

23 June 2026

Dear Sir/Madam

Re: Response from CPRE Sussex to South Downs Local Plan (Regulation 19) – Consultation

I am writing on behalf of the CPRE Sussex, the Sussex branch of the Campaign to Protect Rural England, registered charity 1156568. We set out below our reactions to the current Regulation 19 consultation on the South Down Local Plan.

As stated in paragraph 1.3 the South Downs National Park's Partnership Management Plan 2026-2031 is for the National Park as a whole. It sets out what the National Park Authority, and partners across the National Park, will deliver together up to 2031. It includes an overarching Vision for 2060. This new Local Plan replaces that 2019 Plan, and seeks to further the two statutory purposes of the National Park as required under the National Parks and Access to the Countryside Act 1949, as amended by Section 245 of the Levelling Up and Regeneration Act 2023. Where there is conflict between these two purposes that cannot be reconciled, greater weight should be given to the first purpose (known as the Sandford Principle). (par.1.6).

Paragraph 1.8 stresses that key to planning in a National Park is the Government's ambitions to achieve 30% of land managed for nature by 2030 and its Protected Landscapes Targets and Outcomes Framework, which establishes ambitious targets for National Parks and National Landscapes (legally known as Areas of Outstanding Natural Beauty). This recognises the crucial role protected landscapes play in achieving positive changes for nature, climate, people and place.

Paragraph 1.13 ushers an ambitious approach of the Authority to bring forward large areas of the National Park for nature recovery, seeking to increase the amount of land in the National Park managed for nature to 33% by 2030.

Planning Vision for 2060 (par.2.2) seeks to create special places inspired by this nationally important landscape, enabling people and nature to flourish. Providing well designed homes, buildings and spaces for local communities, and a thriving rural economy, that supports climate action.

Paragraph 2.3 deals with objectives, 16 in total. Objective 1 aims to support development that is landscape-led, follows regenerative development and design

principles and has an overall positive impact on natural beauty, landscape and townscape character, natural ecosystems and biodiversity. However, the Authority contradicts itself by proposing site allocations in places which would affect protected landscape and landscape character alongside with natural ecosystem and biodiversity. Objective 10 which aims to protect and enhance the tranquillity and dark skies of the National Park and tranquillity and safeguards key views sounds rather unrealistic bearing in mind the standard of design of new development which is officially considered as “shockingly poor”.

Objective 15 supports development that provides genuinely affordable housing whilst a requirement of Strategic Policy SDH5 is minimum of 40% of new homes created will be provided as affordable homes on-site on greenfield sites and a minimum of 30% as affordable homes on-site on previously developed land.

The analysis estimates a need for 259 affordable homes per annum to meet all needs. The level of affordable need does suggest the Authority should maximise the delivery of such housing at every opportunity. To satisfy this need at least 80% from 323 new homes supposed to be affordable. What is more, only 9% of homes in rural England are classified as affordable housing. This is contrasted to urban areas where 19% of homes are classified as affordable.

Paragraph 3.9 reveals the major housing development around the South Downs borders and neighbouring areas and their struggle to meet housing demand. It admits that housing within the National Park is more expensive than in surrounding areas, and there is clear evidence of an acute need for affordable homes. This demand is driven by high property prices, rising rents, and comparatively low local incomes. The communities and businesses of the National Park need affordable and accessible housing if they are to continue to thrive and to ensure that those who work in the National Park can afford to live here.

The AECOM study Report South Downs National Park Standard Method Apportionment Study 2025-06-18 (par 3.19) was jointly commissioned in 2025 by the South Downs National Park Authority and Lewes, Chichester, East Hampshire and Winchester Councils, in consultation with the other councils with land in the National Park.

The study also investigated whether a National Park specific affordability ratio could be applied, but concluded that it relied on too many assumptions to be considered accurate. This approach resulted in a figure of 1,048 dpa for the National Park.

Iceni Projects (3.20) was commissioned by the Authority to update its 2023 Housing and Economic Development Needs Assessment with an Addendum. The Iceni Addendum suggests that according the demographic analysis a continuation of recent trends would result in a population growth of around 4,000 people over 20 years.

The application of the Standard Method as set out in the AECOM report would result in a population growth of 40,800 people (35%), 'entirely out of kilter with past trends', with the main growth projected to be in the 16-64 age group. Whilst an increase in the economically active population is generally considered a good thing, that would only be the case if there were a concurrent significant increase in jobs. This is unlikely to be the case in a National Park context and is likely to result in unsustainable commuting patterns.

323 homes per year (or 6,137 new homes between 2024 and 2042) is considered to be the appropriate level of housing need within the National Park, however, as stated in paragraph 3.33, site selection process in this new Local Plan has resulted in a housing supply of 6,735 new homes between 2024 and 2042, which provides for the identified needs of 323 homes a year and includes headroom of 598 homes or approximately 10% to allow flexibility if some sites do not come forward as anticipated. This provision is an uplift of 42% compared to the 2019 Local Plan planned provision of 250 homes per year and reflects the Authority's commitment to contributing to the Government's ambitions to boost housing supply where this is compatible with the statutory purposes of the National Park, as well as addressing to some degree our need for affordable homes for local communities.

HOUSING TARGET

First and foremost, we recognise the unacceptable and practically impossible position that South Downs, as a Local Planning Authority, has been placed in by the Government's approach to housing targets.

The 'Standard Method' produces an entirely unrealistic target as mentioned above. The formula that produces this total is, in any case, largely disconnected from real local need.

Since this is the South Down National Park Authority, 100% of its area is covered by the AONB (National Landscape), and in practice, housing delivery over recent years has been well below the current 323 dpa target. Therefore it would be appropriate to highlight the purpose of an AONB designation in England and Wales which is to [conserve](#) and enhance the natural beauty of the designated landscape. Under the CROW Act, you, the relevant local authority, must make sure that all decisions seek to further the purpose of conserving and enhancing the natural beauty of the AONB.

In relation to National Parks there are concerns that National Park Authorities, which are also the Local Planning Authority, are trying to manage the growth that is needed in a condensed and protected space. This exacerbate tensions around land use decisions between improving nature recovery and considering the landscape character while thousands of new houses are being built across the region and more people are entering National Parks since the COVID-19 pandemic.

As noted in paragraph 3.23, this housing need figure has not been viewed as a ceiling. Through a robust process the Authority has considered all known potential development sites and has proposed a housing supply figure which exceeds the demographic-driven housing need figure.

We believe that it is inappropriate that the NPA is proposing a housing supply figure which exceeds the demographic-driven housing need figure ‘to reflect the Authority’s commitment to contributing to the Government’s ambitions to boost housing supply where this is compatible with the statutory purposes of the National Park, as well as addressing to some degree our need for affordable homes for local communities.’

SITE ALLOCATIONS

Some of the proposed site allocations do not meet the requirements recognised elsewhere in the plan, and stand in contradiction to the plan’s own policies. The level of housing growth as proposed in this new LP is likely to make many of these challenges even worse – while failing to address the housing affordability crisis.

There is a significant risk that the Plan will end up consisting of aspirational and ambitious policies undermined by proposed housing supply figure and site allocations inappropriate for the National Park.

SITE ALLOCATIONS THAT WE CANNOT SUPPORT

Given the Plan’s welcome stated strategic priorities, there are a number of proposed site allocations that we cannot support, and which we believe must be withdrawn. We recognise that this may make the position more challenging in relation to the government’s requirements and a potential plan examination, but we do not believe that these sites meet the requirements for genuinely sustainable development, as required by the National Planning Policy Framework, by the Plan’s own policies, and the two statutory purposes of the National Park.

Policy SDA35 (LAA ref.HO037-038): East Street Farm, Amberley

The proposed sites have a prominent location at the centre and southern edge of the settlement with local and distant intervisibility.

There are in the village at least 3 dwellings that predate 1500 and many more dating from the 17th and 18th centuries (65 Grade II Listed Building within Parish) and Amberly Castle (crenelated in 14th century). Policy SD12: Historic Environment and Cultural Heritage states development proposals will only be permitted where they conserve and enhance the historic environment and cultural heritage, including through the safeguarding of heritage assets and their setting. This site allocation is contrary to Local Plan Objective 11 which supports development that recognises the significance of the cultural heritage of the National Park, conserves and enhances heritage assets.

For the above reason the location of the proposed sites is not suitable for the development. In addition, the number of suggested dwellings extends the needs and capacity of the village. A study of Local Study Needs identified a small number of affordable houses in the Parish and for smaller units for older people. There are poor bus services, problems with parking, pedestrian safety, sewage system failures, energy vulnerability, there are no medical facility.

The Amberley Society in their objection point out the impervious nature of the underlying dip slope bedrock on these fields which means that these fields are usually waterlogged in winter, especially with additional water run-off associated with the Hurst Cottages development to the north of the site, and are prone to flash flooding.

The most importantly, land has a chalk stream running across the middle field (as confirmed by a Natural England map and the Western Sussex Rivers Trust). There are only about 200 chalk streams in the world, they are unique. Reviewed Policy SD17, par 2c)i requires that special regard will be given to the conservation, enhancement and restoration of chalk stream priority habitat.

Policy SDA59 (LAA Ref CH215) Land West of The Street, Lodsworth

The isolated position with a farmstead character of Old Langham Farm. Entirely unsuitable location for development. An isolated farm is a characteristic feature of this countryside location, however, an isolated line of dwellings would be contrary to NPPF, paragraph 84, which requires decisions to avoid the development of isolated homes in the countryside.

The Parish Design Statement identifies key features in the parish that need to be protected including important viewpoints, open spaces and characteristics of settlements. Within the parish there are over 60 Grade II listed buildings as well as other buildings of particular or historic interest.

Approached by a gently ascending, winding lane with high banks, the village itself stretches northwards surrounded by rolling countryside.

This isolated development would be harmful to the surrounding landscape and would spoil the views whilst approaching the village from south, contrary to paragraph 187 of the NPPF, contrary to local policy SDL5 Dark Night Skies and SDN3 Sussex Bat Special Areas of Conservation.

Policy SDA62 (LAA Ref CH074) Land west of Valentines Lea, Northchapel

Due to prominent position adjacent to settlement boundary to the east and the ancient woodland to the west. This site allocation is contrary to the Local Plan Objective 2 that one of aims is to protect ancient woodland and ancient and veteran trees, support protected species, follow the mitigation hierarchy and take opportunities to deliver bigger, better and more joined up nature. Any development beyond this settlement

boundary would result in an unacceptable encroachment to the widely open countryside which is part of the protected landscape. It would contradict the National Park purpose¹ which is conserving and enhancing the natural beauty, wildlife and cultural heritage of the National Park and its setting.

This site allocation would not provide ‘a suitable transition in built form and fabric to the open countryside to the north, south and west’ as suggested in LP requirements, but disrespect and severe threats posed to protected landscape and adjacent ancient woodland habitats to the northwest and south by ever-increasing urbanisation.

Strategic Policy SDL5: Dark Night Skies, SDN3 Sussex Bats Special Areas of Conservation would apply. Strategic policy SDN8: Trees, Woodland, Hedgerows and Scrub suggests that development proposals will be permitted where they conserve and enhance trees, hedgerows, woodlands and, where it makes a positive contribution, scrub.

Policy SDA21(LAA Ref CH165) Land east of Pitsham Lane, Cocking

The site is entirely outside of Settlement Boundary in a prominent position on the southern edge of Midhurst, open to the countryside with the watercourse which runs adjacent to the eastern boundary and the adjacent ancient woodland which forms the eastern and southern boundary of the site with protected trees.

There would be an adverse impact on the protected landscape due to sloping terrain and extensive visibility of the site. The proposed development would be detrimental to the adjacent ancient woodland, contrary to Strategic Policy SDN8.

In relation to the other allocated sites, we also note:

Policy SDA30 (LAA Ref HO022) Shoreham Cement Works

In relation to the Shoreham Cement Works site, we are disappointed not to see a more prescriptive approach for this very large site, especially given the extensive response to the previous consultation. The site was converted from an opportunity area to a full allocation, taking into account the evidence and consultation responses to the Shoreham Cement Works draft Area Action Plan, but we are unclear what the responses said, or exactly how this has informed the policies for this site.

We would like to see a more detailed masterplan for this site, to give greater guidance to developers.

SDA25 (LAA Ref CH089) Land south of Herbert Shiner School, Petworth

Proposed site allocation would result in a major development on the very edge of Petworth. Previously allocated 100 homes would be a maximum that can be accepted for this location in the NP.

Policy SDA34 (LAA Ref WE014) Alfriston Court, Sloe Lane, Alfriston

This allocation is agreeable if a high quality of design and landscaping is secured. Taking into consideration Alfriston Court Care Home (27 units), a substantial 2-storey building with a habitable roof, the new dwelling with a capacity of 25-30 units would unlikely fit to the available space without causing a harm to this sensitive and prominent setting within the National Park, particularly visibility from the Cuckmere River corridor.

Policy SDA22 (LAA Ref CH203) Land at former Easebourne School, Easebourne

Due to the low-density pattern of surrounding development, existing vegetation on the site and the position on the edge of settlement, 5-6 dwellings would be more appropriate for this location.

Policy SDA24 (LAA Ref CH206) Land west of Budgenor Lodge, Easebourne

A sensitive development would be suitable in this location; however, it is not clear how this site can be accessed.

Policy SDA54 (LAA Ref MI014) Land east of Lodge Lane, Keymer, Hassocks

Taking into consideration the pattern of surrounding development, adjacent CA and the open land to the east, south and north and flooding, we suspect a maximum 20 dwelling would be feasible.

Policy SD57 (LA Ref LE124) Audiburn Farm, Ashcombe Lane, Kingston

It is not clear how the site would be accessed.

Policy SDA7 (LAA Ref LE103) Land behind the White Hart, 55: High Street, Lewes

Not clear if it supposed to be a replacement of an existing annex.

Policy SD17 (LAA Ref LE133) Springman House, 8 North Street, Lewes

It is not clear from the policy wording and map, if the proposed 16 dwelling would have any negative impact on emergency services based at the location. It would be helpful if this could be clarified.

Policy SDA6 (LAA Ref LE134) The Shelleys Hotel, 136: High Street, Lewes

This is an excellent approach towards such a substantial and attractive building like Shelleys Hotel and its setting. Ideally, the garden would be kept as a whole, and some of it made accessible to the public.

Policy SDA21(LAA Ref CH165) Land east of Pitsham Lane, Midhurst

The number of dwelling and suitable sensitive pattern should be tested by masterplan alongside with street-scenes.

Policy SDA20 (LAA Ref CH218) Former Bus Depot, Pitsham Lane, Midhurst

The site is on the very edge of the western settlement boundary (prominent corner position, widely open to countryside) and as such low-key development should be considered.

Policy SDA72 (LAA Ref AD001) Land off Steepdown Road, Sompting, Adur

The A27 to the west of the proposed site is separated only by an open field. As such soundscape analysis should be required – and the design adjusted accordingly - to avoid exposing future tenants to the noise from the highway.

Thank you for taking our comments into consideration.

Yours sincerely

Maria Tomalova

Planning Campaigner, CPRE Sussex