



The countryside charity  
Sussex

**CPRE Sussex**  
Brownings Farm  
Blackboys  
East Sussex TN22 5HG  
Telephone 01825 890975  
info@cpresussex.org.uk  
www.cpresussex.org.uk

To: South Downs National Park Authority

by email to:

Lucy Howard, Planning Policy Manager [Lucy.Howard@southdowns.gov.uk](mailto:Lucy.Howard@southdowns.gov.uk)  
PlanningPolicy [planningpolicy@southdowns.gov.uk](mailto:planningpolicy@southdowns.gov.uk)

CC: CPRE Chair & CPRE Protect Sussex Group via CPRE Office

Date 27<sup>th</sup> Aug 2022

Dear SDNPA

### **Call for Sites:**

Please would you help us with some clarification. In reviewing the documentation on the web, it would appear that the call for sites comes under a number of headings which we reiterate below. Are we correct in assuming these are your target areas where you are looking for a response?

1. New homes
2. 100% affordable homes
3. Specialised care (C2) for example for older persons
4. Self and custom build homes
5. Permanent and transit accommodation for Gypsies & Travellers and travelling showpeople
6. Economic development including offices, manufacturing and warehousing
7. Renewable energy (non-domestic scale)
8. Biodiversity Net Gain offsetting
9. Nutrient offsetting
10. Call for Local Green Spaces

If we are correct the with subject headings as above, we have some further questions which we hope you could help us with

### **Housing, offices, manufacturing and warehousing**

Thank you for saying that this local plan review is not just about housing. However, the mere fact of asking for organisations to put forward proposals will encourage developers and landowners to suggest land allocations for housing. Why do we have a concern? it stems from the fact that 4 of your subject headings (i.e.,40%) in the call for sites seem

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To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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to be contrary to the idea of the purposes and duty of national parks insofar as they will expand the 'built environment'.

Without the National Park actually calling for more housing and industrial development there are enough examples of planning applications which have gone through the system causing expansion of the 'built environment' in the Park. Surely there is no need to encourage further development of this nature within the Park? Such an initiative will only make the problems of development control even worse? We can just imagine a skilful barrister quoting back to a planning inquiry the measures which are now being proposed for more housing, offices, manufacturing and warehousing on behalf of their clients.

**New homes (100% affordable homes + self and custom build (homes)**

We are concerned that the National Park is suggesting housing allocation within a 'protected landscape' when there is no legal requirement upon them to do so by the Government.

Would you be able to explain why this action is being taken by the South Downs National Park when it doesn't appear to be the case in any other National Park?

We believe the South Downs National Park is in a unique situation insofar as it is not only the newest National Park, but it is bordered by intensive development areas almost all along its length; both to the north and the south. No doubt you will be aware of the concerns raised by communities where intensive development is proposed by developers in such areas as east of Lewes (the proposed Eton College development of 3000 houses) and development proposed by Market Mayfield Towns (MMT) for around 7000 new homes on countryside to the north east of Henfield as well as new housing development off the A24 at Buck Barn near to the Knepp Castle estate (rewilding project). These are just 3 examples. You will also probably also be aware of the significant number of planning permissions being given to the south of the National Park in West Sussex. These along with such development as Toads Hole on the very edge of the Park (for some 800 homes) would lead one to think that encouraging further development within the Park should be resisted rather than being encouraged.

We hope you would agree that much of the building in the National Park so far has resulted in expensive 4 and 5 bedroom homes being built adding to the problem that many villages have become locations for the well-off who are able to afford expensive housing developments. Surely your initiative should be to partner with housing associations to create genuinely affordable homes in villages across the Park so that local young people don't have to move out in order to find a home. We suggest that the matter of partnering with housing associations and landowners doesn't require a major planning review - it could just be pursued as an ongoing initiative.

**Economic development including offices, manufacturing and warehousing.**

When the Park was formed just over 10 years ago it included considerable areas of brownfield and commercial land. The Shoreham Cement Works is a significant example of this. Alongside this there are many existing examples of farm buildings being turned into offices, manufacturing and warehousing since the National Park was formed. It therefore seems unnecessary to encourage further industrial development when the existing planning system is struggling to defend the *Purposes* of the National Park in rural areas.

In the south east surrounding the National Park there are already considerable industrial land allocations. For example:

- There are large warehousing allocations in Eastbourne and at Hailsham
- Newhaven, which directly abuts the National Park has been made an Enterprise Zone
- Burgess Hill has included within its current development significant areas for offices, manufacturing and warehousing and with the Northern Arc there will be further such development.
- Not far from the National Park plans at Gatwick plans are progressing for further expansion of the airport and surrounding industrial development
- In Hampshire on the edge of the National Park in places like Bordon there has been significant development of offices, manufacturing and warehousing.

We are concerned that encouraging more manufacturing and warehousing in the Park will result in more HGV traffic. Already the smaller A roads and B roads carry a significant amount of HGV and commercial traffic. Further development in the park of this nature will only exacerbate the situation destroying the very thing which the National Park's local plan is aiming for, - protection of the landscape along with tranquillity, protection of dark skies and enhancing biodiversity.

### **Economic Development**

We wonder why the National Park are citing the need for economic development. A better phrase might be "*employment development close to existing villages*". This would help people avoid the need to travel many miles outside the park to seek employment. Rural employment linked with *genuinely rural industries and farming* should be the aim of the National Park. In any event economic development should be sustainable and aligned with the need to enhance the Park in line with (a) its character and purposes and (b) in a manner that improves natural capital and the ecosystem services that the Park's Local Plan says needs to be delivered.

In any event it doesn't seem necessary for the National Park to promote economic development with unemployment running at less than 5% in the South East of England and many businesses finding it difficult to recruit employees.

We don't believe it's the job of the National Park to tackle the dubious subject of economic development but if the Park wishes to do so we hope they take into full account the report published by the government entitled The Economics of Biodiversity: The Dasgupta Review - <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

### **Farming**

We are surprised to see that under "Economic development" you mention "offices, manufacturing and warehousing" but omit to mention farming. This is at a time when this sector needs more support in the current economic climate. We believe that the farming and horticulture sector are vital economic activities, which should be nurtured and supported by the SDNP Authority.

According to Defra farming provides half of the food we eat in the UK, employs almost half a million people and is a key part of the food and drink sector, which contributed £127bn to the economy in 2019. See: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1027599/AUK-2020-evidencepack-21oct21.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1027599/AUK-2020-evidencepack-21oct21.pdf)

## **Transport**

As far as we are aware your review doesn't cover the issues of Transport. We believe it should. Just adding more homes in areas which already suffer from the lack of public transport exacerbates the problem of more cars and commercial vehicles on the roads in the South Downs. Any development within the Park must be closely linked with workable sustainable transport plans. In any event sustainable transport is needed to help visitors and local people move from the car to the bus or train service. Further, any development should include workable active transport routes to transport hubs enabling walkers and cyclists to complete journeys without having to take to the car.

## **Tackling Climate Change**

We are surprised that the 4 items covering development of buildings where they homes or commercial doesn't steer the reader towards the important issue of the need for construction to zero carbon emissions standards and the incorporation of renewable energy such as solar, air/ground sourced and other renewable energy systems. We realise that the Government hasn't legislated for this but proposing to the developer that zero emissions buildings are preferable to any other type of building would be a step forward in tackling climate change.

## **Health and Wellbeing**

In the crowded south east of England it seems contrary to the idea of creating a National Park to encourage further building within the Park. We would rather the SDNPA support National Parks England when they say "*National Parks contribute to the mental and physical health of the nation. They provide a place for escape, adventure, enjoyment, inspiration and reflection and are used by many millions of people. They provide places to replenish the soul*".

Kind Regards

A handwritten signature in black ink, appearing to read 'Vic' followed by a stylized flourish.

Victor S Ient  
South Downs National Park, Planning Lead  
CPRE Sussex

T: 07788720929  
E: vic.ient@cpresussex.org.uk