



Campaign to Protect
Rural England, Sussex Branch CIO
Brownings Farm, Blackboys,
East Sussex, TN22 5HG
Tel 01825 890975
e-mail info@cpresussex.org.uk
www.cpresussex.org.uk

South Downs Local Plan
Planning Policy
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH
By email: planningpolicy@southdowns.gov.uk.

20th November 2017

Dear Planning Policy Team

South Downs Local Plan – Pre-Submission Consultation

This is the formal response of the Sussex branch of the Campaign to Protect Rural England (CPRE Sussex) to the above consultation. CPRE Sussex works to promote the beauty, tranquillity and diversity of the Sussex countryside by encouraging the sustainable use of land and other natural resources in town and country. We encourage appropriate and sustainable land use, farming, woodland and biodiversity policies and practice to improve the well-being of rural communities.

In summary, CPRE Sussex supports the South Downs Local Plan, especially the ecosystem services approach and the housing mix proposed. The South Downs was designated as a National Park in recognition of its exceptional natural beauty, for the opportunities to learn about and appreciate its special qualities, and as a landscape of national importance. Therefore, it is entirely appropriate to take a landscape-led approach to the formulation of its Local Plan. The National Planning Policy Framework (NPPF) states that great weight should be given to conserving landscape and scenic beauty in national parks, which are afforded the highest status of protection. The fact that development allocations and policies are landscape capacity led, not target driven, therefore complies with the National Planning Policy Framework and the DEFRA Vision and Circular 2010 on National Parks. Overall, we believe that the plan has been positively prepared, is justified, effective, consistent with national policy and meets legal and procedural requirements, subject to the following amendments;

Policy SD1: Sustainable Development

We believe that bullet point (4) is unnecessary. We see no justification for permitting development which does not conserve the landscape, natural beauty, wildlife and cultural heritage of the SDNP in circumstances not already covered by policy SD3.

Policy SD7: Relative Tranquillity

CPRE Sussex strongly supports this policy and welcomes the approach that development which would have an adverse impact on relative tranquillity will be refused as being entirely appropriate for the National Park. However, this policy should be strengthened to control land uses and activities with potential to reduce tranquillity by residents and visitors such as drone flying and outdoor festivals.

SD20: Walking, Cycling and Equestrian Routes

In order to be positively prepared this policy should require improvements to the bridleway and footpaths if there is evidence of historic use.

SD22: Parking Provision

We would like to see a stronger commitment to electric charging facilities within this policy to support the Vision and Circular for English National Parks which states that ‘national parks should lead the way in adapting to and mitigating climate change.’

SD25: Development Strategy

We welcome the encouragement in bullet point (3) for farms and estates to prepare “whole estate plans” or similar. We would like bullet point 2(b) to be more specific as to how the ‘essential need for a countryside location’ is to be judged in order to better reflect NPPF para 55 and other policies within the SDNPA local plan.

Policy SD26: Supply of Homes

The recent ‘Planning for the right homes in the right places: consultation proposals’ (sept 2017) set out in para 45 that ‘Where local planning authorities do not align with local authority boundaries, such as National Parks, the Broads Authority and Urban Development Corporations, available data does not allow local housing needs to be calculated using the standard method set out above.’ We therefore believe that the general approach adopted to the provision of housing in the SDNPA Local Plan (particularly affordable housing) using the evidence base and the SHLAA in setting out appropriate local targets is entirely appropriate. However, it is not clear as to whether the Authority is proposing an annual housing requirement of 250 homes per year or a stepped trajectory based on anticipated completion rates at strategic sites? The latter would seem more appropriate.

Policy SD27: Mix of homes and Strategic Policy SD28: Affordable Homes

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 and need for affordable homes. We therefore support the approach in SD:27 and SD28.

SD39: Agriculture and Forestry

Absent from the plan is an emphasis on the importance of protecting land in agricultural use in line with para 112 of the NPPF.

SD32: New Agricultural and Forestry Workers' Dwellings

We support SD32 as we believe that it is in line with national guidance. However, we would like to see further evidence of how the 5 hectares criterion in para 7.100 (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) has been arrived at (as opposed to for example 10 hectares which would support the definition of 'extensive'.) We also like to see para 7.100 expressed as part of the policy text. In section SD32 bullet (4) it should be demonstrated that at the end of any temporary permission the financial viability is proven if any buildings approved under this policy are to be retained and that occupancy terminates if the enterprise ceases.

SD40: Farm and Forestry Diversification

We support the SDS proposal that diversification proposals should incorporate a test for financial viability aimed at ensuring that they are indeed intended to form part of a functioning farm unit. The plan must meet the requirement that the diversification contributes to the viability of the business overall.

SD41: Conversion of Redundant Agricultural or Forestry Buildings

Whilst Policy SD32 provides a robust framework for assessing New Agricultural and Forestry Workers' Dwellings, in line with national guidance, policy SD41 should be similarly strengthened to avoid its abuse as a circuitous route to new housing development. We would like to see further safeguards to limit the length of tenant stay (for example to 4 weeks) and require a register of letting which the NPA can ask to see on demand. We would also like to see a tighter definition of 'agricultural or forestry buildings' and a requirement that buildings are 'established' for a period of time as per SD32.

SD43: New and Existing Community Facilities

It is not clear how this policy relates to settlement boundaries.

SD48: Climate Change and Sustainable Use of Resources

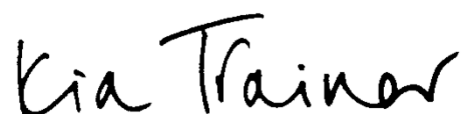
The positive words in the supporting text about meeting high environmental standards in construction, and specifically BREEAM, are disappointingly not carried through into the policy text. There should also be a stronger encouragement to the incorporation of renewable energy measures in new developments.

SD64: South of London Road, Coldwaltham

We do not support this allocation. The site abuts the Waltham Brooks SSSI and is close to an SPA and a Ramsar site which are low lying. Development would impact on landscape quality and threaten biodiversity in this part of the national park.

We trust these points will be taken into account,

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first name "Kia" and last name "Trainor" clearly distinguishable.

**Kia Trainor,
Director CPRE Sussex**