



South Downs National Park

**Strategic Housing Land
Availability Assessment**

December 2016

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South Downs National Park Authority
Strategic Housing Land Availability Assessment

Important Notice – Limitations of use of information

In relation to the information contained within the South Downs National Park Strategic Housing Land Availability Assessment (SHLAA) Covering Report and Appendices, and any other report relating to the findings of the SHLAA, the National Park Authority confirms that:

- **The SHLAA does not allocate sites to be developed. It is but one of many pieces of evidence that will inform the Local Plan.** The allocation of sites for future housing development will be determined through either the South Downs Local Plan or neighbourhood plans, in line with a development strategy for a medium level of growth dispersed across the National Park, and based on an ecosystem services approach.
- **The identification of potential housing sites within the SHLAA does not imply that planning permission would be granted for residential development.** The SHLAA is a high level assessment of potential housing availability. Determination of planning applications will require a high level of detail and understanding of the site constraints. All planning applications incorporating residential development will continue to be considered against the appropriate policies, including all that would apply to non-allocated sites irrespective of the SHLAA recommendation, and having regard to any other material considerations.
- The inclusion of potential housing sites within the study does not preclude them from being considered for other uses. The boundaries of sites are based on the information available at the time. The SHLAA does not prejudice future changes to these boundaries for the purpose of allocating a site in the South Downs Local Plan or a Neighbourhood Plan, or with respect to planning applications.
- The omission of sites from the study does not preclude the possibility of planning permission for residential development on them being granted. It is acknowledged

that sites will continue to come forward that may be suitable for residential development that have not been identified in the SHLAA.

- The categorisation of sites in terms of when they could come forward is based on an assessment at the time of the study. Circumstances or assumptions may change which may mean that sites could come forward sooner or later than originally envisaged or not at all.
- The housing capacity of a site in the study either relates to the number of dwellings granted in a planning permission (where applicable) or is an estimate based on an assessment of what is considered appropriate for that specific site. However, the site capacities in the study do not preclude different numbers coming forward at the planning application stage.
- Sites that have been granted planning permission prior to 1st April 2015 are considered to be commitments and are therefore not included in this SHLAA, in line with the approach to site allocations. All the findings are a 'snap-shot' of information held at the time of assessment. Some of the information held within the SHLAA will have changed.
- The SHLAA, whilst providing evidence of opportunities for land supply, does not provide a housing trajectory or a five year rolling supply of housing land. This evidence is provided in the Authority Monitoring Report (AMR), based on extant planning permissions and anticipated housing allocations. Updates will be provided through review of the AMR, to reflect the emerging South Downs Local Plan housing allocations.

I.0 How to use the SHLAA

- I.1 This document is a technical report which provides evidence of housing land availability across the South Downs National Park. It is intended for use by a wide range of users, including parish councils and local communities, and prospective housing developers. It is structured to reflect the identity of settlements within the National Park, in a way that will, together with other evidence, help determine settlement specific housing requirements.
- I.2 It is strongly advised that users read this covering report in its entirety. This is important to understand the way in which the assessments have been carried out, and the recommendation made on each site.
- I.3 It is also important to refer to Appendix A, which sets out in detail the criteria against which sites have been assessed. Given the importance of landscape in the South Downs National Park, there are specific detailed criteria which have enabled a landscape-led approach to assessing the sites (the Landscape Assessment criteria). There are also other criteria that are more generally applied to SHLAAs, in line with national guidance (the Suitability criteria).
- I.4 To find the details of a specific site, users should take the following approach:
- i. Refer to Appendix B, which contains a map of each settlement where there has been one or more sites submitted for consideration in the SHLAA. The settlements are in alphabetical order, and listed at the start of the appendix.
 - ii. When you have identified the site you are interested in, the legend will tell you straight away whether it is a site the Authority considers has potential for housing development (green edged), or whether the site has been excluded from the assessment (red edge, hatched) or assessed and rejected (red edge, no hatching).
 - iii. The site will also have next to it a unique reference number. The prefixes to these numbers relate to the district, borough or city administrative area within which it is located. Make a note of this number.

- iv. Next, refer to Appendix C, which provides a summary of findings for every site submitted. These are grouped by settlement in alphabetical order, so that the overall housing potential for that settlement can be easily seen. The columns also provide the timescale that would be expected for housing delivery, should the site come forward through an allocation or a planning application.
- v. If the site has been 'excluded' at the first stage of assessment, the reason is given in Appendix C. These sites have not been considered further.
- vi. If the site has been found to 'have potential' or 'rejected', you can find a more detailed explanation for this conclusion by referring to Appendices D and E as relevant. For sites with potential, a larger scale map of the site, together with a detailed assessment proforma, can be found in Appendix D. For rejected sites, a detailed schedule of reasons is given in Appendix E. Both Appendices D and E are listed in order of reference number, however the assessment details provide the settlement to which the site relates. The reference number prefix indicates the district, borough or city administrative area within which it is located. Index tables to identify which sites relate to which settlement, and which prefixes relate to which local authority areas, is provided at the beginning of Appendix B.
- vii. Section 4.0 provides overall conclusions drawn from the SHLAA. It provides total housing potential, in terms of dwelling numbers, for each district, borough or city administrative area within the National Park, and reports the overall number and timescales that could be achieved for delivery. **Note however that this does not determine the local plan target for housing provision, as landscape, relationship to ecosystem services, settlement facilities and historic settlement form have also informed the overall plan target and settlement specific housing numbers.**

2.0 Introduction

2.1 The South Downs National Park covers an area of over 1,600 km², with 15 local authorities operating within the area. The South Downs National Park Authority became the Local Planning Authority for the National Park on the 1st of April 2011. Planning Policy plays an important role in shaping the future of development within the National Park and the key mechanism for this is through the South Downs Local Plan. The SHLAA will form part of the wider evidence base and background information produced to inform the Local Plan. As the local planning authority for the National Park, this SHLAA produced by the National Park Authority updates the approach and information provided in SHLAAs published by local authorities in the past.

2.2 The National Park Authority is required by the National Planning Policy Framework (NPPF) to use an evidence base to ensure that the Local Plan identifies available, achievable and deliverable sites to deliver housing over the Plan period. However, it is important to refer to the great weight given to conserving landscape and natural beauty in National Parks, as outlined in Paragraphs 115-116 of the NPPF. The National Parks Vision & Circular¹ states that the Government recognises that National Parks are not suitable locations for unrestricted housing. The expectation being that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.

2.3 A Strategic Housing Land Availability Assessment (SHLAA) is an essential piece of evidence for local plans which identifies land and assesses the availability, suitability and deliverability of potential housing sites against specific criteria. This evidence will help the National Park Authority understand what sites are theoretically available to provide opportunities for housing development. Together with information on past planning permissions and housing completions (as reported in the Authority Monitoring Report²), the SHLAA provides evidence that there is an adequate housing land supply for meeting the objectives of the Authority and towards the needs of local communities. It also helps

¹ DEFRA (2010) English National Parks and the Broads: UK Government Vision and Circular (para 78).

² South Downs National Park Authority Monitoring Report 2015/16 (December 2016)

identify potential locations for housing to be allocated in the emerging South Downs Local Plan and neighbourhood plans.

2.4 This SHLAA is the second one produced by the National Park Authority since becoming the local planning authority, the first having been published in January 2015³. The same methodology and assessment criteria have been used for both. However, this SHLAA includes a number of additional sites that were submitted during an open Call for Sites which ran from 2nd September to 28th October 2015. In light of the publication of the Strategic Housing Market Assessment (SHMA) in September 2015, which identified an objectively assessed housing need of between 416 and 454 homes per annum, the Authority has also reviewed its recommendations on sites previously assessed to ensure that ‘no stone is unturned’ with respect to positively identifying new housing sites.

2.5 The National Planning Practice Guidance suggests a standard process for undertaking a SHLAA. The methodology set out in Section 4 of this report sets out how the SHLAA has been prepared in relation to the standard process in the Practice Guidance.

2.6 The study has a base date of the 1st April 2015 with regards to commitments (i.e. planning permissions). In effect this means that any housing sites that have gained planning permission on or after 1st April 2015 are included as a site that ‘has potential’. On the other hand, extant planning permissions granted before this date have not been assessed as they are counted as ‘commitments’ in the housing land supply identified in the AMR (with a discount applied across all sites to account for non-implementation). This is to ensure consistency with the approach to allocating sites.

2.7 The findings are a ‘snap-shot’ of information held at the time of publication. Therefore, some of the information held within the SHLAA will have changed. For example, sites that are identified as not having planning permission may have secured permission since the information was compiled and published. Similarly on other sites, a planning permission or pre-application scheme may have been superseded by a later scheme.

³ South Downs National Park Strategic Housing Land Availability Assessment (January 2015, base date 1st April 2014)

Purposes and Aims

2.8 Paragraph 159 of the NPPF states that Local Planning Authorities should:

“...prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.”⁴

2.9 The assessment of land availability is an important step in the preparation of Local Plans. The National Planning Practice Guidance states that assessments should:

- a. Identify sites and broad locations with potential for development;
- b. Assess the development potential of these sites;
- c. Assess the suitability of these sites for development and the likelihood of development coming forward (the availability and achievability).

2.10 The aim of the study is to identify land which is the most suitable and deliverable. This evidence will underpin the policies in the emerging Local Plan and allow the National Park Authority to plan proactively to meet the appropriate level of housing within the National Park.

2.11 The NPPF identifies the advantages of carrying out land assessments for housing and economic development as part of the same exercise. This SHLAA has been prepared at the same time as an update to the National Park Authority’s Employment Land Review and several sites have been assessed by both studies.

2.12 The SHLAA only identifies opportunities for housing development on sites, which are considered to be deliverable and developable. **It does not allocate sites to be developed.** The allocation of sites for future housing development will be determined through either the South Downs Local Plan or neighbourhood development plans.

2.13 **The identification of potential housing sites within the SHLAA does not imply that planning permission would be granted for residential development.** All planning applications incorporating residential development will continue to be considered against the appropriate policies and having regard to any other material considerations.

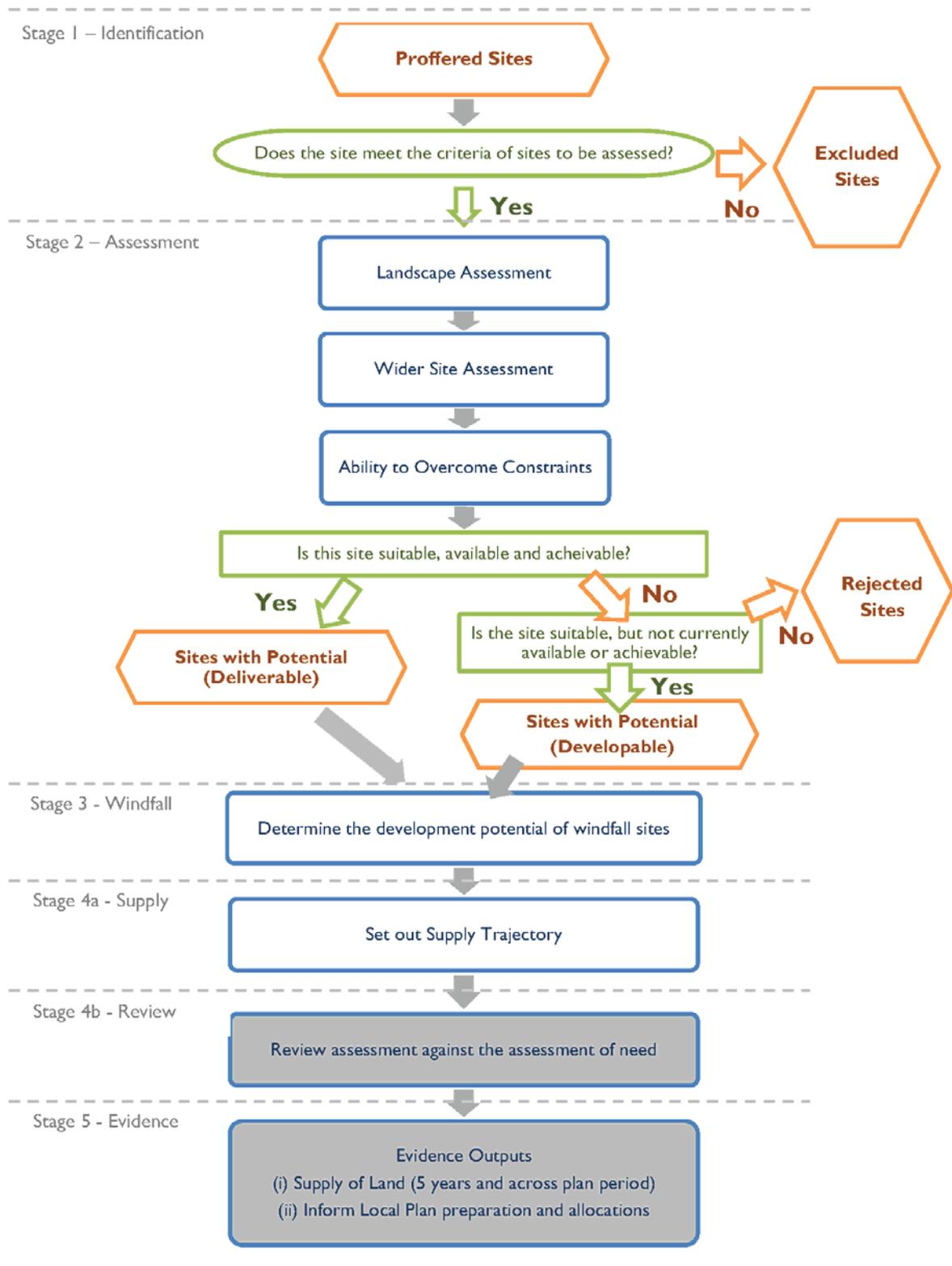
⁴ DCLG (March 2012) National Planning Policy Framework

3.0 Methodology

3.1 The Practice Guidance sets out what inputs and processes should lead to a robust assessment of land availability. The flow chart below (**Figure 1**) outlines the 5 stage process. This differs from the 8 stage process previously set out in government guidance, which the original National Park SHLAA 2015 methodology was based on. The section below sets out below how the methodology used in this SHLAA is consistent with the new guidance under each of the stages.

3.2 Stage 4 indicates that the Local Planning Authority should review the evidence of the SHLAA against the assessment of need. The Strategic Housing Market Assessment (SHMA) is the main evidence based study on housing need and was published in September 2015. Stage 5 requires translation of the evidence to show whether or not there is a sufficient supply of housing land, and to inform local plan allocations. The output of Stages 4 and 5 will be reported in detail in a Housing Background Paper to be published as part of the evidence base for the Pre-Submission version of the Local Plan. The Authority Monitoring Report (AMR) published in December 2016 provides detail of the housing trajectory for the Local Plan period.

Figure 1 – Stages of Assessment and Summary of Process



Stage I – Site Identification

3.3 The geographical area covered by this assessment is the South Downs National Park.

The National Park covers parts of 12 district/borough/unitary local authority areas. Where sites have been assessed prior to the SDNPA becoming the local planning authority by a different local authority, this is now superseded by the SDNPA assessment. A Strategic Housing Market Assessment has been prepared which has identified four housing market areas located partly within the National Park. It is considered appropriate to produce a single assessment for National Park area, given that the SDNPA is now the single local planning authority covering the whole of the National Park.

3.4 We have sought to include a wide range of interested parties in a number of ways during the ongoing SHLAA process, including:

- a. consultation on the draft Methodology in Autumn of 2013;
- b. inviting all interested parties to identify sites to be included in the assessment; through three formal ‘call for sites’ consultations (firstly in Autumn 2013, then in Autumn 2014, and most recently in Autumn 2015);
- c. publicity through the Local Plan newsletter;
- d. meetings and workshops were held with Town and Parish Councils to provide information on the SHLAA, invite comments on the potential sites and invite them to identify any additional sites;
- e. presentations on the assessment to neighbourhood plan groups;
- f. Consultation on the South Downs Local Plan: Preferred Options, which included consultation on the 2015 SHLAA as part of the local plan evidence base.

3.5 A Call for Sites was undertaken in Autumn 2015, which sought to update on sites already submitted, and to identify any further new sites to consider in the 2016 SHLAA.

3.6 In line with Practice Guidance, the identification and assessment of sites has not been constrained by the amount of development needed.

Excluded sites

3.7 In line with the Practice Guidance (Stage I), the assessment has identified particular types of land or areas which should be excluded from this assessment. These are listed

in Figure 2 (below). They are assessed as having nil housing potential due to their inappropriateness for housing, as national and local policy advises against development within these areas. If a larger site has any of these areas within its boundaries, then consideration has been given to whether any portion of the site is developable.

Figure 2 - Sites and Areas to be excluded from the Assessment

Designations
<p>Sites located wholly or largely within any one of the following designations:</p> <ul style="list-style-type: none"> • Ancient Woodland • Sites of Nature Conservation Interest (SNCI) • Sites of Importance for Nature Conservation (SINCs). • Sites of Special Scientific Interest (SSSI) • National Nature Reserves (NNR) • Local Nature Reserves (LNR) • Local Geological Sites (also known as Regionally Important Geological/Geomorphological Sites (RIGS) • Ramsar sites • Scheduled Ancient Monuments • Special Protection Area (SPA) • Special Area of Conservation (SAC) • Sites on the English Heritage Register of Historic Parks and Gardens
Site Location
<p>Any site, which is not considered to be previously developed land, will be excluded from the assessment if it is outside a settlement and is detached and unrelated to that settlement.*</p>
Site Size Threshold
<p>For sites not currently in the planning process a site size threshold for the study is based on an estimated yield of 5 or more net additional dwellings.</p> <p>It may not be possible to determine the estimated yield of all sites at this stage and they may be excluded on these grounds later in the assessment process.</p>

*Note definitions relating to excluded site criteria in Appendix A.

3.8 As identified under the criteria in Figure 2, a minimum yield-based threshold of 5 dwellings has been applied to the study. The consideration of whether a site has potential for 5 or more dwellings will take into account opportunities and constraints on the site, as well as the site size, for example the potential impacts on landscape character of developing the whole site, or conversely, the opportunity for higher density development in urban areas. The implication of surveying every potential housing site

identified or submitted regardless of size as part of the assessment is clearly unrealistic for two main reasons. Firstly, to survey each site would have significant resource implications for the assessment. Secondly, the forms of low-level opportunities for development are most often the sub-division of residential dwellings, infill development and conversions and these sources are extremely difficult to accurately identify and realistically predict when they will come forward for development.

3.9 However, it is expected that these smaller sites will contribute to the overall supply of housing in the National Park. The windfall allowance is justified later in this section (**Stage 3**).

3.10 Sites have been identified using a range of sources. Many of the sites have been previously identified in SHLAAs prepared by district and borough councils, prior to the designation of the National Park. These sites have been reassessed against the criteria set out in Appendix A. The types of sites and sources of supply included in this assessment are:

- Existing housing and economic development allocations and site development briefs not yet with planning permission;
- Planning permissions for housing granted on or after 1st April 2015 that are unimplemented or under construction;
- Planning applications that have been refused, withdrawn, or have lapsed;
- Known surplus public sector land;
- Sites promoted through the 'call for sites' process;
- Sites identified by Parish and Town Councils;
- Sites identified through the Neighbourhood Plan process;
- Sites subject to pre-application advice/discussions;
- Vacant and derelict land and buildings;
- Other sites identified by South Downs National Park Authority.

Stage 2 – Site Assessment

3.11 All sites which are not excluded from the assessment under the criteria outlined in Figure 2 have been the subject of a site visit by a Planning Officer. Most sites have also been assessed by a Landscape Officer, the exceptions being sites that already have

planning permission, are within a fully urban context, and/or well within a settlement boundary and of a scale that would have negligible impact on the wider context. A pro-forma for the planning site survey has been used, which is based on criteria set out in Appendix A. This information has fed into the wider assessment of the sites as outlined below.

Landscape Assessment

3.12 As a designated landscape, the South Downs National Park benefits from the highest status of protection in relation to landscape and natural beauty. The National Park Authority has two statutory purposes, as set out in the Environment Act 1995. All public bodies and utility companies, when undertaking any activity which may have an impact on the designated area, must have regard to these purposes. This is also enshrined in the NPPF paragraphs 115-116. Therefore, a fundamental part of the assessment of potential housing sites is the consideration of any potential detrimental impact on landscape.

3.13 There is also a social and economic duty upon National Park Authorities to seek to foster the economic and social well-being of the local communities within the National Park, which should be considered when delivering the two purposes.

3.14 The landscape assessment considered a number of criteria in relation to potential housing development, as set out in Appendix A – Landscape Assessment (Stage 2). It engaged robust tools to ensure a consistent and detailed approach, including the View Characterisation and Analysis study ('Viewshed Study') published in November 2015. A summary assessment of landscape sensitivity has been concluded for each site assessed, ranging from low sensitivity to high sensitivity.

Assessment of Suitability, Availability and Achievability

3.15 The NPPF requires Local Planning Authorities to identify a supply of specific 'deliverable' sites to provide five years' worth of housing and 'developable' sites to provide a supply of housing over the longer term.

3.16 To be considered **deliverable**, sites should be *available* now, offer a *suitable* location for development now, and be *achievable* with a realistic prospect that housing will be

delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

3.17 To be considered **developable**, sites should be in a *suitable* location for housing development and there should be a reasonable prospect that the site is *available* and could be viably developed at the point envisaged.

3.18 If a site is not considered to 'have potential' by being either deliverable or developable, the site will be rejected. This means that the site is not considered suitable for development following an assessment using the criteria set out in Appendix A. The assessment under each sub-stage is summarised below:

(i) Assessing suitability for housing

3.19 Factors that make a site suitable for housing are considered throughout the assessment process. This includes consideration of the following constraints and/or potential impacts:

- Landscape
- Noise
- Previous land use
- In active employment use that significantly contributes to local employment needs
- Neighbouring land uses
- Accessibility and proximity to local services
- Density and character of the surrounding area
- Flood risk
- Ground conditions/topography
- Land contamination
- Protected Trees
- Biodiversity
- Listed buildings, heritage assets and Conservation Areas
- Public Rights of Way
- Public or community open space in active use for which there is no suitable alternative

3.20 Inherent to many of these criteria is consideration of the impact on Ecosystem Services. This term is used to describe the multiple benefits provided by the natural attributes embedded across the National Park, from water supply and air quality regulation, to providing opportunities for human recreation, relaxation and well-being. The ecosystem services concept has informed the interpretation of both the landscape and wider suitability criteria in carrying out the SHLAA site assessments.

3.21 In applying the criteria, consideration has also been given to whether the site is related to a settlement with a boundary, as defined in draft Policy SD22 in the Local Plan Preferred Options. The text supporting the draft policy states that settlements not included in the policy (i.e. those with a more scattered or diffuse form) will be treated as open countryside for the purposes of Policy SD22. Therefore development in areas defined as having an open countryside character, or at settlements with few or no local services, are unlikely to fare well against the assessment criteria. Whilst this does not rule out consideration of sites in such settlements, which may in turn help to refine Policy SD22, the presumption has been that these are less likely to be suitable for development.

(ii) Assessing availability for housing

3.22 The following has been taken into account when assessing the availability of the site for housing:

- Ownership and/or control of the land
- Intention to develop
- Potential legal constraints
- Planning status and planning history
- In active employment use

3.23 A site has generally been judged as available if it has been promoted as a potential development site within a reasonable timeframe, and there is no subsequent evidence that circumstances have changed. Some sites may not be available within the first 5 years, in which case they will be considered ‘developable’ but not ‘deliverable’.

(iii) Assessing achievability for housing

3.24 The following has been taken into account when assessing the achievability of the site for housing:

- Economic viability
- Potential marketability of the site
- Impact on the Strategic Road Network
- Access to the site
- Highways issues
- Exceptional costs and/or site preparation costs
- Third party land required

3.25 A site has generally been judged as achievable if there are no immitigable physical or legal barriers to development. The Community Infrastructure Levy (CIL) & Affordable Housing Viability Assessment was published in January 2014, and showed that there are no major viability-related barriers to delivering housing sites in the National Park. A Whole Plan Viability Assessment will be prepared in 2017 as part of the Local Plan evidence base, prior to the Plan publication. This will further test the ability of a range of development types throughout the National Park to viably meet emerging Local Plan and adopted CIL requirements.

(iv) Overcoming Constraints

3.26 There may be the option to overcome certain constraints to development through mitigation. This has been considered alongside the survey and assessment of the site and based on the conclusions of the wider Stage 2 assessment.

Stage 3 – Windfall Sites

3.27 Windfall sites are sites that have not been allocated for housing in a Local Plan and are not identified in a SHLAA. They normally comprise previously-developed sites that have unexpectedly become available, however, they may also include greenfield sites which have not previously been identified or allocated. Paragraph 48 of the NPPF states that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends, and should not include residential gardens.

3.28 A review of past planning permission implementation (using dwelling completion records) has provided strong evidence that there has been consistent delivery on

windfall sites as a proportion of total dwellings built. **Figure 3** sets out the number of dwellings built on windfall sites in the past 10 years. However, it is appropriate to treat this trend-based figure with some caution, having regard to the designation of the National Park. Therefore a discount has been applied to the trend-based average in the later part of the 15 year projection period.

Figure 3: Dwellings in South Downs National Park counted as windfall

	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	Average
Net completions on sites with a net dwelling gain of 1-4	77	94	98	67	55	65	46	41	75	68	68.6

3.29 The site size threshold for this study is 5 or more dwellings. Therefore, a windfall allowance will be included in the supply trajectory to take into account the expected supply of dwellings on sites of 1-4 dwellings. A windfall allowance based on sites of 5 or above (the threshold for this study), will not be included as the significant majority of these sites will be identified through the SHLAA or future SHLAA updates and/or allocated in the Local Plan. This will ensure that there is no risk of double counting.

3.30 The calculation of an appropriate windfall allowance has been determined using over 10 years of planning permission implementation rates across the National Park. The following methodology has been applied to these trend-based figures:

- Only including dwellings built on sites delivering 1-4 net additional homes;
- Not including development on residential gardens, in line with Practice Guidance;
- Not including development on allocated sites or rural exceptions sites.

3.31 Figure 3 shows that there has been an average 68.6 dwellings per annum built in the National Park that can be counted as windfalls for the purposes of this study. The following discounts as shown in **Figure 4** will apply with regards housing supply, with reasons given below:

Figure 4: Windfall allowance discounts

Years 1 to 3	100% discount	Reflects that all of these should already have been counted in the supply under extant permissions
Year 4	75% discount	Reflects that most of these will have already been counted under extant permissions
Year 5	50% discount	Reflects that around half of these will have already been counted under extant permissions
Year 6 onwards	25% discount	To take into account the more restrictive planning framework that overall applies since SDNPA became the local planning authority in 2011

3.32 The windfall allowance is therefore calculated as:

- Years 1 to 3 (2015/16 to 2017/18) - 0 per annum
- Year 4 (2018/19) - 17
- Year 5 (2019/20) - 34
- Years 6 to 15 (2020/21 to 2021/22) - 51 per annum

3.33 Hence the total windfall allowance for the 15 year period is 561. Whilst this may be considered to be a conservative estimate, it nevertheless represents around 19% additional supply over and above that which is theoretically deliverable on suitable sites. It is important to bear in mind the advice contained in the National Parks Vision and Circular which recognises that National Parks are not suitable locations for unrestricted housing. Furthermore, the emerging Local Plan is reviewing Settlement Policy Boundaries and, whilst this work is not yet complete, its outcome will reflect the Settlement Boundary Review Methodology which generally applies a tight settlement boundary, in order to protect the landscape qualities of the National Park. The windfall allowance has been included in the housing supply trajectory which is reported in the AMR 2016.

Stage 4a – Supply

3.34 Once the sites have been assessed, the development potential of all sites is set out as an indicative theoretical supply. This sets out the maximum housing potential of the sites in five year tranches over a 15 year period.

3.35 However, there is ample evidence to demonstrate that in the case of the South Downs National Park, it is not appropriate to seek to meet the full objectively assessed need for housing.⁵ Therefore the theoretical supply indicated in the SHLAA does not translate to an actual housing delivery trajectory that would be supported by the emerging spatial strategy, given wider strategic landscape and other constraints. This reflects that the SHLAA does not in itself allocate sites, and that only sites allocated for housing development, together with windfall supply and extant permissions, are expected in reality to come forward.

3.36 The actual housing supply trajectory is contained in the Authority Monitoring Report 2016 that is being published alongside the SHLAA.

Stage 4b – Review

3.37 The amount of supply will need to be reviewed alongside progress of the Local Plan, which will determine the housing requirement for the National Park as informed by the findings of the SHLAA and the Strategic Housing Market Assessment (SHMA). This process, and the outcome, will be reported in a Housing Background Paper to be published in 2017 as part of the evidence base supporting the Pre-Submission version of the Local Plan. In summary, the SHMA 2015 evidenced a need across the National Park for provision of 294 affordable dwellings per annum, and an overall need for 416 to 454 homes per year. Over the whole Local Plan period of 18 years, this would equate to an increase of 7,488 to 8,172 dwellings overall.

⁵ For example, paragraph 115 of the NPPF states that “great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.” Paragraph 78 of the UK Government Vision and Circular for the English National Parks and the Broads (DEFRA, 2010) states “The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.”

3.38 Practice Guidance also indicates that the Authority should also assess need for, and supply of, land supply for economic development. An objective of the National Park is to support thriving and sustainable communities, and to do this it is important to provide some scope for local businesses to modernise and expand. Rather than seeking to deliver strategic economic growth, it is more appropriate for the Authority to seek to foster socio-economic wellbeing of the local communities in line with the Environment Act 1995.

3.39 The Authority has prepared an Employment Land Review (ELR), which has been updated with respect to specific sites identified.⁶ These are published alongside this SHLAA. They conclude a need to safeguard most existing employment sites to ensure that the National Park socio-economic Duty is upheld. However a small number of sites have been concluded as being no longer fit-for-purpose, and therefore more suited to alternative uses. These have, where appropriate, been assessed in the SHLAA as 'Has Potential' for housing or mixed-use development to reflect the findings of the ELR and Update.

Stage 5 - Evidence

3.40 **Figure 5** shows the set of standard outputs that have been produced from the SHLAA:

⁶South Downs National Park Employment Land Review 2015 and Site Focused Update 2016

Figure 5: SHLAA Outputs

	Output	Location
a	A list of all sites considered, cross referenced to their locations on maps	Appendix B – Settlement maps and index Appendix C – Summary site assessments by settlement
b	A detailed assessment of each site which is considered to have potential for housing, including when development is expected to come forward	Appendix D – Proformas for sites with potential by settlement
c	A list of Excluded sites which have not been subject to detailed assessment with reasons to explain why	Appendix B – Settlement maps and index Appendix C – Summary site assessments by settlement
d	The quantity of development that could be delivered on each location, including a reasonable estimate of build out rates	Appendix C – Summary site assessments by settlement
e	An indicative trajectory of anticipated development and consideration of associated risks	Authority Monitoring Report December 2016

4.0 Conclusions

The Indicative Housing Trajectory is reported in the Authority Monitoring Report December 2016

4.1 This SHLAA provides evidence that a comprehensive assessment of potential sites for housing development has been undertaken. In total, 541 sites have been included in the study. The assessment has concluded the following:

- 189 sites were excluded from the assessment at Stage 1 and have therefore not been assessed in detail;
- 108 sites were found to have potential for housing development (i.e. found to be suitable, available and achievable);
- 244 sites were rejected as being unsuitable, unavailable or unachievable (or a combination of these).

Theoretical capacity from sites

4.2 The 108 sites found to have potential have a theoretical capacity to provide the housing numbers shown in **Figure 6** below, when considered by district, borough and city council administrative area.⁷ In effect, this represents the 'pool' of potential known land supply from which actual land supply provided by site allocations will be taken.

4.3 It should be noted that these figures do not include extant permissions that were granted before 1st April 2015. These are counted separately as commitments, and are included in the housing trajectory in the AMR. A total net increase of 401 new dwellings were granted permission in the National Park between 1st April 2014 and 31st March 2015.

⁷ Note that no sites were submitted to the SHLAA in Worthing Borough within the National Park

Figure 6: Total theoretical housing capacity from SHLAA sites by district area

	Yrs 0-5	Yrs 6-10	Yrs 11-15	Total
Adur	15	0	0	15
Arun	37	0	0	37
Brighton & Hove	0	0	0	0
Chichester	518	250	0	768
East Hampshire	573	334	49	956
Eastbourne	0	0	0	0
Horsham	14	20	0	34
Lewes	600	290	0	890
Mid Sussex	22	0	0	22
Wealden	17	6	0	23
Winchester	140	17	0	157
Total	1936	917	49	2902

Estimated windfall supply

4.4 The trend-based annual windfall allowance has been calculated as 51 dwellings per annum from years 6 to 15, i.e. from 2020/21 to 2029/30, after a 25% discount from the annual average has been applied. The allowance is lower (or zero) for the first 5 years to avoid double counting of permissions on small sites. The total allowance for windfall supply over the 15 year period is 561.

Indicative housing trajectory and

4.5 The SHLAA specifically considers sites with potential for development. This is particularly important for providing evidence to support the development of the South Downs Local Plan. However this evidence has the significant limitation of focusing on each site in isolation, and not taking account the *wider context* of the National Park, in particular the landscape, special qualities of the Park, and statutory Purposes. It will also not include some sites being taken forward for allocation in neighbourhood plans or may have different capacities estimated (given that neighbourhood plans are subject to separate processes). The actual *supply* of housing going forward will be based on the Local Plan strategy of a medium level of housing growth dispersed across the National Park.

4.6 The Annual Monitoring Report (AMR) 2016 reports the *indicative housing trajectory*, from sources expected to translate directly into housing supply, based on the emerging Local Plan allocations and spatial strategy. In summary the AMR shows an **expected supply of 4,699 homes over the Local Plan period** (currently 1st April 2014 – 31st March 2032). The sources of supply are shown in **Figure 7**. This is a different calculation from the theoretical housing capacity from SHLAA sites shown in Figure 4, as the SHLAA does not include all extant permissions, and does not apply the draft spatial strategy.

Figure 7: Elements of housing delivery in the South Downs National Park

	Element of Delivery	Dwellings
a	Local Plan and Neighbourhood Plan confirmed allocations, draft allocations and draft requirements	2,529
b	Implementation of planning permissions (non-implementation discount applied)	996
c	Windfall allowance	663
d	Completions in monitoring years 2014/15 and 2015/16	511
	Total	4,699

Assessment of development needs and relating this to the SHLAA

4.7 The Authority has assessed the need for housing and economic development in the National Park, and balanced these needs against conserving and enhancing the Purposes and Special Qualities of the National Park. The Objectively Assessed Need (OAN) for Housing is 416 to 454 homes per annum, equating to a net increase of 7,488 to 8,172 dwellings over the whole Plan period. As explained in the introduction to this SHLAA, it is not considered appropriate to fully meet the full OAN given the Authority's National Park status, as to do so would be to the detriment of the Special Qualities of the National Park and conflict with the National Park purposes.

4.8 The SHLAA assesses the potential for individual sites to provide housing. It demonstrates that there is good potential supply of housing, particularly in the earlier part of the 15 year assessment period. However in relating this to the OAN, it does not translate to a supply trajectory or 5 year housing supply given other constraint factors, in particular the landscape. A housing trajectory based on anticipated Local Plan allocations is given in the AMR 2016 (and subsequent updates). Further explanation of the emerging development strategy will be provided in the South Downs Local Plan and supporting background papers.