



The **Friends of the South Downs** (FSD) are the only membership organisation dedicated to the protection and enhancement of the South Downs. We took a leading role in the campaign for its establishment as a national park and two years ago we celebrated the centenary of our formation in 1923. The FSD has approximately 1,500 members and campaigns for the conservation and enhancement of the special qualities of the national park and its quiet enjoyment. Our objectives and geographical area of interest align with those of the National Park Authority and, as the national park society for the South Downs National Park, we trust that our comments will be afforded appropriate weight.

The Society commented in detail on the Pre-Submission Local Plan in 2017. We welcomed the overall structure of the original Plan and endorsed the landscape-led approach and the emphasis on eco-system services. We are therefore pleased to see that the Authority intends to maintain this approach.

However, we do have a concern about the relative timing of the consultations on the Local Plan Review and the updated Partnership Management Plan. The two do, of course, need to be closely aligned, but the Management Plan is though arguably the more important document. It sets out the strategic overview and should therefore inform the Local Plan Review. Logic therefore suggests that the updated Management Plan should have been in place before the Regulation 18 consultation on the Review started. This is not the case.

It is the Regulation 18 Consultation of course that affords us the main opportunity to comment on and shape the draft Local Plan. There is a very much more limited ability to influence the Plan by the time it reaches the Regulation 19 consultation, with comments confined to whether the Plan is 'sound' or not. We consider it unfortunate that we do not have the update Management Plan to help frame our comments on the Local Plan Review. That said, we are pleased to make the following comments.

Vision

Disagree. We support the Vision as far as it goes but believe that it should include references to conserving and enhancing biodiversity in terms of species as well as habitats, a high quality of design for new development that reflects the character and local distinctiveness of the local area in accordance with paragraph 132 of the National Planning Policy Framework, and climate change.

Policy SD1: Sustainable Development

Disagree. We consider that there is no need for Policy SD1 to set out the circumstances where development proposals that fail to conserve the landscape, natural beauty, wildlife, and cultural heritage of the National Park will be permitted, even if “exceptionally”, as “material considerations” already provide for exceptions to policy. The policy should therefore be as robust as possible and so we would prefer to see paragraph 4 deleted. If, however, the Authority wish to retain these exceptions within the policy, we believe that clause a) should be revised to “*demonstrably and substantially outweigh...*”.

Furthermore, we believe that the policy should refer to the strengthened duty of relevant authorities to seek to further National Park purposes, requiring applicants to demonstrate how their proposals would further those purposes to show that they would be fulfilling the enhanced duty and/or to enable the Authority to fulfil the duty.

Lewes and Petersfield are the two largest settlements in the National Park. If the Authority wants to ensure that development in these major centres is sustainable, let alone regenerative, with so many sites now either new or in uncertain process in the towns, we believe that it is essential to have some kind of masterplans for the towns that establish local development needs and can allocate their fulfilment to the most appropriate sites. These can then be clearly defined in the allocations.

Our experience over the Bus Station in Lewes makes us concerned that the Authority does not appear to understand that sustainable development requires a more consistent consideration of transport and access issues than has yet appeared. (See our comments on Policy SD19).

Policy SD2: Ecosystems Services

Agree. However, some of the terminology e.g. ‘regenerative design’, ‘nature-led place-based design’ and ‘green and blue spaces’ may not be fully understood by the public.

Policy SD3: Major Development

Agree. We previously particularly welcomed the wording of **SD3** on the definition of major development which reflected the Maurici opinion, the views of this organisation and the work carried out on behalf of CNP, CPRE and the National Trust into the workings of the “major development test” across the national parks. We considered it a fair reflection of the necessity of judging the potential impact of developments in their own setting rather than on a “by numbers” basis. We therefore support the retention of the policy and its approach.

Nevertheless, we suggest that the Policy could be improved by:

- a) renumbering the new 4 as 2 and amending it by deleting the words ‘Development proposals’ and substituting the words ‘Any application for a major development’;

- b) consequential renumbering of 2 and 3;
- c) in what was 2 but is now 3, delete the words ‘Consideration of such applications should include an assessment of’ and substitute the words ‘In considering whether exceptional circumstances exist and the development would be in the public interest, the factors the National Park Authority shall have regard to shall include’.

Policy SD25: Development Strategy

Agree. However, we believe that there should be a greater emphasis on sustainability, ecosystem benefits, the provision of adequate infrastructure and the importance of protecting land in agricultural use for reasons of food security and managing/reducing food miles in the selection of strategic sites. Landscape is valued for its visual qualities as a background to our activities but its retention in agricultural use has other significance and should be identified in the Plan as a possible reason for refusing permission for development proposals.

Policy SD25 states that, within certain settlements defined on the Policies Map, “the principle of development ... will be supported”. One of these settlements is East Dean and Friston. We consider that the defined settlement boundary at Friston causes planning problems and should be amended.

East Dean/Friston is located on the dip slope and is surrounded by open downland. Most of the defined settlement lies in a valley, which screens it in views from the north and west. However, the western boundary is formed by Old Willingdon Road, Friston. This road follows the crest of a high ridge that runs north-eastwards from Friston. The road is narrow and has the character of a country track. The east side of the road was mainly developed in the 1920s-30s with substantial houses of traditional design and materials, set in extensive gardens and surrounded by many mature trees. The west side of the road is bounded by fields and falls away steeply to the wide dry valley that leads to Jevington.

The topography means that the houses in Old Willingdon Road are visible on the skyline as seen from a wide area in an otherwise undeveloped landscape. This area includes the road to Jevington, Friston Forest (all of which is open to the public and is heavily used), as well as hills to the west of the Cuckmere River. Because the existing houses are well spaced and their gardens contain many trees, their impact on these skyline views is limited.

The Friston/East Dean estates comprise substantial houses in large gardens. There is little or no vacant land within the settlement boundary. Therefore, the densification encouraged by policy SD25 would take the form of the enlargement of existing dwellings, replacement of single houses with several new houses, and division of large garden plots to allow the construction of additional houses. While this may be

acceptable in the East Dean estate, such in-filling of the skyline would have a seriously detrimental effect on longer-distance views of Old Willingdon Road.

The former Wealden Local Plan contained a similar settlement boundary to that in the South Downs Local Plan. However, it recognised the sensitivity of Old Willingdon Road and included guidance and a policy requiring low densities in the area. We were disappointed that this policy was not carried forward into the South Downs Local Plan, and the review allows an opportunity to rectify this omission.

Having a defined settlement boundary where the policy promotes densification would be at odds with a statement promoting low densities and limited change. We therefore believe that Old Willingdon Road should be excluded from the settlement boundary, so that policies for development in open countryside would instead apply.

Policy SD25 also states that, in considering development proposals outside settlement boundaries, regard will be given to Whole Estate Plans. Paragraphs 7.15-16 give further explanation. We have reservations about the status of WEPs, their preparation process, and the weight given to them in planning decisions.

Nine WEPs have been endorsed since 2017. We closely monitor and comment on planning applications and our experience over the last eight years is that the Authority gives very considerable weight to WEPs in making decisions on planning applications. This often involves the policies of the Local Plan being interpreted very flexibly or, indeed, set aside.

WEPs have many close similarities to Supplementary Planning Documents. SPDs are prepared under a transparent statutory process that includes public consultation and publication of a statement of consultation. WEPs, by contrast, are prepared by the land owner and while public consultation is encouraged, this is discretionary. The Authority engages with the land owner in the drafting of the WEP, but the results of this process are not made public. We consider that public consultation and openness should be made a stronger requirement in WEP preparation.

Most WEPs are lengthy, ranging from 46 to 179 pages. While they may contain much useful information, WEPs are often promotional in character, and it can be difficult to identify the parts that are relevant to determining planning applications, giving an impression of obfuscation. The on-line guidance should recommend more clarity and conciseness.

WEPs will become out of date with the passage of time. The guidance should make recommendations for the monitoring and review of endorsed WEPs. We therefore consider that paragraph 7.15-16 and the on-line guidance for WEP preparation should be revised.

Policy SD4: Landscape Character

Strongly agree.

Policy SD5: Design

Strongly agree.

Policy SD6: Safeguarding Views

Strongly agree.

Policy SD7: Relative Tranquillity

Strongly agree. We previously commented that the Plan should include specific reference to the need and means to control land uses and activities with the potential to reduce tranquillity and the quiet enjoyment of the Park's special qualities by residents and visitors, such as motor sports, drone flying and outdoor festivals. However, we recognise that the SDLP can only set out how to deal with planning applications for development and it does this. We also accept that drone flying is not development and the use of land for motor sports or outdoor festivals may be permitted development. We therefore consider that these issues are more for the Partnership Management Plan.

Policy SD8: Dark Night Skies

Agree. However, we believe that the wording of clause b) could be improved. Saying "*If lighting cannot be avoided, it is demonstrated to be necessary...*" is tautology. If "*Any adverse impacts are avoided*" then why would it be necessary for lighting to be unavoidable? We suggest rewording as follows:

a) All adverse impacts of the installation and use of lighting are avoided; or

b) If all adverse impacts cannot be avoided, i. the lighting is demonstrated to be necessary and appropriate for its intended purpose or use; and ii. the adverse impacts are mitigated to the greatest reasonable extent.

SD12: Historic Environment

Agree. However, the NPPF does not make granting permission for enabling development obligatory – it is a judgement by the planning authority so we believe that clause 6 should say "*Development proposals.....will be assessed on a case by case basis on their individual merits and only permitted...*". Clause 6 could also require that harm to other interests is minimised and/or that proposals will be permitted if there are other benefits (the supporting text refers to other benefits but we would prefer to see this enshrined in the policy).

We also wish to see greater positive emphasis on securing an appropriate future for heritage assets most at risk through neglect, decay, or other threats, in accordance with both the requirement for a positive strategy for the conservation and enjoyment of the historic environment set out in paragraph 203 of the National Planning Policy

Framework and Target 10 of the Government's Environmental Outcomes Targets for National Parks.

We feel a specific policy on non-designated heritage assets would be helpful.

SD13: Listed Buildings

Agree. However, clause 2 is not consistent with paragraph 214 of the NPPF as it does not recognise that whilst substantial harm to a designated heritage asset should be exceptional or wholly exceptional, permission may still be granted where the circumstances in paragraph 214 apply.

SD15: Conservation Areas

Agree. However, we would like to see a commitment to a programme of conservation area appraisals as part of the positive strategy for the conservation and enjoyment of the historic environment required by paragraph 203 of the National Planning Policy Framework.

SD16: Archaeology

Strongly agree

New2: Designated Sites Hierarchy

Strongly agree

SD9: Biodiversity and Geodiversity

Strongly agree. Whilst integrated wildlife boxes/bricks can support the conservation and enhancement of wildlife, we feel that including their provision as a policy requirement would be overly prescriptive. They should, however, be referenced in an SPD or TAN on biodiversity. We agree that a higher percentage of Biodiversity Net Gain, beyond the statutory minimum of 10%. should be considered and support Scenario 3. However, any requirement beyond the statutory 10% should be dependent on the viability of the proposed development.

SD10: The Sussex Bat Special Areas of Conservation

Strongly agree.

New3: Arun Valley Special Protection Area

Strongly agree.

New4: Arun Valley SPA/SAC/Ramsar – Water Neutrality

Strongly agree.

New5: Wealden Heaths Phase II SPA

Strongly agree.

New6: Solent Coast SPAs – Recreational Pressure

Strongly agree.

New7: Solent Coast SPAs and SACs and the River Itchen SAC – Nutrient Neutrality

Strongly agree.

SD11: Trees, Woodlands, Hedgerows and Scrub

Strongly agree. However, chalk grassland and lowland heath are two of the most important habitats in the downland, due to their high biodiversity, national and international rarity, and, in the case of the former, as the Downs' most characteristic landscape. However, 97% of chalk grassland has been destroyed since the 1940s and its restoration should be a high priority. It is therefore very disappointing that the current Plan and the Review policies barely mention chalk grassland.

Most of the loss has been caused by agricultural intensification, but much has also been due to neglect, since grassland is rapidly taken over by scrub and woodland if not managed. Indeed, much existing scrub and woodland has grown up on former chalk grassland and represents the loss of a more valuable habitat. While we support the changes to Policy SD11 on trees, woodland and hedgerows, the supporting text needs to make clear that, because chalk grassland and lowland heath are also very valuable habitats in the Park, it may be desirable to clear scrub and trees to restore these habitats in appropriate cases. The introduction of Biodiversity Net Gain and the opportunities it affords to bring about grassland and heathland restoration have made it increasingly important to clarify this.

SD48: Climate Change and the Sustainable Use of Resources

Strongly agree.

SD51: Renewable Energy

Strongly agree.

SD14: Climate Change Mitigation and Adaptation of Historic Buildings

Neutral. We have no objection to the policy per se, but it is not clear to us that this policy is necessary as it appears to add nothing to the other historic environment policies of the Local Plan.

SD17: Protection of the Water Environment

Strongly agree.

SD49: Flood Risk Management

Strongly agree.

SD50: Sustainable Drainage Systems

Strongly agree.

SD18: The Open Coast

Disagree. Whilst we do not object to the policy per se, we consider that the policy as written is too generic and fails to set out an adequate strategy for the undeveloped coastline within the National Park; the Sussex Heritage Coast between Eastbourne and Seaford and the three stretches of coast at Tide Mills, east of Saltdean and south of Ovingdean. In particular, it does not adequately address coastal erosion or the Heritage Coast. We believe that the policy should be replaced or supplemented by new separate policies for these two important issues.

For coastal erosion, the National Planning Policy Framework states that local plans “*should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and ... be clear as to what development will be appropriate in such areas and in what circumstances.*” It is estimated that the cliff line in the Heritage Coast is retreating at a rapid rate of 0.8 metres per year, giving rise to important planning issues. There have been several planning applications in the past related to coastal erosion and more can be expected during the life-time of the Local Plan.

The erosion rate of 0.8 metres per year is, of course, an average; in reality, coastal retreat takes the form of individual cliff falls of many metres at unpredictable intervals. This is likely to give rise to planning proposals at short notice. It is unacceptable for these to be decided within the very limited time-frame of a planning application. Rather than dealing with applications ad hoc, the Local Plan should set out a clear, long-term strategy for the consequences of coastal erosion. To accord with the Framework we believe that this needs to be a much clearer strategy on this issue than Policy SD18 currently provides.

The specific policy on coastal erosion should reflect the Environment Agency’s Beachy Head to Selsey Bill Shoreline Management Plan policy of “no active intervention” for the National Park’s undeveloped coastline. The policy “no active intervention” means that natural processes will be allowed to operate, coastal defences should not be constructed and so coastal land uses will have to adapt to change. We believe that the general principle should be to not replace or move buildings and facilities that are lost or unviable due to coastal erosion, with the exception of Belle Tout lighthouse and limited visitor facilities at Birling Gap.

There are several locations along the coast where erosion is causing issues that should be resolved through a clear strategy in the Local Plan e.g. Cuckmere Haven. In 2020 a planning application was made to extend the existing sea defences protecting the former coastguard cottages. This was granted permission contrary to the EA's Shoreline Management Plan, but the permission was subsequently quashed following a judicial review. The absence of a clear policy in the Local Plan must have contributed to this confusion.

In 2007 the Environment Agency announced that flood defences south of Exceat bridge would no longer be maintained and natural processes would be allowed to operate. Consequential measures, including the removal of redundant flood defences, reconnecting the meanders to the river flow, and the re-routing of footpaths were also proposed, although these measures were abandoned following opposition. However, the defences are not being maintained and the river is undergoing resultant changes, so new measures will soon be needed, for which planning applications can be expected. The restoration of natural river processes has the potential to bring great benefits to the landscape and wildlife, providing it is well managed, but the Local Plan should also include a policy for the flood defences along the Cuckmere south of the A259 to aid in determining any future applications to remove the defences and rewild the valley.

Birling Gap hosts a terrace of Victorian coastguard cottages, a National Trust visitor centre, visitor car parking, and several bungalows constructed in the 1920s. The terrace has already been partially demolished due to erosion. The visitor centre is now close to the cliff edge, so the National Trust's policy is to demolish threatened parts of it and contract visitor facilities into the remainder of the building. Coastal erosion will, in time, threaten the residential bungalows so either the housing can be progressively demolished as the coast retreats, or new dwellings can be constructed further inland to replace those lost to the sea. There is likely to be pressure for the latter, but we consider this totally unacceptable in a Heritage Coast. Visitor facilities of limited scale are likely to be needed, however. The Local Plan should have a clear strategy for the future of Birling Gap.

The Authority will be aware of the two planning applications submitted in 2000 for sea defences at Birling Gap. These were considered at a public inquiry and refused by the Secretary of State in 2001. The inspector's report discussed issues of coastal erosion in detail; although the national and local policy documents he refers to have been superseded, the policies have all been carried forward into current guidance and have even greater weight and relevance today. This report merits inclusion in the Local Plan review's evidence base.

The historic Belle Tout lighthouse was built in 1831 and is listed grade II. In 1999 it was mounted on wheels and moved back from the cliff edge to avoid cliff erosion. It is likely that it will need to be moved again. A further move is desirable because the lighthouse

is a cherished local landmark; however, the Local Plan should make clear that this will not be regarded as a precedent for proposals to relocate housing at Birling Gap or Cuckmere Haven.

Beachy Head Road is close to the cliff edge east of Belle Tout. Previous development plans have assumed it will need to be rebuilt further inland. However, this would involve taking it across unspoilt downland and close to a dew pond that has been restored under the Changing Chalk project. Consideration should be given to whether the road needs to be re-routed or whether it would be better closed, perhaps terminating at Beachy Head and Birling Gap. Such decisions should be made through the Local Plan process as part of a properly considered strategy, rather than through an ad hoc planning application.

High visitor numbers at Beachy Head are giving rise to proposals for safety measures at the cliff edges. Such measures may be unsightly and of limited effectiveness. The Local Plan needs to give clear guidance.

Turning to a policy for the Sussex Heritage Coast, the Heritage Coast between Seaford and Eastbourne is one of the finest landscapes within the National Park. The importance of the Sussex Heritage Coast is illustrated by the fact that, in 1973, it became the first such coast to be defined in England. However, it is subject to very great pressures, with an estimated one million visitors per year. The National Park Authority needs to take the lead in managing the area to preserve the landscape and mitigate the pressures through a clear strategy in the Local Plan, Partnership Management Plan, and other policies.

The area faces a considerable number of pressures. For instance, high numbers of walkers along the Seven Sisters cause erosion to the cliff-top grassland. At Birling Gap there is a serious problem of large numbers of cars being parked on the verges of Birling Gap Road. Numerous visitors arriving by bus alight at East Dean and walk to the coast along the same road, which has poor visibility and no footway. Beachy Head Road attracts anti-social driving. At Beachy Head there are unsightly car parks and there is only bus provision during the summer.

On the other hand, there is great potential for improvement. Most of the land within the Heritage Coast is owned by public and charitable bodies: large areas are owned by Eastbourne Borough Council, Seaford Town Council, the National Park Authority, and the National Trust, while Friston Forest, which adjoins the defined area of the Heritage Coast, is owned by Forestry England. The National Trust, working with many other partners, has initiated the Changing Chalk project, while Natural England has commenced work on the Seaford to Eastbourne “super national nature reserve”. There are many public rights of way and much of the defined area is access land. The very frequent bus service along the A259, the summer bus service on the coast road and the

bicycle hire facilities at Beachy Head, Litlington and Exceat mean that the area is well served by sustainable transport modes. More active co-ordination of these initiatives and management strategies could bring many more benefits.

The Authority has adopted the “Sussex Heritage Coast Strategy and Action Plan 2016-20”. This was prepared soon after the Authority was established to meet the urgent need to have such a strategy in place but, as a result, it is brief and lacks detail. In 2020 the Authority commenced consultation on the preparation of a new, more ambitious strategy. A second round of consultation followed, but work on the strategy has now regrettably ceased. We feel strongly that work should recommence, co-ordinated with the Local Plan Review.

The lack of an over-arching strategy gives rise to contradictions. For example, the emerging Heritage Coast Strategy proposed that the facilities of the visitor centres should be co-ordinated, with their exhibitions specialising in nature at Seven Sisters, heritage at Beachy Head and Birling Gap contracting as the centre is progressively demolished due to erosion. This has been implemented but, since then, planning permission for a new centre at Black Robin Farm has been granted. It is not clear how this fits in to the overall strategy for the Heritage Coast. We believe that co-ordinated policies between the Local Plan and other strategies and action plans is urgently needed to realise the full potential of the Heritage Coast.

SD54: Pollution and Air Quality

Strongly agree.

SD55: Contaminated Land

Strongly agree.

SD26: Supply of Homes

Agree. We broadly supported this policy in the original Plan, welcoming the general approach adopted to the provision of housing, and particularly affordable housing, in the Park. We maintain our view that in the event of any of the proposed allocations proving unacceptable on further consideration, or undeliverable, there should be no requirement for the Plan to make good any shortfall from the currently proposed targets.

SD27: Mix of Homes

Agree.

NEW1: Accessible Homes

Agree.

SD28: Affordable Homes

Agree. We support the provision of affordable homes in appropriate locations within the Park and therefore agree with Policy SD28 in principle. However, we have concerns over the implementation of the policy. Our experience has been that the Authority considers design more in terms of appearance than requiring design for affordability. Whilst appearance is of course important, “affordable” homes should be designed to be genuinely affordable.

SD29: Rural Exception Sites

Agree. We welcome the thrust of the policy but believe that the policy should be reworded to stress that community involvement is essential from the outset or at least from an early stage and that the community should be engaged in site selection, not just “design, layout and types of dwellings”. Although well intentioned and supported on planning grounds, we question the ability of housing providers to guarantee local connection criteria for affordable homes on a long-term basis

SD30: Replacement Dwellings/ SD31: Extensions to Existing Dwellings

Agree. We believe that these policies, in combination with Policies SD4 and SD5, do adequately capture amenity and design considerations in relation to replacement dwellings, subdivisions, and householder developments. Absolute thresholds may be an inflexible development management tool and can be weakened by appeal decisions. We acknowledge that the policy says “approximately 30%”, but we do wonder if it would be better for 30% to be applied more as a guideline beyond which higher levels have to be individually justified in the circumstances of each case, with the policies reworded as “*normally no more than 30%, with proposals for a larger increases only being permitted where the particular circumstances provide exceptional justification*”. We believe that the restriction on the size of extensions/replacement dwellings be applied to all dwellings everywhere in the National Park.

SD32: New Rural Workers’ Dwellings

Strongly agree. However, we believe that the policy would be clearer if section 2 referred to “permanent” dwellings to distinguish these requirements from those for temporary dwellings in section 4. We also feel that section 4 should make it clear that it is referring to permissions being granted for a temporary period (as explained in paragraph 7.106) rather than temporary dwellings as such. Section 4 could incorporate part of 7.106 to set out what would happen after the expiry of the temporary period i.e. an application for a permanent dwelling demonstrating that the requirements of 2 are met or, exceptionally, an extension to the temporary period where clear progress in establishing the enterprise can be demonstrated or, if neither of these, the removal of

the temporary dwelling. It would be helpful to explain in 7.106 why a time-limited permission rather than a permanent permission might be granted.

SD33: Gypsies, Travellers and Travelling Showpeople

Disagree. We consider that criterion 3c) should also require any mobile home/caravan and ancillary structures not to cause harm to the special qualities of the National Park. The policy could also say proposals for sites on previously developed land will be considered more favourably.

SD34: Sustaining the Local Economy

Strongly agree. While tourism is important there needs to be more positive consideration of other economic activity. We therefore welcome the commitment to safeguard and allocate sites for commercial and industrial uses and the support for small and micro businesses and superfast broadband. We acknowledge the key roles played in the rural economy of the park by tourism, forestry and food and drink but services and employment are also provided by local small enterprises, the safeguarding of and provision for which helps fulfil the statutory duty to have regard to the social and economic wellbeing of the Park's communities.

SD35: Employment Land

Neutral.

SD39: Agriculture and Forestry

Strongly agree. However, we wonder if requirement f) for the removal of redundant buildings when new ones are proposed include more criteria, such as the heritage value of the building, to decide where this will be applied or maybe "where appropriate" is sufficient?

SD40: Farm and Forestry Diversification

Agree. However, we believe that this Policy should not justify uses that are inappropriate for a rural location and/or to support an unsustainable farming business. The requirement that a diversification plan should demonstrate that a proposed development would contribute to the first purpose of the National Park is therefore very important. We suggest that diversification proposals should be required to demonstrate likely financial viability to ensure that such proposals are indeed intended to form part of a functioning farm unit and that the diversification contributes to the viability of the business overall. We also suggest that such a plan should consider whether there would be greater benefit to the farm business from rewilding some or all of it than in continuing the business.

SD41: Conversion of Redundant Agricultural or Forestry Buildings

Agree. However, whilst the initial conversion may lead to a use regarded as acceptable, it may have the potential for further adaptation in due course – for example, from visitor accommodation or employment to residential. While such applications may be determined on their own merits at the time, we consider that it would be helpful if the policy could include, after the cascade of preferential uses, *“This cascade will also apply to any future further proposals for the change of use of the building. Where necessary and appropriate, restrictive conditions and/or legal agreements will be applied to ensure that the original conversion does not become a route to allowing an inappropriate use.”*

Also, paragraph 7.201 of the supporting text explains that not all buildings will be suitable for conversion but we consider that the policy should allow for the possibility that, in exceptional cases, the condition, size, design and location of the redundant building may preclude restoration and reuse because of the implications for the special qualities of the National Park taken together.

New SD8: Viticulture, Winemaking and Wine Tourism

Agree. However, in our experience, viticulture operations often require deer-proof fencing, usually about 2m in height. In some sensitive locations that might be harmful to views and/or the landscape. The likely impact of fencing should therefore be an important consideration in assessing proposals for viticulture operations where planning permission is required. We also suggest that the Authority should consider the use of Article 4 Directions to remove permitted development rights for fences. The words “Having regard to the above,” could be added to the beginning of criterion h).

SD36: Town and Village Centres

Strongly agree.

SD37: Development in Town and Village Centres

Strongly agree.

SD38: Shops Outside Centres

Strongly agree.

SD52: Shop Fronts

Strongly agree.

SD53: Advertisements

Strongly agree. However, the policy or its supporting text could explain that proposals for advertisements in conservation areas will be subject to particular scrutiny.

SD23: Regenerative Tourism

Strongly agree.

SD24: Equestrian Uses

Strongly agree.

SD43: New and Existing Community Facilities

Agree. However, as we would prefer new community facilities to be within the confines of villages where possible, we suggest that the policy should include an additional criterion 1 f); *“Proposals for new community facilities on sites outside settlement boundaries will normally only be permitted where it can be demonstrated that there are no suitable sites within the boundaries”*. This criterion could also include the text from paragraph 7.229 *“and they would not replace more sustainably located community facilities within the boundaries.”*

SD45: Green Infrastructure

Strongly agree.

SD46: Provision and Protection of Public Open Space, Sport and Recreational Facilities and Burial Grounds/Cemeteries

Strongly agree.

SD47: Local Green Spaces

Strongly agree.

SD20: Walking, Cycling and Equestrian Routes

Strongly agree. However, where existing public rights of way cross development sites, the routes are typically retained within the design but at the minimum possible width and on inconvenient alignments. They are usually bounded by high fences, have poor signage and legibility, and attract fly tipping from neighbouring occupiers. This makes them very unattractive to users, breaks links between settlements and the countryside, and risks causing the paths to fall into disuse. There are regrettably countless examples of this throughout the National Park.

We believe that Policy SD20 and its supporting text should be strengthened to state that, where public rights of way cross development sites, the design of the scheme should ensure that the route is of substantial width, is incorporated into the layout and landscaping, and provides users with clear legibility and signage.

SD19: Transport and Accessibility

Agree. However, Policy SD19 only deals with detailed aspects of highway design. It is a development management policy, relevant to the consideration of, for example, road layouts in planning applications for housing or commercial developments. The Local Plan lacks any strategic policy for transport, which is a serious omission. When planning applications for major transport proposals have been submitted, such as those for Exceat bridge widening, various schemes for A27 “improvements”, and the loss of Lewes bus station, the Local Plan provides no policy against which they can be assessed.

A strategic approach to transport appears to have been excluded from the Plan because the Authority is not the highway authority. This function is performed by the three County Councils and Brighton & Hove City Council. These authorities publish local transport plans for their areas. However, their transport plans and their decisions on transport measures give little or no special consideration to the National Park. As a result, most roads suffer from the dominance of traffic and there have been few measures to rectify this. It is the proper role of a Local Plan to provide co-ordination of the transport authorities’ policies in the National Park, to ensure that their transport projects, as well as those of National Highways, comply with the Park purposes.

“Roads in the South Downs” is an excellent statement of how this co-ordination should be achieved. However, it has no statutory status and it is too often ignored. The Local Plan needs a new strategic policy that distils the approach of the document. The new policy should be based on the ‘Core Principles’ set out in the document, which state that traffic should only have priority on defined major routes, and everywhere else environmental and community considerations will be given much greater weight.

Furthermore, we suggest that the following wording be added to the policy; “*Bus/ rail interchange facilities should be sought at all gateway rail stations within or close to the South Downs National Park including Chichester rail station where the existing bus station or provision of a transport hub adjacent to the rail station should provide convenient interchange onto all bus services which lead into the National Park*”.

SD21: Public Realm, Highway Design and Public Art

Agree. However, we consider that the policy contains insufficient protection for historic roads and routes within settlements, which can often contribute significantly to their character and amenity. We therefore consider that the policy should contain an additional criterion; “*Development will not be permitted where it would fail to conserve or enhance the character and alignment of historic roads and routes within settlements*”.

SD22: Parking Provision

Agree. However, we wish to see the addition of additional criterion; 1d) “*within settlements, the car park can be linked to other parts of the settlement by attractive walking routes, to allow easy onward journeys on foot.*”

SD42: Infrastructure

Strongly agree. Unfortunately, we are aware of examples in Lewes of strategic sites where appropriate, necessary, and reasonable infrastructure investment has not been secured before permission was granted.

SD44: Telecommunications

Agree.

SD57: North Street Quarter, Former Bus Station and Adjacent Eastgate Area, Lewes

Agree. However, despite its key location, the two present strategic site of North Street/Bus Station/old Wenban Smith timberyard site has never had an overall plan such as was provided for the Shoreham Cement Works site. SD57 provides that any proposal will need to demonstrate: ‘*Alternative uses on the bus station site are subject to the facility being replaced by an operationally satisfactory and accessible site elsewhere*’. The supporting text explains “...*the principle of redevelopment is acceptable, providing that attractive, operationally satisfactory interchange facilities for passengers are provided on a site elsewhere of equal convenience in this sector of the town*’.

In our view, the financial contribution, to be secured through a S106 agreement, for the provision of two bus stops on the south side of Phoenix Causeway to serve westbound buses included within the proposals for the redevelopment of the bus station (application reference SDNP/23/02973/FUL) was not an acceptable provision and the scheme did not come close to satisfying the requirement of the Local Plan for an “*attractive, operationally satisfactory interchange facilities for passengers*”. We were therefore very disappointed that the Authority resolved to grant permission for the scheme.

Presumably, the retention of this requirement in the Local Plan reflects the possibility that the approved scheme may not be built out. We therefore exhort the Authority to require genuinely attractive, operationally satisfactory, safe, and accessible bus interchange facilities elsewhere should the opportunity arise. To that end, clause 5c) should be strengthened and emphasised.

EA215: Land west of Liphook/Land at Westlands Park

Strongly disagree. We strongly oppose this new draft allocation for 250 units on a greenfield site within the National Park at Liphook. We objected to a similar proposal that was refused by the Authority in 2015.

Firstly, as a more general point, we believe that the allocation of this site would set a most unwelcome precedent. The boundaries of the National Park were debated at length before and during two lengthy public inquiries and were finalised on landscape grounds. We therefore struggle to understand why the Authority would be minded to consider a major housing development just inside the boundary. Such a large-scale development would negate the considerable efforts and careful consideration that resulted in the eventual landscape-led boundary. It is sometimes difficult enough trying to protect the setting of the Park from developments outside the boundary without contemplating major developments just within it!

250 units would indeed represent major development in the National Park. The National Planning Policy Framework (NPPF) sets out that National Parks are not suitable for major development and proposals for major developments should be refused other than 'exceptional circumstances'. There is no indication in the Proposed Review of any such circumstances to justify this allocation. No requirement such as EA215 is contained in your HEDNA Final Report nor was anything like it one of the five options circulated for comment last year (Scope of the Local Plan Review). Policy 50 of the Authority's Partnership Management Plan - with your 67 Partners - requires development to have a "close match" with the social and economic needs of local people: we detect no such close match.

The statutes, policies, and regulations relevant for proposals of this sort are widely known and understood including by our members, and are listed in the scoping and assessment papers which accompany the draft. However, we see insufficient mention of the Bramshott & Liphook Neighbourhood Development Plan (NDP) which was made last year. The NDP contains nothing to suggest that such a huge development at this location is feasible, but we do refer you to the NDP's policies for Sustainable Development and Housing at BL1, BL2, BL3.

Such a large-scale development would overwhelm the historic property and cause major damage to the surface of the ground, its natural and geological features, archaeological interest and above all would interrupt tranquil enjoyment of this well-known scenic landscape to and from Weavers Down and the south-east. This landscape is of outstanding merit in our view. It remains government policy that national parks have the highest status for protection of landscape and natural beauty and the NPPF sets out that "great weight" should be given to conserving and enhancing the landscape and scenic beauty of the national parks. 250 units would substantially compromise the landscape and its enjoyment in this part of the village. Furthermore, it is increasingly recognised that our open spaces are essential in terms of health and well-being.

Moreover, practicalities (in the draft Review) appear to be generalised rather than assessed; for example, the reference on page 137 of the draft Review that "regard must

be had” to NDP View 1 does not provide explanation of how such “regard” will actually protect or enhance enjoyment of the scenic landscape. Wishful thinking is not sufficient.

The site is located within the 5km buffer of the Wealden Heaths SPAs together with the Woolmer Forest SAC, which is intended to ensure protection of these internationally recognised habitats. It is adjacent to several large water bodies (wetlands are a BAP priority) leading to Stagg Wood. The ‘West Land Parcel’ is immediately close to watercourses, headwaters of the River Wey. We all want to avoid pollution risk at this delicate and important location. The draft Review appears to insufficiently comprehend this issue; again, wishful thinking does not justify an unsuitable or unwise location. Run off into these areas from the development of 250 homes and proposed drainage would compromise the future resilience of the woodland and conflicts with the term ‘sustainable development’.

To conclude; with no statutory or regulatory authority behind it this drafted suggestion EA215 should be removed. Local housing needs are researched and explained in the local NDP policies BL1, BL2, and BL3. Together with improved public access it is in these policies where the future lies. This huge allocation would not accord with the new duty under Section 245 of the 2023 Act to “seek to further” the statutory purposes of the South Downs National Park and would set an unwelcome precedent for the Park.

LE039: County Hall, St Anne’s Crescent, Lewes

Agree. LE 039 and LE 114 (i.e. all the land around and including County Hall) includes two sections that are already allocated for housing in the Lewes Neighbourhood Development Plan. We are pleased to note that it appears that the SDNP also intend to preserve the woodland. However, we believe that these need to be treated as one major site. If ESCC is vacating the site, then all its buildings plus the two LNDP sites i.e. St Anne’s Special School buildings site (LNDP site), the school grounds (potential expansion for the adjacent civic cemetery that is now full - green burials?) and the St Annes’s Crescent site (LNDP site) need to be treated comprehensively. Access to the whole area could be via County Hall - depending upon any decision to demolish or convert or if a mayoral office comes to East Sussex, retain it as office space. If demolition is proposed, the mural should be retained. The parking spaces could serve the whole town. As a publicly owned site its potential to serve other needs of the Town, particularly its needs for locally affordable accommodation, must be considered both on the site and in relation to other sites in the Review process.

LE141: East Sussex College, Mountfield Road, Lewes

Disagree. This site is important in offering tertiary, including vocational, education that can generate employment and we believe that it particularly needs to be considered for wider needs than housing. Access is a major issue here. The rail access is excellent but

it restricts any alternative road access than expanding the present narrow road into the football ground which is hardly feasible. We therefore believe that this site may be best suited to expanding education provision, particularly vocational education, and providing the employment spaces that students could go on to need rather than more housing.

Indeed, it could be argued all the tertiary college sites should not be allocated for housing. The site at the top of Ham Lane has had flooding issues and would extend beyond the built up area into the soggy floodplain area. The site at the top end of Mountfield Road again was mostly under water in 2000 and contains a lovely old flint barn and accommodation for overseas students who attend the College. The only site that does not flood is the proposed redevelopment of the prefab area but that is a through route for the school students and FE College students to the foot bridge and a clear and legible pedestrian route is needed. The College is also short of car parking for any events parents' evenings etc and as its wide country catchment area is not served by evening bus services, it does need parking provision. There is also already a major pavement capacity issue in the morning and afternoons when the students overwhelm the pavement - only on one side for the length adjoining the Football Club. We consider that introducing commuters into that mix would not be good planning.

WE014: Alfriston Court, Sloe Lane, Alfriston

Disagree. As noted by the Authority, the site is indeed sensitive and prominent, being visible not only from the Cuckmere River corridor, but also from the Downs beyond. Even with careful design, we are concerned that development on this site would be intrusive and harmful to this particularly attractive and sensitive landscape. Furthermore, Sloe Lane and the roads leading to it are narrow and Sloe Lane is a dead end for vehicular traffic, becoming a public footpath beyond the site. Potential additional traffic on this lane would be likely to be a hazard and cause disturbance for non-motorised users.

HO037-38: East Street Farm, Amberley

Disagree. We believe that the proposed allocation is flawed, but that it could be rendered acceptable by extending the site to take in the field to the south which also belongs to Horsham DC. We suggest that the top field, which appears to get very waterlogged, should be left vacant as a nature reserve, while the middle and lower fields could be developed for, say, 25 dwellings, with a community hall and a new home for the tea room, all accessed off Turnpike Road. This would benefit the village by taking traffic out of the centre where the roads are narrow and can become congested.

EA161: Land south of Lovell Gardens, Binsted

Disagree. Although the site itself appears to be of no great merit, the development of this site would still be an incursion into the attractive countryside with lovely views over the valley to the south of the village.

EA005: Land at Greenways Lane and Kiln Lane, Buriton

Neutral. Although outside the settlement boundary we consider that the inclusion of this site as an allocation in the Review makes sense; this proposed new site is slightly closer to the main village than the small site on the other side of Greenways Lane to the north going towards Buriton Cross that has already been developed as housing. However, we consider that the reference in d of the Policy Matters and Policy Requirements to maintaining and enhancing where possible existing vegetation belts should be an absolute requirement.

CH003: Land East of Coombe Crescent, Bury

Disagree. We acknowledge that although the site is outside the settlement boundary for Bury, it is adjacent to it and some limited development here could, with the right design, be seen as a natural extension to the village. Furthermore, the right design could help mitigate the existing view of the backs of the Coombe Crescent houses in the historic view of the village from Houghton Lane. However, 15 new houses would represent a significant development for the village and extension of the built-up area. Moreover, the development of this site would intrude into and detract from the views from Houghton Lane on the approach to the village and the Grade I listed church.

CH199: Land east of A286: and north of Mill Lane, Cocking

Strongly disagree. The proposed housing allocation would be on the sloping edge of the upper greensand ridge on which the village is situated and would compromise the iconic view of the former Cocking chalk pit on the northern scarp of the Downs beyond. We see no way could a housing development be built on this site without damaging the setting of the village and of the Downs. Moreover, it would sit as an unrelated outlier harming the Cocking conservation area.

LE090: Land at Beechwood Lane, Cooksbridge

Neutral.

LE148: Land rear of 71: East End Lane, Ditchling

Neutral.

CH147: Midhurst Community Hospital and 1-2 Rotherfield Mews, Easebourne

Agree.

CH203: Land at former Easebourne School, Easebourne

Agree. This is a further development to complement SD 68 one of the three Cowdray sites nearing completion. However, it is important that any development on this site is as carefully designed as the Metis development so as to not harm the open views across the Easebourne valley seen from both the west (from the field just north of the public right of way, Glaziers Lane) and or from the public right of way to the east (named the Race).

CH206: Land west of Budgenor Lodge, Easebourne

Strongly disagree. This is a greenfield site, part of an extensive tract of rolling countryside higher than the existing village. Any development on this site could be intrusive when viewed from public rights of way to the west and/or to the north including the right of way leading north-west from the bottom of Canada Gate towards Buddington Farm and Old Buddington.

CH026: Land at Hawksfold, Fernhurst

Neutral.

AR009: Former Allotments north of The Quadrangle, Findon

Agree. We consider that residential development would be a logical use of this site now that the allotments have fallen into use and that such a development need not be harmful to the special qualities of the National Park.

M1014: Land east of Lodge Lane, Keymer, Hassocks

Agree. We accept the Authority's position that to be considered for development it '*is required to demonstrate that it delivers exceptional benefits to the area*' and that that might take the form of '*flood alleviation measures to attenuate storm water and help prevent 'flash flooding' events in Hassocks*'. We agree that this benefit could justify the development of this site.

LE118: Land at Beaumont, Wellgreen Lane, Kingston

Disagree. Access to this site would be from Wellgreen Lane, a heavily-used single lane road. Any development on the site would be visible from the top of the Downs and we believe would be harmful to the character and appearance of Kingston.

LE124: Audiburn Farm, Ashcombe Lane, Kingston

Disagree. Access to this site would be from Ashcombe Lane, a heavily-used single lane road. The site appears to be on an eastward-facing downward slope and would be visible from the surrounding footpaths. There are no existing buildings on the site. We consider that even a modest development of 5 dwellings would be harmful to the special qualities of the National Park.

LE103: Land behind the White Hart, 55: High Street, Lewes

Agree. However, the site is very constrained. We would be likely to oppose any intrusion onto the car park that should be retained to ensure the viability of the recently refurbished hotel. Access cannot be through the arch under the White Hart but must be via the narrow one way Station Street so any development here should be small scale cottages.

LE114: Land at the rear of 49-55: St Anne's Crescent, Lewes

Agree. LE 114 and LE 039 (i.e. all the land around and including County Hall) includes two sections that are already allocated for housing in the Lewes Neighbourhood Development Plan. We are pleased to note that it appears that the SDNP also intend to preserve the woodland. However, we believe that these need to be treated as one major site. If ESCC is vacating the site, then all its buildings plus the two LNDP sites i.e. St Anne's Special School buildings site (LNDP site), the school grounds (potential expansion for the adjacent civic cemetery that is now full - green burials?) and the St Annes's Crescent site (LNDP site) need to be treated comprehensively. Access to the whole area could be via County Hall - depending upon any decision to demolish or convert or if a mayoral office comes to East Sussex, retain it as office space. If demolition is proposed, the mural should be retained. The parking spaces could serve the whole town. As a publicly owned site its potential to serve other needs of the Town, particularly its needs for locally affordable accommodation, must be considered both on the site and in relation to other sites in the Review process.

LE133: Springman House, 8 North Street, Lewes

Strongly agree. We consider that Springman House is an unsightly property that detracts from the character and appearance of the Conservation Area. We would therefore welcome its demolition and the redevelopment of the site with a development lower and more domestic in scale and appearance to turn the corner and reflect the size of houses in Lancaster Street.

LE134: The Shelleys Hotel, 136, High Street, Lewes

Disagree. The Shelleys Hotel is a lovely listed hotel and should only become housing as a last resort, particularly given the importance of tourism at this end of the town.

EA216: Land at Westlands, Liphook

Neutral

CH215: Land West of The Street, Lodsworth

Strongly disagree. This site is separated from the main village by agricultural fields and is therefore unrelated to the existing development in Lodsworth. Consequently, a new development here would be an incursion into the undeveloped countryside and so would appear as incongruous. We do not believe that a faux farmyard design would be

successful because future occupiers of the properties would inevitably have cars and domestic paraphernalia. We also fear that those occupiers may cause difficulties for the continued operation of the popular Langhams Brewery.

CH165: Land east of Pitsham Lane, Midhurst

Agree. However, we do have some concerns and suggestions. The site is a large undulating greenfield site outside the Settlement Policy Area. We agree with the need for a detailed landscape assessment and master plan, which should avoid any vehicular access from Pitsham Lane to the west, However, as the Lane is a bridleway and forms part of the Serpent Trail, we believe that there should be a footpath/cycle link to it. We also believe that vehicular access to the site should not be solely via the existing housing development to the north but also from Holmbush Road to the east across a deep brook.

Holmbush Road is an unpleasant and poor quality unadopted road serving the Holmbush industrial estate but it is also the only motorised and non- motorised link between the extensive housing estates to the north and south and is on the half-hourly bus service from Midhurst to Chichester. The road should be adopted and provided with footways and street lighting and the speed ramps replaced by speed tables. Development of the site could be an opportunity for the extension of Centurion Way from Cocking into Midhurst, perhaps linking it to Pitsham Lane from where it could connect with the proposed Petersfield to Midhurst cycleway in the vicinity of Bepton Road. The master plan should allow for this opportunity.

CH217: Land at Forest Road, Midhurst

Strongly agree.

CH218: Former Bus Station, Pitsham Lane, Midhurst

Agree, However, we consider it unfortunate that access will mean complete removal of the overgrown tree screen across the end of Apple Tree Road cul de sac. We believe that the development should include a footpath/ cycle link onto Pitsham Lane which is a bridleway and forms part of the Serpent Trail.

CH222: Land adjacent to The Grange Car Park, Midhurst

Strongly agree. However, we do feel that the site may be capable of accommodating more than the 10 dwellings proposed, to make the most efficient use of this urban site.

CH074: Land west of Valentines Lea, Northchapel

Neutral. However, we would wish to see the retention of the tree belt alongside the A283.

W1100: Land at Old Green Farm, Owslebury

Neutral

W1101: Land at Whites Hill Farm, Owslebury

Neutral

EA067: Land at Penns Place, Petersfield

Neutral

EA071: Land south of Paddock Way, Petersfield

Neutral

EA225: Land at Festival Hall, Petersfield

Neutral

EA182: Land at Drum Court, The Spain, Petersfield

Neutral

EA187: Land at Windward, Reservoir Lane, Petersfield

Neutral

EA195: The Courtyard, Heath Road, Petersfield

Neutral

CH092/093: Land at Rotherbridge Lane, Petworth

Disagree. We consider that it would be difficult to integrate development on this site with the existing/proposed development to the north and that the development of this site would thus result in an unnatural extension beyond Rotherbridge Lane, which forms a well-established southern boundary to the town. Any development would thus represent an undesirable incursion into the countryside at this prominent gateway position on the main southerly approach to Petworth. We also believe that, given the limited size of the site, it would be difficult to provide adequate planting on the southern and western boundaries to provide the necessary suitable transition in built form and fabric to the open land and countryside to the south and west, thus softening the settlement edge and providing for nature recovery as indicated in the Key Matters and Policy Requirements.

CH096: Land north of Northend Close, Petworth

Neutral

CH236: Land west of Village Hall, Rogate

Strongly disagree. The site is at the highest point of and at the northern approach to the village; a very sensitive area of landscape. The site is clearly visible from two public footpaths and thus very conspicuous. Indeed, it lies within three Characterising Views identified in the Rogate and Rake Neighbourhood Development Plan. We believe that development here would seriously impact the village's connection with the open countryside. We are not convinced that the site is sufficiently large enough to provide the suitable transition in built form and fabric to open countryside and land to the north and west, including planting to soften the settlement edge and provide for nature recovery, as set out in the Key Matters and Policy Requirements. Moreover, the form of the existing historic development in this part of the village is essentially linear, such that the development of the proposed site in depth would be at odds with the prevailing character.

Furthermore, the proposed access would be off a historic, narrow lane. Visibility splay requirements would require the loss of a substantial length of the roadside hedgerow, part of which we understand has been identified as both a Bat Home Network and Bat Movement Network. Many of the historic properties along this lane are Grade II listed and the proposed site is adjacent to the Rogate Conservation Area. Development on the site would largely sever the connection between the listed original Georgian farmhouse for most of the farming land in the area for over 200 years and that farmland. We therefore consider that any such development would fail to conserve and enhance the character and appearance of the Conservation Area and the setting of the listed farmhouse.

LE109: Land at Seaford Golf Club, Firle Road, Seaford

Strongly disagree. We note that the site is classified by the Authority as a "Boundary Site" and is thus required to demonstrate "*that it delivers exceptional benefits to the area*". We cannot see what these exceptional benefits to Seaford would or could be; the addition of 12 undoubtedly high-value properties would do nothing to meet the housing needs of the town.

Development on the proposed allocation site would represent an incursion into currently undeveloped countryside. Firle Road ends just beyond the Golf Club; there is a "twitchen" along the western boundary of this parcel of land. Land to the east of this parcel is agricultural (mainly sheep), and includes a major footpath, "The Comp", and views across to Alfriston. Development of the site would have the potential to seriously impair these views across a particularly dramatic area of the National Park.

EA200: Land off Merryfield Road, Sheet

Neutral

AD001: Land off Steepdown Road, Sompting

Agree. This site borders and would round off existing development that extends further into the National Park. We consider that the development of this site would not be harmful to the special qualities of the Park.

EA212: Land north of Winchester Road, Stroud

Disagree. The development of the proposed site would represent a substantial incursion into the much less developed north side of Winchester Road; it would not respect the character or form of the village, which historically and more recently has developed to the south of the A272.

W1102: Land north of Dodds Lane, Swanmore

Neutral

W1056: Land north of Hewlett Close, Twyford

Neutral

EA043: Land at Farnham and Station Roads, West Liss

Neutral. We do not wish to see any significant erosion of the open 'scattered' character of West Liss or further loss of greenfield beyond the proposed allocated site at this location. However, provided that the existing mature trees and younger planting on or near the site are retained and protected, as indicated in the Key Matters and Policy Requirements, together with new mitigation planting and a development design that will fix and provide an appropriate altered settlement policy boundary, we do not object to this new proposed allocation.