

# PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN CONSULTATION

Representations form for public consultation (Regulation 19)  
26 September – 21 November 2017

## Part A

### Contact Details

Title: Ms      Name: Jeanne Peterson, Clerk to Kingston Parish Council

Organisation (if relevant): Kingston Parish Council (KPC)

Address: Kingston Community Pavilion, St Pancras Green, Church Lane, Kingston, Lewes, East Sussex

Post Code: BN7 3LN

Email: clerk@kingston-lewes-pc.gov.uk

Tel: 07526 489933

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

(1) That the Local Plan has been submitted for independent examination

Yes

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

Yes

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

Yes

\*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
- Please complete Part A and then Part B for each representation made. Please copy or download additional copies of Part B as required and Part C if necessary
- All representations are publicly available and can be viewed on request
- Please make your responses before the deadline of 23:59, 21 November 2017

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

# Part B

Name or Organisation

Kingston Parish Council

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

Policy number  
(SDxx) or section

6a. Sustainable  
Transport

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(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

**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.**

**A key requirement of a Local Plan, as set out in the section on “What should a Local Plan contain?” of the UK Government’s Planning Practice Guidance on Local Plans, is the requirement that the Local Plan should aim to meet the objectively assessed development and deliverability of infrastructure needs of the area**

**KPC submits that this should include identifying improvements to the infrastructure to enable the parks’ objective of providing opportunities for the enjoyment of the special qualities of the Park to be met.**

**The pre-submission draft of the Local Plan does not include any policies concerning:**

- **Proper consideration of the existing road network and traffic on the Plan Strategies including management of speed and volumes and the need for enhancements to the road network to complement the development strategies, such as housing,**
- **Parking; including the need and location for additional car parking and possible parking restrictions,**
- **Facilitating access to the National Park including footpaths, roads, traffic management, parking and public transport, by identifying where existing access is inadequate and proposing schemes for improving it.**

**KPC submits that since the pre-submission draft of the Local Plan fails to identify a range of infrastructure requirements in relation to the road network, parking, failure to address these issues make the document legally non-compliant .**

**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.**

**KPC submits that the pre-submission draft of the Local Plan should identify a range of infrastructure requirements in relation to the road network, parking and routes and means for accessing the Park.**

**6. Do you consider it necessary to participate at the Examination in Public?**

No

Yes

**7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?**

In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions

Signature:

*Jeanne E-Kererson*

Date: 20<sup>th</sup> November 2017

# Part B

Name or Organisation

Kingston Parish Council (KPC)

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

Policy number  
(SDxx) or section

6b. Understanding and  
enjoyment of the  
National Park

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(paragraph or table number)

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**Two key purposes of a National Park are to enhance the wildlife of the area and to provide opportunities for the enjoyment of the special qualities of the Park. Commercial shooting and hunting are two specific threats to wildlife, as well as to the safety of people walking in the Park. Shooting also disturbs the peace of the area both for wildlife and human visitors and residents.**

**The pre-submission draft of the Local Plan does not include any policies concerning either of these activities. In the Kingston area commercial shooting for sport is being encouraged by local interests and hunting is also a pastime. These activities are very controversial for the majority of residents in Kingston.**

**In the section on “How detailed should a Local Plan be” of the UK Government’s Planning Practice Guidance on Local Plans, there is a requirement that the Local Plan should concentrate on the critical issues facing the area, and the strategy and opportunities for addressing them. As written on Figure 2.2 of the draft Plan a key objective of the Local Plan is to protect and provide opportunities for everyone to discover, enjoy, understand and value the National Park and its special qualities.**

**KPC submits that the threat to wildlife and park users of commercial shooting and hunting are critical issues which if not properly managed and controlled would have long term, and avoidable, negative impacts on the wildlife in the Park and would limit the opportunities for enjoyment of the Park.**

**KPC considers that failure by the Authority to address these issues is indicative of a lack of soundness in the preparation of the Plan and renders the document legally non-compliant.**

**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.**

**KPC submits that the Local plan should include specific policies and guidelines for strictly controlling, or even banning, where commercial shooting and hunting may be carried out in the Park. These policies should be consistent with the purposes of the park**

**6. Do you consider it necessary to participate at the Examination in Public?**

No

Yes

**7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?**

**In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions**

**Signature:**

*Jeanne E-Kererson*

**Date: 20<sup>th</sup> November 2017**

# Part B

Name or Organisation

Kingston Parish Council

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

Policy number  
(SDxx) or section

7b. Homes (Strategic  
Policies)

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(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

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(1) Not positively prepared

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Yes

No

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**The need for additional affordable/social housing in the Park is undeniable, but it is essential that provision recognises actual ability to pay and is tailored to local circumstances,**

**The pre-submission plan includes no consideration of what might actually be affordable in specific areas, or how the development of housing can be designed to ensure affordability**

**Because of the plan's failure to address this issue, KPC submits that that the document is unsound.**

**In addition, a key requirement of a Local Plan, as set out in the section on "How can the local planning authority show that a Local Plan is capable of being delivered including provision for infrastructure?" of the UK Government's Planning Practice Guidance on Local Plans, is the requirement that the Local Plan should identify what infrastructure is required and for at least the first 5 years, should set out, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.**

**The Planning Guidance also requires that Local planning authorities should ensure that the policies in their Local Plan recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement. This could include sites for older people's housing including accessible mainstream housing such as bungalows and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes.**

**KPC submits that as the draft Plan fails to address any of these issues, it is therefore not legally compliant**

**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.**

**The Local Plan housing strategies should recognize the economic circumstances prevailing in different settlements and propose innovative methods for ensuring that developments are configured in a manner which assists affordability. Options could include splitting some "houses" into flats.**

6. Do you consider it necessary to participate at the Examination in Public?

No

Yes

7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?

In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions

Signature:

*Jeanne E-Kererson*

Date: 20<sup>th</sup> November 2017

**Part B**

# Part B

Name or Organisation

Kingston Parish Council

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

Policy number  
(SDxx) or section

SD77- Housing at  
Castelmer Fruit  
Farm at Kingston

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(paragraph or table number)

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The specific proposals for housing at Castelmer Fruit farm in Kingston have only been developed within the last few months and hence prior to the present consultation on the pre-submission Local Plan, there has been no public consultation on the proposal.

**KPC submits that this lack of consultation is not in compliance with Section 18 of the UK Government's National Policy Planning Framework**

**A key requirement of a Local Plan, as set out in the section on "How can the local planning authority show that a Local Plan is capable of being delivered including provision for infrastructure?" of the UK Government's Planning Practice Guidance on Local Plans, is the requirement that the Local Plan should identify what infrastructure is required and for at least the first 5 years, should set out, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. In this regard:**

- **There is no evidence in the Plan that proposals for housing development have properly taken into consideration the availability of necessary utility and social infrastructure,**
- **Considering specific infrastructure issues, KPC has significant concerns about road safety and traffic implications of the junction of the road from the development with Ashcombe Lane,**
- **We note that the site was not included as part of the Site Allocations Highway Assessment undertaken by Hampshire County Council Highways and no evidence has been provided that this issue has been looked at by any other qualified organization before including the site in the draft Plan,**
- **Specific concerns are:**
  - **The junction is at a bottom of a hill (Ashcombe Lane) down which practical experience shows that traffic regularly exceeds the 30 mph speed limit,**
  - **The traffic along Ashcombe Lane is at a high volume at certain times of day with long tails backs. This is due to the use of the road as a short cut between the A27 and the C7 Lewes to Newhaven road as well as Kingston school traffic,**
  - **KPC considers that lines of sight for drivers leaving the development to enter Ashcombe Lane would be very poor. Visibility splays measuring 2.4m x 43m are required in both directions, but at present KPC considers that driver visibility is restricted in this direction by the road alignment and neighbouring hedge and would allow only 2.4m x 30m,**
  - **KPC is doubtful whether the additional sight lines can be achieved to the northwest over land which would be within the control of applicants promoting the development or within the highway boundary. Constraints include an electricity sub-station at the junction.**
- **At the time of writing, SDNPA have indicated that whilst they have requested comments on the safety, or otherwise of this junction, from the ESCC Highways Authority, none have been provided to them at this time.**

- **KPC submits that until there is a definitive response from ESCC, or another competent organisation, on these matters, the development may not be deliverable and alternative sites might need to be considered,**
- **In addition, KPC has concerns that the Highways Authority might require changes to the road layout, removal of trees and possibly street lighting at the junction with Ashcombe Lane which would detrimentally change the character of the village Also, physical infrastructure issues such as the location of an electricity substation, might limit the scope for improvement**

**KPC also notes that:**

- **Since the site was selected after the Strategic Housing Land Availability Assessment was undertaken in 2016, there is no clarity or objectivity underlying the selection of the site in preference to alternative sites in the village,**
- **The plan does not demonstrate through the provisions of maps or drawings how building the proposed number of houses (10 to 12) can be consistent with the area available and maintaining as much of the stock of existing mature trees on the site as possible,**
- **The proposal should be quite specific that there should be no possibility of the development having a road link with Spring Barn Farm to the East or of further development towards Spring Barn Farm,**
- **Whilst there is general support in the village for the limited development of appropriate housing in the village, Kingston already has many high value (£ million plus) houses and future “market” housing should be realistically priced and generally aimed at buyers on mid and lower range incomes,**
- **The location for new housing should be acceptable not only from road and traffic considerations but should also take account of any negative impacts that a significant development could have on the character of the village,**

**KPC therefore submits that given these shortcomings the strategy is both unsound as the selection of the site is not evidenced based and deliverability has not been proven. Also the process of selection and consultation has not been in compliance with the legal requirements.**

**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.**

**In view of the shortcomings identified above affecting the deliverability of the site for the development of 10 to 12 homes, and the lack of consultation on it to date, KPC considers that the proposal is not at this time of sufficient quality.**

**KPC considers that the development should be subject to further scrutiny and analysis on deliverability by the SDNPA considering:**

- **The response from ESCC Highways Authority or other appropriate highways experts of the safety and suitability of the arrangements of the junction with the development and Ashcombe Lane which should take account of:**
  - **Detailed analysis of traffic volumes and average speeds along Ashcombe Lane,**
  - **If the proposals involve an additional 50 movements per day over what is**

currently generated, the findings of a Stage I Road Safety Audit,

- Detailed analysis of visibility splays at the junction of Ashcombe Lane and entry to the development, and methods to remediate any shortcomings,
- The capability of the existing gas, electricity, water and sewage infrastructure to meet the development's needs,
- Recognition that Kingston already has many high value (£ million plus) houses and future "market" housing should be realistically priced and generally aimed at buyers on mid and low range incomes,
- Requirements should be inserted into any strategy for Castelmor to demonstrate that any "affordable" housing which is provided is truly affordable given the economic circumstances of likely users,
- To this end innovative methods should be required for adoption by developers which will ensure that the development will be configured in a manner which assists affordability. Options could include splitting some "houses" into flats,
- Analysis should be presented to clarify the underlying basis for the selection of the site in preference to alternative sites in the village,
- Ultimately, KPC submits that, given lack of detailed evidence in the Plan for requirements for new housing in Kingston, the provision of new housing should be balanced against the negative impacts as well as deliverability. If necessary, and as for Rodmell, consideration should be given to removing the allocation of new housing to Kingston in the Plan if no environmentally sustainable and socially acceptable new developments can be identified within Kingston.

**6. Do you consider it necessary to participate at the Examination in Public?**

No

Yes

**7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?**

In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions

Signature:

*Jeanne E-Kererson*

Date: 20<sup>th</sup> November 2017

# Part B

Name or Organisation

Kingston Parish Council

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

Policy number  
(SDxx) or section

SD78. Gypsy &  
Traveller Site at the  
Pump House Kingston

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(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 specific proposals for a permanent gypsy/traveller site at the Pump House in Kingston have only been developed within the last few months and hence prior to the present consultation on the pre-submission Local Plan, there has been no public consultation on the proposal. The proposal was included in a confidential consultation in late 2016 which KPC were barred from sharing with villagers.**

**KPC submits that this lack of consultation is not in compliance with Section 18 of the UK Government's National Policy Planning Framework**

**The present site has been temporarily designated as a traveler/gypsy site for the very specific use of a member of the local family who own the land on which the site is located. KPC is not convinced that a need for a permanent site at the Pump House for longer term use by the wider gypsy/traveller community has been proven. No data has been provided from the study used to evidence the need for a site in Kingston, and KPC is not aware that any gypsy/travellers, apart from the present family who own the site, have sought a pitch in Kingston.**

**KPC notes a general concern that the area of land allocated for the site and for access is far larger than necessary for one permanent pitch. This leaves the possibility of the number of pitches being increased in the future which is strongly opposed by KPC and local residents**

**It is not clear from the draft Plan whether the landowner is supportive of the proposal, and hence whether the strategy is indeed deliverable.**

**KPC therefore submits that given these shortcomings the strategy is both unsound as the area of land allocated is inconsistent with a single caravan pitch, and the deliverability and need have not been proven.**

**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.**

**If a permanent site is to be designated, then a much smaller area of land should be allocated which would be consistent with one permanent pitch, vehicle turning space and the necessary road access to the site,**

**The precise location of a smaller site should be carefully specified and designated to minimise its visual impact and landscape character as the site is in a sensitive area on a ridge which is visible from the surrounding area.**

**6. Do you consider it necessary to participate at the Examination in Public?**

No

Yes

**7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?**

In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions

Signature:

*Jeanne E-Kererson*

Date: 20<sup>th</sup> November 2017

# Part B

Name or Organisation

Kingston Parish Council

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

Policy number  
(SDxx) or section

Kingston  
Settlement Map

Sustainability Appraisal  
(paragraph or table number)

Policies Map  
(state map title)

Habitat Regulations Assessment  
(paragraph or table number)

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**KPC has the following comments on the revised Settlement Boundary presented on the Settlement Map:**

- **KPC considers that the land at Audiburn Stables on Ashcombe lane should be retained within the Settlement Boundary as this could potentially be a future development site,**
- **The map which was used to develop the boundary line within 10 metres of the rear of some existing properties is out of date. Some properties have been extended at the rear and the new boundary line does not always reflect this, so that in some instances the boundary actually passes through the extended property. New surveys should be undertaken to update the property footprints and the boundary redrawn,**
- **The settlement boundary proposals in the area of the Pump House are inconsistent with the map provided as part of the Traveller/Gypsy allocation (SD78). The boundary should be reviewed both considering this and the desirability of reducing the land allocated for the site. In particular it is unclear why the access to the site can't be the existing road from Kingston Ridge which is already inside the Settlement Boundary.**

**For these reasons, KPC considers that the description of the Settlement Boundary is unsound.**

**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.**

**KPC considers that the map should be altered as follows:**

- **Land at Audiburn Stables should be retained within the Settlement Boundary,**
- **Where the boundary line is proposed within 10 metres of the rear of some existing properties, new surveys should be undertaken to update the property footprints to take account of building extensions and the boundary then redrawn,**
- **The boundary around the proposed Traveller/Gypsy site (SD78) should be reviewed for consistency with the drawing for SD78 and to reflect the desirability of reducing the land allocated for the site noted in a comment on SD78. In particular it is unclear why the access to the site can't be the existing road from Kingston Ridge which is already inside the Settlement Boundary.**

**6. Do you consider it necessary to participate at the Examination in Public?**

No

Yes

**7. If you answered Yes to the last question, why you feel it is necessary to participate at the Examination in Public?**

**In order to have the opportunity to express our range of concerns about how the Plan has been prepared and some of its provisions**

**Signature:**

*Jeanne E-Kererson*

**Date: 20<sup>th</sup> November 2017**

## Part C

**Additional Comments (note these should relate to all matters relating to the Local Plan other than the tests of soundness and legal compliance)**

### **1. Public consultation and engagement with parishes**

**KPC submits that the process for consulting with parishes during the various phases of the local plan has been flawed. In particular:**

- **The SDNPA failed initially to successfully communicate the importance of the planning process to parish councils and villagers nor their approach to consultation on specific local issues, As a consequence many parishes failed to recognize the significance of the earlier rounds of consultation meaning that this consultation has become the main vehicle for comment. This is particularly true as far as Kingston is concerned due to the lack of consultation specific to Kingston to date. As a result the consultations have been less effective than desirable,**
- **A very large body of evidence and reports was prepared on behalf of the Authority to form inputs to the Planning process. However the existence of these and their significance was not well publicized, and in many instances KPC only became aware of their existence in a very late stage of the process,**
- **The SDNPA's confidential consultation phase at the end of 2016 was ill advised, divisive and ineffective. It effectively prohibited parish councils from sharing the main plan strategies being considered at that time with villagers and created a lot of bad feeling both towards the Council and the Authority,**
- **The specific proposals for Kingston have only been developed within the last few months and hence there has been no proper public consultation on any of the key strategies (Housing, Gypsy/Traveller site and the Settlement Boundary) as the first time they have been available for public scrutiny is in the pre-submission version of the Plan presently out for consultation,**
- **The procedure for obtaining comments on the pre-submission Local Plan is very complicated and off-putting. It has clearly been designed to try and simplify the work of the Park Authority at the expense of the effort put in by consultees.**

**Future rounds of Local Plan preparation will benefit from the lessons learned over the past months, but consideration should be given by the SDNPA to more open and targeted consultation including greater dissemination of information on what is actually available and when.**

### **2. Roads, Car Parks and Footpaths**

**KPC considers that the plan should include consideration of the following infrastructure requirements:**

- **The C7 road between Newhaven and Lewes is presently used as a short cut by commuters and other road users and has excessive and potentially dangerous levels of traffic at times. It should be viewed in the Local Plan primarily as a major access route to the National Park and not a strategic link road, and its character should reflect this,**

- **Proposals should therefore be included within the Plan to manage the C7 traffic flows and to reflect the philosophies set out in the July 2015 report prepared for the SDNPA on “Roads in the South Downs”. This could include proposals for the use of the Park Authority’s own funds to implement improvements and management schemes including encouraging use of the A26 as the main link between Newhaven and Lewes,**
- **Increasing levels of traffic on the C324 which passes through Kingston and links the A27 and the C7 is probably the biggest concern for village residents. Improving the management of traffic on the C7 could be designed to reduce traffic flows through the village, and again KPC considers that the Plan should properly address this key infrastructure problem,**
- **Lack of a proper car park for visitors to the village, the local school and the National Park is also a concern in Kingston. We consider that the Plan should recognise the importance of good car park facilities across the Park and should identify proposals to meet specific needs in key access points to the Park, such as Kingston,**
- **The provision of well maintained footpaths is an essential component of the National Park infrastructure. No consideration is given in the plan to improving the network of footpaths in the Park and we consider that this oversight needs to be addressed by identifying footpath improvement projects. In the Kingston area there is, for example, an urgent need for improvements to the existing footpath connecting Cranedown and Spring Barn Farm on the C7 with Kingston itself as this path which gets flooded in the winter. Indeed it could be upgraded to a cycle track.**