

SOUTH DOWNS LOCAL PLAN MAIN MODIFICATIONS

Representations form for public consultation

01 February – 28 March 2019

The consultation period on this document runs from 1 February 2019 to 28 March 2019. All comments and completed forms should be returned to the Planning Policy team by 23:59 on 28 March 2019.

The Main Modifications schedule, together with supporting documents, is available on our website via www.southdowns.gov.uk/localplan. Paper copies of the schedule and supporting documents are also available at the South Downs Centre, Midhurst and at a further six deposit locations. See our website via www.southdowns.gov.uk/localplan for further details.

Comments should ideally be made using the consultation website via www.southdowns.gov.uk/localplan. If you prefer to comment by email or post, comments can also be returned using this questionnaire, via email to planningpolicy@southdowns.gov.uk or posted to the following address:

South Downs Local Plan
Planning Policy
South Downs National Park Authority
South Downs Centre
North Street
Midhurst
West Sussex
GU29 9DH

Please note that comments received cannot be treated as confidential as all comments must be publicly available in accordance with Government regulations.

If you have any questions about the consultation please contact the National Park Authority on 01730 814810 or planningpolicy@southdowns.gov.uk. Please be aware that officers will be unable to provide a personal reply to representations made during the public consultation period.

If you would like to comment on any part of this document using the questionnaire then please complete the form overleaf. This form has three parts:

Part A - Personal Details

Please note that representations are not confidential and that they will be published on the Authority's website and copies made available for public inspection. However, personal details, other than the respondent's name and/or organisation will not be made public. Please also use Part A as appropriate to request to be notified of remaining stages of the Local Plan examination and adoption.

Part B - Your Representation(s)

Please fill in Part B for **each** representation you wish to make i.e. individual representations will need to be made for each Main Modification referred to. Please ensure you enter the correct reference as shown in the first column of the Main Modifications schedule e.g. **MM1**, **MM2** etc. Boxes 4 and 5 may be used to write your comments in relation to any of these matters. Please request additional copies of this form if necessary or supply information on separate paper.

(continued overleaf)

PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN CONSULTATION

Representations form for public consultation (Regulation 19)

1 February 2019 – 28 March 2019

Part A

Contact Details

Title: ...Ms Name:Alison Tingley

Organisation (if relevant):South Downs Land Managers

Address: 17 Martins Fields, Compton, Winchester,

..... Post Code: SO21 2AZ

Email:info@southdownsland.com

Tel:07917471436

Do you wish to be notified at the email / address stated above* of any of the following:

(1) That the Local Plan Inspector's Report has been published making recommendations on the South Downs Local Plan

(2) That the South Downs Local Plan has been adopted

*Note that you will be notified by email rather than by letter if an email address is given.

Important Information:

- Please provide your name and full address. 'In confidence' representations cannot be accepted. Personal data will be redacted before any publication of the representations
- Please complete Part A and then Part B for each representation made. Please copy or download additional copies of Part B as required
- All representations are publicly available and can be viewed on request
- Please make your responses before the deadline of 23:59, 28 March 2019

Please note all representations made will be forwarded to the Inspector.

Part B

Name or Organisation

South Downs Land Managers

1. To which part of the Local Plan does this representation relate?

Main Modification
reference
(e.g. MMI)

MM33

Sustainability Appraisal Addendum
(paragraph or table number)

Habitat Regulations Assessment
Addendum
(paragraph or table number)

For information about legal/procedural requirements and whether the local plan is sound, please see paragraph 182 of the NPPF and Planning Practice Guidance on Local Plans.

2. Do you consider the document is Sound?

Yes

No

If No, do you consider it is unsound because it is:

(1) Not positively prepared

(2) Not justified

(3) Not effective

(4) Not consistent with national policy

3. Do you consider the document complies with the legal/procedural requirements for preparing a development plan?

Yes

No

Continues over page

4. Please give details in the box below of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

The South Downs Land Managers (SDLM) represent some 450 farmers, landowners, managers and foresters operating within the South Downs National Park area. The following representations have been prepared for and agreed by the Executive Committee of the SDLM.

Landowners are an essential part of the NP community, who are vital in maintaining the natural capital of the area and providing ecosystem services. In order to continue to do this they have to be economically viable. In order to adapt to market forces, particularly in light of uncertainty over Brexit, and maintain their viability, many farms will need to develop alternative sources of income through diversification. In our opinion the current wording runs counter to the duty that National Park Authorities have to foster social and economic wellbeing of communities within the NP. The current wording limits the opportunities for diversification. This we believe will restrict economic well-being rather than fosters it, which we would argue is contrary to national policy and therefore makes this policy unsound.

(continue on a separate sheet if necessary)

5. What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Replace 'will be far more limited' with 'should also support landscape character'.

(continue on a separate sheet if necessary)

Signature: A Tingley

Date:26.3.2019

Name or Organisation

South Downs Land Managers

1. To which part of the Local Plan does this representation relate?

Main Modification
reference
(e.g. MMI)

MM34

Sustainability Appraisal Addendum
(paragraph or table number)

Habitat Regulations Assessment
Addendum
(paragraph or table number)

For information about legal/procedural requirements and whether the local plan is sound, please see paragraph 182 of the NPPF and Planning Practice Guidance on Local Plans.

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(2) Not justified

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3. Do you consider the document complies with the legal/procedural requirements for preparing a development plan?

Yes

No

Continues over page

4. Please give details in the box below of why you consider the document is not legally compliant, or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.

The South Downs Land Managers (SDLM) represent some 450 farmers, landowners, managers and foresters operating within the South Downs National Park area. The following representations have been prepared for and agreed by the Executive Committee of the SDLM.

The addition of 'in exceptional circumstances to the wording of this paragraph, in our opinion reduces development opportunities for landowners. This we would argue is contrary to the duty of the National Park Authority to foster social and economic well-being of local communities, of which farmers and landowners are a very important section of the community on whom the NPA relies on to enhance large swathes of the National Park, manage the natural capital of the area and deliver ecosystem services. If farmers are to carry out these essential services, they have to be economically viable. This reduction in their potential viability, particularly in light of uncertainty over Brexit, we believe is contrary to the NPA's duty.

(continue on a separate sheet if necessary)

5. What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We believe that the wording 'in exceptional circumstances' is unnecessary and should be deleted. Paragraph 7.201 has already said that farm diversification should make 'best possible use of existing, appropriate buildings'.

(continue on a separate sheet if necessary)

Signature: A. Tingley

Date:26.3.2019