

SOUTH DOWNS NATIONAL PARK LOCAL PLAN

Local Plan Review: First Public Consultation (Reg 18)

Consultation date: Monday 20 January – 17 March 2025 (23:59)

Please email planningpolicy@southdowns.gov.uk or return to Planning Policy Team, South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH

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This response form has three parts:

Part A: Personal Details & demographic information

Part B: Introduction, Policies and Supporting Assessments survey

Part 3: Existing & Proposed site allocations survey. Please fill in a separate sheet for each site you wish to comment on.

Please complete the following questions to help us put inclusivity and diversity at the heart of our local decision making. The following information about you is stored securely and will never be shared publicly.

Part A

What is your name: Mike Mordecai

Which organisation do you work for: Clerk, Binsted Parish Council

Agent name providing comments on behalf of : Binsted Parish Council

What is your postcode? GU34 4PB

What type of stakeholder are you responding on behalf of? Parish Council

What is your connection to the area? A significant portion of the parish is within SDNP.

What is your age group? N/A

What is your employment status? N/A

How do you usually travel in or around the area? N/A

How would you describe your gender? N/A

Do you consider yourself to be trans? N/A

Which of the following best describes your sexual orientation? N/A

Do you consider yourself as having a disability or long term health condition? N/A

What is your ethnicity? N/A

What is your religion/belief? N/A

Part B

Introduction - *This chapter explains why we are reviewing the Local Plan and what work has been undertaken so far. Do you have any comments to make on the Introduction chapter?*

Binsted Parish Council recognises the need for SDNP to update the Plan, and has welcomed the Park's approach to engage on the Plan at the various stages, and provide a mix of channels to see and listen to the plans and ask questions.

Binsted parish sits within both EHDC and SDNP planning authorities, so we would have liked to have seen more in sections 1.10-1.12 (Relationship With Other Plans) on whether there has been engagement with neighbouring districts/planning authorities, and if there has, what sort of engagement and in what subject areas. Whilst housing numbers have been the topic that has caught the headlines, there are many areas of policy and potential impacts (such as the economy and transport) where a joined-up approach and strong relationships between organisations would be beneficial. Such issues are acutely felt in parishes such as ours which straddle the boundary - our residents' considerations and concerns do not split on boundary lines, but the boundary has a material impact on the lives of individuals and the whole community.

Vision and Objectives - *This chapter includes the Vision for the South Downs National Park and a number of strategic objectives for the Local Plan, based on the National Park purposes and duty. Do you have any comments to make on the Vision & Objectives chapter?*

There is much we would agree with in terms of the Visions and Values section, and how the policies support these visions and values, particularly in relation to biodiversity and nature recovery. However, we believe there is insufficient emphasis and focus in other areas and their supporting policies and focus.

We recognise that:

- a) National Parks exist to protect the characteristics that made them sufficiently special and cherished to be made National Parks, which the respective Authorities have various statutory duties to protect;**
- b) SDNP has no or limited direct powers in many important policy and operational aspects; and**

c) the South Downs has some unique challenges, particularly in being within such a densely-populated wider region that is within commuting distance of London and other large cities.

However, SDNPA's well-meaning policies and guidance (such as its excellent 'Roads in the South Downs') are failing to achieve the desired outcomes. We believe there needs to be a greater emphasis on policies and actions to support the stated visions of thriving economies and villages/market towns, farming and tourism sectors, and the social and economic wellbeing of residents and communities.

How can SDNP Authority play a positive role in its own work *and through partnership working* in ensuring that there are public and social amenities in communities that enable them to thrive, such as schools, healthcare, and public transport?

Policies supporting the sustainable growth of the rural economy and provision of affordable/social housing are welcome, but it must be recognised that many residents work outside of the Park boundaries, and living within the boundaries of the Park can be an unattractive or impossible option for families on lower incomes and other demographic groups such as the elderly, and can create issues such as cultural and demographic monocultures, social isolation and dangerous roads that are unsuited to increasing traffic volumes.

How in practice can the Authority balance the pressures on the rural landscape in a wider region of high population density and pressure to build, ensuring that there is a thriving rural economy and farming sector alongside nature regeneration?

It feels like there is a greater emphasis and clearer vision of what success looks like in policies supporting nature regeneration than in thriving communities, farming and key issues that the residents in our parish see as vital, such as transport, traffic and public and social amenities. We feel that Policies SD34 (Sustainable Local Economy), SD26

(Supply of Homes), SD27 (Mix of Homes), SD5 (Design) and SD17 (Protection of Water Environment) need greater emphasis in SDNPA's decision making.

Core Policies - *This chapter sets out the Local Plan core policies, which 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. Take a look and let us know your comments below.*

Note on format of revised policies

As this is a Review of an existing award-winning Local Plan, policies have only been changed where there are strong reasons to do so. These reasons include:

- Changes to national policy and legislation which might impact the previous findings of the Planning Inspector that these policies were 'sound' (i.e. passed all the legal and policy tests at the last Local Plan examination in 2018);*
- Changes to the National Park Authority's own priorities and objectives;*
- New issues that have arisen since the last Local Plan was adopted (such as nutrient and water neutrality and the growth of viticulture); and*
- Difficulties encountered in implementing adopted policies that could be fixed by clarifying wording.*

Where possible policy numbers have been kept the same as in the existing Local Plan to make it easier for people to see what we are proposing to change, however we have regrouped some of these policies so that those most closely related are easier to find. This means that policy numbers are not always in order. We are not including supporting text at this time but will be adding some back in at the next stage where necessary to explain how to apply policies or to signpost other relevant policies.

What are your views on Policy SD1 Sustainable Development? STRONGLY AGREE

our answer: We strongly support the fact that no changes have been made to SD1 with the Authority taking a positive approach that reflects the presumption in favour of sustainable development. We are reassured that planning permission will be refused where development proposals fail to conserve the landscape, natural beauty, wildlife and cultural heritage of the National Park, however we don't believe that 4b - exceptions where there is substantial compliance with other relevant policies in the development plan should be applied since doing so would undermine the priority given to sustainable development.

What are your views on Policy SD2 Regenerative Design, Ecosystem Services and Environmental Net Gain? AGREE

our answer: A cautious welcome for the policy principles. We sense that many of the policy's principles already surface in other parts of the Plan. The BNG percentage should not be enhanced beyond 10%. The SDNPA aspiration to go beyond 10% indicates a worrying tendency to gold-plate the plan. It should not be a requirement to set out plans for the EBN metric– the planning process in the Park is seen by many as overly onerous already.

If an updated Environmental Benefits from Nature Metric is published, should we include a requirement for this to be submitted as part of applications for major development?

NO, for reasons stated above.

What are your views on Policy SD3: Major Development? AGREE

our answer: We are supportive of not permitting major developments. We would query the inclusion of exceptional circumstances permitting major development. We query if the revised targets set out as part of the revisions to the NPPF will drive exceptional circumstances for major development.

What are your views on Policy SD25: Development Strategy? STRONGLY AGREE

our answer: We welcome the changes proposed to close the PDL loophole in criterion 2(d): Binsted parish has many small settlements with stables outside settlement boundaries.

To ensure the clause is very clear, we suggest the wording is changed to read:

“Development will be permitted outside settlement policy boundaries where policies in the Development Plan so permitor, exceptionally.....”

This will make it very clear that outside the listed exceptions in (a) to (d) it is only development expressly allowed by the Plan which is permitted outside settlement policy boundaries, such as rural exception sites.

Landscape and Heritage

This chapter includes policies covering landscape character, design, views, dark night skies and protection of the historic environment. Let us know your comments below.

What are your views on Policy SD4 Landscape Character? AGREE

our answer: We agree with the high-level policy intentions. Responses in questions below set out further detail as to how we believe the more detailed policies could be enhanced and delivered in practice.

What are your views on Policy SD5 Design? AGREE

our answer: Improving South Downs' Design Policy is vital. We welcome South Downs' 'landscape-led' philosophy, but further improvements to Policy SD5 are needed so that builders, designers and homeowners are crystal clear about the design 'rules' to be met.

Our first concern is that Policy SD5 needs to be clearer and more forceful about developers' duty to use '*architectural design that 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*' as well as contributing to local distinctiveness and sense of place through the other measures described in SD5's proposed wording. We understand that material costs can make the use of certain materials prohibitive, but we feel that greater attention to these types of design features should be a requirement for building permission. We feel that the design standards of many of the recent developments approved within our parish have fallen short. In our parish, examples of important design features include:

- low roof pitches, which are vital if new buildings are to fit alongside the many local smaller dwellings/terraced cottages built in the past for farmworkers and hop-pickers.
- incorporating soft yellow stone (rather than grey Welsh slate), to echo the malmstone ashlar quarried locally and used for many of our parish's older buildings.

A **further concern** is that, as Policy SD5 is the only policy setting out requirements for all new development, neither SD5 or SD19 treat pedestrians and cyclists as a priority in new developments. Our experience has shown that developers do not take the needs of pedestrians and cyclists seriously. If SDNPA is serious about sustainable travel, policies SD5 and SD19 absolutely must force developers to "design" in the needs of pedestrians and cyclists. Once built, these can rarely be "retrofitted."

What are your views on Policy SD6 Safeguarding Views? NEUTRAL

our answer: No comment

What are your views on Policy SD7 Relative Tranquillity? AGREE

We strongly support continuation of Policy SD7 Relative Tranquillity, which is highly valued by local residents and is essential to conserving the National Park's special qualities.

However, this policy needs to be strengthened to limit noise impacts caused by business hospitality venues which cannot be controlled by licensing permissions. Many applications to expand tourist accommodation in the National Park involve building holiday cabins and 'EcoPods'; hospitality venues also frequently apply to expand the capacity of hospitality

venues through 'Tipis', 'yurts' and the like. Noise from all of these carries long distances in rural areas, often continues late at night, and cannot be controlled by licencing permissions.

What are your views on Policy SD8 Dark Night Skies? AGREE

our answer: We strongly support continuation of Policy SD8 Dark Night Skies, which is essential to conserving the National Park's special qualities. However, it is inconsistent that the very dark skies of the Alice Holt Forest (in our parish) are not included in the Dark Sky Core area, despite having SQMs (Sky Quality Meters) as low as the Dark Sky Core Area.

The fact that SDNPA restricts its Dark Skies enforcement to the Core Area makes Policy SD8 Dark Skies toothless in our area.

This is a particular problem for planning permissions granted to businesses, whose installed lighting schemes rarely align with the policy and create light pollution on a significant scale.

What are your views on Policy SD12 Historic Environment? NEUTRAL

our answer: No comments.

What are your views on Policy SD13 Listed Buildings? NEUTRAL

our answer: We strongly support the need to conserve and protect Listed Buildings, but greater flexibility is needed to allow the retrofitting of renewable energy and energy-saving measures (e.g. double glazing). Creating barriers to the updating of heating and insulation is counterproductive – for example, older properties can deteriorate (e.g. from damp) if heating systems cannot be modernised because of over-vigilant rules.

What are your views on Policy SD15 Conservation Areas? NEUTRAL

our answer: No comments.

What are your views on Policy SD16 Archaeology? NEUTRAL

our answer: No comments.

Nature Recovery

What are your views on Policy SD9 Nature Recovery? STRONGLY AGREE

We understand that SDNPA needs to substantially review its Nature Recovery policy to incorporate national policy changes that were made through the Environment Act 2021, secondary legislation, other national policy and supporting guidance introducing Local Nature Recovery Strategy (LNRS) and Biodiversity Net Gain (BNG) requirements.

As also noted in our comment about Policy SD11 Trees, Woodlands and Hedgerows, we think there need to be better monitoring and financial penalties for planning applicants who remove trees, woodland or hedgerows prior to submitting their proposals, and then claim Biodiversity Net Gain for replanting the development site or adjacent land that the applicant may own. Google Earth makes it easy to identify where cynical tree removal of this type may have taken place.

Should the Local Plan have policy requirements for integrated wildlife boxes/bricks?

YES

If yes, what matters should the policy address?

It should be standard across the South Downs that any new build (including self-build) and any major house extension should be required to incorporate one swift brick or owl box or bird box: these measures are inexpensive for developers if rolled out at scale. Some of the better housebuilders already include these measures, but the fact that these measures are currently optional enables these housebuilders to focus their advertising on these measures, sometimes using them as a 'green mist' to distract attention away from more fundamental environmental concerns (such as drainage, design, etc).

Do you agree that a higher percentage of Biodiversity Net Gain (BNG), beyond the statutory minimum of 10% should be considered? NO

our answer: The Biodiversity Net Gain mechanism is still new: no change should be made to the basic 10% BNG rule until the system 'beds in': it would cause adverse public reaction to change the scheme at this early point. Also, although it seems appealing to set higher percentages for strategic greenfield sites, this would also be likely to backfire unless ALL planning authorities were to adopt the same rules. For example, if SDNPA adopted a 30% BNG for strategic greenfield sites, but EHDC did not, differences in the planning authorities' rulebooks would distort the evaluation of which is the 'better' site.

A higher BNG percentage in the Park means potentially more farmland could be taken out of food production use to meet enhanced BNG requirements. There will of course be farmers who see the market potential to provide BNG land as a commercial service. It might be sensible to put this aspect of the policy on hold especially as the Defra Land Use Framework consultation is ongoing.

Do you agree with the scenarios proposed to be tested? NO

We are not experts in the field of Biodiversity Net Gain, and we do not quite understand what is being proposed through these scenario 'tests'.

If you said no to any of the above, what other scenarios should be considered and why?

If any other scenarios are to be tested, it would be useful to understand whether the maximum biodiversity benefit is achieved on small or on large nature recovery sites..

What are your views on Policy NEW2 Designated Sites Hierarchy? NEUTRAL

We lack sufficient knowledge in wildlife site designations to comment on this new hierarchy.

What are your views on Policy SD10 The Sussex Bat Special Areas of Conservation (SAC): The Mens SAC, Ebernoe Commons SAC and Singleton & Cocking Tunnels SAC?

NEUTRAL

our answer: It seems important to consider that the possibility that Barbastelle or Bechstein's Bats will be present on any development proposal on a greenfield site, or on 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), irrespective of whether the site is in Sussex or elsewhere. In such cases, the necessary surveys should be required and key features (foraging habitat and commuting routes) retained, with an additional buffer to safeguard against disturbance

What are your views on Policy NEW3 Arun Valley Special Protection Area (SPA): Functionally Linked Habitat? NEUTRAL

our answer: No comments.

What are your views on Policy NEW4 Arun Valley SPA/SAC/Ramsar – Water Neutrality? NEUTRAL

our answer: No comments.

What are your views on Policy NEW5 Wealden Heaths Phase II SPA – Urbanisation and Recreational Pressure? STRONGLY AGREE

our answer: We agree that development proposals resulting in a net increase in residential units (including gypsy/traveller units and hotels with permanent staff accommodation) within

400m of boundary of Wealden Heaths Phase II SPA, Woolmer Forest SAC and Shortheath Common SAC boundaries should not be permitted without the Assessment described.

We also agree that development proposals resulting in a net increase in residential units within 5km of the boundary of the Wealden Heaths Phase II SPA must be supported by a Habitats Regulation Assessment, as described.

If any mitigation measures are proposed (as described in paragraph 2), such mitigation measures must be delivered "in perpetuity", to ensure they are maintained in the long term.

What are your views on Policy NEW6 Solent Coast SPAs – Recreational Pressure?

NEUTRAL .

our answer: No comments.

What are your views on Policy NEW7 Solent Coast SPAs and SACs and the River Itchen SAC – Nutrient Neutrality? NEUTRAL

our answer: No comments.

What are your views on Policy SD11 Trees, Woodlands, and Hedgerows? AGREE

our answer:

- **Policy SD11 Trees, Woodlands and Hedgerows needs to introduce a penalty for planning applicants who remove trees, woodland or hedgerows prior to submitting their proposals, especially if the applicant is also claiming Biodiversity Net Gain for replanting his site, either on the same development site or on adjacent land he may own. Google Earth makes it easy to identify where cynical tree removal of this type may have taken place.**
- **We welcome the updated advice from NPPF, DEFRA policy and Natural England on ancient woodland, which is a big feature of our well-wooded parish.**
- **We welcome the new National Planning Policy Framework guidance (para 136) that new streets should be tree-lined unless there are clear, justifiable and compelling reasons why this would be inappropriate.**
- **We welcome the recognition that scrub, deadwood and connectivity contribute to nature recovery and should be given recognition for this contribution in planning applications. However, scrub varies considerably in density and wildlife value, so South Downs' policy must be applied on a site-specific basis. It must also be recognised that the removal of scrub is in certain circumstances beneficial to landscape character, nature recovery and efficient grazing.**

- We suggest that paragraphs 5 and 6 be swapped to reflect a hierarchy of vegetation.

Climate Action

What are your views on Policy SD48 Climate Change and Sustainable Use of Resources?

AGREE

our answer: We note the SNDP will “*encourage all developments to incorporate sustainable design features*”. We would comment, that with the current climate emergency we should seek to include conditions to mandate sustainable design features, regardless of size, scale or type. With regards to minimum standards could more be included with the targets, such as renewable energy requirements, solar on roofs, grey water recycling, embodied carbon requirements?

Are the standards in this policy appropriate, legible for applicants and decision-makers and likely to be relevant until 2032 (when this Local Plan is likely to be reviewed)? NO

our answer: Code for sustainable homes should also look to mandate recording CO₂ emissions for construction sites, and allow for targets. Although not specifically detailed, consideration is also needed to be taken for water and surface water removal to be sustainable, with capacity at local treatment works a precondition for planning consent.

Should the policy cross-refer to the UK Net Zero Carbon Buildings Standard? YES

our answer: The policy should refer to UK net zero carbon building standards to drive low carbon construction

Is criteria 2 on embodied carbon appropriate? NO

our answer: Insufficiently detailed requirements on embodied carbon within the policy note. This is a key requirement in building regs for new buildings and should specifically be detailed.

Should small-scale development (<10 units or <1,000sqm) be required to prepare an embodied carbon assessment, without setting a specific target for upfront embodied carbon emissions? YES

our answer: All development should include the requirement for embodied carbon assessment, this will drive more sustainable construction and use of materials.

What are your views on Policy SD14 Climate Change Mitigation and Adaptation of Historic Buildings? AGREE

our answer: We are supportive of this policy, as long as the development is sympathetic to the character of the heritage and historical features are maintained. The re-use and adaptation of buildings should produce less carbon than new builds. Sustainability targets should still be included as requirements to support a low carbon development.

What are your views on Policy SD51 Renewable Energy STRONGLY AGREE

our answer: We fully appreciate that there is a corporate responsibility for climate action and want to be proactive in supporting the net zero target for 2040. While community energy proposals have a significant role to play, we would urge extreme caution where this leads to a detrimental impact and even destruction of greenfield sites. We strongly support development proposals for solar panels on existing roofs, car parks within settlements and on brownfield land.

Site REN__002 at Blacknest within the parish of Binsted is a historic site with priority habit and open scenic views , on which any solar development would be highly visible. There is no existing safe access to the site which is adjacent to a notoriously dangerous junction. We endorse South Downs' Site Assessment that the site is a highly sensitive one and that solar development here would have significant negative impact.

Water and Pollution

What are your views on Policy SD17 Protection of the Water Environment? AGREE

our answer: We are supportive of the policy. In addition to the current policy wording we would also like to see reference to specific protection of Chalk Streams and aquifers, recognising the importance of the aquifers in feeding chalk streams, and ensuring that new developments do not damage or pollute aquifers, or the volumes of water that will feed chalk streams over time.

Are there any catchment specific matters not covered by the policy below? YES

If yes, please describe:

Only chalk streams – as mentioned above

Are there matters relating to chalk streams not covered by the policy below? YES

If yes, please describe:

As mentioned above, there should be greater recognition and specific policies relating to chalk streams, given the rarity/international significance of these environments and associated biodiversity. Particularly given that SDNP contains so many chalk streams, and therefore has a particular responsibility to ensure they thrive.

What are your views on Policy SD49 Flood Risk Management? STRONGLY AGREE

our answer: We are supportive of the flood risk management strategy. Steering development away from flood risk, along with not increasing the risk elsewhere are good core policies. There should be a reference to what the designers are assessing against e.g. 1 in 100 year storms.

What are your views on Policy SD50 Sustainable Drainage? STRONGLY AGREE

our answer: We support the policy. In relation to assessments of post and pre-development to ensure no net increase, the policy should reflect what data is needed for assessment, to ensure the drainage is sustainable and takes into account additional rainfall resulting from climate change. As per previous comments, we believe that specific reference to chalk stream aquifers should be referenced.

What are your views on Policy SD18 Open Coast? NEUTRAL

our answer: No comment

What are your views on Policy SD54 Pollution and Air Quality? DISAGREE

our answer: The policy references a wide range of different types of pollution, but then seems to focus specifically on air quality. Is this a policy for all types of pollution (if so, it is inadequate), or is it about air quality?

More widely on pollution of any kind, should any policies regarding pollution include requirements for impact assessments, measuring pre-development levels and post-

development impact. Both to assess whether any conditions for development have been achieved, and so that SDNP can build an evidence base to assess whether their policies have had an impact? As a Parish Council we regularly see developers downplaying the impact on traffic, pollution and public infrastructure, presenting only best-case scenarios, and using poorly maintained/old data from statutory bodies. As far as we can see, the actual post development impact is never measured or reviewed, and indeed is impossible if measuring pre-development levels do not take place.

What are your views on Policy SD55 Contaminated Land? STRONGLY AGREE

our answer: No comment

Homes

What are your views on Policy SD26 Supply of Homes? DISAGREE

our answer: It is difficult to assess SD26 without target figures for housebuilding being included in the policy. However, having mapped all of the development sites being proposed, it seems obvious that there is a deep inequality in allocation across the different areas of the National Park. We note that:

- i. 67% of all proposed new development sites lie at the fringes of the National Park, which are exactly the areas which are already suffering the impacts of excessive development pressure from planning authorities outside of the National Park.**
- ii. Parishes that are split between two planning authorities (such as Binsted) are receiving a disproportionate share of development. The total population of Binsted accounts for about 0.9% of the National Park's population, so at first glance it seems reasonable that Binsted should receive 0.8% of the homes proposed through the Reg 18 sites. However, Binsted is also being asked by EHDC to accommodate much larger numbers of new houses (both within the parish itself and in its immediate hinterland).**

- iii. It is remarkable that NO development sites are proposed in the many villages in the west and south west areas of the National Park (including the whole of the Meon valley and southern area between Cowplain, Midhurst and Arundel.)**
- iv. The allocation for Petersfield seems surprisingly low. The population of Lewes is 20% larger than that of Petersfield, but Lewes is scheduled for almost four times the number of new homes as Petersfield.**

It is vital that SDNP meets its supply allocations responsibly to avoid over-burdening certain areas and to avoid these areas being overwhelmed by the scale of new housing. We are surprised that there is no statement within Policy SD26 of the principle that new developments should be of a size that is appropriate to the existing community (rather than being based on land availability.)

***Planned level of growth:** For context, the existing Local and Neighbourhood Plan allocations and planning permissions, together with proposed new allocations, amount to approximately 4,500 new homes 2024-2042 (or 250 per year excluding windfall). The existing Local Plan plans for 250 homes per year including a windfall allowance. Note that these supply figures are likely to change as we do more work on the proposed allocations and further sites are put forward.*

What level of growth should the National Park be planning for?

our answer: We cannot comment on this, as economic policy is a political matter.

What are your views on Policy SD27 Mix of Homes? AGREE

our answer: We broadly support proposals for a balanced mix of housing, particularly to include high proportions of smaller and of affordable housing. Policy SD27 needs to respond flexibly to the specific needs of particular communities regarding home sizes. In our parish of Binsted, a significant proportion of homes are large (4 or more bedrooms. Large numbers of smaller homes have been (and are continuing to be) extended into larger homes. As a result, there is a great shortage of smaller homes which are acutely needed (for those downsizing, with small families, or buying first

homes). We would support a policy to build only one and two-bedroom homes for a period, to re-establish a balanced mix of available housing in our local area.

What types of homes do communities in the National Park need?

our answer: The parish of Binsted needs more smaller and affordable homes. Without these, we cannot ensure the rich demographic mix that enables the community to thrive, and people to continue to live in the communities in which they have grown up. We believe these principles apply across the National Park and that the SDNPA should guard against not becoming a mono-culture or a museum.

What are your views on Policy NEW1: Accessible Homes? STRONGLY AGREE

our answer: The HEDNA evidence base makes requirements for accessible homes very clear. All new dwellings should meet accessible and adaptable standards Part M4(2) of Building Regulations.

Clause 3, which stipulates 15% wheelchair accessible home on developments of 20+ homes, includes the exception '*unless it is demonstrated not to be practical to meet this provision.*' This is an unacceptable potential loophole for developers wishing to skirt around planning expectations: as per our previous response, we want to ensure there is housing suitable for everyone. It would be good to see more detailed guidance regarding what "*not to be practical*" looks like.

The HEDNA suggests 10-15% of dwellings should be wheelchair accessible homes in the affordable sector. Should the policy require 15%? YES

our answer: With an increasing population of 65+ year olds, and with wheelchair accessible homes not precluding habitation by able-bodied inhabitants, for this reason it would seem prudent to aim for the higher %.

What are your views on Policy SD28 Affordable Homes? STRONGLY AGREE

our answer: Priority MUST be given within our parish to affordable housing. Affordable homes as defined in NPPF are in fact unaffordable to many in our area who have longstanding connections to our communities, and form an important part of the rural workforce. Social rent is crucial to enabling these people and their

families to continue to live in those communities. We therefore support the reference to social rent homes in paragraph 1(a). Why is no such reference included in paragraph 1(b)?

We fully support the fact that proposals will be permitted provided that housing units are integrated and are indistinguishable in design and materials from the market housing on the site, and, where feasible, will remain affordable in perpetuity.

However, there should perhaps be consideration that if integrated, indistinguishable design renders affordable housing units unviable then some compromise would need to be accepted. We welcome the clear statement (par 5) that developers may not circumvent this policy by artificially subdividing sites; this is an often-seen ploy that is a source of great frustration locally and trust that this would be proactively enforced.

Is reference to First Homes in criteria 1 appropriate or desirable? YES

our answer: With some of the smallest 'first homes' in our area still equating to the national average of house prices, it is clear that first time buyers need to be actively supported in purchasing their home.

Are the requirements of criteria 3 still appropriate and practicable for the ongoing management of affordable homes by a Registered or other recognised affordable housing provider? YES

our answer: Affordable housing providers share an equal responsibility in their contribution to sustainable communities for the future. The requirements of Criteria 3 need not preclude affordable housing from the housing and social ambitions of our local and regional plans.

What are your views on Policy SD29 Rural Exception Sites? AGREE

our answer: We welcome the substantial revision of Policy SD29, as a potential route to achieve the increase in affordable housing provision in Binsted parish. We are concerned that Rural Exception Sites (RES) are currently being underused in the delivery of affordable homes (just 546 homes built in England between 2021 and 2022, compared with some 3,000 new affordable homes that could have been built using RES, according to research from English Rural).

If this policy is to succeed and have the desired impact, a step change in SDNPA's approach is needed. SDNPA must give much clearer guidance on (and promotion of) RES, including showing parish councils how they can assist this process. Without such a step change, the only affordable housing being built in our area will continue to be in the parts of large development sites that are unattractively adjacent to sewage treatment works and A-Roads, a situation which we consider unacceptable.

Is 20% the right level of cross-subsidy to assist in rural exception site delivery whilst limiting landowner hope value? UNSURE

our answer: Cross subsidy should be restricted to the minimum required to support viability.

Should a degree of flexibility be given to Rural Estates that develop affordable homes as part of a Whole Estate Plans, to determine occupancy conditions and tenure?

UNSURE our answer: We are insufficiently expert in this topic to have a view on this.

What are your views on Policy SD30 Replace & Subdivision of Dwellings? AGREE

our answer: This full review is welcomed. Many of our local residents work from home for a significant proportion of the week. This is reflected in, for example, a significant decrease in numbers parked at our local railway station of those commuting to London. The policy will enable homes to be provided that meet the needs of those with combined working arrangements and enable all-important residential elements of homes that enable a work-life balance. This is a luxury currently afforded only to those with larger homes. We believe that the 30% figure is appropriate and that it should only be applied to those homes below 120 sq m. It should be applied uniformly across the National Park. However, too rigid a formula governing the extent of permissible extensions on larger homes will not necessarily result in the most sensible and satisfactory schemes. The stated guidelines should represent the norm but well designed schemes outside of this should still be considered by the Planning Authority who might make exceptional approval where this is deemed to add to the strategic aims of planning policy; often on bigger plots, larger dwellings may add to/protect the

character of the local area by extension or replacement. A general 30% limit enables consideration of design and scale and maintains settlement patterns. (SD4, SD5).

What are your views on Policy SD31 Householder Development? AGREE

our answer: See previous response.

Do these policies, in combination with Policies SD4 and SD5, adequately capture amenity and design considerations in relation to replacement dwellings, subdivisions, and householder developments? YES

our answer: See previous response

The restriction on the size of extensions / replacement dwellings should be applied to only those which are currently small dwellings.

our answer: See previous response

Is 30% the right percentage limit? YES

Should the percentage limitation be applied everywhere in the National Park or should a different approach be taken within Lewes and Petersfield?

YES, Same Percentage should be applied everywhere.

What are your views on Policy SD32 Rural Workers' Dwellings? STRONGLY AGREE

our answer: The widening definition of rural worker is helpful, and the usual tests (e.g. viability of business requiring a rural workers dwelling) remain in place.

What are your views on Policy SD33 Gypsies and Travellers? NEUTRAL

our answer: No comments.

Are there any other sites that should be considered for Gypsies or Travellers accommodation? If yes, please complete the Call for Sites nomination form: www.southdowns.gov.uk/planning-policy/the-south-downs-local-plan-review/evidence-base/homes-and-economy/land-availability-assessment/submit-a-site/

Economy (This chapter includes policies to support the local economy including the supply of employment land and criteria for different sectors such as tourism, viticulture, agriculture & forestry.) Let us know your comments below.

What are your views on Policy SD34 Sustaining the Local Economy? DISAGREE

our answer: As per our response in the Visions and Values section, we believe the scope and focus of the strategic policy is too narrow, and that the economic and social

well-being of communities can only genuinely thrive if there is consideration given to availability and improvements in wider public and social infrastructure. We fully understand that there are many elements of this infrastructure (such as utilities, healthcare, schools, public transport, highways) that are not directly controlled by the SDNPA, but we believe that the SDNPA should recognise these factors in their strategic policies and devote resources to partnership working to enable joined-up thinking and creating the wider conditions that will ensure economic and social well-being.

Businesses can only thrive if there is the infrastructure to support them and availability of people to work in them- poor provision of public infrastructure will make it increasingly difficult to retain and attract people to live within the Park and will be a brake on economic development.

What are your views on Policy SD35 Employment Land? NEUTRAL

our answer: No comments.

What are your views on Policy SD39 Agriculture and Forestry? NEUTRAL

our answer: No comments.

What are your views on Policy SD40 Farm and Forestry Diversification? NEUTRAL

our answer: No comments.

Does this policy facilitate farm diversification sufficiently to address changes to the economics of agriculture?

our answer: No comments.

Does this policy (in combination with others including SD5) adequately protect communities from the impacts of farm diversification schemes, including from incremental changes?

our answer: No comments.

What are your views on Policy SD41 Conversion of Redundant Agriculture or Forestry Buildings? NEUTRAL

our answer: No comments.

What are your views on Policy NEW 8 Viticulture, Winemaking and Wine Tourism?

AGREE

our answer: We support the addition of this policy, given the increasing importance and success of this sector, and taking into account the suitability of the land and changing climatic conditions. Our only comment regarding the detail is subsection (h), where minimising field subdivisions/eroding historic field boundaries could have unintended consequences- preventing the inclusion of the necessary windbreaks that viticulture may require or necessary landscape redesign if land is being converted from arable.

What aspects of viticulture, winemaking, and wine tourism should this new policy address, consider and/or cover?

What are your views on Policy SD36 Town and Village Centres? NEUTRAL

our answer: No comments.

What are your views on Policy SD37 Development in Town and Village Centres?

NEUTRAL

our answer: No comments.

What are your views on Policy SD38 Shops Centres? NEUTRAL

our answer: No comments.

What are your views on Policy SD52 Shop Fronts? NEUTRAL

our answer: No comments.

What are your views on Policy SD53 Adverts? NEUTRAL

our answer: No comments.

What are your views on Policy SD23 Regenerative Tourism? NEUTRAL

our answer: Many of the policies, exceptions and definitions are so broad that they will provide little practical help to interpret consistently or enforce, and could be used to accept or reject just about any tourist related development, good or bad, well-meaning or otherwise. The policies regarding the use of the car and sustainable transport ignores the fact that for vast swathes of the Park (including our parish) , public transport is either minimal or non-existent, the poor maintenance of public highways and lack of enforcement of speeding motorists means that using non-motorised options (by either tourists or local residents) is not an attractive or practical

one, and the Park has very little power or influence in the highways/public transport space.

Does the policy strike the right balance between furthering the purposes of the National Park and supporting the local economy? NO.

our answer: See previous response. In addition, to what extent has this policy been cross-referenced with policies elsewhere? For example, the policy states that tourism proposals that aren't located within a settlement boundary can only proceed if they meet the exception policy at SD25, which includes the need for a "countryside" location. Quite a lot of the SDNP might be considered a countryside location.

What are your views on Policy SD24 Equestrian Development? AGREE

our answer: No comments.

Does the policy sufficiently capture all considerations for equine development? YES

our answer: No comments.

Communities, Open Spaces and Active Travel This chapter contains policies relating to the facilities, open spaces and public rights of way important to communities across the National Park. Let us know your comments.

What are your views on Policy SD43 New and Existing Community Facilities? DISAGREE

our answer: As per previous responses, the definition of 'community facilities' is bland, unclear, and the policy is too narrow (focussed on individual planning applications). Without an evidence base of what communities need, this policy adds little value. If there is no documented overall vision, or statement of needs for facilities in specific communities, then demonstrating need/impact of loss for individual developments can become problematic- commercial organisations will sometimes use considerable financial resources and "expert" consultants to bolster their application to close facilities that may be unavailable or unaffordable to local communities. And the ACV process is flawed in terms of local communities being able to stop the closure of community facilities.

What are your views on Policy SD45 Green Infrastructure? AGREE

our answer: No comments.

Should the policy be expanded to explicitly state blue infrastructure & better connect with design and water policies in relation to SuDS and water management? YES

our answer: No comments.

What are your views on Policy SD46 Provision and Protection of Open Space, Sport and Recreational Facilities and Burial Grounds / Cemeteries? AGREE

our answer: No comments.

Do you think we should update Figure 7.6 (p153) of the Adopted Local Plan using either:

Natural England's Green Infrastructure Standards (January 2023) (this includes accessible green space standards with an initial focus for everyone to have access to, and benefit from, good quality green and blue spaces within 15 minutes' walk from home)

Fields in Trust's Standards for creating great spaces for all (November 2024) (this includes minimum sizes and walking distance for open space, outdoor sports, and play space)

A different recognised standard

If you selected 'A different recognised standard' what should it be? No view on this.

Should we require developments for 10 homes or more to provide open space, or set a higher threshold? our answer: 10 homes or more

Should we include considerations for allotments, community orchards, and community farms? No

If so, what should these be and why? our answer: No comments.

What are your views on Policy SD20 Walking, Cycling and Equestrian Routes?

STRONGLY AGREE

our answer: We strongly support the conservation and enhancement of the non-motorised user route network (its amenity value, character, tranquillity and views) and the requirement for development proposals to connect and contribute to this network. We support safeguarding disused railway line routes in the National Park, including the Bentley to Bordon route, for their existing and potential future use as car-free travel routes.

Policy SD20: Should we include a criterion about wayfinding infrastructure? YES

our answer: It would be helpful for clear and consistent waymarking signs to be provided on the network of non-motorised user routes across the South Downs National Park, including on Forestry Commission land which often has (unmarked) high quality routes that are ideal for non-motorised users.

Should we include a criterion or supporting text about path materials and widths? NO

our answer: No additional criteria are necessary – The County Councils' Countryside Services already provides clear guidance on this, and Countryside Services should remain the source for this type of information.

What are your views on Policy SD47 Local Green Space? STRONGLY AGREE

our answer: We strongly agree that development proposals on designated Local Green Space should only be permitted in very special circumstances.

We note that Binsted parish's green space areas are currently missing from this list and have used the Nomination Form to correct this omission.

Transport and Infrastructure

What are your views on Policy SD19 Transport & Accessibility? NEUTRAL

our answer: Policy SD19 needs to be substantially further strengthened, as communities currently feel unable to safely walk, cycle or ride on rural roads or road verges. This Policy needs to be substantially strengthened to counter Highways departments' unwillingness to challenge developments, even where the proposed development is poorly served for active travel options and will clearly exacerbate local road volumes and traffic issues.

We welcome the addition of Active Travel England as a new statutory consultee.

What are your views on Policy SD21 Public Realm, Highway Design and Public Art?

NEUTRAL

our answer: Policy SD20 has good sentiments but needs to be substantially strengthened. Huge growth in road traffic, speeding, HGVs and collisions is by far the biggest concern in our parish. The excellent guidance in South Downs' '*Roads in South Downs*' publication is very rarely put into practice. Greater focus needs to be given to the transition from fast A-roads to the minor road 'public realm' network, and to contest Highways departments' unwillingness to challenge developments that harm the public realm.

What are your views on Policy SD22 Parking Provision? STRONGLY AGREE

What are your views on Policy SD42 Infrastructure? STRONGLY AGREE

What are your views on Policy SD44 Telecommunications? AGREE

Integrated Impact Assessment As part of the evidence base to support the Local Plan Review an Integrated Impact Assessment has been produced. The Integrated Impact Assessment incorporates:

- Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA)
- Equalities Impact Assessment (EIA) and
- Health Impact Assessment (HIA)

A set of objectives are used which cover all the relevant issues. The development strategy, policies and allocations of the Local Plan Review are assessed against these objectives. The outcomes from this Assessment should then inform the choices made about the content of the Local Plan Review.

Tell us if you have comments to make on the Integrated Impact Assessment:

None.

Habitats Regulations Assessment As part of the evidence base to support the Local Plan Review a 'Habitats Regulations Assessment' has been produced. This assesses the impact of the Local Plan Review on the 20 European Habitats Sites within or nearby the South Downs National Park. These are:

- Special Areas of Conservation (SAC) – designated for habitat types and species considered to be most in need of conservation at a European level (excluding birds);
- Special Protection Areas (SPA) – classified for rare and vulnerable birds and for regularly occurring migratory species; and
- Ramsar Sites – wetlands which are of international significance.

Tell us if you have comments to make on the Habitats Regulations Assessment: NONE.

Part C - Site Allocation surveys: We are commenting on:

SD60, Land at Clements Close, Binsted

Is this an existing or proposed new site allocation? EXISTING

If Existing: If applicable, do you agree with proposed amendments to this site

allocation? Our answer: The Plan has made no amendments to any aspects of the prior allocation. This site is not ideal, as noted in Binsted Parish Council's objections to the latest application for this site (October 2024), which identified concerns relating to Biodiversity, Flood risk, Transport and the developer's reticence to include affordable housing. With regard to traffic, access via Clements Close is problematic for larger vehicles (for example we understand that refuse collection trucks prefer to park at the start of Clements Close as the road width with parked cars make access difficult)

Are there any significant changes in circumstances since the site was allocated in 2019 which would justify amendments to this allocation? No

SD61, New Barn Stables, The Street, Binsted

Is this an existing or proposed new site allocation? EXISTING

If Existing: If applicable, do you agree with proposed amendments to this allocation?

Our answer: The Plan has made no amendments to any aspects of the prior allocation.

Are there any significant changes in circumstances since the site was allocated in 2019 which would justify amendments to this allocation? NO

NEW ALLOCATION: SDxx, Land South of Lovell Gardens, Binsted

What are your views on the proposed new site allocation? DISAGREE

Our answer: We agree that this site would seem to integrate well with the existing settlement at Binsted, but we do not welcome it. All local infrastructure is already under extreme pressure (GPs, roads, sewage treatment, etc.) A particular infrastructure concern is that of water provision (for many years local residents regularly experience instances where they have 'no water' and many many more instances of extremely feeble water supply due to low pressure).

We are extremely concerned about the excessive quantity of development being considered across the parish of Binsted (including EHDC's Reg 18 proposal for a

Strategic Site of 1,650 homes at Neatham Downs and plans for extensive house building in neighbouring Holybourne and Alton.) This further development is being proposed within Binsted parish whilst no development sites are being proposed in the interior of the whole western section of the National Park (In the area west of Petersfield, the only SDNP sites being proposed are in Winchester (30 dwellings), Swanmore (15 dwellings) and in Binsted (Lovell Gardens).

If this development site is included, rigorous adherence to all SDNPA policies will be required to avoid negative impacts. Particular attention will need to be given to transport aspects (access issues, active travel options and overall highway impacts), to southern boundary screening, and to public RoW routes (in terms of connectivity of RoW routes and in avoiding any loss of views from RoW).