

South Downs National Park Authority Examination Statement

The following comments are made in relation to the *Matters, Issues and Questions* (ID-02) raised by the Inspector.

Matter 4 - Environmental, landscape, biodiversity and heritage.

4.4 Do any of the proposed site allocations threaten to harm the setting of the South Downs National Park (SDNP), and if so, can effective mitigation be achieved?

The South Downs National Park Authority (SDNPA) submitted comments to the Regulation 18 consultation and Regulation 19 consultations of the Mid Sussex Site Allocations DPD. The SDNPA has also signed a Statement of Common Ground with Mid Sussex District Council (MSDC) (DC11).

As stated in the SDNPA representation at the Regulation 19 consultation and recognised in the Statement of Common Ground, the SDNPA raises concerns about two proposed allocations, SA12 and SA13. These sites are within the setting of the South Downs National Park (SDNP). With regard to SA13 in particular, this site is part of a larger landscape of which its historic character is shared with parts of the SDNP and this coherence in historic character suggests the site contributes positively to the setting of the SDNP. We consider the sites to be able to accommodate some development, however, based on the evidence presented we have concerns that the scale of development proposed is too great to allow the development to respond to the sensitivities of the site and its role within the setting of the SDNP. We would refer the Inspector to our representation to the Regulation 19 consultation and in the Statement of Common Ground for our detailed comments on these matters. Identification of the number of units that can be accommodated whilst responding to the site's role in the setting of the SDNP would address these concerns. The SDNPA would be happy to work together with MSDC on this.

All relevant authorities, including MSDC, are required to have regard to the purposes of the SDNP as set out in Section 62 of the Environment Act 1995. We draw attention to the first purpose: 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area'.

The NPPF paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks. We wish to draw attention to the Government's proposed changes (underlined below) to the NPPF paragraph 175 on national parks. Although this is still in draft form it certainly shows policy direction by the Government to protect the setting of national parks as well as the national parks themselves.

"The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscape."

The fourth test of soundness set out in the NPPF is that plans should be consistent with national policy. It needs to be considered whether the two allocations as currently worded are consistent with existing and emerging national policy on protected landscapes and their settings. The Authority would be more than happy to work pro-actively with MSDC to ensure that the development of these sites does not adversely impact the setting of the South Downs National Park.

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21st May 2021