

South Downs Local Plan Review (August-September 2024)

Example Answers by PeCAN

1 Introduction

The South Downs National Park Authority (SDNPA) have asked the public for their comments on the scope and the focus of their review of the South Downs Local Plan. The SDNPA's consultation is available on this web page:

<https://sdnpalocalplanreview.commonplace.is/>

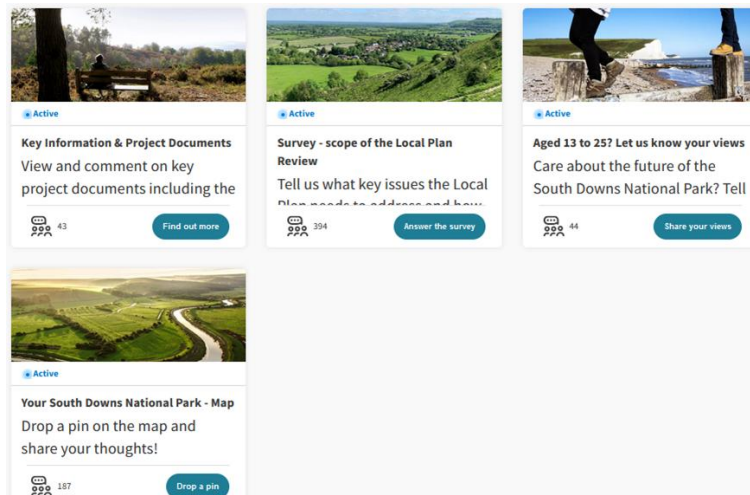
In response to this consultation, PeCAN (Petersfield Climate Action Network) trustees have reviewed the documents provided as part of this survey, thought carefully about the questions posed by the survey and prepared a response. PeCAN's response is in two parts. We have prepared slides which set out our view of the climate mitigation priorities for the South Down Local Plan. These slides can be found here:

<https://petersfieldcan.org/media/lqcoavr2/sdnpa-local-plan-slides-aug-24.pdf>

In addition, we have prepared this note which provides answers to the specific questions within the SDNPA's online consultation.

2 The On-line Questionnaire and Our Example Answers

The SDNPA's online consultation includes four separate surveys which are accessed by clicking on the four "buttons" on the opening page of the consultation and which are illustrated here:



Our example response to the "Key information & Project Documents" (top left) can be found in Section 3 below, while our response to "Survey - scope of the Local Plan Review" (top middle) can be found in Section 4 below. **Our answers are shown below in blue text.**

Local plans guide planning decisions on planning applications. In essence, this Local Plan set out the opportunities for development in the South Downs National Park, and says what types of development will and will not be permitted and in which locations.

In the answers set out below, we have focused on where the Local Plan can really make a significant contribution to the SDNPA's published ambition that the National Park economy reaches net zero by 2040 and will achieve 5% per annum reductions in emissions towards this goal.

If you feel that our answers are appropriate, you are welcome to copy our text and use it in your response, but where we have used "we" within an answer, you may wish to use "I".

We encourage you to respond to SDNPA's on-line questionnaire and to utilise our example answers in their responses. The submission deadline is the 16th September.

3 Key Information & Project Documents

This part of the on-line questionnaire invites comments on each of the following three documents:

- **The Project Initiation Document (PID)** defines the scope and programme of work to be completed by the SDNPA.
- **The Local Development Scheme (LDS)** sets out the timetable for the Local Plan Review.
- **The Statement of Community Involvement (SCI)** sets out how we will consult with all stakeholders, including local communities, business, and public bodies, on planning matters.

On the second page you will find the following questions.

Do you have any comments about the PID ?

The Local Plan needs to be aligned with the SDNPA's ambitions with strengthened policies on transport and green infrastructure and strong new policies on energy efficiency and low carbon energy. Hence we welcome the inclusion of climate emergency and biodiversity crisis as the first items in the list of "Key issues for the Local Plan Review" (Section 2.1) and that the PID explicitly refers to the SDNPA goal of net zero by 2040 for the Park as a whole and the contributing target of 5% per annum reductions in emissions.

For more detail on how the scope of the South Down Local Plan Review could better reflect the need to mitigate climate change, please see the slides at this link, specially prepared for this consultation: <https://petersfieldcan.org/media/jwld2ncu/slides-on-sdnpa-local-plan-august-2024.pdf>

Historically, the location and design of many new homes mean that people need to rely on using a car for basic, everyday journeys, which is detrimental to climate change, health and levelling up. Having carefully read the PID and other documents, we are concerned about the absence of anything to suggest that the site allocation process will be informed about the potential distances that future residents will have to walk/cycle to reach basic services (taking into account the usability of the route), or the availability of public transport services.

In terms of other documents, we realise that the legal requirement for Design Codes and Neighbourhood Plans to contribute to climate mitigation and adaptation are not automatic, but depend on whether the plan-making authority considers it appropriate. We believe this is essential in a National Park and with a Local Plan built so much upon Neighbourhood Plans. We therefore ask the SDNPA to confirm that both mechanisms should contribute as much as possible to climate mitigation and adaptation (see Levelling-up and Regeneration Act 2023, 98(3) and Sch7, 15CC(9a)).

It would be helpful to know which polices or types of policy will go into the Design Code and which will remain in the Local Plan. We are concerned that residents will not be able to contribute at an early stage to the Design Code, without a Reg 18 consultation. What is the plan for gathering early feedback on design policies?

Do you have any comments about the LDS ?

No comment

Continues overleaf

Do you have any comments about the SCI ?

We welcome the plans for community engagement, including extended deadlines when consulting over a holiday period. However, some changes could make the Commonplace platform more user-friendly eg:

- *Display a downloadable pdf listing all the consultation questions and their answer format, such as word or character limits, so that respondents can see in advance what is coming.*
- *Use a simple layout and numbering in the documents, online and offline. Make them shorter and easy to navigate by avoiding photos and aesthetic design elements, unless they are part of the content such as diagrams.*
- *If the document is split into smaller files, please choose file names/numbers that correspond with chapter names/numbers.*

Please see Section 4 overleaf.

4 Survey - Scope of the Local Plan Review

Which issues are most important to you? (select up to 5)

We have selected Biodiversity loss and Climate change

| | | | |
|---------------------|------------------|--------------------|--------------------------|
| Biodiversity loss | Affordable homes | Climate change | Protecting the landscape |
| Cultural heritage | Water quality | Health & wellbeing | Ageing population |
| Vibrant communities | Rural economy | Technology change | |

Add something else

Vision for the National Park

The Partnership Management Plan sets out the overarching strategy for the management of the National Park and a vision to ensure the South Downs remain a special place in 2050. This strategy and vision is for all with a responsibility for the National Park, from land owners, conservation bodies, local communities and the SDNP Authority.

Tell us what you think about the Vision for National Park:

We have selected "Dissatisfied"

| | | | | |
|-------|-----------|---------|--------------|---------|
| | | | | |
| Happy | Satisfied | Neutral | Dissatisfied | Unhappy |

Please can you explain the reason for your answer:

The Vision was written in 2013 and needs to be updated. It is no longer enough for it to refer to simply to places "adapting well to the impacts of climate change". The landscape and economy of the National Park need to be on a path to net zero emissions and this should be explicitly mentioned in the Vision.

The Vision should mention that new development is directed to locations that are co-ordinated with transport provision, have good access to support existing services, community facilities and open space.

We are not sure that the current vision statement adequately communicates to the non-specialist how a difference can be made through the Local Plan and related documents. In addition, the text lacks specific references to the places/features/characteristics, such that it feels too generic.

Continues overleaf

Can the Vision be improved? Tell us how:

Select one or more options

We have selected "Needs updating"

Make it shorter

Make it clearer

Needs updating

 Add something else

Add something else

Including mitigation in the Vision will provide an essential golden thread between it, the Partnership Management Plan and Local Plans, the ambitions on climate change adopted by the SDNPA, and strong and effective local plan policies on climate change. Planning is not the only mechanism that the SDNPA has to support net zero, but it is perhaps the single most important.

The first National Park Local Plan was pioneering in its treatment of ecosystem services and biodiversity net gain, its ambition for affordable housing, and its extensive use of Neighbourhood Plans. But arguably even then the Plan fell short of the leading examples from other Authorities in terms of the level of ambition on climate change and the path to net zero.

Delivering the Vision

Planning is one mechanism to help deliver the Vision by 2050. How important are the following for planning and the Local Plan to best contribute to realising the Vision?:

The Local Plan should make development...

| | Very important | important | Not important | Somewhat important |
|---|----------------------------------|-----------|---------------|----------------------------------|
| Contribute funds to improve local facilities | | | | <input checked="" type="radio"/> |
| Include measures for nature recovery | <input checked="" type="radio"/> | | | |
| Be net zero in carbon emissions | <input checked="" type="radio"/> | | | |
| Include a high proportion of affordable homes | | | | <input checked="" type="radio"/> |
| Support farmers diversify whilst protecting the landscape | | | | <input checked="" type="radio"/> |
| Provide opportunities to access and enjoy the National Park | | | | <input checked="" type="radio"/> |

Any other ways the Local Plan can contribute to the Vision for the National Park?

Include new or stronger policies on climate change in key areas, especially the following:

- *New policies on operational and embedded emissions in new and existing buildings.*
- *Strengthened policies on sustainable transport / active travel, including a strong definition within the Local Plan of what is deemed to be sustainable in transport terms, and how that is to be tested.*
- *New Policies on renewable and community energy, microgrids, district heating.*
- *Strengthened policies on climate proofing new developments - Green infrastructure green ratio, Design and Build, biodiversity friendly location.*

Full background detail to underpin these asks can be found in the slides at this link, specially prepared for this consultation: <https://petersfieldcan.org/media/jwld2ncu/slides-on-sdnpa-local-plan-august-2024.pdf>

Build net zero requirements into the accompanying Design Code.

Align the CIL charging regime and the categories eligible for CIL investment (see further below).

These comments are made within the following context:

- *A great deal of additional national and international evidence has emerged on the scale and impact of the climate crisis during the last six years.*
- *The 2nd Partnership Management Plan set an ambition for net zero National Park economy by 2040 and a target to reduce emissions by 5% per annum.*
- *The Future Homes Standard (FHS) will apply to new-builds from April 2025.*
- *The shift in emphasis on sustainable transport matters in recent versions of the NPPF.*
- *Need to prioritise GHG emissions reductions in NP because:*
 - *Household electricity emissions in the National Park are around 27% higher than for an average UK resident.*
 - *Emissions from driving are 26% above the UK average.*

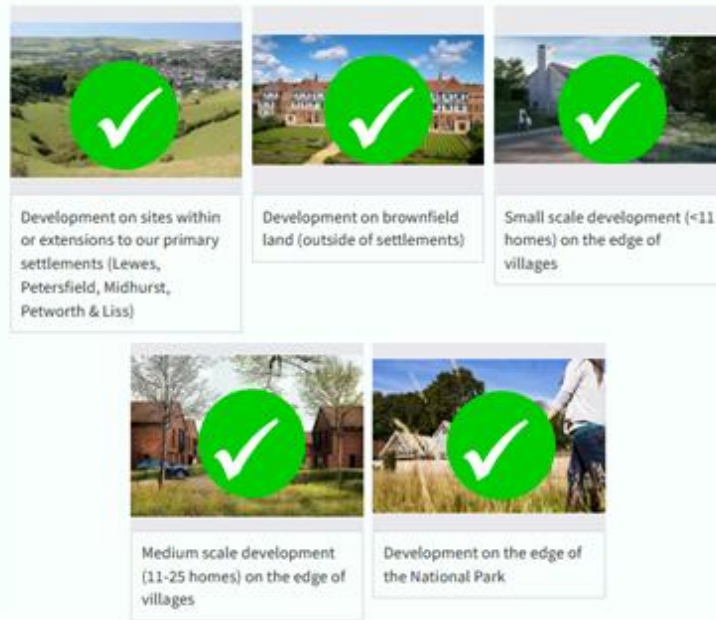
Continues overleaf

Distribution of Development

The Local Plan directs where development should be focused in the National Park. Which options should we consider? Select one or more options

The Local Plan directs where development should be focused in the National Park. Which options should we consider? Select one or more options

We have selected all five but with important caveats below



Tell us your reasons for choosing these options:

Development sites should be located to reduce car dependency though a genuine choice of transport modes to local services, except for a few small sites. To facilitate this:

- *Appraise the accessibility of each potential site in terms of the walking and cycling distances to a mix of key amenities (a food shop, park/green space, pub/ café/ church, primary school, bus stop/railway station, etc).*
- *Take account of the usability of the route - riders and pedestrians must be physically separated from high speed/volume traffic.*
- *Reject sites which lack the potential for sustainable travel in all but exceptional circumstances.*
- *Ensure site specific development requirements in the Local Plan always include access routes to and from the site, as well as walking and cycling routes to local amenities.*

If I had £1 million pounds to invest in the National Park

| I would spend it on: | |
|--|------------|
| Adapting to climate change | 10% |
| Affordable homes | |
| Arts & heritage | |
| Community facilities eg playgrounds or village halls | |
| Nature recovery | 20% |
| Walking & cycling routes | 20% |

| | |
|----------------|-----|
| Something else | 50% |
|----------------|-----|

If you said 'Something else' - please specify

We assume this question is designed to canvas views on how CIL money should be invested as guided by the new Infrastructure Business Plan which will accompany the Local Plan. We believe that CIL is an important tool in tackling climate change:

- A new category should be created to cover Climate mitigation/Net Zero projects. This could cover initiatives such as retrofit of existing community facilities, community renewables etc.*
- A reduction in CIL chargeable could also provide an incentive for developers who go well beyond the Future Homes Standard.*

Consultation approach

This is a matter of individual preference.