASSETS

5.140 Preservation of archaeological assets in situ is the preferred position. In respect of scheduled monuments or non-designated heritage assets of

equivalent significance, the preservation of the archaeological remains in situ and undisturbed will usually be required. In some cases this can be achieved by avoiding sensitive areas. It should be noted that development which affects a scheduled monument and its setting will require permission from the Secretary of State.

5.141 If a development cannot preserve archaeological assets in situ, the significance of those assets should be established through a desk-based assessment, and where necessary field evaluation including geophysical survey and/or trial trenching. From this a series of mitigating measures can be identified. The scope of these mitigation works will be set out in a Written Scheme of Investigation in accordance with the professional standards of the Chartered Institute for Archaeologists (CIfA). Information from this investigation and recovered archaeological assets should be made available as appropriate, for public understanding and appreciation.

WRITTEN SCHEME OF ARCHAEOLOGICAL INVESTIGATION

5.142 Any projects where significant archaeological interest has been established, such as projects involving major infrastructure, and/or within

historic urban centres (particularly those which are the subject of an extensive urban survey), may require a programme of archaeological work. The details must be set out in the *Written Scheme of Investigation*. This will include a programme which promotes a wider understanding and appreciation of the site's archaeological heritage in a local and regional context.

5.143 The *Written Scheme of Investigation* must provide for the deposition of the record created by any investigation or recording in a publicly accessible institution such as a Record Office or accredited museum. It must also provide for the publication and dissemination of the information gathered through the *Written Scheme of Investigation*.

5.144 In addition to direct physical impacts on archaeology, development can potentially impact on the setting of archaeological sites and this will be assessed. Where there is evidence of deliberate neglect or damage to archaeology, its deteriorated state will not be taken into account in any decision.

5.145 The Authority will require all archaeological works to be undertaken to proper professional standards, as defined by the CIfA.

5D. WATER

INTRODUCTION

5.146 This section of the Local Plan includes two strategic policies relating to the protection of water assets. Policy SD17 seeks to protect the quality of groundwater and surface water features. Policy SD18 seeks to protect the open and undeveloped nature of the National Park coastline. These policies are interrelated through the water cycle, ecosystem services and marine planning, which applies up to the tidal extent of seawater in the estuaries of the rivers within the National Park.

5.147 The National Park contains a diverse range of groundwater and surface water features. Groundwater is the water which is held underground in the soil or in pores and crevices in rock. Groundwater features include aquifers and sources such as headwaters and springs. Surface water features include rivers, lakes, winterbournes, estuaries and open coastline. Water plays an important role in the special qualities of the National Park and also offers essential supporting, provisioning and cultural ecosystem services.

5.148 Groundwater is a key part of the water cycle: it provides an important source for rivers, sustaining flows in dry periods, and thus supporting wildlife habitats. Two aquifers, one chalk and one greensand, supply people inside and outside of the National Park with high-quality drinking water. Both aquifers

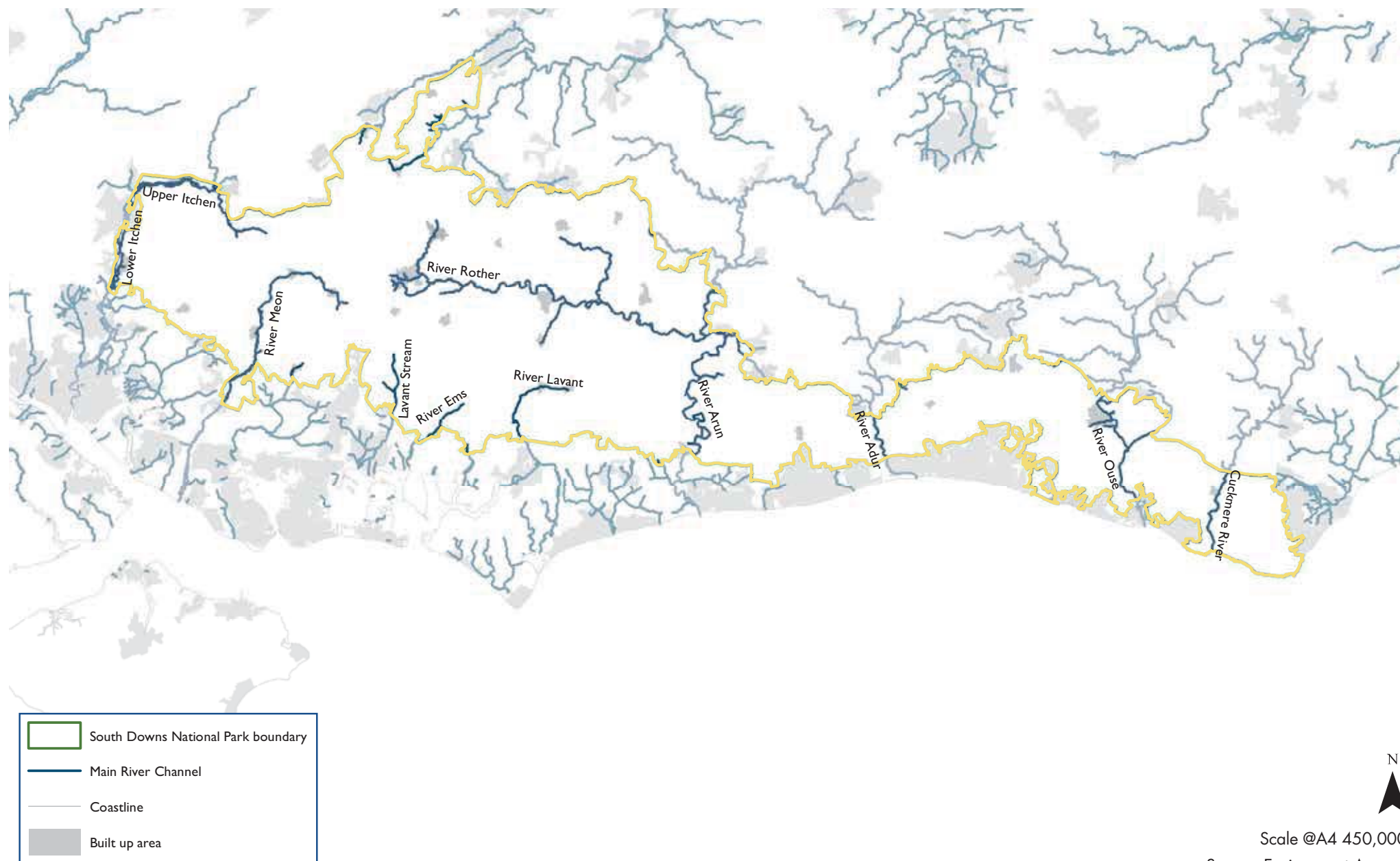
are under stress. The future demands of development from inside and outside of the National Park from water abstraction poses a risk. The quality of ground water is easily polluted directly and indirectly. It is therefore better to prevent or reduce the amount of contamination at source rather than treat it afterwards.

5.149 There are eleven main rivers⁵¹ flowing through the National Park shown in Figure 5.5 and numerous other important watercourses and other surface water features. These do not function in isolation and have complex and dynamic interactions with the landscape.

5.150 The National Park has 17.5km of largely undeveloped open coastline incorporating the whole of the Sussex Heritage Coast, the iconic coastline between Eastbourne and Seaford where the South Downs meets the sea. Heritage coasts have four purposes, three of which align with National Park purposes and duty. The additional purpose is to maintain and improve the health of inshore waters affecting heritage coasts and their beaches through appropriate environmental management measures. Figure 5.6 is a map of the National Park's coastline showing its designations and attractions.

⁵¹ Main rivers are larger streams and rivers but also include smaller watercourses of strategic drainage importance. They are shown on a main river map and the EA has powers to carry out flood defence works

FIGURE 5.5: MAP OF THE MAIN RIVERS ACROSS THE NATIONAL PARK



★ Strategic Policy SD17: Protection of the Water Environment

1. Development proposals that affect groundwater, surface water features, and watercourse corridors will not be permitted unless they conserve and enhance the following:
 - a) Water quality and quantity, and help achieve requirements of the *European Water Framework Directive*, or its replacement;
 - b) Ability of groundwater, surface water features and watercourse corridors to function by natural processes throughout seasonal variations, within the immediate vicinity, and both upstream and downstream of the site of the proposal; and
 - c) Specifically for surface water features and watercourse corridors:
 - i. Biodiversity;
 - ii. Historic significance;
 - iii. Character, appearance, and setting;
 - iv. Public access to and along the waterway for recreational opportunities; and
 - v. Ability for maintenance of the watercourse, including for flood risk management purposes.
2. Development within Groundwater Source Protection Zones (SPZs) will only be permitted provided that there is no adverse impact on the quality of the groundwater source, and provided there is no risk to its ability to maintain a water supply.
3. Development proposals must incorporate measures to eliminate risk of pollution to groundwater, surface water and watercourse corridor features which would harm their ecological and/or chemical status.
4. Development proposals for the provision of agricultural reservoirs that aid demand management, water efficiency and water storage will be permitted where they are compatible with the National Park purposes.

5.151 The purpose of Policy SD17 is to protect groundwater and surface water assets; ensuring that proposed development, either individually or cumulatively, does not cause the quality of groundwater and surface water assets to deteriorate. Development should also seek to deliver enhancements to groundwater and surface water features and should incorporate an ecosystems services approach as set out in Policy SD2: Ecosystem Services. This policy therefore applies to any development proposals which may impact on groundwater or surface water features.

5.152 Coastal waters are included in this policy because the *Water Framework Directive (WFD)* extends to cover coastal waters.

WATERSOURCES AND WATERCOURSE CORRIDORS

5.153 The corridor of a watercourse can be defined as the width of the channel in which water flows, plus its extensive influence on its surrounding landscape that is necessary for its natural functioning. This is characterised by many natural interactions between topography, hydrology, flooding hazards, geology, soils, climate, flora and fauna.

5.154 The location and design of development alongside watercourses must ensure that the watercourse corridor is protected and must positively respond to their character and appearance, setting and functions, making the most of opportunities to enhance the watercourse environment, including public access.

5.155 The character, appearance and setting of watercourses reflect both natural and human influence over time. Requirements regarding landscape character and appearance and setting are found in policies SD4: Landscape Character and SD5: Design. Reference should be made to the *SDILCA* and *South Coast Seascape Character Analysis* when assessing the impact of potential development on landscape character.

5.156 Opportunities to access and enjoy rivers relate to the second purpose of national parks with many recreational opportunities such as canoeing, fishing, walking or observing their wildlife. All development proposals alongside watercourses should maximise opportunities to enhance recreational public access, whilst ensuring biodiversity is conserved.

5.157 Where a watercourse is present on a development site, it should be retained or restored into a natural state and enhanced where possible. Any enhancements and mitigation should inform the earliest stages of the design process. The culverting of watercourses will not be permitted, and development should wherever possible remove existing culverts.

5.158 Development should be laid out to enable maintenance of the watercourse, including for flood risk management purposes where appropriate. In order to protect the watercourse and its corridor from pollution, to allow for the natural function, to protect biodiversity and to support long term management, development should not be located within a distance of 8 metres of the watercourse. Wider buffer strips may be appropriate, depending on the nature of the topography or sensitivity of habitat. These buffer strips should form part of the overarching landscape design of the site and arrangements should be made for long-term management.

GROUNDWATER/AQUIFERS

5.159 The quality of groundwater is easily polluted directly and indirectly from many types of development, and is difficult to remediate. It is therefore better to prevent or reduce the amount of contamination at source. Consideration should be given to the requirements in policies SD9: Biodiversity and Geodiversity and SD48: Climate Change and Sustainable Use of Resources.

5.160 The EA provides information on areas which are sensitive to groundwater pollution and on the presence of solution features (karst) in the chalk which are preferential pathways for pollutants. It defines SPZs for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. Maps of SPZs are available on the EA's website. These show three main zones (inner, outer, and total catchment) and a fourth zone of special interest to a groundwater source, which usually represents a surface water catchment that drains into the aquifer feeding the groundwater supply.

5.161 There are also a number of private water supplies, which are not under the control of a licensed water undertaker. These supplies have their own SPZs,

the details of which are held by local authorities who should be consulted on any development proposals that are in the vicinity.

5.162 The EA may be consulted during the determination of planning applications, and conditions directed at preventing deterioration of water quality and quantity may be imposed on any approved development. This may also be achieved through the requirements of Policy SD50: Sustainable Drainage Systems. Particular attention will be paid to proposals for waste disposal, on-site sewage disposal, agriculture, and industrial and chemical processes. Advice should be sought at the earliest opportunity from the Authority on the sensitivity of a location in regard to aquifers.

WATER QUALITY AND POLLUTION

5.163 Pollution pressures arise in part from urban and rural surface water run-off that represent key challenges in meeting the WFD. Therefore, the Authority expects that pollution prevention measures, water efficiency measures to reduce surface water run-off, and sustainable drainage measures are incorporated into new development, in accordance with policies SD48: Climate Change and Sustainable Use of Resources and SD50: Sustainable Drainage Systems. Site investigation and remediation of contaminated land is required in accordance with Policy SD55: Contaminated Land. An adequate buffer zone should be provided between the development and surface water features.

5.164 The preferred method of foul drainage is to connect to the mains system at the nearest point of adequate capacity.

AGRICULTURAL RESERVOIRS

5.165 In general, reservoirs are not supported within the National Park due to their impact on the landscape. Proposals for large scale reservoirs would be subject to the requirements of Policy SD3: Major Development. The role of small scale, agricultural reservoirs in certain circumstances is understood for sustainable water management. The design of any agricultural reservoirs will be carefully considered in relation to a range of considerations including reservoir safety, flood attenuation and risk, landscape character

and biodiversity. Reference should also be made to Policy SD4: Landscape Character and Policy SD39: Agriculture and Forestry.

★ Strategic Policy SD18: The Open Coast

1. Development proposals within the Sussex Heritage Coast area and the undeveloped coastal zone of the National Park, as defined on the Policies Map, will not be permitted unless they:
 - a) Meet one of the following two criteria:
 - i. Are appropriate to the coastal location and conserve and enhance the character of the Heritage Coast/undeveloped National Park coastline; or
 - ii. Are necessary for the operational needs of activities in support of the Heritage Coast.
- and
- b) Are consistent with the Beachy Head to Selsey Bill Shoreline Management Plan, or its replacement;
 - c) Conserve and enhance coastal access to/from the coast and along the coastline; and
 - d) Cause no adverse impact on any designated MCZ and should ensure their conservation and, where possible, enhancement.

5.166 Policy SD18 seeks to protect the undeveloped nature of the National Park coastline both within and outside the Sussex Heritage Coast, and ensure that vulnerability to any new development is minimised. It ensures a level of protection consistent with the *Marine Policy Statement*, emerging *South Marine Plan*, the *Heritage Coast Definition* applying to the Sussex Heritage Coast, and the *Beachy Head to Selsey Bill Shoreline Management Plan*.

5.167 The policy applies to both the undeveloped coastal zone and the Sussex Heritage Coast shown in Figure 5.6 and the Policies Map. The undeveloped coastal zone outside the Heritage Coast, is a zone defined as 1 km inland from the National Park coastal boundary extending east and west as far as the National Park's boundary for each section of coastline.

CHARACTER OF THE UNDEVELOPED COAST

5.168 The character of the undeveloped coast has been, and continues to be, heavily influenced by natural and human pressures. Sensitive design that relates to the relevant seascape and landscape character analysis is required for this iconic location. In particular, reference should be made to both the *SDILCA* and *South Coast Seascape Character Analysis*⁵² when assessing the impact of potential development on landscape character. A coordinated approach to development is required which takes into account the various pressures outside/adjacent to this vulnerable area including coastal port infrastructure, offshore development and recreational pressures, which have the potential to impact on the coastal area and the seascape. In this respect their landscape sensitivity demands equal protection to the Heritage Coast area.

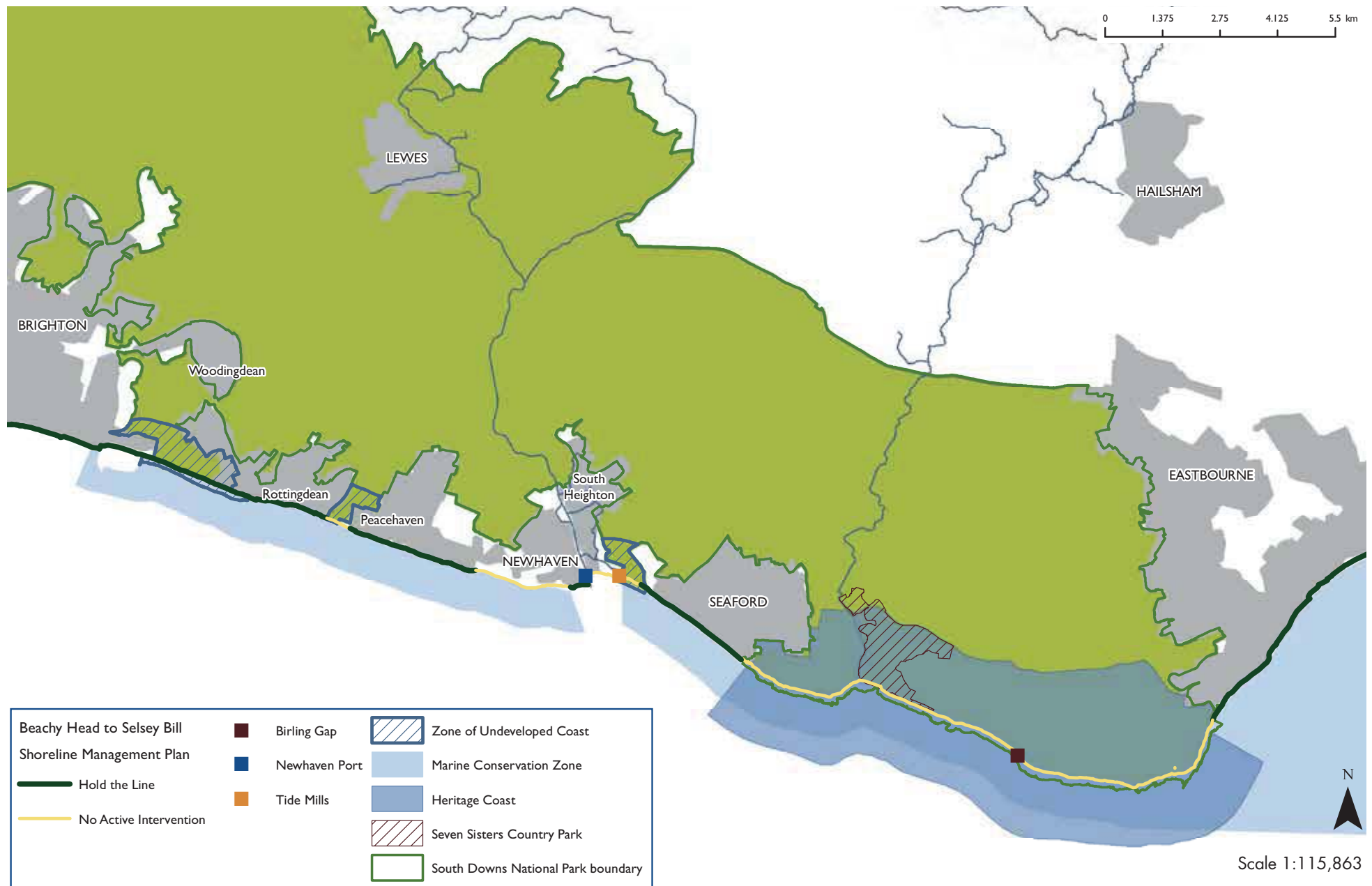
⁵² www.gov.uk/government/publications/seascape-assessment-for-the-south-marine-plan-areas-mmo-1037

OPERATIONAL NEEDS OF CERTAIN ACTIVITIES

5.169 Purpose 4 of Heritage Coasts provides the basis for Criterion (b) of Policy SD18. Improvements to existing sea defence works are not usually subject to planning control although the National Park Authority would expect to be consulted on any proposed changes. Planning permission is, however, required for new sea defence works. As sea defences can have a considerable effect on the coastal environment and natural beauty of the area as well as coastal access, good design will be essential to ensure proposals conserve their surroundings visually and enhance coastal access, where possible.

BEACHY HEAD MARINE CONSERVATION ZONE

5.170 There is one MCZ situated off the National Park coastline, the intertidal section of which intersects with the Local Plan area, namely Beachy Head West. The purpose of these zones is to protect the biodiversity of our marine environment.

FIGURE 5.6: MAP OF THE SUSSEX HERITAGE COAST AND THE 'UNDEVELOPED COASTAL ZONE'

A photograph of a woman and a young child walking along a wooden fence in a green field. The woman is wearing a dark blue shirt and jeans, and the child is wearing a pink shirt. They are both smiling. The background shows rolling green hills under a cloudy sky.

PEOPLE CONNECTED TO PLACES

INTRODUCTION

6.1 The theme for this chapter, People Connected to Places, is taken from the *PMP*⁵³. It is primarily based on the second purpose of the National Park, namely, to promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public. It is also relevant to the National Park duty. The policies in this chapter are divided into two sub-sections: sustainable transport, and understanding and enjoyment of the National Park.

6.2 Improving the efficiency of transport networks and the promotion of sustainable tourism are both key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the *Duty to Cooperate*.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 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

Objective 5: To protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities

⁵³ Partnership Management Plan: Shaping the future of your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

6A. SUSTAINABLE TRANSPORT

INTRODUCTION

6.3 This section of the Local Plan contains two strategic policies and two development management policies. The first strategic policy, SD19: Transport and Accessibility, seeks to minimise the traffic impacts of new development and facilitate improvements to public transport. The second strategic policy, SD20: Walking, Cycling and Equestrian Routes, is focussed on the protection and enhancement of the PRoW network and the safeguarding of land for new routes. The first development management policy, SD21: Public Realm, Highway Design and Public Art, is about the protection of the existing public realm especially historic rural roads and ensuring that new developments provide good quality public spaces. Finally, Policy SD22: Parking Provision, covers new public vehicle parks and parking on private developments.

6.4 Effective planning policies on transport routes and the public realm are essential to fulfilling the National Park purposes and duty. Firstly, our transport policies will facilitate developments that make it easier for people to travel to and around the National Park by sustainable means. Secondly, transport policies can help support the National Park Authority's duty to communities, by focussing growth in the most sustainable locations, so it best meets the needs

of residents and businesses while protecting the special qualities. Thirdly, most visitors experience the National Park's special qualities mainly whilst travelling. Therefore the public realm (such as roads, pavements, public rights of way and open access land) needs to be conserved and enhanced, to improve people's experience of it.

6.5 There are a number of studies supporting the transport policies in the Local Plan. The *Transport Study Phase 1*⁵⁴ provides an inventory of existing available data in relation to transport issues and an overview of the issues affecting the National Park. The *Local Plan Transport Assessment*⁵⁵ looks at the impact of the Local Plan's proposed development in Petersfield, Liss, Midhurst and Petworth, and at the former Syngenta site, on traffic flows through key junctions in the National Park. The *Site Allocations Highways Assessment* looks at all the housing allocations set out in Chapter 9⁵⁶. Finally, *Roads in the South Downs*⁵⁷ provides a resource and reference point for emerging best practice in rural and urban highway design, drawing on experience gained in other UK National Parks.

⁵⁴ SDNPA Transport Study – Phase 1 Report (MTRU, 2013)

⁵⁵ Transport Assessment of the South Downs Local Plan (Hampshire Services, 2017)

⁵⁶ Site Allocations Highways Assessment (Hampshire Services, 2017)

⁵⁷ Roads in the South Downs (Hamilton-Baillie Associates Ltd, 2015)

Strategic Policy SD19: Transport and Accessibility

1. Development proposals will be permitted provided that they are located and designed to minimise the need to travel and promote the use of sustainable modes of transport.
2. Development proposals that are likely to generate a significant number of journeys must be located near existing town and village centres, public transport routes, main roads and, where relevant, the cycle network. Such developments will be required to provide a transport assessment or transport statement.
3. Development proposals must demonstrate the continued safe and efficient operation of the strategic and local road networks.
4. The following improvements to transport infrastructure will be supported:
 - a) Public transport waiting facilities, particularly those with reliable and accessible information;
 - b) Infrastructure supporting the transfer of freight from road to rail and water;
 - c) Improvements to walking, cycling and bus connectivity at all transport interchanges; and
 - d) Improvements to the quality and provision of cycle parking at railway stations and key bus stops.
5. In town and village centres, development will be permitted which appropriately provides for improved footways and cycle routes, cycle parking, and measures to restrict the impact of heavy goods vehicles and other traffic on historic streets.

6.6 The purpose of Policy SD19 is to encourage development towards the most sustainable locations in transport terms. All new development will be expected to be located and designed so as to minimise the need to travel, and to maximise the availability of relevant sustainable transport options, so that growth in private vehicle use is kept to a minimum.

6.7 Information to support a planning application will include a design and access statement stating the likely vehicle movements to be generated by the development, and, for some developments, transport assessments.

TRANSPORT ASSESSMENTS AND TRAVEL PLANS

6.8 A Transport Assessment (TA), Transport Statement (TS), Transport Report (TR) and/or Travel Plan (TP) will be required on development that generates significant amounts of traffic movement. This requirement will be determined in accordance with the relevant guidance and thresholds produced by the local highway authority for the area where the development takes place, whilst having strong regard to the environmental sensitivity of the National Park. The TA, TS and/or TP must set out mitigation measures that are necessary to ensure that development is sustainable and deliverable, and to prevent harm to the special qualities. They must also demonstrate the continued safe and efficient operation of the relevant strategic and local road networks.

6.9 TAs, TSs and TPs will be secured by condition or legal agreement. They must be agreed with the Authority at the earliest opportunity, with appropriate input from the local highway authority and Highways England if required. The impact of traffic generated from a development should be considered cumulatively by taking into account all committed development in the area including, where relevant, outside the National Park.

6.10 The HRA identified that some traffic movements may have the potential to impact on internationally designated nature conservation sites. This should be duly taken into account when considering the transport impact of new development. Further information is set out in Policy SD9: Biodiversity and Geodiversity and its supporting text.

PROVISION OF PUBLIC TRANSPORT

6.11 There is potential to improve the role of railway and bus stations as hubs by improving bus interchanges, cycle parking and other infrastructure. The provision of more sympathetically designed and located bus shelters can make public transport a more attractive proposition. Connectivity and signage to walking routes into the countryside will also be supported and facilitated

where possible through the planning process. Freight transport by railway and water will also be encouraged, since any reduction in the movement of freight via the road network would be beneficial to the environment.

TOWN AND VILLAGE CENTRES

6.12 The centres of the National Park's towns and villages provide opportunities for developments to take advantage of better public transport connectivity and encourage walking and cycling. However, vehicle traffic has been identified as having a major negative impact on the environment in some settlements. The Authority will seek opportunities to reduce negative impacts from traffic, and to give priority to the safe movement of walkers and cyclists, including through planning decisions.

STRATEGIC ROADS

6.13 Policy SD42: Infrastructure deals with projects relating to strategic roads.

Strategic Policy SD20: Walking, Cycling and Equestrian Routes

1. Development proposals will be permitted provided they contribute to a network of attractive and functional non-motorised travel routes, with appropriate signage, throughout the National Park.
2. The following disused railway line routes within the National Park, as shown on the Policies Map, are safeguarded for existing, and potential future use as non-motorised travel routes. Development proposals that facilitate such use will be permitted. Development proposals that adversely affect their future potential as non-motorised transport routes will be refused:
 - a) Bordon to Bentley;
 - b) Petersfield to Pulborough (via Midhurst);
 - c) Chichester to Midhurst (Centurion Way);
 - d) Wickham to Alton (Meon Valley Trail);
 - e) Guildford to Shoreham-by-Sea (Downs Link);
 - f) Liss to Longmoor;
 - g) Devil's Dyke Route; and
 - h) New Alresford to Kingsworthy (Watercress Way).
3. The following corridors, as shown on the Policies Map, are safeguarded for future restoration to their respective historic uses. Development proposals will not be permitted where they would adversely affect their future potential for such restoration. Proposals for restoration to their historic uses will be supported:
 - a) The original course of the former Lewes – Uckfield railway line; and
 - b) The Wey and Arun Canal.

4. Development proposals will be permitted provided they protect and enhance existing crossings provided for non-motorised travel routes across major roads, railways and watercourses. Proposals for sensitively designed new crossings, and proposals to upgrade the safety of existing crossings, will be supported.
5. Development proposals will be permitted provided they incorporate attractive, accessible public links through the site, which are suitable for pedestrians, cyclists, mobility scooters and equestrians as appropriate, which connect to the nearest convenient point on the public rights of way network and/or local footway network.
6. Development proposals will be permitted provided that they:
 - a) Maintain existing public rights of way; and
 - b) Conserve and enhance the amenity value and tranquillity of, and views from, non-motorised travel routes and access land.

6.14 The purpose of Policy SD20 is to safeguard and enhance the extensive network of routes across the National Park, which provide motor traffic-free travel and recreational opportunities. These non-motorised travel routes include public rights of way, for example footpaths, bridleways and restricted byways, as well as permissive rights of way, designated cycle routes and quiet, very lightly-trafficked lanes.

6.15 These routes are a valued asset to many types of user, including cyclists, walkers, horse riders and users of mobility aids. They are a fundamental element of Purpose 2, and greatly valued by local communities and visitors to the National Park alike. Being so close to many urban areas, the National Park should also be easily accessible from those areas by non-motorised transport routes. The National Park Authority will work to increase accessibility by public rights of way and other non-motorised routes, and also take opportunities to increase connectivity between the rights of way network and public transport, whilst avoiding harm to the special qualities.

DISUSED RAILWAY LINES

6.16 There are a number of former railway lines running through the National Park which present outstanding opportunities for new non-motorised user paths. These are defined as routes for pedestrians, cyclists and horse-riders for leisure and/or commuting. The use of electric powered vehicles may be permissible in some circumstances, for example pedelecs (low-powered electric bicycles) and Class 2 mobility scooters or any updated equivalent. Some of these routes are already partly converted to non-motorised user paths, and development to extend the network is underway. The safeguarding of these routes will protect them from any development that would prevent future proposals to convert them to non-motorised user paths.

6.17 In many cases, the exact route of development for these schemes is not yet established; some diversions from the original railway line route may well ultimately be necessary. If a site along one of the safeguarded routes is proposed for redevelopment or conversion then the route of the former railway must be protected within the proposed development.

6.18 In instances where the line passes in or close to designated wildlife sites or where a survey reveals protected species, regard must be had to relevant policies in the development plan particularly Policy SD9: Biodiversity and Geodiversity. A diversionary route may prove to be more appropriate.

6.19 Development of a recreational transport route within the Singleton & Cocking Tunnels SAC will not be permitted and this section is left out of the safeguarding of the Chichester to Midhurst railway line route. Likewise, the section of the Liss – Bordon Railway which runs through Longmoor and Woolmer Forest is not suitable for development; the only safeguarded section of this route is that between Liss and Longmoor, which already operates as a non-motorised transport route.

6.20 Wherever possible, development proposals on disused railway lines should retain existing structures and features connected with railway use.

RESTORATION OF ABANDONED ROUTES

6.21 The National Park Authority supports restoration of the short sections of the Lewes – Uckfield railway (near Hamsey) and the Wey and Arun Canal to railway and canal use respectively, and will safeguard these routes. Proposals for such restoration should provide suitable routes for non-motorised travel alongside the new railway or canal, wherever feasible. Should proposals for a non-motorised transport route (as described in Criterion 2) come forward on the route of the Lewes – Uckfield railway, before it is restored to railway use, these will also be supported.

CROSSING MAJOR ROADS AND RAILWAYS

6.22 Major roads and railways can often create breaks and safety hazards in the network of public rights of way and non-motorised routes. The result is that some leisure users may be discouraged from accessing the National Park. Proposals for developments to reduce the severance effect of major roads and railways will generally be supported. Policies SD4: Landscape Character, SD5: Design and SD9: Biodiversity and Geodiversity will be of particular relevance in considering such applications. Existing crossing points, including existing bridges across watercourses, will be protected, and their safety conserved and enhanced where possible, including through Section 106 contributions. Enhancement may include the introduction of speed limits, signage or a change of surface or levels. Wherever new crossing places are installed, they should be well-signed, of a high quality and locally distinctive design, respecting their setting and convenient and safe for all non-motorised users who may legitimately wish to use them.

CONNECTIONS FROM NEW DEVELOPMENT

6.23 Where new development takes place, it should provide opportunities for new or enhanced connections for pedestrians, cyclists and horse riders. This should be achieved on-site, and where appropriate off-site. Wherever possible, development proposals with potential to generate footfall, for example residential development, employment uses, and development open to the public, should provide the appropriate infrastructure to link routes on site to the

nearby public rights of way network, footways and, where relevant, the routes listed in Criterion 2 of Policy SD20.

PROTECTING THE AMENITY OF PUBLIC RIGHTS OF WAY, OTHER NON-MOTORISED ROUTES AND ACCESS LAND

6.24 The rights of way network, together with access land, non-motorised user paths and permissive paths, are some of the National Park's most important assets in attracting visitors, and the Authority will protect the quality of experience enjoyed by users. Development which harms views from, or is otherwise detrimental to the amenity value, character and tranquillity of public rights of way and other non-motorised user routes, will not be permitted. This includes development that would increase vehicular traffic on the network, for example, on a public right of way that follows the line of a private driveway, to the detriment of its enjoyment by walkers, cyclists and horse riders. Developments that are likely to generate significant additional pressure on the surrounding rights of way network will be required to provide a mitigation contribution to the local transport authority (LTA) towards enhancing the local network.

6.25 Developments affecting PRoW must refer to the *Rights of Way Improvement Plan* for the local area, and any relevant LTA design standards applicable to rights of way. A commuted sum may be required to cover future maintenance. The historic alignment of rights of way should be safeguarded. In exceptional circumstances it may be appropriate to make minor diversions to rights of way, providing the amenity value and convenience for their users is not harmed; such changes will also be subject to application for a *Public Path Order*.

Development Management Policy SD21: Public Realm, Highway Design and Public Art

1. Development proposals will be permitted provided that they protect and enhance highway safety and follow the principles set out in the document, *Roads in the South Downs*, or any future replacement.
2. Development will not be permitted where it would reduce the biodiversity, landscape and amenity value and character of historic rural roads. Particular attention will be given to new access points and other physical alterations to roads, and to the impacts of additional traffic.
3. Site layout must be designed to protect the safety and amenity of all road users. The design and layout of new development must give priority to the needs of pedestrians, users of mobility aids, cyclists and equestrians. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it.
4. Street design and management proposals must be context-sensitive, responding to the specific character, activities, heritage, built form and layout, materials and street furniture of the location. Highway design must pay particular attention to the role and location of buildings, doors and entry points.
5. Appropriately designed and located new public art will be supported, in particular within settlements. New public art should be site specific, reflecting and respecting the site and its context.

6.26 The purpose of Policy SD21 is to protect and enhance the public realm and street scene in the National Park, for the benefit of all users and in support of Purpose 2 of the National Park in particular.

ROADS IN THE SOUTH DOWNS

6.27 The guidance document *Roads in the South Downs* developed by the local highways authorities and the National Park Authority, sets out broad principles and procedures which should be followed by all developments involving changes to the public realm and the creation of new public spaces

and highways. Development proposals will not be permitted where they do not protect highway safety whilst following the principles of context-specific design set out in *Roads in the South Downs*. Development will be expected to contribute to the adaptation of existing highways so that standardised road infrastructure can be minimised in a way consistent with highway safety.

HISTORIC RURAL ROADS

6.28 Historic rural roads are defined as those roads outside towns shown on the *second edition of the Ordnance Survey*⁵⁸, which have not undergone significant widening or straightening in the intervening period. 'Roads' in this context refer to the highway itself as well as any associated pavements or cycle paths, verges, banks, ditches and boundary features.

6.29 Both development proposals themselves, and their off-site traffic impacts, may impact on historic rural roads. Physical impacts may include the removal of portions of hedgerows and banks for new access points, or the construction of new kerbs and signage. Development proposals involving physical alterations to roads and their immediate setting should identify whether the roads in question are historic rural roads and if so, demonstrate that the historical significance, ecological, landscape and recreational value and character of those roads are conserved and enhanced. The integrity of banks, hedges, walls and roadside trees must be maintained.

6.30 A Design and Access Statement should demonstrate that Policy SD21 is complied with, covering both physical changes arising from the development and impacts on traffic levels. The level of detail required in the statement should be proportionate to the expected impact. As a guideline, any development proposal outside Lewes, Petersfield, Midhurst, Petworth and Liss which comprises at least one net additional dwelling, or the addition or change of use of 100m² or more of floorspace, will generally be required to specifically address the matters set out in Policy SD21.

⁵⁸ Ordnance Survey 2nd edition, Six-inch to the mile, England and Wales, 1891 – 1914: accessible online through various providers including National Library of Scotland, <http://maps.nls.uk/os>

6.31 Firstly, the statement must detail the expected traffic flows arising from the development and whether any routes leading to or from the site are likely to experience a traffic increase of approximately 10% or more on existing hourly vehicular traffic as a result. Where this applies, the assessment should check whether these routes meet the definition of historic rural roads given above. If that is the case it must be demonstrated that the changes to traffic levels and patterns arising from the development would conserve and enhance the ecological, landscape and recreational value of those roads. Cumulative impact must be taken into account.

6.32 Current levels of agriculture and forestry related traffic are part of the rural character of the National Park. Whilst this policy applies equally to agricultural and forestry developments where planning permission is required, there may be circumstances where benefits to the purposes of the National Park from specific agricultural or forestry operations outweigh a negative impact of traffic increases arising from those operations that would otherwise be unacceptable.

STREET LAYOUT

6.33 This policy, specifically covering areas within the public realm, must be read in close conjunction with Policy SD5: Design, which discusses the design of new development more broadly.

6.34 *Roads in the South Downs* and the national guidance documents *Manual for Streets*⁵⁹, *Manual for Streets 2*⁶⁰ and the *Design Manual for Roads and Bridges*⁶¹ provide useful guidance in relation to site layout, design and the safety of all users. Street clutter should be minimised and removed where safe to do so. Formal traffic calming measures can be inappropriate; good design at the outset should limit the need for further physical measures. New and amended road layout and design in rural areas should take account of

the movement of large vehicles and machinery associated with agriculture and forestry.

6.35 Given the ageing population of the local area and the importance of visitors from this demographic group to the National Park's economy, it is especially important that the needs of disabled users of the public realm be factored into the design of new development at an early stage. A locally distinctive and easily legible and navigable environment is particularly important for people with visual impairments and those with dementia.

SENSITIVITY TO CONTEXT

6.36 Context-specific design of the public realm is important for maintaining and enhancing the attractiveness and distinctiveness of towns and villages. *Roads in the South Downs* and the Historic England document, *Streets for All: South East*⁶² provide guidance on this.

6.37 New street lighting may be considered inappropriate in areas of the National Park due to the need to protect dark night skies. Detail on street lighting is contained in Policy SD8 (Dark Night Skies).

PUBLIC ART

6.38 Public art is generally more characteristic of towns, villages and designed landscapes than of the broader countryside. The principle of new public art will be supported within settlement boundaries, especially when incorporated into the fabric of developments by the engagement of artists at an early stage in the design process. Proposals for new public art outside settlement boundaries, where it is subject to the planning process, will be assessed on a case by case basis according to the policies contained in this Local Plan.

⁵⁹ *Manual for Streets* (Department for Transport, 2007)

⁶⁰ *Manual for Streets 2: Wider Application of the Principles*, (Chartered Institution of Highways and Transportation, 2010)

⁶¹ *Design Manual for Roads and Bridges* (Highways England, last updated 2017)

⁶² *Streets for All: South East* (Historic England, last updated April 2018)

Development Management Policy SD22: Parking Provision

1. Development proposals for new, extended or re-located public parking will be permitted provided that they are located in or adjacent to the settlements listed in Policy SD25: Development Strategy, or have a strong functional link to an established cultural heritage, wildlife or landscape visitor attraction, provided that:
 - a) There is evidence that overriding traffic management or recreation management benefits can be achieved;
 - b) It is a component of a strategic traffic management scheme which gives precedence to sustainable transport; and
 - c) The site is close to and easily accessible from main roads by appropriate routes, and well connected to the PRoW network.
2. Development proposals will be permitted if they provide an appropriate level of private cycle and vehicle parking to serve the needs of that development in accordance with the relevant adopted parking standards for the locality. Wherever feasible, electric vehicle charging facilities must also be provided.
3. All new private and public parking provision will:
 - a) Be of a location, scale and design that reflects its context; and
 - b) Incorporate appropriate sustainable drainage systems.
4. All new public parking provision will comply with the following:
 - a) Wherever feasible, electric vehicle charging facilities must be provided. Where located with potential for onward travel by mobility scooter, this should include charging facilities for such scooters; and
 - b) Where located with good accessibility to the bridleway network, include provision for horse box parking.

6.39 New parking areas will be expected to contribute to a range of ecosystem services while protecting the landscape, and their distribution will contribute to the spatial strategy for the National Park.

NEW PUBLIC CAR PARKS

6.40 Roadside car parking is a problem at various locations, causing damage to verges and reducing road capacity. However, the ability of the National Park's road network and car parks to accommodate an increasing number of visitors' cars is limited. It is not practicable, nor would it be desirable in landscape terms, to cater for peak demand. The Authority will direct new public car parking provision to locations in or adjacent to the settlements listed in Policy SD25 (Development Strategy), where it will maximise benefits to the local economy and minimise harm to the landscape.

6.41 The construction of new public car parks should always be justified as part of an overall traffic management scheme whose primary focus is increasing access to the site by public and non-motorised transport. Large scale car parks with supporting infrastructure such as lighting can be particularly obtrusive in the landscape. Development proposals for significant new car parks may be classed as major development within the meaning set out in Policy SD3.

6.42 Traffic Regulation Orders (TROs) can be a means of improving access and preventing inconsiderate parking in towns and villages, and may be necessary in some cases to mitigate the impact of development. Associated street clutter should be avoided and additional signage kept to a minimum.

6.43 There are many existing visitor attractions in the countryside away from settlements related to the National Park purposes, which may wish to expand or relocate their parking facilities. Policy SD22: Criterion 1 only applies to parking areas whose primary purpose is to serve the visitor attraction in question.

PARKING STANDARDS FOR RESIDENTIAL AND NON-RESIDENTIAL DEVELOPMENTS

6.44 The provision of vehicle and cycle parking for new development should be in accordance with the local parking guidance applicable to that area.

DESIGN, LOCATION AND LAYOUT OF NEW VEHICLE PARKING

6.45 New vehicle parking areas, whether public or private, can negatively impact on landscape, the local environment, biodiversity and drainage when inappropriately sited and designed. The cumulative impact of changes on biodiversity and surface water run-off will be given particular consideration when deciding applications for the loss of existing garden space to car parking.

6.46 Permeable parking surfaces should be used in preference to impermeable surfaces unless there are overriding reasons that render their use unsuitable. Materials should be selected which are appropriate to the site context and predicted levels of use. Usage should be made of existing and proposed buildings, landscape features and planting to successfully integrate

the parking area within its surrounding landscape context and avoid negative impacts on local character. Changes to existing parking areas to bring them into line with the principles of *Roads in the South Downs* will be supported.

6.47 The type of parking provided must be accessible to all and resilient to future changes. All new public car parks should therefore deliver a proportion of parking spaces for disabled people/blue badge holders, cyclists and motorcyclists which are compliant with the relevant national and local guidelines for the area. Public parking should address the needs of mobility scooter users, and accommodate horse boxes, in line with the National Park's Purpose 2 and duty. Electric vehicle charging facilities must be provided for in all new parking areas, including residential developments and public car and cycle parks, unless it can be demonstrated that this is not viable or that adequate connections to the electricity grid are not available.

6B. UNDERSTANDING AND ENJOYMENT OF THE NATIONAL PARK

INTRODUCTION

6.48 This section of the Local Plan includes Strategic Policy SD23: Sustainable Tourism, relating to sustainable delivery of development proposals for visitor accommodation, attractions and recreation facilities, supporting the *Sustainable Tourism Strategy*⁶³. It also includes Development Management Policy SD24: Equestrian Uses, relating to the planning, design and management of land on which horses are kept.

6.49 The National Park is a major resource for recreation and tourism, which play a significant role in the local economy. The *South Downs Visitor and Tourism Economic Impact Study*⁶⁴ report noted that, in 2011/12, 46 million visitor days were spent in the National Park, generating over £464m of expenditure and supporting over 8,000 jobs. By supporting and promoting sustainable tourism and recreation there is an opportunity to contribute to sustainable economic growth and contribute to meeting Purpose 2. Where development proposals appear to conflict with Purpose 1, then *The Sandford Principle* will be applied and greater weight will be given to Purpose 1.

6.50 The *South Downs Visitor and Tourism Economic Impact Study* and the *South Downs Visitor Accommodation Review*⁶⁵ found that the tourism sector is largely leisure driven, and there are frequent shortages of all types of accommodation at weekends throughout the year and during the

week in summer. There is strong demand for high-quality accommodation and clear prospects for future growth in the demand for all types of visitor accommodation. There are some gaps in accommodation provision, particularly hotel accommodation in Petersfield and accommodation supply along the South Downs Way. A significant proportion of visits are day trips from those living in the National Park or in the villages, towns and cities surrounding the National Park.

6.51 Enabling the provision of appropriate, properly scaled accommodation will help to manage the number of visitors who stay within the National Park for overnight/multi-night stays.

6.52 The National Park has sensitive habitats and landscapes, and a rich and varied historic environment. The National Park Authority's *Sustainable Tourism Strategy*⁶⁶ has been developed in association with many partner organisations to guide tourism activities and our work with partners, so that visitors enjoy the National Park without compromising its special qualities. The strategy establishes four themes or 'lands' which seek to engage the public, building knowledge and patronage of the National Park. They are Adventure, Cultural, Natural and Working Lands.

6.53 Equestrian activities are strongly linked with the understanding and enjoyment of the National Park through their significant role in shaping the National Park's landscape, agriculture and industry, and their role in recreation and sport. The race meetings at Goodwood and polo fixtures in Midhurst are important national sporting events. The keeping of horses has the potential to make a positive contribution to the local landscape and offers opportunities

⁶³ South Downs National Park Sustainable Tourism Strategy 2015 – 20, (South Downs National Park Authority, 2016)

⁶⁴ South Downs Visitor & Tourism Economic Impact Study: Technical Report on the Research Findings (TSE Research, 2013)

⁶⁵ South Downs National Park Visitor Accommodation Review: Report of Key Findings (Hotel Solutions, 2014)

⁶⁶ South Downs National Park Sustainable Tourism Strategy 2015 – 20 (South Downs National Park Authority, 2017)

to diversify the rural economy. While the grazing of horses does not require planning permission, the keeping of horses and related development does. This type of development includes small-scale private domestic stables, riding schools, commercial livery yards of various scales and polo related activity.

Strategic Policy SD23: Sustainable Tourism

1. Development proposals for visitor accommodation, visitor attractions and recreation facilities will be permitted where it is demonstrated that:
 - a) The proposals will provide opportunities for visitors to increase their awareness, understanding and enjoyment of the special qualities;
 - b) The design and location of the development minimises the need for travel by private car and encourages access and/or subsequent travel by sustainable means, including public transport, walking, cycling or horse riding;
 - c) Development proposals will not detract from the experience of visitors or adversely affect the character, historical significance, appearance or amenity of the area;
 - d) Development proposals make use of existing buildings, and, if no suitable existing buildings are available, the design of any new buildings are sensitive to the character and setting;
 - e) Ancillary facilities are not disproportionately large in relation to the rest of the visitor facilities;
 - f) Any proposal does not have an adverse impact on the vitality and viability of town or village centres or assets of community value; and
 - g) Where proposals are located outside settlement policy boundaries as defined on the Policies Map, they:
 - i. Positively contribute to the natural beauty, wildlife and cultural heritage of the National Park; and
 - ii. Are closely associated with other attractions/established tourism uses, including the public rights of way network; or

iii. Are part of farm diversification schemes or endorsed Whole Estate Plans.

2. Development proposals that would result in the loss of visitor accommodation, visitor attractions and recreation facilities will not be permitted unless :
 - a) Evidence is provided that the current use is financially unviable and a robust marketing campaign of at least 12 months has been carried out that clearly demonstrates there is no market demand for the existing use or an equivalent tourism use; or
 - b) The current use or related development harms the special qualities.
3. The Authority will support a year-round visitor economy, while ensuring the facility remains for visitor use only.
4. Development proposals, on their own or cumulatively with other development uses, must not prejudice or disadvantage people's enjoyment of other existing and appropriate tourism and recreation activities. Development proposals that generate significant additional pressure upon the surrounding rights of way network will be required to mitigate these impacts.

Details of the marketing requirements are set out in Appendix 3.

6.54 The purpose of this policy is to foster the responsible and sustainable delivery of tourism and recreation development in accordance with the *Sustainable Tourism Strategy*. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of the National Park. They should also foster guardianship of the special qualities, for example, by promoting and incorporating the National Park's natural beauty, wildlife, cultural heritage, and the ecosystem services the National Park provides. Proposals will be supported which reflect the four themes as set out in the *SDNPA's Sustainable Tourism Strategy* and future updates. There are many diverse and creative ways in which development proposals could address this, which should be tailored to the context of the proposals.

6.55 This policy applies to recreation facilities which will attract visitors both from within and outside the National Park and contribute to the visitor economy. Requirements and guidance for proposals for recreation facilities to meet local needs within the National Park such as sports pitches and local parks are set out in Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries.

SUSTAINABLE TOURISM

6.56 While the National Park Authority will support growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or causing physical erosion. The Authority will support proposals for sustainable attractions and recreational activities, which avoid undesirable impacts, and contribute to the conservation and enhancement of the natural environment whilst providing for the needs of users and bringing benefits to the local economy.

PROPOSALS OUTSIDE OF SETTLEMENT BOUNDARIES

6.57 Development proposals for visitor accommodation, attractions and recreation facilities should be located sustainably. Locating such tourism development within existing settlements, particularly those identified as hubs in Chapter 3: Spatial Portrait and Strategy give most opportunity for access to sustainable transport and other facilities, helping to minimise use of the private car.

6.58 Given the nature of some tourism-related and recreational activities, a more rural location or proximity to a geographically specific feature, such as the coast or a river, may be required. Criterion 1(g) of Policy SD23 seeks to ensure that these are planned for appropriately. An example of how a proposal might contribute to Purpose 1 and to ecosystem services, is habitat restoration of a degraded site.

6.59 Every opportunity for sustainable travel should be utilised including access to the site and/or subsequent travel, for example bicycle hire provision, as part of visitor accommodation. This is to ensure that the proposals are in accordance with National Park purposes and do not harm the special qualities.

RETENTION AND REUSE OF EXISTING BUILDINGS

6.60 Landscape character and built form are central to the attractiveness of the National Park as a destination for visitors and therefore, in the first instance, proposals should retain and utilise existing buildings. If existing buildings are not available, or are causing harm to the special qualities, then proposals for any new buildings should be accompanied by justification and evidence that the proposals are sensitive to the site and its wider context. Favourable consideration will be given to the removal of existing buildings which produce net gains for landscape.

RETENTION OF VISITOR ACCOMMODATION, VISITOR ATTRACTION, RECREATION FACILITIES AND ASSOCIATED DEVELOPMENT

6.61 The Authority will seek to retain visitor accommodation. This is supported by existing evidence in the *Visitor Accommodation Review*, which indicates a need to increase capacity and potential for growth in demand for visitor accommodation. This study also identifies that due to the availability of sites for new development, any loss of visitor accommodation can be difficult to replace. Proposals that would result in the loss of visitor accommodation will be required to demonstrate that it is financially unviable, by providing evidence in accordance with Part 2(a) of Policy SD23, and in accordance with Appendix 3: Marketing Requirements for Change of Use Applications.

6.62 The minimum marketing period required by Policy SD23 is 12 months. A longer marketing period may be required to cover more than one season or where the existing use is located in close proximity to established tourist attractions or the rights of way network.

6.63 Redevelopment of visitor accommodation, visitor attraction, recreation facilities or associated development which is currently resulting in harm to

the special qualities of the National Park should, in the first instance, be redeveloped for other more suitable tourist or community uses.

YEAR-ROUND VISITOR ECONOMY

6.64 In order to support a year-round visitor economy, the Authority may support proposals for the relaxation or removal of seasonal planning restrictions, where appropriate. Instead, conditions will be used to prevent the occupation of accommodation as a permanent residential dwelling and restrict continuous periods of stays by occupiers, ensuring the facility remains for visitor use.

Development Management Policy SD24: Equestrian Uses

1. Development proposals for equestrian development will be permitted where they:
 - a) Are of a scale and/or an intensity of equestrian use compatible with the landscape and the special qualities;
 - b) Demonstrate good design which is well located and responds to local character and distinctiveness;
 - c) Re-use existing buildings wherever feasible and viable;
 - d) Locate new buildings, stables, yard areas and facilities adjacent to existing buildings provided they respect the amenities and activities of surrounding properties and uses;
 - e) Are well located to existing utilities and transport infrastructure, including vehicular and field accesses, tracks and bridleways;
 - f) Provide new or supplementary landscape features including hard and soft treatments and planting, consistent with local character; and
 - g) Demonstrate a conservation based land management approach.

6.65 The purpose of this policy is to ensure the careful planning, design and management of land on which horses are kept. It is important that equestrian activities have a positive impact and protect natural beauty. Good design should be informed by local character and distinctiveness, with particular

reference to farm buildings, layout and materials. Further criteria on landscape and design is set out in Policies SD4 and SD5 respectively.

FENCING AND SUBDIVISION

6.66 The subdivision of fields into small turnout paddocks can affect landscape character and relates to many of the criteria of this policy. Fencing which subdivides large fields into individual paddocks can have a significant visual impact on the landscape. Sensitive and well thought out fencing which respects the existing field pattern and contours, together with appropriate levels of grazing, can enhance a site leading also to improvements in biodiversity and the quality of grazing. The removal of hedgerows from existing field boundaries will be strongly resisted.

STABLES, FIELD SHELTERS AND NEW BUILDINGS

6.67 The location of new buildings like stables, field shelters, and tack storage can change the character of the land and views, particularly when poorly sited substantial and intrusive earthworks take place including manèges. Equine buildings on sites which are open, exposed, elevated or sloped are likely to have particular landscape impacts that may make it difficult to achieve sensitive design solutions. Wherever viable, existing buildings should be re-used to avoid additional buildings in the countryside.

6.68 New buildings should be sited next to existing buildings and new structures should be kept to a minimum. The layout of buildings should seek to contain and enclose yard areas for storage, parking and other activities. Equestrian development such as new barns and manèges should be sensitively lit in accordance with Policy SD8: Dark Night Skies. Examples of equestrian development that can impact on dark night skies include barns with extensive glazing and roof lights, floodlit manèges and other intrusive lighting may not be permitted.

JUMPS, FEED BINS, GENERAL STORAGE

6.69 Equestrian equipment like jumps and open storage can harm views. Careful design and layout should mitigate against these impacts through the

siting of buildings and permanent structures to screen and protect them from the elements. Management of manure and waste should take account of the amenities of local residents and other uses as well as environmental protection requirements.

UTILITIES AND TRANSPORT INFRASTRUCTURE

6.70 Development proposals should be well located to existing transport infrastructure and utilities infrastructure, including water, electricity, and gas. Access for cars and larger vehicles is often required as part of an application. Car parking, trailer storage and manure arrangements can create clutter and have urbanising influences in the landscape. This should be addressed through good design and the careful location of these areas in relation to existing landscape features and boundaries. Sites that are well located adjacent to the bridleway network can reduce pressures on the land and provide good recreational opportunities.

LANDSCAPE FEATURES AND TREATMENTS

6.71 Where new or supplementary landscape features such as planting or hard landscape features and boundary treatments are required, these should reflect the local character of the site and wider area and planting should consist of a locally appropriate native species mix. Further requirements on this matter can be found in Policy SD4: Landscape Character and SD5: Design.

CONSERVATION BASED LAND MANAGEMENT

6.72 The National Park Authority seeks to encourage owners to adopt a best practice approach towards managing the land, depending on the breed, size and purpose of keeping horses, which supports horse welfare as well. A conservation based land management approach is strongly encouraged. This could include a range of measures such as: species rich grazing with a locally native seeding mix, incorporation of headlands around paddocks (ungrazed areas along hedgerows), grazing rotation programme, on site hay production, native tree planting in groups and restoration hedgerows as a framework for paddock subdivision and track grazing systems. This approach may also be influenced by soil type and natural drainage patterns where the support of

natural drainage processes through management of ditches and water courses can contribute to the resilience of the soil to wear, and increase biodiversity habitats.

6.73 It will be appropriate in some cases for management plans to be devised and submitted to support planning applications to demonstrate how this approach will be delivered. Advice should be sought from the Authority at the earliest opportunity and prior to submitting an application on whether a management plan would be needed.

A woman with short blonde hair, wearing a blue and white checkered shirt, stands on the right side of the frame, smiling. She is in a field of tall, golden-brown grass. In the background, there are several houses, including a large red-brick house with a white door and a smaller house with a white door. A large tree is visible behind the houses. The sky is blue with some wispy clouds. A large, semi-transparent white number '7' is on the left side of the image.

TOWARDS A SUSTAINABLE FUTURE

INTRODUCTION

7.1 The theme for this chapter, Towards a Sustainable Future, is taken from the *PMP*⁶⁷. It is primarily based on the duty of the National Park Authority, namely, to seek to foster the economic and social well-being of the local communities within the National Park. The chapter begins with the development strategy for the National Park and is followed by the strategic and development management policies relating to homes, employment, town centres and retail, agriculture and forestry, infrastructure, GI, climate change, advertisements and pollution.

7.2 The delivery of new homes, including affordable homes and pitches for Gypsies, Travellers and Travelling Showpeople, the development of the local economy and GI are all key cross-boundary strategic issues identified by the National Park Authority for the purpose of fulfilling the *Duty to Cooperate*.

Local Plan Objectives

The following Local Plan objectives are considered most relevant for this section:

Objective 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

Objective 6: To adapt well to and mitigate against the impacts of climate change and other pressures

Objective 7: To conserve and enhance the villages and market towns of the National Park as thriving centres for residents, visitors and businesses

Objective 8: To protect and provide for the social and economic wellbeing of National Park communities supporting local jobs, affordable homes and local facilities

Objective 9: 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

⁶⁷ Partnership Management Plan: Shaping the future of your South Downs National Park 2014 – 2019 (South Downs National Park Authority, 2013)

7A. DEVELOPMENT

INTRODUCTION

7.3 This sub-section of the Local Plan contains strategic Policy SD25: Development Strategy. This responds to the spatial strategy, set out in Chapter 3, to plan for a medium level of growth dispersed across the towns and villages of the National Park. The development strategy reflects the vision and objectives of the Local Plan and promotes sustainable development. It should be read in conjunction with the spatial portrait relating to the five broad areas that characterise the National Park: the Western Downs, the Western Weald, the Scarp Slope, the Dip Slope, the Coastal Plain and the four river corridors formed by the Rivers Arun, Adur, Ouse and Cuckmere.

7.4 There are 53 settlements that are well-placed to accommodate some level of growth as set out in Policy SD25. This sets a clear framework for accommodating the local housing, employment and other development needs of communities. In particular, it provides a starting point for positively identifying settlements that can help meet the Plan objectives, as set out in Policy SD26: Supply of Homes, Policy SD35: Employment Land and Policy SD36: Town and Village Centres. Figure 7.1 is a map of the 53 settlements distributed across the broad areas and river corridors.

7.5 The development strategy recognises that Neighbourhood Development Plans (NDPs) constitute an important element of the statutory development plan. A number of settlements listed in Policy SD25 are within parishes or town council areas that are developing or have made NDPs. These reflect the vision and objectives of the local community, and should help to deliver the objectives and strategy of this Local Plan by making positive provision for development in line with Policy SD25. It is important that NDPs meet Local Plan as well as local objectives, as they provide the principal framework for determining planning applications within the parish.

7.6 As shown in Figure 7.2, the Local Plan only seeks to allocate sites where an NDP has not done so. This is usually because there is no made NDP, nor one being developed. An important exception to this is that the Local Plan allocates strategic sites and strategic housing allocations across the National Park.

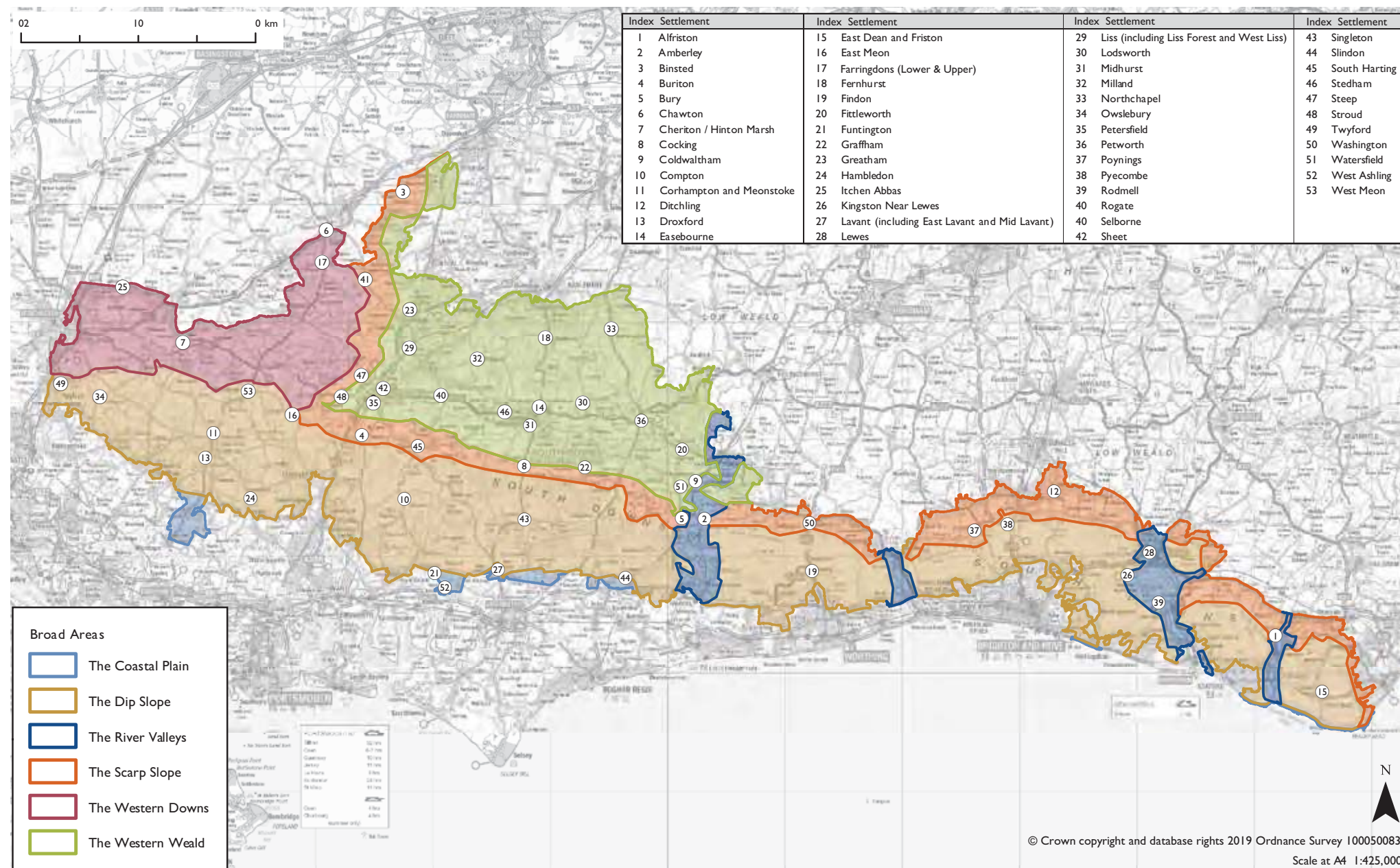
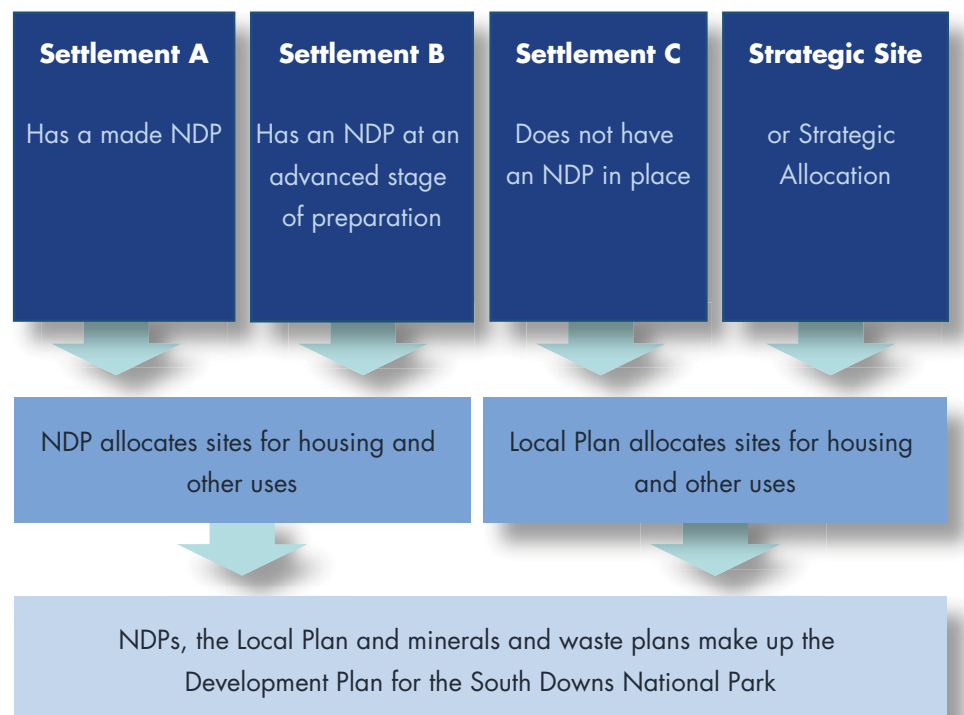
FIGURE 7.1: SETTLEMENTS IDENTIFIED IN POLICY SD25: DEVELOPMENT STRATEGY

FIGURE 7.2: NEIGHBOURHOOD DEVELOPMENT PLANS AS PART OF THE DEVELOPMENT PLAN



Strategic Policy SD25: Development Strategy

1. The principle of development within the following settlements, as defined on the Policies Map*, will be supported, provided that development:
 - a) Is of a scale and nature appropriate to the character and function of the settlement in its landscape context;
 - b) Makes best use of suitable and available previously developed land in the settlement; and
 - c) Makes efficient and appropriate use of land.

Western Downs

- Chawton
- Cheriton/Hinton Marsh
- Itchen Abbas

- Farrington (Lower and Upper)
- Stroud

Western Weald

- Binsted
- Easebourne
- Fernhurst
- Fittleworth
- Greatham
- Liss (including Liss Forest and West Liss)
- Lodsworth
- Midhurst

- Milland
- Northchapel
- Petersfield
- Petworth
- Rogate
- Sheet
- South Harting
- Stedham

Scarp Slope

- Buriton
- Bury
- Cocking
- Ditchling
- East Meon
- Graffham
- Poynings
- Selborne
- Steep
- Washington
- West Meon

Dip Slope

- Compton
- Corhampton and Meonstoke
- Droxford
- East Dean and Friston
- Findon
- Hambledon
- Owslebury
- Pyecombe
- Singleton
- Slindon
- Twyford

Coastal Plain

- Funtington
- Lavant (including Mid Lavant and East Lavant)
- West Ashling

River Arun Corridor

- Amberley
- Coldwaltham
- Watersfield

River Ouse Corridor

- Kingston near Lewes
- Rodmell
- Lewes

River Cuckmere Corridor

- Alfriston

2. Exceptionally, development will be permitted outside of settlement boundaries, where it complies with relevant policies in this Local Plan, responds to the context of the relevant broad area or river corridor, and:
 - a) It is allocated for development or safeguarded for the use proposed as part of the Development Plan; or
 - b) There is an essential need for a countryside location; or
 - c) In the case of community infrastructure, there is a proven need for the development that demonstrably cannot be met elsewhere; or
 - d) It is an appropriate reuse of a previously developed site, excepting residential gardens, and conserves and enhances the special qualities of the National Park.
3. In considering development proposals outside settlement boundaries within rural estates and large farms, positive regard will be had to the following:
 - a) The development proposals are part of a Whole Estate Plan that has been endorsed by the National Park Authority; and
 - b) The development proposals deliver multiple benefits in line with the purposes and the special qualities of the National Park and in regard to ecosystem services.

*Additionally, a portion of the Arundel settlement boundary is shown on the Policies Map. Other settlements not listed in Policy SD25 may also be shown on the Policies Map if an NDP has allocated, designated or safeguarded sites or areas within the National Park.

PRINCIPLES OF DEVELOPMENT

7.7 The purpose of Policy SD25 is to identify towns and villages across the broad areas and river corridors of the National Park that are able to accommodate growth of a scale and nature appropriate to their character and function. These have been identified in line with two principle criteria:

- The future sustainability of the settlement, in terms of its facilities and services; and
- The form and character of the settlement within its landscape context.

7.8 Evidence to support the inclusion of these settlements includes the *SDILCA*⁶⁸, and the *Settlement Facilities Assessment*⁶⁹, which form part of the Local Plan evidence base.

SETTLEMENT BOUNDARIES

7.9 Settlement boundaries are defined on the Policies Map. They have all been comprehensively reviewed as part of the Local Plan process unless this was done through an NDP. The methodology for determining the boundaries is set out in the *Settlement Boundary Review: Methodology Paper*⁷⁰, which forms part of the Local Plan evidence base. Policy SD25 sets a clear distinction between land within a settlement boundary and open countryside. Within the settlement boundary, the principle of further development is established subject to other policies in this Plan. Outside of settlement boundaries, land will be treated as open countryside. Settlements that are more scattered or diffuse in their form have not been given settlement boundaries, and will be treated as open countryside for the purposes of Policy SD25.

⁶⁸ South Downs Integrated Landscape Character Assessment (SDILCA) (LUC, 2005, updated 2011)

⁶⁹ Settlement Facilities Assessment (South Downs National Park Authority, 2015)

⁷⁰ Settlement Boundary Review: Methodology Paper (South Downs National Park Authority, 2015 and updated 2017)

EXCEPTIONAL DEVELOPMENT OUTSIDE SETTLEMENTS

7.10 Policy SD25 acknowledges exceptional circumstances whereby development outside settlements may be acceptable. For example, particular uses of land relating to agriculture or countryside recreation may only be able to function successfully in fully rural locations. Community uses that are crucial for sustaining thriving communities, such as extensions to schools or health centres, may only be achievable through minor incursion into the countryside. Other exceptions to the development strategy are set out in other policies in this Local Plan, for example Policies SD23: Sustainable Tourism and SD29: Rural Exception Sites. Robust evidence will need to be provided to support applications for such developments to demonstrate that an exceptional approach is fully justified.

DEVELOPMENT ON PREVIOUSLY DEVELOPED LAND

7.11 In order to conserve wider landscape character and minimise the footprint of development, it is important to focus development on previously developed land (PDL), which is often referred to as 'brownfield' land. Therefore the Authority will expect developers to make best use of PDL within settlement boundaries, subject to other locational and physical constraints. Policy SD25 also provides some limited flexibility, in exceptional circumstances, to allow 'brownfield' development outside settlement boundaries, where demonstrably necessary to meet the wider objectives of this Local Plan. An example would be where development necessary to uphold the purposes of the National Park can be provided on previously developed land as an alternative to encroaching on undeveloped countryside.

7.12 However all development on PDL must always be within the context of a 'landscape first' approach whereby previously developed sites will not automatically be the best in landscape terms. Any proposal for re-use of PDL outside settlement boundaries must have full regard to Purpose 1 and the special quality of an environment shaped by centuries of farming. Wider development needs and pressures will not be accepted as a reason to develop on any site outside of settlement boundaries.

EFFICIENT USE OF LAND

7.13 Throughout the National Park, development pressures are great, whilst availability of land suitable for development is scarce. Furthermore, many of its villages and towns are characterised by relatively densely clustered, small buildings. Therefore it is important to make efficient use of land that does become available and is suitable for development. This approach is likely to encourage a design of new development that respects traditional patterns of built form, whilst reducing demand for additional land supply to meet local communities' needs.

7.14 It is equally important to recognise that efficient use of land does not translate to overdevelopment of sites in the context of the surrounding area and setting. In some contexts, a more diffuse built form may be more appropriate. Principles and criteria relating to design and mix of housing are set out elsewhere in this Local Plan.

WHOLE ESTATE PLANS AND LARGE FARM PLANS

7.15 Estates, institutions and farms across the National Park have an important role to play in the conservation of the landscape, the development of a sustainable rural economy and ecosystem services. Policy SD25 recognises that Whole Estate Plans may be able to demonstrate particular material considerations, relating to the purposes and special qualities of the National Park that justify development outside of settlement boundaries. The Authority will only give weight to such plans where they have been endorsed by the National Park Authority, in line with the *Whole Estate Plans Guidelines*⁷¹.

7.16 Where new dwellings are proposed as part of a Whole Estate Plan, these should meet the priority housing needs of the local area, hence should be affordable homes, or accommodate full-time, rural workers as defined by Policy SD32 and its supporting text. An exception may be made where to do so would make the delivery of multiple benefits to ecosystem services and the special qualities of the park unviable, provided clear evidence is provided in the endorsed Estate or Farm Plan.

⁷¹ Whole Estate Plans Guidelines (South Downs National Park Authority, 2015 and updated 2016), available on the SDNPA website

7B. HOMES (STRATEGIC POLICIES)

INTRODUCTION

7.17 This sub-section of the Local Plan includes two strategic policies namely SD26: Supply of Homes and SD27: Mix of Homes.

7.18 Provision of housing to meet local needs is crucial to ensure the sustainability and vitality of communities within the National Park. An objective for the Local Plan is to conserve and enhance the villages and market towns as thriving centres for residents, visitors and businesses, whilst conserving and enhancing the landscape of the National Park. Housing to meet local needs is important to sustain future generations and communities, and to support rural enterprise by providing homes for local workers. However, the provision of housing should not be at the expense of a nationally protected landscape. The *NPPF* cites national parks as areas where development should be restricted and objectively assessed need not met.

7.19 The Local Plan determines the level of housing provision and types of homes to be delivered. To inform this, the National Park Authority commissioned a Housing and Economic Development Needs Assessment (*HEDNA*)⁷² which forms part of the evidence base for this Local Plan. This updated the *Strategic Housing Market Assessment (SHMA)* to incorporate new national population projections and new household projections. Over the 19 year period 2014 – 2033, the *HEDNA* identifies an objectively assessed need of 447 homes per year and separately identifies a need for 293 affordable homes per year. Policy SD25: Development Strategy provides the starting point with regards to settlements considered. Policy SD26 sets out the overall housing provision for the National Park along with specific figures for the market towns and a number of villages.

7.20 The Local Plan incorporates the overall levels of housing proposed within the adopted Joint Core Strategies, updated where relevant by made

NDPs. For example, the housing figure for Petersfield is based on the *East Hampshire Joint Core Strategy* and the *Petersfield Plan*. This Local Plan meets the commitment in the *East Hampshire Joint Core Strategy* to deliver a total of 1,694 dwellings in that part of East Hampshire within the National Park. This equates to approximately 100 dwellings per annum until the *East Hampshire Joint Core Strategy* end date of 2028.

7.21 National policy states that the Local Plan should plan for a mix of housing based on current and future demographic trends, market trends, and the need for different groups in the community. The *HEDNA* and *SHMA* identify a need for a mix of dwelling sizes across the National Park, with a much greater level of need for small and medium-sizes homes, and limited need for larger houses of 4 or more bedrooms. Consultation on this Local Plan has indicated that local communities favour a policy that ensures a good mix of dwelling sizes to meet local needs.

Strategic Policy SD26: Supply of Homes

1. The National Park Authority will make overall provision for approximately 4,750 net additional homes over a 19 year period between 2014 and 2033.
2. These will be delivered through:
 - i) The development of strategic sites and the allocation of land for housing in the Local Plan and NDPs;
 - ii) The implementation of planning permissions; and
 - iii) The development of land previously unallocated or identified (windfall).
3. Approximately the following levels of housing are provided for, in addition to extant planning permissions granted prior to 1st April 2015 and windfalls, through sites either:
 - Allocated in this Local Plan or in Neighbourhood Development Plans, or
 - Substantially completed at the time of Local Plan submission:

⁷² Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Settlement	Housing provision
Alfriston	15
Amberley	6
Binsted	11
Buriton	10
Bury	6
Cheriton/Hinton Marsh	14
Coldwaltham	28
Corhampton and Meonstoke†	18
Ditchling	15
Droxford	26
Easebourne	50
East Dean and Friston (East Sussex)†	11
East Meon	17
Fernhurst (including Syngenta*)	220 (*200)
Findon	28
Fittleworth	6
Greatham (Hampshire)	38
Itchen Abbas	9
Kingston near Lewes	11
Lavant (including Mid Lavant and East Lavant)	20
Lewes (including North Street Quarter*)	875 (*415)
Liss (including West Liss and Liss Forest)	150
Midhurst	175
Petersfield	805
Petworth	150

Settlement	Housing provision
Pyecombe†	8
Rogate	11
Selborne	6
Sheet	16
South Harting	13
Stedham	16
Steep	10
Stroud	28
Twyford	20
West Ashling	16
West Meon	11

4. Neighbourhood Development Plans that accommodate higher levels of housing than is set out above will be supported by the National Park Authority providing that they meet local housing need and are in general conformity with the strategic policies of the development plan.

† At the time of Local Plan submission, the housing provision figures for Corhampton and Meonstoke, East Dean and Friston (East Sussex) and Pyecombe have been met through sites allocated in the *Pre-Submission South Downs Local Plan* having been subsequently built out. These sites therefore no longer require an allocation policy.

THE AMOUNT OF HOUSING

7.22 The purpose of this policy is to set out figures for how many new homes will be provided in town and villages across the National Park in line with the spatial strategy for the Local Plan.

7.23 The process for determining the amount of housing to be delivered starts with the identification of the ‘objectively assessed need’ for housing. This is followed by consideration of the extent to which meeting need within the National Park can be reasonably met. The Local Plan must first and foremost reflect the purposes of the National Park, and is therefore capacity-based. Pursuant to the purposes, the Local Plan must also reflect the duty of the National Park Authority, and therefore should seek to foster the economic and social wellbeing of local communities.

7.24 Policy SD26 sets a level of new housing provision which totals 4,750 over the Plan period, representing a net increase of 250 homes per year. This is informed by the evidence from the *HEDNA*⁷³, including the great need for affordable housing to meet locally generated housing needs. It is equally informed by a robust body of evidence on constraints and opportunities, which includes the *SHLAA*⁷⁴ (incorporating site-specific landscape assessments), and the *Settlement Facilities Assessment*. These evidence based studies form part of the Local Plan evidence base.

THE LOCATION OF HOUSING

7.25 Policy SD26 sets out set out figures for how many new homes will be provided in individual settlements. This approach provides clarity to local communities on the amount of development to be provided, which will be of particular importance in designated neighbourhood plan areas. The starting point for the housing provision figures is the spatial strategy for a medium level of dispersed growth across the National Park. A further key driver is the estimated capacity of each settlement to provide for growth, whilst

safeguarding Purpose 1. Key evidence includes the *SHLAA* incorporating site-specific landscape assessments and the *Settlement Facilities Assessment*, which form part of the Local Plan evidence base. Levels of local growth have additionally been informed by consultation with local communities, in particular with parish and town Councils.

7.26 The housing provision figures have been calculated firstly taking account of opportunities and constraints, primarily landscape context, then settlement facilities, and secondly the estimated supply of suitable and available housing land. The figures are approximate, and actual delivery in individual settlements may vary should the land supply position change. Nevertheless, it is expected that the National Park Authority, parish and town councils and other partners will work together to deliver at least these numbers.

ALLOCATION OF STRATEGIC SITES AND HOUSING SITES

7.27 An important element of housing delivery in the National Park is the allocation in the Local Plan of strategic sites to include provision of housing, and a number of smaller sites in settlements across the National Park.

7.28 There are two previously developed strategic sites allocated in chapter 8 of this Local Plan: North Street Quarter in Lewes, and the former Shoreham Cement Works in Upper Beeding. The former Syngenta site is allocated as a strategic site in the *Fernhurst NDP*. North Street Quarter and Syngenta will deliver a considerable number of homes as part of mixed use development schemes. There are two strategic housing allocations in Chapter 9 namely Old Malling Farm, Lewes and the former Brickworks and West Sussex County Council Depot in Midhurst.

7.29 Non-strategic Local Plan housing site allocations are being made in areas of the National Park where there is currently no emerging NDP, or where the NDP does not allocate land for housing in line with Policy SD26. In areas where NDPs are emerging or have been made, these are expected to allocate sites sufficient to meet the settlement level housing provision figures set out in Policy SD26.

⁷³ Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

⁷⁴ Strategic Housing Land Availability Assessment (South Downs National Park Authority, 2016)

7.30 The allocation of land in an NDP which will deliver a greater number of homes than is specified in Policy SD26 will be supported, where it meets an identified local housing need in that settlement or locality and is supported locally.

7.31 A list of made and emerging NDPs can be viewed on the National Park Authority's website.

WINDFALL ALLOWANCE

7.32 The development of previously unallocated or unidentified land, known as 'windfall sites', will count towards the Local Plan housing provision figure. This is known as a 'windfall allowance', and is not attributable to particular settlements. Therefore windfall sites will not count towards settlement-specific housing provision figures. A review of past planning permission implementation, using dwelling completion records, has provided strong evidence that there has been consistent delivery on windfall sites as a proportion of total dwellings built; therefore allowance of a modest element of windfall housing supply is justified. However, in the context of a national park, it is appropriate to adopt a conservative allowance. The windfall allowance is calculated as 51 dwellings per year for the National Park area, based on an analysis of past trends, whilst taking into account the emphasis on future growth taking place primarily within tightly drawn settlement boundaries, generally in the form of infill development.

Strategic Policy SD27: Mix of Homes

1. Planning permission will be granted for residential development that delivers a balanced mix of housing to meet projected future household needs for the local area. Proposals should provide numbers of dwellings of sizes to accord with the relevant broad mix.
 - a) Proposals for affordable housing delivered as part of a market housing scheme should provide the following approximate mix of units:

1 bedroom dwellings:	35%*
2 bedroom dwellings:	35%
3 bedroom dwellings:	25%
4 bedroom dwellings:	5%
 - b) Proposals for market housing should provide the following mix of units:

1 bedroom dwellings:	at least 10%
2 bedroom dwellings:	at least 40%
3 bedroom dwellings:	at least 40%
4+ bedroom dwellings:	up to 10%
 2. Planning permission will be granted for an alternative mix provided that:
 - a) Robust evidence of local housing need demonstrates that a different mix of dwellings is required to meet local needs; or
 - b) It is shown that site-specific considerations necessitate a different mix to ensure National Park Purpose 1 is met.
 3. Development proposals will be permitted for residential development that provides flexible and adaptable accommodation to meet the needs of people who are less mobile, or have adult homecare requirements. Development proposals of 5 or more homes will be permitted where it is clearly demonstrated that evidence of local need for older people's or specialist housing is reflected in the types of homes proposed.
- * 1 bedroom affordable dwellings may be substituted with 2 bedroom affordable dwellings

MEETING THE NEEDS OF LOCAL HOUSEHOLDS

7.33 The purpose of this policy is to ensure that development proposals provide a mix of homes that reflects the need and community aspiration for small and medium-sized homes.

7.34 The precise mix of homes within each proposal should be informed by the latest evidence of strategic and local needs, including the currently published *HEDNA* or future reviews as relevant. However, given clear evidence in the *HEDNA* of future household needs, it is important that new housing development focuses on providing smaller and medium size dwellings, to reflect the National Park duty to foster the well-being of the local communities.

7.35 The mix of dwellings set out in Policy SD27 is in line with the recommendations of the *SHMA* (and confirmed by the *HEDNA*), which is based on detailed modelling of housing market trends up until 2033. The *SHMA* and *HEDNA* recommend that market housing, in particular, should be explicitly focused on delivering smaller family housing for younger households. This approach also complements Policies SD30: Replacement Dwellings and SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings, which similarly seek to retain smaller dwellings.

7.36 It is recognised that many housing sites are small and in such instances it may not be possible to achieve the exact proportions set out in Policy SD27. Nevertheless the requirements should be broadly met. For all proposals for standard occupancy housing, the onus will be on providing smaller homes, some of which should be suitable for families with children.

7.37 Affordable 1 bedroom dwellings may be substituted with 2 bedroom dwellings, in recognition that 2 bedroom dwellings are more adaptable to changing needs, for example, where a couple have children whilst living there.

7.38 For avoidance of doubt, any room in a proposed dwelling that is not a main reception room, kitchen, bathroom or WC, and has dimensions that allow for a single bed, will be counted as a bedroom. This will include studies and additional reception rooms.

ALTERNATIVE MIX OF HOMES

7.39 The Authority recognises that future development will need to respond appropriately to local needs. Policy SD27 therefore allows for regard to be had to bespoke local housing need evidence relating to the parish. This would normally be in the form of a local (parish) housing needs assessment. Such evidence should be robustly and independently prepared, and agreed in writing with the Authority as an appropriate evidence base for informing new residential development. Where a made NDP proposes an alternative housing mix based on robust local evidence, this should be used in place of the mix proposed in Policy SD27.

7.40 Exceptionally, the effect of unit types and sizes on a scheme's financial viability may be a material consideration, where this has been clearly evidenced through independent viability appraisal. For avoidance of doubt, the overall proportion of affordable housing with tenure mix to reflect Policy SD28: Affordable Homes will be prioritised, if exceptionally necessary, over the normal mix of market housing.

7.41 The delivery of each element of supply will be subject to ongoing monitoring.

OLDER PEOPLE'S HOUSING

7.42 The evidence from the *SHMA*, and confirmed by the *HEDNA*, demonstrates the importance of making provision for older people's housing. Furthermore, providing smaller homes suitable for older people encourages 'downsizing' which in turn frees up larger dwellings more suited to larger households.

7.43 The National Park has a higher than average proportion of its population within the 'older person' category of 55 years old or over, with further growth in this age demographic predicted. In particular, there is predicted to be strong growth in the 85+ age category.

7.44 The *HEDNA* identifies an indicative demand for some 90 homes per annum suitable to meet the needs of older people. This represents some 20% of the total objectively assessed housing need. Figure 7.3 indicates the different



types of older people's housing need. There is a particular need for more sheltered housing in future.

FIGURE 7.3: ESTIMATED NEED FOR SPECIALIST HOUSING FOR OLDER PEOPLE, 2014 – 33

	Affordable		Market		Total	
	2014-33	Per annum	2014-33	Per annum	2014-33	Per annum*
Sheltered	506	27	758	40	1,264	67
Enhanced sheltered	81	4	121	6	202	11
Extra-care	101	5	152	8	253	13
Total	688	36	1,031	54	1,719	90

*Note total differs from sum of rows due to rounding

Source: South Downs Housing & Economic Development Needs Assessment (GL Hearne, Sep 2017)

7.45 All proposals for new residential development should include smaller homes that are designed to meet the living requirements of older people, for example, allowing step-free access to and within the home. Proposals of 5 or more dwellings are considered most likely to provide opportunity to achieve this. Sites that can reasonably accommodate a comprehensive mix of housing types should demonstrate that opportunities for specialist older people's accommodation have been fully investigated and, where appropriate, incorporated into the development. This should be of a type which reflects local or strategic needs, including affordability.

OTHER HOUSING NEEDS

7.46 The National Park Authority recognises that there are other specialist housing needs that exist in local communities. People with disabilities may have particular requirements in respect of how their homes are designed to function, that is, the need for 'accessible and adaptable homes'.

7.47 The national requirements and advice in respect of addressing such needs are set out in *statutory building regulations (Approved Document Part M)*. The Authority is supportive of proposals that go beyond meeting the statutory minimum standards.

7C. AFFORDABLE HOMES

INTRODUCTION

7.48 This sub-section of the Local Plan includes two strategic policies namely SD28: Affordable Homes and SD29: Rural Exception Sites.

7.49 Policy SD28: Affordable Homes, relates to the proportion of affordable housing to be delivered from development schemes. Provision should be on-site as required by the *NPPF* unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified.

7.50 The National Park Authority supports the principle of rural exception sites, which provide 100 per cent affordable housing delivery on sites which may not be suitable for market housing. Policy SD29 sets out the basis for this type of development which is particularly relevant to a national park.

7.51 The affordability of housing is a major barrier to sustainable communities in the National Park. In 2016, the average house price was 13.6 times average earnings, making it the second least affordable National Park in the UK. House prices in the National Park increased by 45% from 2006 to 2016. With relatively high house prices, jobs that tend to be lower paid and a comparatively small proportion of affordable homes, it can be difficult for people working in the National Park to afford to live within it. Young people and young families, in particular, struggle to find low-cost housing which creates a significant local housing need. The *HEDNA* concluded that there is strong justification for policies seeking to maximise delivery of affordable housing, given that 293 affordable homes per year are needed to meet the full need for affordable housing.

7.52 The Local Plan must balance meeting these local housing needs with upholding the purposes of the National Park. It responds to the challenge posed by a large proportion of housing in the National Park being delivered on small sites of 10 or fewer homes – especially in the National Park's smaller settlements, where the long-term impacts of housing unaffordability are most

keenly felt. The National Park Authority has prepared a robust evidence base to demonstrate the deliverability of the Local Plan, including those policies that seek to deliver affordable housing on the majority of housing sites. This evidence also takes into account the adoption of the Community Infrastructure Levy (CIL) which came into force on 1st April 2017.

7.53 Community Land Trusts (CLT) are supported as one mechanism for delivering affordable housing. They facilitate community ownership of land, homes and other assets to deliver long-term community benefits such as affordable housing, low cost workspace and local services. Partnership working between Housing Authorities, CLTs and other community-led and legally constituted organisations is essential to maximise the delivery of affordable homes.

7.54 It is crucial for the Local Plan to deliver affordable housing that truly meets the needs of those on low incomes, such as affordable rented tenures. The National Park Authority also recognises the complementary role of housing provided for rural workers by large-scale landowners, as part of their historic stewardship role and commitment to local communities. Opportunities for these less formal types of arrangement will be encouraged through Whole Estate Plans.

Strategic Policy SD28: Affordable Homes

1. Development proposals for new residential development will be permitted that maximise the delivery of affordable housing to meet local need, and provided that, as a minimum, the following are met:
 - a) On sites with gross capacity to provide 11 or more homes, a minimum of 50% of new homes created will be provided as affordable homes on-site, of which a minimum 75% will provide a rented affordable tenure.
 - b) On sites with gross capacity to provide between 3 and 10 homes, a proportion of affordable homes will be provided in accordance with the following sliding scale, applied to new homes created:

3 homes	Meaningful financial contribution, to be negotiated case-by-case
4 – 5 homes	1 affordable home
6 – 7 homes	2 affordable homes, at least 1 of which is a rented affordable tenure
8 homes	3 affordable homes, at least 1 of which is a rented affordable tenure
9 homes	3 affordable homes, at least 2 of which is a rented affordable tenure
10 homes	4 affordable homes, at least 2 of which is a rented affordable tenure

Development proposals of 4 to 10 net dwellings will provide affordable housing on-site. Exceptionally, at the discretion of the Authority, financial contributions in lieu will be accepted.

2. Where, exceptionally, provision of affordable housing which complies with Part 1 of this policy is robustly shown to be financially unviable, priority will be given to achieving the target number of on-site affordable homes over other requirements set out in this policy.
3. Development proposals will be permitted provided that affordable housing units are integrated throughout the development, are indistinguishable in design and materials from the market housing on the site, and, where feasible, will remain affordable in perpetuity.
4. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.
5. Developers may not circumvent this policy by artificially subdividing sites.

APPLYING POLICY SD28 TO RESIDENTIAL DEVELOPMENT

7.55 The purpose of Policy SD28 is to maximise the delivery of affordable homes across the National Park as part of market-led housing schemes.

7.56 All development falling within Use Class C3 is subject to Policy SD28, including any retirement or assisted living accommodation within this use class. The policy applies to all developments of 3 or more new homes, and applies to all residential units on the site that have been created by building new structures or converting existing structures.

AMOUNT OF AFFORDABLE HOUSING

7.57 Policy SD28 sets out a sliding scale of requirement for developments to provide affordable housing. This recognises the greater challenges that exist for small site developers in making such provision. These requirements have been tested for viability, taking account of the different market circumstances across the National Park. Where the calculation of the on-site affordable housing requirement results in a fraction of a unit, the requirement will be rounded up to the nearest whole number. Applications proposing a lower proportion of affordable home provision should present robust evidence to demonstrate constrained viability or other exceptional circumstances.

MIX OF AFFORDABLE HOUSING TENURES

7.58 The *SHMA*, as confirmed by the *HEDNA* recommends that 75% of new affordable homes should be either social rented or affordable rented tenure to reflect evidence of need, with the remaining 25% being provided as intermediate forms of housing, such as shared or low-cost ownership. However the *SHMA* also recognises that different communities within the National Park have different needs and aspirations.

7.59 Policy SD28 reflects the *SHMA* strategic tenure mix (as confirmed by the *HEDNA*) as a requirement for new housing development, whilst allowing flexibility to reflect local need. Evidence of local need can include, but is not limited to: local (parish) housing needs assessment, relevant housing market assessment published by a local authority, and housing registers (waiting lists). If a tenure mix is proposed which departs from the strategic tenure mix set out in Policy SD28, robust evidence must be provided, which is supported by the relevant housing enabler.

7.60 The National Park Authority considers that social rent tenures are the most affordable to those in greatest need, and should be prioritised over other forms of rented tenure. Levels of rent for affordable rented homes must be genuinely affordable, and must not exceed the relevant Local Housing Allowance.

LOCAL CONNECTIONS

7.61 Local connections will be assessed in a cascade manner: to include the needs of the relevant settlement; then the parish; and then the wider area including nearby settlements and parishes within the National Park, as necessary. Rural local connection criteria, which is linked to parishes, will take precedent over other needs.

7.62 Local connections will be determined by the Authority, parish council and relevant housing authority, having primary regard to the relevant housing register allocations policy. Where a CLT is to be the managing body for the homes provided, regard will be given to the CLT's objectives and strategy. The Authority will also have regard to evidence of local need which is specific to a rural estate or large farm, particularly where this is set out in a Whole Estate Plan that has been endorsed by the National Park Authority.

VIABILITY

7.63 The *South Downs Whole Plan and Affordable Housing Viability Study*⁷⁵ demonstrates that for the great majority of sites, the requirements of Policy SD28 can be achieved. The *Vision and Circular on English National Parks and the Broads*⁷⁶ states that new housing should be focused on affordable housing requirements, and support local employment opportunities and key services. Insufficient affordable housing provision which runs contrary to Policy SD28 will be a significant factor weighing against approval, irrespective of any viability barriers.

7.64 In exceptional cases where viability is a genuine barrier to delivery, the Authority will require the applicant to demonstrate this by submitting a robust viability appraisal. This should show that the cost of land reflects the existing value of land in its current use, plus a reasonable, but not excessive, uplift which provides an incentive for the land to be sold. The Authority will not accept a land cost assumption that factors in 'hope' value. It will expect

⁷⁵ South Downs Whole Plan and Affordable Housing Viability Study (BNP Paribas, 2017)

⁷⁶ Vision and Circular on English National Parks and the Broads (DEFRA, 2010)

also that land purchase/sale negotiations have ensured due diligence, and have fully taken into account the whole cost of development, including all adopted and emerging development plan policies, CIL, and any abnormal costs reasonably identifiable ahead of development, as a prerequisite for development potential. Affordable housing provision and other planning obligations should therefore result in reduced residential land values which reflect these factors.

7.65 In cases where viability is, having had regard to the above, still an issue, developers will be expected to contribute as fully as possible to mixed and balanced communities, by assessing development options in accordance with the following cascade:

- i) Firstly, reduce the proportion of rented affordable tenure homes in favour of intermediate housing that best reflect local need;
- ii) Secondly, reduce the overall percentage of housing provided as affordable units; and
- iii) Thirdly, provide a financial contribution for affordable housing to be delivered off-site.

7.66 The viability appraisal must be done on an independent and open-book basis, and must be undertaken by a professionally qualified member of the Royal Institution of Chartered Surveyors (RICS) to establish the appropriate form and level of contribution. Where the Authority does not agree that the appraisal has been undertaken robustly and fairly, it must be independently audited at the cost of the developer and subsequently reviewed if necessary.

7.67 Where a lower proportion of affordable housing is accepted by the Authority as an exception, a clawback clause will be included in the Section 106 Agreement to secure higher affordable housing contributions, up to the requirement in Policy SD28, if market conditions improve before the completion of development.

7.68 The National Park Authority will publish guidance on viability matters in due course.

PROVIDING FOR AFFORDABLE HOUSING ON-SITE

7.69 Affordable homes should be provided on-site. The options for achieving this should be discussed in full with both the Authority and the relevant housing enabler.

7.70 Exceptionally, off-site provision or a financial contribution of broadly equivalent value to the normal on-site provision may be justified. Only when all options for on-site provision are shown to have been reasonably explored, without success, will a financial contribution to provide affordable housing off-site be accepted. On larger sites of 11 or more homes, this will usually be due to a lack of financial viability, ascertained by working through the cascade set out under 'Viability' above. On smaller sites of 10 or fewer homes, there may on occasion be other site-specific practical constraints that make on-site provision of a policy-compliant mix of housing tenures unfeasible.

7.71 Financial contributions secured in lieu of affordable housing must directly address local needs within the National Park, and support achievement of mixed and balanced communities. In such cases, a legal agreement will be required that sets out the terms of payment, and that limits its spending to relate only to schemes that address local needs. The calculation of financial contributions will be based on the most up-to-date policy or guidance published or used by the local housing authority within which the site is located. The National Park Authority will publish its own guidance on this matter in due course, which will supersede other guidance.

7.72 In some cases, the Authority may be willing to accept serviced plots as payment-in-kind, either on the application site, or on an equivalent site that equally addresses local need and is in other respects suitable and deliverable. This, together with any additional payment necessary, should represent a value equivalent to the financial contribution which would otherwise be calculated and paid to the Authority in the absence of acceptance of the serviced plot.

DESIGN AND MIX

7.73 Affordable homes must be integrated throughout the development and be of visually indistinguishable design. They should be located throughout the site in a manner that supports integration but can also be managed efficiently by the relevant housing association. The mix of dwelling types and standards of design for affordable housing are considered under other development management policies alongside all other types of housing.

ARTIFICIAL SUBDIVISION OF SITES

7.74 The Authority will not accept the artificial subdivision of sites where an obvious consequence of doing so would be to fall under the relevant policy threshold requiring either on-site provision of affordable housing, or a financial contribution proportionate to the total sum of development. For the purposes of housing provision, the Authority will consider a site to be a single site if the current arrangements, in either functional and/or legal land ownership terms, can be considered part of a wider whole.

AFFORDABLE HOUSING DELIVERY

7.75 Affordable housing provision will be secured at the granting of planning permission by a Section 106 legal agreement. The National Park Authority will work in close partnership with the relevant Local Housing Authority to ensure that affordable housing is delivered effectively. Affordable housing should remain as such in perpetuity.

7.76 CLTs provide an opportunity for local community ownership of land for long-term affordable housing provision. Affordable housing provided by CLTs and most housing associations are exempt from the "Right to Buy", allowing affordable housing to remain affordable in perpetuity.

Strategic Policy SD29: Rural Exception Sites

1. Proposals for new residential development of 100 per cent affordable housing outside of settlement boundaries as shown on the Policies Map will be permitted, provided that the following are met:
 - a) Affordable housing is provided in perpetuity;
 - b) The site selection process has considered all reasonable options, and the most suitable available site in terms of landscape, ecosystem services and overall sustainability has been chosen;
 - c) The scale and location relates well to the existing settlement and landscape character; and
 - d) It is shown that effective community engagement has fed into the design, layout and types of dwellings proposed.
2. The size (number of bedrooms), type and tenure, (for example, social and affordable rented, intermediate, shared ownership or older people's housing) of affordable homes for each proposal will be based on robust and up-to-date evidence of local community need.
3. Occupancy conditions and local connection criteria will be applied to affordable housing to ensure local needs are met. Specific criteria will be determined by the Authority, in close partnership with established community-led and legally constituted organisations or CLTs where applicable.

7.77 The purpose of Policy SD29 is to encourage the delivery of rural exception sites. These sites provide a critical source of affordable housing in perpetuity to meet local needs, which are not served by the market, on land that would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

MIX OF TENURES

7.78 The National Park Authority believes that a policy of allowing market housing would reduce the number of affordable homes coming forward and may reduce the willingness of communities to support the principle of rural exception sites. The emphasis on rural exception sites in national parks should be on 100 per cent affordable housing. If a viability appraisal has robustly demonstrated that viability genuinely risks preventing a rural exception site from coming forward, and there are no alternative, more viable, sites, the Authority will work with the landowner, community and other stakeholders to establish the optimum alternative option which best meets the local need.

SITE SELECTION, SCALE AND LOCATION

7.79 Policy SD29 (1) (b) requires the most sustainable, available site to be chosen. It is important to ensure that locations which have an overall positive impact on the ability of the natural environment to contribute to ecosystem services, work best within the landscape and settlement form, allow better access to local services, and are most suitable in other respects, are preferred.

COMMUNITY AND STAKEHOLDER ENGAGEMENT

7.80 “Effective community engagement” should be demonstrated by the applicant in both the site selection and application design processes. This can include liaison with the relevant parish council(s), community groups and neighbours. It is also essential that the advice of the relevant Rural Housing Enabler feeds into these processes, so that any practical difficulties regarding management issues are identified and overcome at an early stage of design.

LOCAL NEED AND LOCAL CONNECTION

7.81 Occupation of affordable housing brought forward on both rural exception sites and market-led sites is subject to conditions to ensure the needs of local people are being met. The meanings of “local need” and “local connection” are set out in the supporting text to Policy SD28: Affordable Homes. Rural exception sites should also take into account the aspirations of the local community, for example, as expressed in the relevant NDP, Parish Plan or Village Design Statement. The type and tenure of dwellings on rural exception sites will need to balance the provision of local needs with the character of the existing settlement and the landscape within which it is located.

DELIVERY OF RURAL EXCEPTION SITES

7.82 The Authority will expect all rural exception sites to reflect local needs and aspirations. An effective way to achieve this is through establishing CLTs to drive the delivery of sites. Local partnership arrangements will generally be appropriate for delivering on sites, for example, between CLTs, Parish or Town Councils, Specialist Housing Associations and/or Rural Housing Enablers (RHEs). Whichever delivery model is used, the Authority will seek to ensure that affordable housing remains affordable in perpetuity.

7D. HOMES (DEVELOPMENT MANAGEMENT POLICIES)

7.83 This sub-section of the Local Plan includes three development management policies relating to housing namely: SD30: Replacement Dwellings, SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings and SD32: New Agricultural and Forestry Workers' Dwellings.

Development Management Policy SD30: Replacement Dwellings

1. Development proposals for replacement residential dwellings outside settlement boundaries, as defined on the Policies Map, will be permitted where:
 - a) The structure, constituting all new and existing development, does not result in a net increase of more than approximately 30% compared with the gross internal area of the existing dwelling; and
 - b) The replacement dwelling is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and/or privacy.
2. Development proposals for the replacement of one residential dwelling with two or more separate residential dwellings will be permitted where:
 - a) Criteria 1 (a) and (b) are satisfied;
 - b) The replacement dwellings are 'small' and designed with appropriate layouts and internal arrangements; and
 - c) There is sufficient scope within the existing dwelling and its curtilage to provide satisfactory private amenity space, landscaping, boundary treatments, external storage and vehicular parking for each dwelling.
3. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.84 The purpose of this policy is to reduce the loss of small homes in the National Park through replacement by substantially larger homes. A key consideration is demonstrating that there is no increase in the overall visual impact of the replacement dwelling(s) on the landscape of the National Park.

APPLYING POLICY SD30 TO DEVELOPMENT PROPOSALS FOR REPLACEMENT DWELLINGS

7.85 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 18 December 2002 or, if built after that date, as originally built. This is the date that the National Park was first designated.

7.86 Where outbuildings were utilised for ancillary domestic purposes on 18 December 2002, and where the number of outbuildings would be rationalised to improve the appearance of the site, the Gross Internal Area (GIA) of the outbuildings may be considered in the assessment of whether the proposed replacement dwelling is materially larger than the existing dwelling.

7.87 It is expected that the residential curtilage (domestic garden area) of a replacement dwelling would be no larger than that of the existing dwelling. The Authority will need to be satisfied that the dwelling to be replaced has a lawful use for residential purposes. The policy relates to a dwelling as it existed on 18 December 2002, or as the dwelling was originally built or legally established, if the residential use post-dates 18 December 2002. Where residential use may have been abandoned, used for some other purpose or is in an uninhabitable condition, the advice of the Authority should be sought at an early stage.

7.88 Within the broad principles set out in the policy, proposals for replacement dwellings will be expected to be of a high standard of design in accordance with Policy SD4: Landscape Character and Policy SD5: Design. Proposals should take account of local and traditional elements of design and

should not introduce discordant or intrusive features in the landscape. It will be appropriate to maintain existing gaps between dwellings to ensure that the existing rural character is not prejudiced. It is particularly important that the cumulative impact of increasing the overall number of homes is not detrimental to local or wider landscape character. Any replacement dwelling will normally be expected to be located on the site of the existing dwelling it is to replace. However, where a re-siting within the residential unit is proposed it must be demonstrated that there would be no harmful impact on the landscape of the National Park.

INCREASE IN NUMBER OF DWELLINGS

7.89 Where proposals include a net increase in the number of dwellings on the site, a 'small' dwelling is defined as having a total GIA of 120m² or less. Proposals must not result in cramped, impractical and/or contrived layouts and internal arrangements. Such proposals must ensure that each dwelling has suitable vehicular parking, bin and cycle storage and private amenity space. Features such as fencing, entrance gates, lighting, new driveways and additional hardstanding can have a considerable urbanising effect on rural areas and as such proposals which do not respect, or are not in keeping with, the rural character of the area will not be permitted.

PERMITTED DEVELOPMENT RIGHTS

7.90 In determining planning applications for replacement dwellings, consideration will be given to the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD31: Extensions to Existing Dwellings and Provision of Annexes and Outbuildings

1. Development proposals for extensions to existing dwellings, and the provision of annexes and outbuildings will be permitted where:
 - a) The proposal does not increase the floorspace of the existing dwelling by more than approximately 30% unless there are exceptional circumstances;
 - b) The proposal respects the established character of the local area; and
 - c) The proposal is not overbearing or of a form which would be detrimental to the amenity of nearby residents by virtue of loss of light and/or privacy.
2. Proposals for annexes should demonstrate the functional and physical dependency on the host dwelling.
3. Proposals for outbuildings should demonstrate that they are required for purposes incidental to the use of the host dwelling.
4. Where permission is granted future extensions may be controlled by the removal of permitted development rights.

7.91 The purpose of this policy is to avoid the over-extension of existing dwellings and the adverse impact that this has on the character and appearance of both settlements and the countryside. This policy is consistent with Policy SD27: Mix of Homes and seeks to protect the limited supply of small and medium-sized homes in the National Park. This policy relates to the extension of existing houses and the provision of new annexes and outbuildings across the National Park. Within the broad principles set out in Policy SD31, proposals will be expected to be of a high standard of design and compliance with any size limits will not alone be sufficient in itself to secure planning permission. Proposals should respect local character and complement the scale, height, massing, appearance and character of the existing dwelling. All applications for extensions, annexes and outbuildings will therefore need to comply with SD4: Landscape Character and SD5: Design.

APPLYING POLICY SD31 TO DEVELOPMENT PROPOSALS FOR EXTENSIONS

7.92 The term 'existing dwelling' for the purposes of this policy refers to the residential unit that existed on 18 December 2002 or, if built after that date, as originally built. Where outbuildings were utilised for ancillary domestic purposes on 18 December 2002, and where the number of outbuildings would be rationalised to improve the appearance of the site, the GIA of the outbuildings may be considered in the assessment of any increase in floorspace.

7.93 With respect to the size of extensions and annexes the Authority will generally seek modest proposals which increase the Gross Internal Area (GIA) of the existing dwelling by no more than approximately 30%. A larger proposal may be permitted where it can be clearly demonstrated that there will be no harmful intrusive impact in the landscape and that there is an enhancement in the appearance of the host dwelling. The Authority will consider larger extensions that are needed to accommodate exceptional family needs, for example, arising from a disabled or elderly member of the family; robust evidence will be required to support such applications.

7.94 Proposals for outbuildings should be sensitively sited to the side or rear of the host dwelling. Single or double detached garages of appropriate dimensions and design may be permitted if they are not intrusive upon the local area, remain subordinate to and do not detract from the character and appearance of the main dwelling.

7.95 Proposals for annexes to provide additional ancillary accommodation must demonstrate a functional link between it and the host dwelling. The annexe must be in the same ownership as the main dwelling and share utility services, access, vehicular parking and private amenity space. An annexe should usually be incorporated within or physically attached to the host dwelling. Where an extension to provide an annexe is not practical, consideration will also be given to the size of the detached annexe and sub-ordinance to the host dwelling.

7.96 For the purposes of applying this policy, the use of outbuildings to support home working and home-based businesses will generally be supported where this does not involve a change of use of the main dwelling or have

an adverse impact on the residential amenities of adjoining residents or the landscape of the National Park.

PERMITTED DEVELOPMENT RIGHTS

7.97 In determining planning applications for extensions, annexes and outbuildings, the impact of cumulative additions will be taken into consideration as well as the removal of permitted development rights to ensure that future development of the site respects the identity and character of the built form, landscape character and neighbouring amenity.

Development Management Policy SD32: New Agricultural and Forestry Workers' Dwellings

1. Development proposals for agricultural and forestry workers' dwellings will be permitted where it has been demonstrated that the nature and demand of the work concerned make it essential for one or more people engaged in agricultural and forestry enterprises to live at, or very close to, the site of their work.
2. Applications for new agricultural and forestry workers' dwellings will need to demonstrate that:
 - a) The agricultural or forestry enterprise is established, extensive, viable and contributes to the special qualities of the National Park;
 - b) There is an essential functional need for the agricultural and forestry dwelling that could not be fulfilled either by another residential dwelling on the enterprise or existing residential accommodation in the local area which is suitable and available for occupation by the workers concerned;
 - c) No other residential dwellings either on or closely connected to the enterprise have been sold off separately or alienated from it in the past five years unless the reason for separation is justified through robust evidence;
 - d) Full consideration has first been given to the conversion of an existing building within the enterprise; and
 - e) The proposed agricultural or forestry dwelling should be well-related in terms of siting to existing buildings or dwellings within the enterprise, result in and remain as a total habitable floor space not exceeding 120m² (gross internal area) and be sensitively designed.

3. Applications for the removal of occupancy conditions will not be permitted unless it can be demonstrated through robust evidence that there is no longer a current or possible renewed need for the dwelling for the authorised use for the foreseeable future, and will only be made available on the open market when it has been robustly demonstrated that its use as an affordable dwelling would be unviable or unsuitable or unnecessary.
4. Temporary dwellings for agricultural and forestry workers will be permitted where they are essential to support the agricultural or forestry enterprise, whether new or established, provided that it is demonstrated that:
 - a) There is a firm intention and ability to develop the enterprise;
 - b) There is a clear functional need to support the enterprise;
 - c) The enterprise has been planned on a sound financial basis;
 - d) The location would be suitable for a permanent agricultural or forestry workers' dwelling; and
 - e) It is easily dismantled and/or taken away.
5. Where permission is granted for new dwellings under this policy, future extensions may be controlled by the removal of permitted development rights.

7.98 The purpose of this policy is to address an essential need for agricultural or forestry workers to live either permanently or temporarily at, or closely sited to, their place of work. The Authority wishes to ensure that any proposal for a dwelling is not an abuse of the concession that the planning system makes for such dwellings and as such will be subject to strict criteria and conditions to ensure that they are only used for the purpose intended.

DEMONSTRATION OF NEED

7.99 Permanent dwellings will only be permitted to house full-time, rural workers and their immediate family on established (at least 3 years old) and extensive (at least 5 hectares) agricultural or forestry enterprises in line with the criteria set out in the policy. The functional test is necessary to establish whether it is essential for proper functioning of the enterprise for one or workers to be readily available at most times. Occupiers will need to be engaged in

actual operational work, actively contributing to the management of the land. This is because non-operational work, although it may be associated with the business, can be achieved away from the enterprise and as such these cases will not meet the exception test needed to justify new dwellings in the open countryside.

7.100 Applicants should provide suitable information which clearly sets out the economic viability of the enterprise.

7.101 Applicants should also provide an independently corroborated statement from an appropriately qualified individual which suitably demonstrates that the functional requirement cannot be accommodated by either another dwelling on the enterprise or other available and suitable accommodation in the local area, and that no dwellings on or closely connected with the enterprise have recently (at least the last five years) been disposed of, for example, by sale or by removal of restrictive conditions so that the dwelling can be let out on the open rental market.

7.102 Where there is an essential need for accommodation, and a new dwelling is proposed, the applicant should first demonstrate through structural surveys undertaken by a suitably qualified individual that redundant buildings, both agricultural and non-agricultural, within the enterprise are not capable of, or suitable for, being converted to residential use under Policy SD41: Conversion of Redundant Agricultural or Forestry Buildings.

7.103 The Authority will seek appropriately sited dwellings to avoid isolated dwellings in remote locations. Proposals should respect the local vernacular and provide appropriate boundary treatments to reduce the potential impact on the rural landscape. Proposals which include disproportionately large private amenity spaces will not be permitted.

OCCUPANCY CONDITIONS

7.104 The use of agricultural and forestry workers' dwellings will be secured through occupancy conditions, which will not be removed while there is a need for such dwellings in the local area. The implementation of new agricultural or forestry workers' dwellings submitted as part of a larger development proposal shall be controlled through suitable planning obligations and conditions to

ensure appropriate phasing of development. If the need on a given enterprise disappears, there may still be a need for agricultural and forestry workers to live close to other holdings in the local area and as such their continued use for such purposes would contribute towards maintaining a sustainable rural economy.

7.105 Applications seeking the removal of occupancy conditions will only be permitted where the enterprise has been marketed unsuccessfully for a minimum of 12 months. The scope of the marketing exercise required to demonstrate the lack of need for agricultural and forestry workers' housing will comprise an independently corroborated statement from a suitably qualified individual demonstrating that there is no longer the immediate requirement for a unit of this type within a suitable catchment, and the marketing of the property at no more than 70% of deemed open market value, through advertisements in the local press, internet and other publications including at least one agricultural publication, for at least 12 months. The unit will then be made available as an affordable dwelling in the first instance. Only if it can be robustly demonstrated that such use would be unviable, unsuitable or unnecessary at the location, will release on to the open market be deemed acceptable.

TEMPORARY DWELLINGS

7.106 The need for a temporary dwelling for an agricultural or forestry worker to live on or in close proximity to the enterprise in order to be readily available at most times, will also be subject to a functional test demonstrated by robust evidence. The Authority will specify the period for which the temporary permission is granted and the date by which the temporary dwelling will have to be removed or reverted to agricultural use. Successive extensions to a temporary permission will not normally be granted unless material considerations indicate otherwise.

7E. GYPSIES, TRAVELLERS AND TRAVELLING SHOW PEOPLE

INTRODUCTION

7.107 This sub-section contains Policy SD33: Gypsies, Travellers and Travelling Showpeople. It safeguards permanent lawful sites, establishes the need for new sites and sets the criteria against which applications will be considered. Site allocations for Gypsies, Travellers and Travelling Showpeople are set out in Chapter 9.

7.108 It is important to try to address the housing needs of all people within our community. This includes the needs of Gypsies, Travellers and Travelling Showpeople. The National Park has small resident and transient communities of each group. There are currently around 45 permanent pitches for gypsies and travellers, 30 transit pitches and 4 permanent plots for travelling showpeople.

7.109 The need for all types of sites is identified through Gypsy and Traveller Accommodation Assessments (GTAA). Recognising the cross boundary nature of these assessments, the National Park Authority has worked in partnership with all local authorities across the National Park to identify the need for further accommodation. This has resulted in six studies which together combine to cover the National Park. There are inherent difficulties in obtaining accurate data given the transient activities of some groups and the level of statistical information available at a national park level. Notwithstanding this, a proportionate approach has been taken in the various assessments, the results of which have been collated and are set out in the *Gypsy, Traveller and Travelling Showpeople Background Paper*⁷⁷.

7.110 Work to identify suitable sites has been undertaken jointly with those groups of districts and boroughs where a need has been identified. The methodology used and the list of all sites considered is set out in the *Gypsy, Traveller and Travelling Showpeople Background Paper*. The results of this work are:

- The allocation of a small number of sites within the National Park for permanent pitches in chapter 9 of this Local Plan;
- The intensification of the usage of some sites; and
- The safeguarding of existing authorised sites from other uses under Policy SD33.

7.111 The outcome of this work is that the National Park Authority is not able to identify sufficient sites to meet the entire identified need for Gypsies, Travellers and Travelling Showpeople within the National Park. Very limited opportunities have been put forward by land owners or other interested parties for consideration and the National Park Authority does not own any land on which sites might be provided. All local authorities with land within the National Park have reviewed their land holdings as part of these studies.

7.112 As local authorities review their Gypsy & Traveller Needs Assessments the outcomes will be shared with the National Park Authority and will also be a consideration in determining planning applications.

⁷⁷ *Gypsy, Traveller and Travelling Showpeople Background Paper* (South Downs National Park Authority, 2016)

Strategic Policy SD33: Gypsies, Travellers and Travelling Showpeople

1. Lawful permanent sites for Gypsies, Travellers and Travelling Showpeople will be safeguarded from alternative development, unless acceptable replacement accommodation can be provided or the site is no longer required to meet any identified need.
2. The National Park Authority will seek to meet the need of Gypsies, Travellers and Travelling Showpeople, by the allocation of permanent pitches and the granting of planning permission on currently unidentified sites for approximately:
 - a) 13 pitches in that part of the National Park located in Brighton & Hove;
 - b) 6 pitches in that part of the National Park located in Lewes District;
 - c) 6 pitches in that part of the National Park located in East Hampshire District.
3. Development proposals to meet the needs of the Gypsy, Traveller and Travelling Showpeople community (as defined in *Planning Policy for Traveller Sites (2015)* or any subsequent policy) on unidentified sites will be permitted where they:
 - a) Meet a need as identified in Figure 7.4 below;
 - b) Do not result in sites being over-concentrated in any one location or disproportionate in size to nearby communities;
 - c) Are capable of being provided with infrastructure such as power, water supply, foul water drainage and recycling/waste management without harm to the special qualities of the National Park;
 - d) Provide sufficient amenity space for residents;
 - e) Do not cause, and are not subject to, unacceptable harm to the amenities of neighbouring uses and occupiers;

- f) Have a safe vehicular and pedestrian access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site; and
 - g) Restrict any permanent built structures in rural locations to essential facilities.
4. Proposals for sites accommodating Travelling Showpeople should allow for a mixed use yard with areas for the storage and maintenance of equipment.

7.113 Considerable joint working with neighbouring local authorities has taken place to come to this current position. The provision of sites for Gypsies and Travellers is rarely a static matter that can be concluded in its entirety through a Local Plan, therefore this joint working will continue through the plan period. In response to the limited allocations that have been possible, the policy includes criteria that will be used to determine applications on unallocated sites.

7.114 The purpose of this policy is to safeguard permanent lawful sites, establish the need for new sites and set the criteria against which applications will be considered.

SAFEGUARDING

7.115 Given the limited availability of suitable and available sites it is important to safeguard all existing, lawful permanent and transit sites. Existing sites are identified in Appendix A of the *Gypsy, Traveller and Travelling Showpeople Background Paper*. Where proposals involve the loss of a pitch or plot, applicants will need to identify a suitable alternative site or establish that the existing site is no longer required. This should be assessed against the relevant GTAA and any subsequent update or assessment. Alternative sites should not be any less suitable than the existing pitch or plot proposed to be lost.

MEETING THE NEED FOR SITES

7.116 A summary of the need for permanent and transit pitches within the National Park as of the 1st December 2016, together with a summary of the allocations and remaining need, is presented in Figure 7.4. The slight variation in the periods covered reflects the different dates of the studies. In addition, there is a need for around 8 transit pitches within the East Sussex area. The assessment of need is undertaken by the relevant Local Authority and any subsequent updates will need to be taken into account as appropriate. The Local Plan allocates 10 pitches within the National Park for Gypsies & Travellers.

NEW SITES FOR GYPSIES AND TRAVELLERS

7.117 National policy makes clear that, as with any other form of development, planning permission for sites should only be granted in the National Park where it is demonstrated that the objectives of the designation will not be compromised by the development. As a result the National Park

Authority will only permit a development, in addition to those sites allocated within the Local Plan, when there is an identified need. The current identified local need as established through various GTAA's is set out in SD33. However, this will be subject to change as Local Housing Authorities update respective studies. The SDNPA will input as required into these pieces of work.

7.118 New sites should respect the scale of, and not dominate, the nearest settled community. Observing this principle can help with community cohesion. Sites should be well related to settlements with services and facilities, but it is recognised that throughout the National Park sites are often in very rural locations.

7.119 Any planning permission will include a planning condition or obligation to ensure that occupancy of the site is limited to persons as defined in *Planning Policy for Traveller Sites (2015)* or any subsequent policy. Applicants should also consider the *Caravan Sites and Control of Development Act 1960* which specifies a separation distance of 6m or more between each caravan.

FIGURE 7.4: SUMMARY OF LOCAL PLAN ALLOCATIONS AND PERMANENT NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE AS OF 1 OCTOBER 2018

Area (within National Park)	Permanent Gypsies & Travellers pitch need	Permanent Showpersons' plot need	Allocations in the Local Plan	Remaining unmet need
Brighton & Hove*	13	0	0	13 Gypsy & Traveller
West Sussex				
Coastal West Sussex (Arun, Adur, Chichester, Worthing)*	0	0	0	0
Horsham	0	0	0	0
Mid Sussex	0	0	0	0
East Sussex				
(Lewes, Eastbourne, Wealden)*	6	0	5	1 Gypsy & Traveller
Hampshire				
East Hampshire	4	9	5 (Gypsy & Traveller)	9 Travelling Showpeople
Winchester	0	0	0	0
Total	23	9	10	14 Gypsy & Traveller, 9 Travelling Showpeople

**This requirement is based upon a GTAA undertaken before the change in definition introduced in the Planning Policy for Traveller Sites (2015).*

7F. EMPLOYMENT

INTRODUCTION

7.120 This sub-section includes two strategic policies relating to employment. The first policy is about sustaining the local economy. The second policy sets employment land provision figures for the National Park and safeguards existing employment sites.

7.121 Within the National Park the challenge is to encourage sustainable development within the limits of the environment and to ensure purpose 1 and 2 are not compromised by meeting the socio-economic duty, given that the duty is pursuant to the purposes. A Local Plan objective derived from the Vision is 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.

7.122 The National Park is home to about 10,000 businesses and generates £19,450 GVA per head. The business base is focused on small and micro businesses and there is a high level of self-employment. Although the main centres of employment are within the market towns, the economy is mainly rural.

7.123 The *Employment Land Review (ELR)*⁷⁸ is the main evidence based study supporting the Local Plan policies on employment. A site focused update of the ELR was published in 2017 (ELR Update)⁷⁹ to support the allocation and safeguarding of employment sites in the Local Plan. An updated calculation of employment land need is set out in the HEDNA⁸⁰ published in 2017.

⁷⁸ South Downs National Park Employment Land Review: 2015 (G.L. Hearn, 2015)

⁷⁹ South Downs National Park Authority Employment Land Review: 2017 Update (South Downs National Park Authority, 2017)

⁸⁰ South Downs National Park Housing and Economic Development Needs Assessment (G.L. Hearn, 2017)

Strategic Policy SD34: Sustaining the Local Economy

1. Development proposals that foster the economic and social well-being of local communities within the National Park will be permitted provided that they meet one or more of the following:
 - a) Promote and protect businesses linked to the National Park's key sectors of farming, forestry and tourism;
 - b) Promote and protect green businesses linked to ecosystem services;
 - c) Support rural supply chains across the National Park and its environs and encourage closer ties between rural businesses;
 - d) Provide for and support small and micro businesses through the provision of small, flexible, start-up and move-on business units including incubator uses;
 - e) Provide flexibility for established businesses to secure future resilience and protect local jobs;
 - f) Intensify the commercial use of an employment site and make a more efficient use of brownfield land; and
 - g) Promote smart economic growth and advances in information and communications technologies, particularly superfast broadband.

7.123 The purpose of this policy is to promote and protect local businesses without compromising the purposes of the National Park. The policy is consistent with the spatial strategy of a medium level of development dispersed across the National Park. It should be read in conjunction with the development strategy set out in Policy SD25, which identifies settlements where the principle of development is accepted.

KEY SECTORS

7.125 Following on from the *State of the Park Report*, the Local Plan identifies three key sectors or clusters of economic activity, namely farming, forestry and tourism. These sectors are all rooted in the National Park purposes and are linked to ecosystem services, particularly provisioning and cultural services. This Local Plan supports the expansion of these existing business sectors where to do so is compatible with the landscape and special qualities.

7.126 Food and beverages form an important economic sector. Vineyards and wineries are an expanding part of this sector, with the soils and weather patterns on the south facing dip slopes being ideal for grape production. The provision of ancillary facilities such as bottling plants should support local production, and be compatible with, and not harm, the special qualities of the National Park. Climate change and market forces will continue to influence the landscape leading to new enterprises, and increasing opportunities for producing alternative energy, for example, wood fuel.

7.127 The South Downs is England's most wooded national park, and wood-related activities are located primarily in the Western Weald. The specific development requirements for agriculture and forestry are set out in Policy SD39: Agriculture and Forestry.

7.128 Policies on tourism and the visitor economy are set out in the Local Plan section on Understanding and Enjoying the National Park.

GREEN BUSINESSES

7.129 The National Park Authority will encourage green business proposals particularly when they are linked to the special qualities. A green business is defined as an enterprise that has a positive impact on the local and/or global environment. Green businesses are linked to ecosystem services, for example, a coppicing business provides 'provisioning' services with a renewable source of wood.

RURAL SUPPLY CHAINS

7.130 Rural supply chains link products, services, finance and information from the producer to the customer. Policy SD34 seeks to encourage rural supply chains within and across the National Park in order to nurture and grow rural businesses. This is particularly important for the local food network. Rural supply chains are not, however, linked exclusively to food and drink, for example, the use of local building materials contributes positively to sustainable landscape management and local employment. The market towns have both a traditional and future role as hubs for rural supply chains including traditional markets, networking, training and services.

SMALL AND MICRO BUSINESSES

7.131 There are thousands of small and micro businesses in the National Park. A small business employs less than 10 people and a micro business employs less than 5. Although the main centres of employment are within the market towns, there are a significant number of rural business units. The ELR found that 88 per cent of workplaces employ fewer than 10 people and 98 per cent of enterprises employ fewer than 50 people. These proportions are significantly higher than national and regional levels. It indicates a strong entrepreneurial employment base reliant on small companies and start-ups.

7.132 Policy SD34 seeks to promote and protect small businesses. This could be through the provision of affordable 'move on space' for expanding home-based businesses and flexible 'move in/move on' accommodation for start-up companies. Policy SD40 deals with small businesses as part of farm diversification.

7.133 Many micro businesses are home based and collectively they make a significant contribution to the local economy. Home working provides a cost-effective solution to finding accommodation for new and micro businesses, and reduces the need to travel from home to the workplace. It is important that home based businesses do not cause unacceptable harm to the amenity of neighbours in terms of traffic, smell, loss of privacy, outlook, noise and overlooking.

RESILIENCE

7.134 Provision of workspace is only one part of encouraging new business start-ups and developing existing businesses. It is also important that businesses are resilient to changes in the local and international economy, for example, having the ability to adapt or expand premises to respond to a changing market. The planning process also has a role in supporting the availability of advice and training, and on-going business support. These types of services help to ensure the survival and development of small businesses and thus improve their resilience.

INTENSIFICATION

7.135 The development strategy set out in Policy SD25 prioritises the development of previously developed land. Commercial development on existing employment sites should make an efficient use of existing buildings and previously developed land through intensifying uses, provided that this does not compromise the special qualities of the National Park.

SMART ECONOMIC GROWTH

7.136 Smart economic growth seeks to achieve economic growth at a lower environmental cost and with a more positive impact on quality of life. Superfast broadband is key ingredient for achieving it, but significant areas of the National Park are currently severely disadvantaged by slow and unreliable internet connections. The proliferation of 'not-spots' is a major barrier to sustainable economic growth particularly for home-based businesses. Policy SD44 deals with telecommunications and other utilities.

Strategic Policy SD35: Employment Land

1. The SDNPA will make overall provision for the following amounts of new employment land between 2014 and 2033:
 - Office (B1a/b): approximately 5.3 hectares
 - Industrial (B1c/B2): 1.8 hectares
 - Small-scale warehousing (B8): 3.2 hectares

2. Development proposals for the change of use of redundant B2 premises and land to accommodate the need for new offices and/or warehousing will be permitted provided that there would not be a potentially adverse impact on the landscape and other special qualities of the National Park including by reason of traffic, noise or pollution.
3. The Authority will safeguard all existing employment sites and allocations that are fit for purpose from development proposals for non-employment uses. Change of use applications that would result in a loss of employment land will only be permitted provided that evidence of a robust marketing campaign of at least 12 months clearly demonstrates that there is no market demand for the business premises.
4. The principal and local employment sites are shown on the Policies Map, to which further protection applies as follows:
 - a) On principal employment sites: B Class employment uses will be safeguarded from development proposals for Non-B Class Uses and evidence of a robust marketing campaign of at least 18 months will be required.
 - b) On local employment sites: commercial uses will be safeguarded from development proposals for non-commercial uses and evidence of a robust marketing campaign of at least 18 months will be required.

Details of marketing requirements are set out in Appendix 3.

7.137 The purpose of this policy is to set out employment land provision figures for the National Park and safeguard existing employment sites. For the purpose of this policy 'employment' is defined as a type of economic development relating to the B uses as defined by the Use Class Order (UCO) namely B1 business, B2 general industrial and B8 storage and distribution.

EMPLOYMENT LAND REQUIREMENTS

7.138 Policy SD35 sets out the employment land provision figures, which meet the objectively assessed need for employment land identified in the ELR and HEDNA. Evidence indicates that this amount of development is deliverable

on sites across the National Park, particularly in the market towns, without harming the special qualities.

7.139 The methodologies for calculating the employment land provision figures are explained in full in the ELR and HEDNA. The provision figures build upon the evidence supporting the employment policies in the East Hampshire, Winchester and Lewes Joint Core Strategies. Due to the difficulties of undertaking economic forecasts in a national park, the employment need figures should be treated with caution and will be kept under review. It is important to take a flexible approach to the allocation and designation of employment land to ensure that the purposes are not compromised in order to meet its socioeconomic duty.

7.140 A sufficient supply of employment sites is available to meet the provision figures set out in Policy SD35 whilst taking into account that there will be some losses of existing employment land. The new employment provision is focused in Petersfield, Lewes and the smaller market towns of Midhurst and Petworth. These sites fall within the Functional Economic Market Areas (FEMA) of Central Hampshire, Brighton and Chichester/Bognor respectively. There are three tranches of future employment land supply, which make up the core supply. These are set out in Figure 7.5. The first tranche of sites is made up of sites with planning permission that are not allocated in this Plan or an NDP. The second tranche is NDP allocations, most significantly the Petersfield NDP, which allocates approximately 3 hectares of land for employment, and the Petworth NDP which allocates about a hectare of land as an extension to an existing employment site. There is one Local Plan allocation in Lewes, which is set out in Chapter 9 of this Plan.

7.141 In addition, there is limited additional potential supply on the strategic sites of Shoreham Cement Works and the former Syngenta site. The redevelopment of North Street Quarter in Lewes will deliver higher-quality business premises. All these sites are allocated for exceptional mixed-use redevelopment in this Local Plan. The detailed policy for Syngenta is set out in the Fernhurst NDP. The strategic policy for Shoreham Cement Works is set out in Policy SD56 and detailed policies will be contained in the Area Action Plan. Policy SD57 forms the detailed policy for North Street Quarter.

FIGURE 7.5: EMPLOYMENT LAND SUPPLY IN THE SOUTH DOWNS NATIONAL PARK

Source of employment land	Amount (hectares)
Sites with extant planning permission for employment development (excluding Local Plan and NDP allocations)	5.35
NDP allocations	4.69
Local Plan allocations	1.72
Total	11.76

FLEXIBLE APPROACH TO CHANGE-OF-USE APPLICATIONS

7.142 The ELR forecasts a growth in demand for both office (Use Class B1⁸¹) and small-scale warehouse accommodation (Use Class B8). Business support services, head office and management consultancy and other professional services are the major growth sectors underpinning the demand for office floorspace. A growth in warehousing and the postal sector, along with a smaller growth in wholesale trade, underlies the forecast need for warehouse floorspace.

7.143 In contrast, the ELR forecasts that there will be a continued and significant decline in employment in manufacturing, although manufacturing may contribute to growth in economic output linked to productivity improvements. This, in turn, will lead to a decline in demand for B2 floorspace although some manufacturing businesses may see a decline in jobs which does not translate directly through to floorspace.

7.144 The Authority will take a flexible and pragmatic approach to change of use applications in order to maximise the opportunities to re-use existing but vacant manufacturing premises for other forms of employment for which there is a demand. This will make an efficient use of previously developed land, and

81 The Town and Country Planning (Use Classes) Order puts uses of land and buildings into various categories known as 'Use Classes'

will reduce the impact of new development on the landscape. It may also offer opportunities to remediate land contamination. Some of the predicted losses in B2 accommodation could be converted into meeting the need for small-scale B8 uses. Both uses broadly require similar premises in locational terms; out of centre with strategic road access.

7.145 Robust evidence will need to be submitted and approved by the Authority that there will be no adverse effect on the landscape and other special qualities through traffic, noise or pollution. Advice on these matters will be sought from other statutory bodies, particularly the county councils and Highways England on the amount and type of traffic generation and the impact on the National Park's rural roads.

SAFEGUARDING

7.146 It is important to safeguard premises for local businesses that are fit for purpose both within towns and the wider rural area. In order to be considered fit for purpose, the business premises need to be of a necessary standard for the intended use as defined by the UCO. This will help to support the long-term future of communities, by providing local employment opportunities for local residents, and by reducing out commuting to employment centres outside the National Park. The ELR and ELR Update provide robust information on existing employment sites across the National Park.

7.147 Change of use applications that would result in the loss of employment land need to be supported by robust evidence. Guidance on the evidence required to prove that a robust marketing exercise has been carried out to support relevant applications is set out in Appendix 3. Advice should be sought from the local planning authority at the earliest opportunity to agree the details of the exercise.

7.148 There are a small number of principal employment sites in Petersfield, Midhurst and Lewes, which are large-scale, good-quality employment sites providing jobs and services across a wide area. The National Park Authority supports the continued use of these sites for B Class employment and will resist development proposals for alternative commercial uses and housing. The

following principal employment sites are identified on the Policies Map and safeguarded for employment uses:

- Bedford Road, Petersfield
- Holmbush Industrial Estate, Midhurst
- Central Lewes
- Cliffe Industrial Estate, Lewes

7.149 There are a number of local employment sites located in towns and villages identified in Policy SD25. It is important to protect these sites as they contribute to the sustainability of the settlements in which they are located, by providing jobs and services to the local community. Many of these local employment sites are protected in NDPs. The Local Plan will safeguard those local employment sites outside designated neighbourhood planning areas that are identified on the Policies Map:

- Abbas Business Centre, Itchen Abbas
- Farringdon Business Park, Lower Farringdon
- Farringdon Industrial Estate, Lower Farringdon
- The Old Piggery, South Harting
- The Wharf, Midhurst
- Midhurst Business Centre, Midhurst
- Hampers Common Industrial Estate, Petworth

7.150 The Authority will take a more flexible approach to change of use applications on these sites by allowing other forms of economic development that provide jobs, generate wealth or produce an economic output. Proposals for alternative uses will need to provide evidence that the proposed uses will not adversely impact on the existing and future B Class Uses. Any proposals for main town centre uses will need to comply with Policy SD37 on town and village centres.

7.151 Because the National Park's economic base is focused on small businesses it is not practicable to identify all these sites on the Policies Map. It is important to protect all existing small business premises, extending beyond identified principal and local employment sites, unless it can be proved that the site and the premises are not fit for purpose. Proposals that would result in a loss of employment floorspace will need to provide evidence in line with Appendix 3.

7J. GREEN INFRASTRUCTURE

INTRODUCTION

7.240 This sub-section includes policies related to GI provision. It includes one strategic policy providing the overarching requirements for GI (Policy SD45). It also includes two development management policies on specific requirements for open space, sports and recreation facilities or other amenity space and burial grounds (Policy SD46) and on Local Green Space designation (Policy SD47).

7.241 GI is the multifunctional network of natural and semi natural features, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. GI is a vital tool for the delivery of ecosystem services benefits, for resilience to climate change, and for health and wellbeing. The National Park as a whole is a nationally significant GI asset through its role as the green heart of the South East, and its GI network is recognised to extend beyond its boundaries. Accordingly, GI is identified as one of the six key strategic cross boundary issues (see Chapter 4 of the Local Plan).

7.242 The emerging South Downs Green Infrastructure Framework sets out a roadmap for GI planning for the National Park and the wider sub-region. It aims to “create, protect and enhance a connected network of multifunctional assets; which sustainably meet the needs of local communities and supports the special qualities of the South Downs; by achieving a consensus about the strategic principles for planning, delivery and management of green infrastructure”.

7.243 National Parks have traditionally been places for informal recreation and this is widely recognised in the National Parks Vision and Circular. As the local planning authority, the National Park Authority has an additional responsibility to plan for the provision of formal sports and recreational facilities for the health and wellbeing of its population. Such provision needs to

be based on robust and up-to-date assessments of the needs for facilities and opportunities for new provision.

7.244 The NPPF introduces the concept of Local Green Space designation as a way to provide special protection for green areas that are demonstrably special and holds a particular local significance for local communities. The designation would rule out development other than in very special circumstances. The Local Plan designates and protects Local Green Spaces which were nominated by local communities.

Strategic Policy SD45: Green Infrastructure

1. Development proposals will be permitted where they demonstrate that they:
 - a) Maintain or enhance GI assets, GI links and the overall GI network; and
 - b) Provide new GI, or improvements to existing green assets and green linkages, which are integrated into the development design, that meets the needs of communities both within and beyond the site's boundaries.
2. GI proposals must contribute to multifunctional landscapes which:
 - a) Strengthen connectivity and resilience of ecological networks;
 - b) Incorporate GI measures that are appropriate to the type and context of the development proposal as part of an overall landscape design;
 - c) Maximise opportunities to mitigate, adapt and improve resilience to climate change;
 - d) Maximise opportunities for cycling and walking, including multi user routes and, where possible, facilitate circular routes; and
 - e) Support health and wellbeing and improve opportunities for understanding and enjoyment of the National Park and its special qualities.
3. Development proposals that will harm the GI network must incorporate measures that sufficiently mitigate or offset their effects.
4. Where appropriate, the Authority will seek to secure via planning condition or legal agreement provision for the future management and/or maintenance of GI.

7.245 The purpose of this policy is to promote the provision of new GI whilst protecting existing assets and the integrity of the GI network as a whole. This network extends well beyond the boundaries of the National Park.

ENHANCING EXISTING AND PROVISION OF NEW GREEN INFRASTRUCTURE

7.246 Both GI assets and the GI network as a whole are important considerations in determining planning applications. GI assets in this context may relate to a wide range of natural or semi-natural features. For example,

a development may undermine the viability of a larger habitat through fragmentation.

7.247 New development should be designed in a way that enhances GI and avoids harm. The National Park Authority will seek contributions as appropriate for the future management and maintenance of the new infrastructure.

7.248 Improvements to existing or provision of new infrastructure should be an integral part of the design of development proposals, and should be landscape led, planned around existing GI assets, and should be multifunctional. Opportunities should be identified and taken for improving and creating new connections between habitats.

7.249 It is acknowledged that GI assets serve not only residents within the immediate locale, but also the wider community both locally and further afield. Wherever possible both new and enhanced GI will be planned to deliver benefits to as wide a cross-section of National Park users as possible.

MULTIFUNCTIONAL AND CONNECTED GREEN INFRASTRUCTURE

7.250 GI that is multifunctional and connected provides multiple benefits for people and wildlife. There are many ways in which GI can be multifunctional. In order to maximise opportunities for multifunctional GI, proposals must be informed by the context and address potential conflicts between users, for example between recreational uses and also between people and wildlife.

7.251 The multifunctional role of GI can strengthen climate change resilience through sustainable drainage and flood storage provision, and mitigate against climate change through carbon storage and providing sustainable transport options. Where appropriate, GI should be integrated into the built form of development proposals, for example, through green roofs and swales.

7.252 Green linkages can include green areas of land which connect habitat, green corridors which support movement of wildlife (for example, hedgerows), and PRoW. PRoW provide linkages between GI assets and also between villages and towns and can be multifunctional for the movement of

both people and wildlife. Where appropriate, proposals for PRow should take opportunities for multi user and inclusive access.

Development Management Policy SD46: Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries

1. Residential development will be required to provide open space on site or within proximity to the site, in line with the National Park Authority's adopted standards as set out in Figure 7.6, or their replacements. Development proposals for open space should demonstrate how they:
 - a) Are of a type determined by the scale and type of development and the needs of the area;
 - b) Are of high quality design which reflects the landscape character and setting;
 - c) Are safe and accessible for all members of the community; and
 - d) Include provision for the long-term management and maintenance of any recreation or open space facilities provided.
2. Development proposals for new buildings that provide local sport and recreational facilities should be located within settlement boundaries as defined on the Policies Map. Outside of settlement boundaries new buildings for local sport and recreational facilities will be limited to those ancillary to and essential for the use of the land for outdoor sport and recreation. Robust evidence of a sequential search for sites and the ancillary nature of the building will need to be provided and agreed with the Authority. Development proposals for new or improved playing surfaces should be located within or close to settlement boundaries as defined on the Policies Map.
3. Development proposals will be refused where they would result in the loss of open space unless provision of equal or better quantity, quality and accessibility is made in close proximity to the existing open space. Robust evidence must be provided to demonstrate the following:
 - a) Alternative provision is available in the vicinity without causing an unreasonable reduction or shortfall in meeting the local need;

- b) It has been demonstrated that the land cannot reasonably be converted to another form of open space provision for which there is an identified deficit; and
 - c) The development will provide alternative, sports, recreation or open space facilities, the need for which clearly outweighs the loss of the open space.
4. Development proposals for new cemeteries and burial grounds will be permitted where they are:
 - a) Appropriately sited with regard to impact on local amenity;
 - b) Designed to make the most of opportunities to improve and/or create new biodiversity, habitats and GI; and
 - c) Will have no adverse impact on groundwater and surface water.

7.253 The purpose of Policy SD46 is to ensure provision is made for open space, sports and recreational facilities commensurate with assessed need and protects existing facilities that are valued by the communities they serve.

ADOPTED OPEN SPACE STANDARDS

7.254 The National Park Authority, as the local planning authority, works with the twelve local authorities that are responsible for the delivery of sports and recreation facilities within their district, borough or city both in and outside of the National Park. The South Downs National Park Open Space, Sports and Recreation - Evidence Study⁸⁷ reviewed the open space standards in operation throughout the National Park. The standards set out in Figure 7.6 are taken from this report and represents the standards that the National Park Authority will adopt. These are based on standards set out in adopted Local Plans or in local needs-based evidence. Residential development proposals will be required to provide open space on site or within a set proximity in accordance with the appropriate standard in Figure 7.6 or any updated standards adopted in the course of the plan period.

⁸⁷ South Downs National Park Open Space, Sports and Recreation – Evidence Study (South Downs National Park Authority, 2014)

7K. CLIMATE CHANGE

INTRODUCTION

7.263 This section of the Local Plan includes two strategic and two development management policies linked to the subject of climate change. These policies are SD48: Climate Change and Sustainable Use of Resources, SD49: Flood Risk Management, SD50: Sustainable Drainage Systems and SD51: Renewable Energy.

7.264 Mitigating against and adapting to climate change is an international and national priority. In response to anticipated long-term changes in our planet's average temperatures, weather and seasonal patterns and sea level rises, the UK has committed to reducing carbon dioxide emissions by 80 per cent of 1990 levels by 2050⁹¹. Currently, the built environment nationally is responsible for approximately 50 per cent of carbon dioxide emissions.

7.265 The Vision and Circular for English National Parks states that national parks should lead the way in adapting to and mitigating climate change. Development should therefore minimise the National Park's vulnerability to climate change through reducing and mitigating the factors which are causing it, and become more resilient by being able to adapt to its effects. The South Downs National Park Climate Change Adaptation Plan (CCAP)⁹² is the main evidence based study on climate change and states that the South Downs is

particularly vulnerable to the impacts of present and future climate change. It sets 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.

7.266 Our use of resources is not sustainable, and the design and construction of new development with improved environmental performance is a critical part of delivering sustainable development. Even without climate change, there is still an imperative to promote development which meets the highest possible environmental design standards which minimises the use of finite resources.

7.267 The likelihood of flooding is predicted to increase as a result of climate change causing more extreme weather events, such as prolonged periods of intense rainfall. Reducing the National Park's vulnerability to the impacts of climate change, and particularly flooding to residential properties, is therefore a key objective of the Local Plan. The National Park's extensive chalk geology makes groundwater flooding a key issue with a number of areas at risk. A Strategic Flood Risk Assessment (SFRA)⁹³ has been undertaken for the National Park. Areas at risk of surface water flooding typically follow the main water courses and dry valleys in chalk downland areas.

7.268 The SFRA also identifies that groundwater influence on fluvial flooding is a problem along the Findon Valley and Rivers Itchen, Meon, Lavant, as well as some of the smaller tributaries. A Level 1 Update and a Level 2 SFRA has also been produced which assesses all allocated sites that are at risk from fluvial and tidal flooding; surface water flooding and groundwater flooding in both the Local Plan and the Lewes NDP⁹⁴. This study has helped

⁹¹ The Climate Change Act 2008 commits the UK to set a long-term binding framework to cut our emissions by at least 80 per cent by 2050 and by at least 35 per cent by 2020 against 1990 levels. It also places a duty on authorities to report to Government on the current and future predicted impacts of climate change on their organisation; proposals and policies for adapting to climate change; and an assessment of progress towards implementing the policies and proposals set out in previous reports. This is in the context of the national climate change risk assessment and adaptation programme that has been devised to address the Act's requirements

⁹² South Downs National Park Climate Change Adaptation Plan (South Downs National Park Authority, 2016)

⁹³ South Downs National Park Authority Water Cycle Study and SFRA Level 1 Scoping and Outline Report (Amec, 2015)

⁹⁴ South Downs National Park Authority Level 1 Update and Level 2 SFRA Report (Amec, 2017)

to facilitate the application of the Sequential and Exception Test, where necessary, the formulation of site specific flood risk management policies and recommendations on the suitability and design of Sustainable Drainage Systems (SuDS) for allocated sites.

7.269 SuDS can help to mitigate the risk of flooding. Development can lead to increased surface water run-off and as such all proposals should ensure that as a minimum there is no net increase in surface water run-off taking account of climate change. SuDS are designed to replicate, as closely as possible, the natural drainage from a site before development and treat run off to remove pollutants, reducing the impact on groundwater and receiving water courses. Therefore, development should incorporate mitigation techniques in its design such as permeable surfaces and SuDS. However, there are locations in which elements of SuDS are either unfeasible or inappropriate; for example, infiltration mechanisms may not be appropriate on floodplains, areas of high groundwater or in areas with known soil contamination. Similarly they will not be a feasible option in areas with impermeable soils.

7.270 The use of renewable energy rather than fossil fuels will help to reduce carbon emissions and thus reduce climate change. Renewable energy offers a more sustainable use of natural capital and therefore is an important ecosystem service. However, the landscape character of the National Park is a finite and precious resource that the National Park Authority is charged with conserving and enhancing. Development of renewable energy, therefore needs to be suitably constrained so as not to compromise the special qualities.

7.271 It should be noted that there are restrictions on designated landscapes including national parks, which mean that permitted development rights do not apply to solar photo voltaics and solar thermal technologies in the same way as non-designated areas⁹⁵. Similarly there are more specific restrictions that apply to the installation of renewable technologies in listed buildings or conservation areas. Potential applicants should seek guidance from the Authority on the nature of these restrictions.

⁹⁵ Part 40 of The Town and Country Planning (General Permitted Development) (Amendment) (England) order 2008

Strategic Policy SD48: Climate Change and Sustainable Use of Resources

1. The Authority will encourage all new development to incorporate sustainable design features, as appropriate to the scale and type of development.
2. All development proposals will be required to achieve the minimum standards as set out below unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable:

Residential:

- i. Energy efficiency: 19% carbon dioxide reduction improvement against Part L (2013)⁹⁶ through the energy efficiency of the building and;
- ii. Water: Total mains consumption of no more than 110 litres per person per day⁹⁷.

Non-residential and Multi-residential⁹⁷:

- i. Major: Building Research Establishment Environmental Assessment Method (BREEAM) Excellent⁹⁸
3. All development proposals, including retrofitting, will be required to demonstrate, proportionately, how the development addresses climate change mitigation and adaptation through the on-site use of zero and/or low carbon technologies, sustainable design and construction, and low carbon materials.
4. Major development proposals should also include an energy assessment to demonstrate how carbon dioxide emissions are to be minimised on-site.

⁹⁶ This standard is equivalent to CO2 emissions allowed under Ene 1 of the former Code for Sustainable Homes Level 4

⁹⁷ The optional enhanced national standard is defined within the 2015 Approved Document G, Building Regulations 'Sanitation, hot water safety and water efficiency', March 2015, pp.15 G2(3)

⁹⁸ Multi-Residential as defined by the Building Research Establishment (BRE). These developments can include: student halls of residence; key worker accommodation; care homes; sheltered housing; and other multi-residential buildings that have communal areas making up more than 10% of the total net internal floor area

⁹⁸ Major non-residential development is defined as Development over 1,000 sq/m; or development on a site of 0.5ha or more. Major residential is defined as Development of 10 houses or more; or development on a site of 0.5ha or more

7.272 The purpose of this policy is to encourage high standards of sustainable building design and construction in new and existing buildings, as an essential part of the National Park's response to the challenges of climate change.

7.273 The way in which buildings are designed, constructed, operated and decommissioned have significant impacts on the built and natural environment and require major resource inputs such as energy, water and materials. Designing and constructing buildings that help to reduce or avoid adverse impacts can reduce resource inputs and the National Park's carbon footprint, and also costs for developers and occupants. These aspects should be integral to development from the start, rather than improvements 'bolted on' at the end of this process, and should work alongside relevant elements of the Local Plan design policies. This applies equally to development which is allowed under Permitted Development Rights. Developers, other businesses and homeowners are encouraged to consider these aspects to achieve the highest possible environmental standards in their proposals.

SUSTAINABLE CONSTRUCTION AND TECHNOLOGIES

7.274 Applicants are strongly encouraged to consider what measures could be incorporated into their proposals. For example, it can be the case that the most sustainable building materials to use are those sourced locally.

7.275 The Authority will consider site constraints, technical restrictions, financial viability and the delivery of additional benefits to the National Park where requirements of the policy cannot be met. However, all development proposals should minimise the impact on landscape character, features of natural beauty, wildlife, cultural heritage and the general amenity of communities.

ON-SITE ENERGY

7.276 A Renewable and Low Carbon Energy Study (RLCES) was prepared as part of the evidence for the Local Plan¹⁰⁰. This has fed into the requirements set out in Policy SD48.

7.277 The BREEAM is a widely recognised, accredited, independent method for assessing environmental performance of non-residential buildings. Until superseded by nationally prescribed standards, the BREEAM standards for non-residential and multi-residential buildings by nationally recognised certification bodies may also be accepted.

RETROFITTING

7.278 The existing building stock also makes a large contribution to carbon emissions. Measures should be implemented which lower the environmental impact from the existing stock through reuse and refurbishment of buildings, reducing carbon dioxide emissions and fossil energy use, increasing thermal efficiency, reducing waste and noise impacts, and conserving water, materials and other resources.

MAJOR DEVELOPMENT⁹⁹

7.279 A detailed assessment of the energy demand and carbon dioxide emissions will be expected from all proposed major developments in order to ensure that climate change is fully addressed.

ON-SITE WATER USE

7.280 The EA has identified that all of South East England, including the National Park, is an area of serious water stress. It is therefore imperative that water resources are managed efficiently. Accordingly, all new homes in the National Park will be required to achieve total mains water consumption of no more than 110 litres per person per day. This target is equivalent to that proposed as an optional requirement of the Housing Standards Review which corresponds with Code Level 4 in relation to water efficiency. The Whole Plan and Affordable Housing Viability Assessment¹⁰⁰ sets out that viability analysis

⁹⁹ South Downs National Park Renewable and Low Carbon Energy Study – Main Report (AECOM, 2013) As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015

¹⁰⁰ South Downs Local Plan and Affordable Housing Viability Assessment (BNP Paribas, 2017)

factored in Code 4 as a minimum and as such this requirement will not impact residential development viability in the National Park.

Strategic Policy SD49: Flood Risk Management

1. Development proposals will be permitted that seek to reduce the impact and extent of all types of flooding through:
 - a) Steering development away from areas of flood risk as identified by the EA and the SFRA and directing development to Flood Zone 1, wherever possible. Development in areas of flood risk will, where relevant, be required to meet the national Sequential and Exception Tests;
 - b) Not increasing the risk of flooding elsewhere and, wherever possible, reducing overall flood risk;
 - c) Flood protection, mitigation and adaptation measures necessary and appropriate to the specific requirements of the proposal, the development site and other areas potentially impacted; and
 - d) Ensuring that the integrity of coastal and river flood defences are not undermined.
2. Development proposals should, where required by national policy and guidance, be accompanied by a site specific Flood Risk Assessment (FRA).
3. Proposed flood protection, mitigation and adaptation measures should be supported with a management schedule, the identification of the body responsible for maintenance, and evidence of funding and maintenance in perpetuity.

7.281 The purpose of Policy SD49 is to reduce the National Park's vulnerability to flood risk and the impacts of flooding associated with climate change. The Authority will seek to manage flood risk through avoidance of risk wherever possible. The National Park Authority will work with others to implement relevant flood and coastal protection strategies and plans.

SEQUENTIAL AND EXCEPTION TESTS

7.282 Proposed development within a flood zone will be assessed using the sequential and exception tests in national policy. The sequential test aims to steer different types of new development away from areas with the highest risks of flooding, which includes considering reasonably available alternative sites where it is proposed in areas at highest risk of flooding.

7.283 The exception test is used to demonstrate whether flood risk to people and property will be managed satisfactorily, while allowing necessary development to be permitted in circumstances where suitable sites in areas with a lower risk of flooding are not available. It must be demonstrated that there are wider sustainability benefits which outweigh the flood risk, it will be safe for its lifetime, does not increase flood risk elsewhere and that any residual risk can be safely managed.

RISK OF FLOODING

7.284 Development proposals should not increase the risk of flooding elsewhere. A site-specific FRA is required for proposals of one hectare or greater in Flood Zone 1; all proposals for new development in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the EA); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding. If there is any potential for tidal or fluvial flood risk issues, advice from the EA should be sought before submitting an application. Advice from the Lead Local Flood Authority (LLFA), Local Authority and relevant water company should be sought on local sources of flooding.

7.285 Requirements for a site specific FRA are set out in Box 5.1 page 43 of the South Downs National Park Authority's Level 1 Update and Level 2 SFRA Report.

FLOOD PROTECTION, MITIGATION AND ADAPTATION

7.286 Flood risk management opportunities should be sought to reduce the overall level of flood risk in the application site and beyond. This can be achieved through suitable design, appropriate GI, the application of SuDS, off-site works and through safeguarding land for flood risk management.

7.287 The Authority, as appropriate, will secure ongoing maintenance and operation of approved flood mitigation and adaptation systems through planning obligations or suitable conditions.

7.288 Where surface water flooding is identified as a relevant issue for a development, a detailed assessment will need to be made on a site-by-site basis. The assessment should identify the suitable management and mitigation necessary to ensure that there is no increase in surface water run-off from the proposal on both the development site and elsewhere. Proposals incorporating SuDS should address Local Plan Policy SD50: Sustainable Drainage Systems.

7.289 Where development is proposed in areas of groundwater flooding risk, proposals must take account of any relevant existing plans or strategies, including those produced by the LLFAs¹⁰¹. For example, Hampshire County Council has prepared a Groundwater Management Plan, which includes specific flood risk management plans for the Finchdean, Hambledon, West Meon and Rowlands Castle areas.

7.290 Where coastal and/or tidal flood protection, mitigation and adaptation is proposed, proposals must take account of any relevant existing plans or strategies, including the SFRA, and engage constructively with relevant authorities at the pre-application stage.

¹⁰¹ In the National Park there are four (4) LLFAs – Hampshire County Council, West Sussex County Council, Brighton and Hove City Council and East Sussex County Council

WORKING WITH OTHERS

Development Management Policy SD50: Sustainable Drainage Systems

1. Development proposals will be permitted where they ensure that there is no net increase in surface water run-off, taking account of climate change.
2. Proposals for major development* will be permitted where they provide suitable sustainable drainage systems, unless it is demonstrated to be inappropriate. All other development proposals must give priority to the use of suitable sustainable drainage systems where required by the LLFA.
3. SuDS, where feasible, must support the provision of open space, public amenity areas and enhancing biodiversity and other public benefits as appropriate.
4. Where SuDS are provided, arrangements must be put in place for their whole life management and maintenance.

* . Major development as defined in the Town and Country Planning (Development Procedure) (England) Order 2015.

7.291 There are a number of organisations involved in flooding matters, including the EA and the LLFAs, which the National Park will work with closely to reduce the risk of flooding through relevant strategies and plans. This includes Shoreline Management Plans (SMP)¹⁰², Flood Risk Management

¹⁰² SMPs are developed by Coastal Groups with members mainly from local councils and the EA. They identify the most sustainable approach to managing the flood and coastal erosion risks to the coastline in the short (0-20 years), medium (20 to 50) and long (50-100 years) terms

7M. POLLUTION AND CONTAMINATION

INTRODUCTION

7.320 This section of the Local Plan includes two development management policies. The first policy on pollution and air quality deals with a wide range of pollutants. The second policy focuses on contaminated land.

7.321 The natural environment of the National Park provides many regulating ecosystem services, for example, vegetation cover helps to remove vehicle emissions from the air. In general, air quality in the National Park is good. However, there are concerns about the levels of nitrogen dioxide emissions in certain areas. In 2005 an Air Quality Management Area (AQMA) was declared in Lewes Town Centre for nitrogen dioxide¹¹¹, mainly due to traffic emissions. Ground level concentrations of ozone have also frequently exceeded the UK air quality standards at Lodsworth where Chichester District Council measure this pollutant.

7.322 Contaminated land exists in pockets throughout the National Park, the sources of which include old petrol filling stations, land used for industrial processes involving hazardous substances, landfill sites and sewage works.

7.323 The purpose of the policy is to ensure that the National Park Authority, working with local authority partners and other relevant agencies, manages the impact of pollutants and in particular improves air quality throughout the National Park. In line with other policies in the Local Plan development proposals should promote opportunities for walking, cycling, public transport and congestion management to reduce traffic levels in areas of reduced air quality.

Development Management Policy SD54: Pollution and Air Quality

1. Development proposals will be permitted provided that levels of air, noise, vibration, light, water, odour or other pollutants do not have a significant negative affect on people and the natural environment now or in the foreseeable future, taking into account cumulative impacts and any mitigation.
2. Development proposals that by virtue of their location, nature or scale could impact on an existing AQMA, as shown on the Policies Map, will be required to:
 - a) Have regard to any relevant Air Quality Action Plan (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP; and
 - b) Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.
3. Development proposals will be required to provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.
4. Development proposals will be permitted where they follow best practice methods to reduce levels of dust and other pollutants arising during a development from demolition through to completion.

7.324 The effects of air pollution can be felt far beyond the original source of the pollution and impact other areas. Therefore all proposals, not just those for development within or adjacent to AQMAs, need to consider the potential impact on air quality. This includes not just those matters covered by statutory legislation but also more general amenity issues such as dust and odour. For example, developments adjacent to existing wastewater treatment works or smaller wastewater facilities, such as pumping stations will only be permitted if the proposal demonstrates that there is adequate mitigation. Pollution takes

¹¹¹ Declaration of an AQMA is necessary under Part 4 of the Environment Act 1995, when certain statutory air quality thresholds are breached

many forms and the impact of litter resulting from a development such as a takeaway will be considered and management will be required.

7.325 Development proposals that may lead to a deterioration in air quality resulting in unacceptable effects on human health, the natural environment or local amenity, will require the submission of an air quality assessment. Where this effects internationally designated nature conservation sites an HRA will be required in line with Policy SD9: Biodiversity and Geodiversity. Should an air quality assessment or HRA be required it should address but is not restricted to:

- The existing background levels of air quality;
- The cumulative impact of development levels of air quality; and
- The feasibility of any measures of mitigation.

7.326 An AQAP has been produced for the Lewes Town Centre AQMA and includes a number of measures that aim to improve air quality. It is expected that developments within the vicinity will aid in the delivery of the AQAP by either providing measures set out in the AQAP or by funding their delivery, thereby mitigating the development's potential negative impacts.

7.327 Applicants for development within or adjacent to an AQMA, be it inside or outside of the National Park, should discuss any requirements with the Authority at the earliest opportunity and certainly before a planning application is submitted. This will help to determine whether a proposed development could impact upon the AQMA and therefore require mitigation measures.

Development Management Policy SD55: Contaminated Land

1. Development proposals for sites with either known or suspected contamination or the potential to contaminate land either on site or in the vicinity, will require the submission of robust evidence regarding investigations and remedial measures sufficient to ensure that any unacceptable risk to human health or the health of the environment is removed prior to development proceeding.

7.328 The purpose of the policy is to ensure that when considering the development of land known or suspected of being contaminated, the principle is one of ensuring the land is "suitable for use". This requires that the owner, occupier or developer of a site should undertake those measures necessary to deal with any unacceptable risks to health or the environment, taking into account the intended use of the land. Consideration must be given to the potential impact on neighbouring developments, residents, the environment and the road network of any decontamination process. This includes groundwater which is a significant risk if decontamination is not carried out correctly.

7.329 It is for the owner or developer to determine the existence and extent of any contamination. The Authority will follow national guidance in regard to the need for pre-application investigation into contamination issues but such an assessment may include some or all of the following;

- A desk top study;
- Site investigation;
- Risk assessment,
- Remediation; and
- Post remediation certification of the work completed.

7.330 Where there is no evidence to the contrary, the possibility of contamination will be assumed when concerning applications in relation to land on or adjacent to previous industrial use or where proposed uses are considered that are particularly sensitive to contamination for example housing, schools, allotments, children's playing areas.

7.331 If there is only a suspicion of contamination or the contamination is slight, planning permission may be granted subject to conditions requiring site investigation and any necessary remedial measures.

Authority on the proposed scope for such a study at the earliest opportunity. Householder applications should be informed by the *Landscape and Biodiversity Baseline Checklist* which is available on the Authority's website in the first instance. Further study may be required following on from completion of the checklist which the Authority would advise on.

5.12 The cumulative impact of development or land-use change can detrimentally affect landscape character. There are many heritage features in the landscape and these contribute to local distinctiveness reflecting the time depth which is present in the landscape.

DESIGN AND LAYOUT

5.13 The design and layout of proposals should be consistent with local landscape character. Good design should avoid the need for screening which could appear incongruous in the landscape. Proposals should be designed to be complementary to their context and setting. Policy SD5: Design, includes further requirements and guidance on design and landscape matters. The introduction of undesirable exotic plant species into the wider countryside and at the settlement edge as part of scheme planting proposals will be strongly resisted. The use of non-native plant species may be justifiable in some cases where there are clear reasons for this, for example, based on biodiversity or other ecosystem services functions.

DESIGNED LANDSCAPES

5.14 There are many locations where designed landscapes, gardens and parkscapes exist within the towns, settlements and wider countryside, often associated with land holdings. There are 30 parks and gardens on the *Historic England Register of Historic Parks and Gardens*³⁰, for example, Petworth Park, designed by Capability Brown. In addition, there are many other sites which are identified as being designed landscapes, but not included on the

Historic England list. These are identified in the *Historic Landscape Character Assessments*³¹ for the National Park and are important cultural heritage assets.

5.15 Policy SD12: Historic Environment, sets relevant requirements for heritage assets. Detailed records of historic parks, gardens and designed landscapes are available from the County Garden Trusts, which are independent charities engaged in caring for gardens and designed landscapes.

5.16 Proposals which may affect designed landscapes, gardens and parkscapes should be informed by a design process which understands and identifies the key features within the designed landscape. This process should ensure that development will enhance the designed character of the landscape.

THE INDIVIDUAL IDENTITY OF SETTLEMENTS

5.17 The gaps between settlements protect the individual character and identity of towns and villages. They retain the open nature and the physical and, either real or perceived, visual separation between settlements. The land at the edge of settlements often forms part of the historic setting of the settlement and can include areas which have cultural importance. Public RoW can often provide access to these areas and connections to the open landscape of the National Park beyond.

GREEN AND BLUE CORRIDORS

5.18 Green and blue corridors are areas or linear features which connect habitat and wildlife populations and can provide opportunities for walking and cycling, and also facilitate the movement of wildlife. Green and blue corridors are an essential component of the National Park's GI, and can provide benefits for people and wildlife at both the landscape scale and more local scale. More information is provided under Policy SD45: Green Infrastructure.

³⁰ Link to the Historic England website to view/search the Historic Parks and Gardens Register: <https://historicengland.org.uk/listing/the-list/>

³¹ Link to the Sussex Historic Landscape Characterisation study: www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/sussex-historic-landscape-characterisation/; the Historic Landscape Assessment of Hampshire is underway