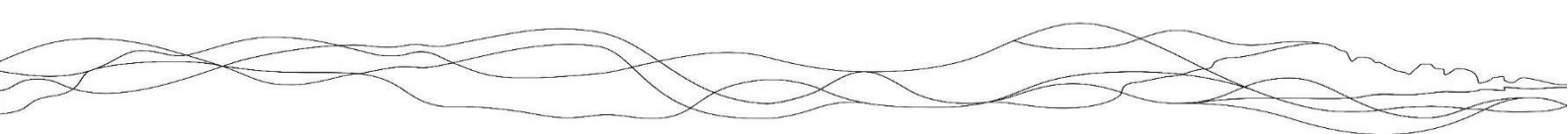


Supply of Homes Background Paper South Downs Local Plan

**September 2017
UPDATED April 2018**



I. INTRODUCTION

Policies covered:

- Policy SD26: Supply of Homes

1.1 This paper outlines the basis upon which Policy SD26: Supply of Homes of the Pre-submission Local Plan was developed and then refined. It draws together a number of influences on the amount and distribution of homes to be provided in the National Park. Relevant national policy is summarised, which focuses on boosting the delivery of new homes, whilst recognising that certain areas (including national parks) are not expected to deliver unrestricted housing growth. The policy is also put in the context of wider market indicators of housing need.

2. NATIONAL PARK PURPOSES & DUTY AND SPECIAL QUALITIES

2.1 Policy SD26 relates primarily to the socio-economic duty of national parks, which is to seek to foster the economic and social well-being of the local communities within the National Park. The duty is articulated in the English National Parks Vision & Circular (DEFRA, 2010)¹ as set out below. The delivery of the right types of housing to meet local needs is a key part of meeting the socio-economic duty.

2.2 The policy is most closely related to Special Quality 7: Distinctive towns and villages, and communities with real pride in their area. The South Downs Partnership Management Plan (PMP) explains the importance of encouraging communities to become more sustainable, where residents have access to the housing, jobs, facilities and services they need locally, and to make them less reliant on private transport or lengthy journeys on public transport. The PMP also seeks the creation of more balanced communities, recognising the particular challenge of higher-than-average house prices for those on low incomes and for young people and young families. Policies SD48, SD49 and SD50 in the PMP specifically support an appropriate level of growth in towns and villages to meet local need, and support their functions as social and economic hubs.

3. NATIONAL POLICY AND GUIDANCE

3.1 The National Planning Policy Framework (the NPPF)² sets a strategy to significantly boost housing. For the most part, this is focused on meeting the objectively assessed housing needs for the area. However it also makes very clear that where specific policies in it indicate development should be restricted, then this requirement to meet the full need does not apply (footnote 9 to paragraph 14, which specifies that national parks are one such area).

¹ English National Parks and the Broads: UK government vision and circular 2010 (Defra, 2010)

² National Planning Policy Framework (CLG, 2012)

3.2 The NPPF expects local authorities to deliver a wide choice of high quality homes. The NPPF states that to boost significantly the supply of housing, local planning authorities should ensure that the full, objectively assessed need for market and affordable housing is met in the housing market area, as far as is consistent with the policies set out in the Framework. It should identify a rolling ‘5 year housing land supply’ (5YHLS) with an additional buffer of 5% to ensure choice and competition in the market. Further land should be identified to meet needs beyond the initial 5 year period. They should also plan for a mix of housing based on current and future demographic trends, market trends, and the needs of different groups in the community, and set policies for meeting affordable housing needs which should generally be on-site. In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing to reflect local needs, particularly for affordable housing.

3.3 In terms of plan-making, the NPPF expects local planning authorities to prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. They should also prepare a Strategic Housing Land Availability Assessment (SHLAA) 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. The NPPF also expects that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the Framework.

3.4 A priority outcome of the Vision and Circular is to ‘foster and maintain vibrant, healthy and productive living and working communities’. Paragraph 76 recognises the critical link that housing provision has to this objective, and in particular affordable housing. The document recognises that the desirability of national parks as a place to live has consistently driven up house prices, whilst wages have remained relatively low. The lack of housing opportunities can affect the social and economic diversity of rural communities, undermine social support networks and the viability of rural businesses. Paragraph 77 states that through their local development frameworks, planning authorities should include policies that pro-actively respond to local housing needs. However a key message is set out as follows in the Vision and Circular (paragraph 78):

“The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services.”

3.5 It should also be noted that the recent Housing White Paper – Fixing our Broken Housing Market (CLG, Feb 2017), whilst recognising the importance of housing provision in rural areas, nevertheless proposes to strengthen the presumption against unrestricted housing. Paragraph A38 of the document says:

“The Government proposes to clarify which national policies it regards as providing a strong reason to restrict development when preparing plans... it is proposed that these are limited to the policies currently at footnote 9 of the NPPF, with the addition of Ancient Woodland and aged or veteran trees; and that these are no longer set as ‘examples’ but as a clear list.”

- 3.6** In summary, national policy points to the need for national parks to ensure that the amount and type of housing development is sufficient to ensure communities and businesses within their areas are sustained and continue to rejuvenate through the generations, whilst limiting housing development to ensure that their environmental and landscape integrity are maintained and enhanced. There is a clear focus on prioritising affordable housing to meet identified local needs.
- 3.7** The Government has also published Planning Practice Guidance (PPG) to support the NPPF and wider policy objectives. A key consideration has been the approach advised in PPG to thresholds at which affordable housing should be sought (Reference ID: 23b-031-20161116). This advice has to be read in the context of the legal judgement handed down in May 2016 (*Reading & West Berkshire Councils v SSCLG*)³. SDNPA has nevertheless been mindful that in seeking to maximise the amount of affordable housing, in line with its statutory Duty, it is important to seek all opportunities for delivering sites large enough to guarantee a contribution to affordable housing, and especially to achieve this on-site.

4. LOCAL CONTEXT AND EVIDENCE

- 4.1** The starting point for developing the approach to housing supply is the Spatial Strategy for a medium level of development dispersed across the towns and villages of the National Park, as set out in Section 3 of the Local Plan, and the Development Strategy. The development of Policy SD25: Development Strategy is summarised in Background Paper: Development Strategy, which outlines key evidence relating to the development strategy for the South Downs, and which should be read alongside this paper.
- 4.2** However there are specific elements of the evidence base that have directly informed the quantity and precise distribution of housing. These are outlined below. Note that many of these source documents are very detailed, therefore the below summaries are necessarily high-level, and should not be interpreted as the ‘complete picture’.

Housing completions monitoring

- 4.3** Housing completions monitoring data has been analysed over a 13 year period, which is a useful indicator of patterns of growth in the National Park. Figure 1 sets out these figures. There has been an average of 264 net dwellings per annum built. It should be noted that this includes the period of recession that occurred from 2008, and also that most of these figures arise from development approved prior to the creation of the South Downs National Park.

³ *Reading Borough Council and West Berkshire District Council v Secretary of State for Communities and Local Government* [2016] EWCA Civ 441 (Case no. C1/2015/2559)

FIGURE I: NET NEW DWELLINGS IN THE SOUTH DOWNS NATIONAL PARK

| Monitoring year | Net new dwellings |
|------------------------|--------------------------|
| 2004/05 | 420 |
| 2005/06 | 339 |
| 2006/07 | 232 |
| 2007/08 | 428 |
| 2008/09 | 433 |
| 2009/10 | 162 |
| 2010/11 | 169 |
| 2011/12 | 211 |
| 2012/13 | 144 |
| 2013/14 | 132 |
| 2014/15 | 249 |
| 2015/16 | 262 |
| 2016/17 | 250 |

Source: SDNPA monitoring data

South Downs Strategic Housing Market Assessment (SHMA) (GL Hearne, 2015)⁴

- 4.4** The SHMA 2015 was commissioned in recognition that the NPPF requires an assessment of full ‘objectively assessed housing need’ (OAHN) forecast for the whole local plan period to inform the plan-making process. In keeping with Government guidance and good practice, the SHMA also assessed the full need for affordable housing (i.e. housing made available at sub-market values to cater for all households who cannot afford to pay full market purchase prices or rents to meet their housing needs). To further inform policy, the SHMA brief also included an analysis of specialist housing needs (in particular to cater for older people’s needs), and the mix of dwelling sizes needed to accommodate the expected range of household sizes.
- 4.5** It was deemed appropriate to undertake this for the same geographical area for which the Local Plan was being prepared. However a particular challenge existed, insofar as the South Downs National Park incorporates parts of four Housing Market Areas (HMAs). These are shown in the summary analysis under ‘HEDNA’ below.
- 4.6** The outcomes from the SHMA 2015 demonstrated that the demographically-derived housing needs for all parts of the National Park far outstripped both historic housing supply, and anticipated future supply, when considered against the landscape and environmental constraints that are an inherent part of a national park. The annual need figure for all types of housing was

⁴ Strategic Housing Market Assessment – South Downs National Park Authority (GL Hearne, 2015)

found to be **416-454 dwellings per annum**, whilst the affordable housing need was found to be **294 dwellings per annum**. These were broken down by HMA and individual district.

Housing and Economic Development Needs Assessment (HEDNA) (GL Hearne, 2017)⁵

- 4.7** The National Park Authority commissioned the HEDNA in 2017, in recognition that the nationally determined demographic baseline data had been updated in 2016. A HEDNA was therefore required to ensure an up-to-date and robust evidence base in relation to the objectively assessed housing need (OAHN), affordable housing need, the needs of specific groups such as the elderly, and the future need in relation to dwelling sizes. The HEDNA also updated employment land supply evidence.
- 4.8** Given improvements in the baseline data, the HEDNA was able to provide a precise assessment of OAHN based on the 10-year trend in household growth. The demographic trend-based approach was considered appropriate in the context of a National Park, as it most accurately reflects previous rates of household growth, and reflects that significant levels of affordable housing would not be deliverable without significant market housing. The housing need for the National Park was therefore concluded as **447 dwellings per annum** over the period covered by the Local Plan.
- 4.9** The HEDNA also updated the affordable housing need, based on the Affordable Needs Assessment Model set out in PPG. This concluded a need for **293 dwellings per annum** over the Plan period- almost identical to the need concluded by the SHMA 2015. It also confirmed the previous recommendation that affordable housing should be sought on roughly a 75%:25% tenure split in favour of affordable rented housing. In terms of older people's housing, it was concluded that there would be a need for 90 per annum of specialist older people's housing units.
- 4.10** Recommendations were also made on the proportion of dwellings of particular sizes (in terms of number of bedrooms) for both affordable and open market housing. These were only slightly different to the previous recommendations of the SHMA, and pointed to the same policy conclusions.

⁵ South Downs National Park HEDNA – South Downs National Park Authority (GL Hearne, 2017)

Joint Core Strategies and Petersfield Neighbourhood Plan

4.11 Joint Core Strategies (JCSs) have been prepared for Winchester, East Hampshire, Lewes and Wealden. Whilst these were still emerging at the time preparation began on the South Downs Local Plan, they were advanced enough to provide some quite detailed evidence on the level of growth considered appropriate for settlements within those areas. In particular, they set a solid baseline figure for an appropriate level of housing provision for certain settlements within the National Park. The JCSs set the following settlement-specific net housing requirements for these larger towns, excluding existing commitments:

East Hampshire JCS (Plan period: 2011-28):

- Petersfield – 700 homes
- Liss – 150 homes

Lewes JCS (Plan period: 2010-30)

- Lewes – 875 homes
- Ditchling – 15 homes

Wealden JCS (Plan period: 2006-27)

- East Dean – 10 homes
- Alfriston – 6 homes

4.12 In addition to development at Petersfield, the East Hampshire JCS set a minimum housing provision of 100 net additional homes to be delivered over the plan period through allocating sites at villages in the National Park within East Hampshire. Appendix 2 of the JCS (the housing land supply table and trajectory as of 2013) anticipated that 1,727 homes in total would be delivered within the National Park in East Hampshire over the 17-year plan period – a figure that consists of the 100 additional homes to be delivered through new site allocations in the smaller villages, plus the new allocations in Petersfield, Liss, and all completions, commitments and windfalls. This equates to approximately 100 dwellings per annum in the East Hampshire part of the National Park.

4.13 The Petersfield Neighbourhood Plan was made in January 2016. The Plan set a housing requirement for a minimum of 700 new dwellings, in line with the East Hampshire JCS. However site allocations were made to provide for 805 dwellings in total, effectively increasing the provision by some 100 homes over the Plan period.

4.14 The Winchester JCS did not apportion any of its housing supply to the National Park, and instead directed all development to areas outside the National Park boundary.

Strategic Housing Land Availability Assessment 2015 (SHLAA 2015) (SDNPA, 2015)⁶

4.15 The SHLAA was undertaken to provide evidence as to the development potential of sites identified across the National Park. The SHLAA included all sites previously considered by district-specific SHLAAs, and sourced further prospective sites through the undertaking of two formal 'call for sites' exercises (in Autumn 2013 and again in Autumn 2014). Over 400 sites were considered, and the potential for some 2,344 homes identified. An important part of the

⁶ South Downs National Park Strategic Housing Land Availability Assessment (SDNPA, 2015)

study was an assessment of landscape sensitivity, which was undertaken by a qualified landscape officer.

- 4.16** The SHLAA 2015 identified suitable, available and achievable sites in a number of settlements across the National Park. This allowed sites to be put forward as allocated housing sites in the Preferred Options version of the Local Plan, which for some settlements provided an appropriate number of new homes to approximately meet the scale of development deemed appropriate for its size and setting, and for the services available. However for many other settlements, the sites identified still fell short of the level of development needed to properly address the National Park's socio-economic duty.

Settlement Facilities Assessment (SDNPA, 2015)

- 4.17** The Settlement Facilities Assessment is outlined in the Development Strategy Background Paper. It is important to note that this study is not definitive in respect of arriving at housing provision numbers for individual settlements. However it provides a strong indication of the socio-economic sustainability of settlements with regard to provision of services, and proportionate impact of new housing development on existing community infrastructure.
- 4.18** Overall, the Study showed that the existing larger towns and villages of Lewes, Petersfield, Midhurst, Petworth and Liss scored highly for provision of facilities and services. The numerous smaller villages across the National Park showed significant variation. However, it was noted that some small settlements in close proximity to a town or large village achieved a greater score as the services in the larger settlement were readily accessible to those in the smaller one.

Preferred Options Sustainability Appraisal (SA) (Aecom, 2015)⁷

- 4.19** The SA published alongside the Preferred Options tested different housing growth scenarios that emerged from the Strategic Housing Market Assessment (SHMA) 2015 and from current land supply availability as set out in the SHLAA 2015, based on specific quanta of housing. Spatial Options 4 and 5 assumed a medium level of growth dispersed across the National Park. The overall amount of net additional housing for both these options was set at 2,578 new homes delivered as a result of draft site allocations, plus unimplemented planning permissions and a windfall allowance. These options performed better than Options 1, 2 and 3 (which were either/both a concentrated strategy and/or a higher quantum of development), as the effects on sensitive environmental receptors (such as landscape, biodiversity, tranquillity and cultural heritage) would be less.
- 4.20** As part of this process, a hypothetical breakdown was provided by settlement. The 'dispersed medium' strategy (Option 4) carried through settlement-specific levels of development from JCSs (for example for Lewes and Petersfield). For other settlements, figures were as advised as broadly appropriate for those settlements based on either the SHLAA, or professional judgement drawing from the emerging analysis of settlement facilities that was finally published as the Settlement Facilities Study and local knowledge, and having regard to the emerging development strategy (see Development Strategy background paper). This breakdown is presented in the Preferred Options SA as Table 7.5, and is summarised in Appendix I.

⁷ Sustainability Appraisal (SA) of the South Downs Local Plan: SA report to accompany the Local Plan Preferred Options (Aecom, 2015)

Strategic Housing Land Availability Assessment (SHLAA) 2016⁸

- 4.21** Following a new call for sites in late 2015, the SHLAA was updated in 2016 to reassess the new sites as well as re-assess all previously submitted sites. It was informed by a further ‘call for sites’. This was essentially an update to refresh the evidence base, ensuring that final recommendations on the housing site allocations were based on an up-to-date evidence. A critical part of this exercise (as with the previous SHLAA) was a site-specific assessment of landscape sensitivity conducted by the Authority’s Landscape Officer. In carrying this out, the Landscape Officer drew on resources such as the South Downs Integrated Landscape Character Assessment (LUC, 2005/2011) and the South Downs National Park: View Characterisation and Analysis (LUC, 2015).
- 4.22** The SHLAA 2016 identified potential for 2,902 homes across the National Park. This included the identification of many new potential sites (that are suitable, available and achievable), including in most of the settlements identified in the Preferred Options Policy SD23: Housing Supply that were considered to have capacity to accommodate housing growth.

5. OBJECTIVELY ASSESSED HOUSING NEED VERSUS SUPPLY

- 5.1** As set out above, there is no expectation that a national park authority will meet its full OAHN or indeed other strategic development needs. The legally-enshrined ‘duty’ requires that the Authority seeks to foster the economic and social well-being of the **local** communities within the National Park, which sets the context for the approach outlined in section 6 of this paper below. However the ‘duty’ is pursuant to the ‘purposes’ of the National Park, in particular the statutory purpose of conserving and enhancing. Furthermore, the OAHN goes beyond consideration of individual communities’ socio-economic needs, in factoring in the following:
- Past population trends, and (linked to this),
 - Projection of growth in new households (which includes in-migration).
- 5.2** The OAHN set out in the HEDNA is therefore a high-level, ‘top-down’ estimate of future housing needs, which does not take account of development constraints nor the specific National Park ‘duty’.
- 5.3** It is important to note that the projections of household growth reported in the HEDNA are based on the sum of population projections, translated to households and dwellings, for each constituent local authority area. The National Park boundary does not neatly correspond with geographical ‘output’ areas. Calculations have therefore been influenced by a number of villages and built developments outside the National Park. Furthermore, as 10-year past trends (2006-2016) have been used to project future trends, the estimates have also been influenced by patterns of growth before the National Park was designated.
- 5.4** The OAHN has been calculated as 447 dwellings per annum (dpa). This is a demographic-led estimate, based on a 10-year past population growth trend (2006-2016). It represents overall growth in the population of the National Park of 11.1%, which is entirely made up of in-

⁸ South Downs National Park Strategic Housing Land Availability Assessment (SDNPA, 2016)

migration. Separately, and more importantly in the context of the duty, the HEDNA estimates a need for the net addition of 293 affordable homes per annum, which is primarily based on existing and newly-forming households in need of affordable housing, taking account of average incomes.

- 5.5** It should be noted that the HEDNA also considered an alternative approach of calculation an ‘economic-led’ growth forecast. This analysis suggested a need for between 541 and 620 dpa based on job growth forecasts. However given that significant economic growth (beyond promoting local job opportunities) is not a driver for fulfilling the National Park’s purposes and duty, a demographic-led approach is considered preferable to an economic-led approach.
- 5.6** Figure 2 below shows the difference between annualised housing need, and housing supply provided for by the development plan (both in terms of the housing provision figure, and the actual sources of supply). It is evidence that a significant shortfall exists. Nevertheless, the Local Plan will provide over 50% of the OAHN which, for a national park in an area of significant development pressure and associated high housing needs, is a substantial contribution to wider housing needs. It is possible that, on current evidence of future sources of supply, the number of homes delivered may be higher still than the SDLP housing provision figure.

FIGURE 2: OBJECTIVELY ASSESSED HOUSING NEED COMPARED WITH SUPPLY

| | Annualised average | Total over Plan period (19 yrs) |
|---|---------------------------|--|
| Objectively assessed housing need (South Downs National Park) | 447 | 8,493 |
| Housing provision – Policy SD26: Supply of Homes | 250 | 4,750 |
| <i>Shortfall against OAHN</i> | <i>197</i> | <i>3,743</i> |
| Future housing supply (SDLP housing trajectory) ⁹ | - | 4,998 |
| <i>Shortfall against OAHN</i> | <i>-</i> | <i>3,495</i> |

Source: HEDNA 2017, South Downs Local Plan (submission version); SDLP housing trajectory

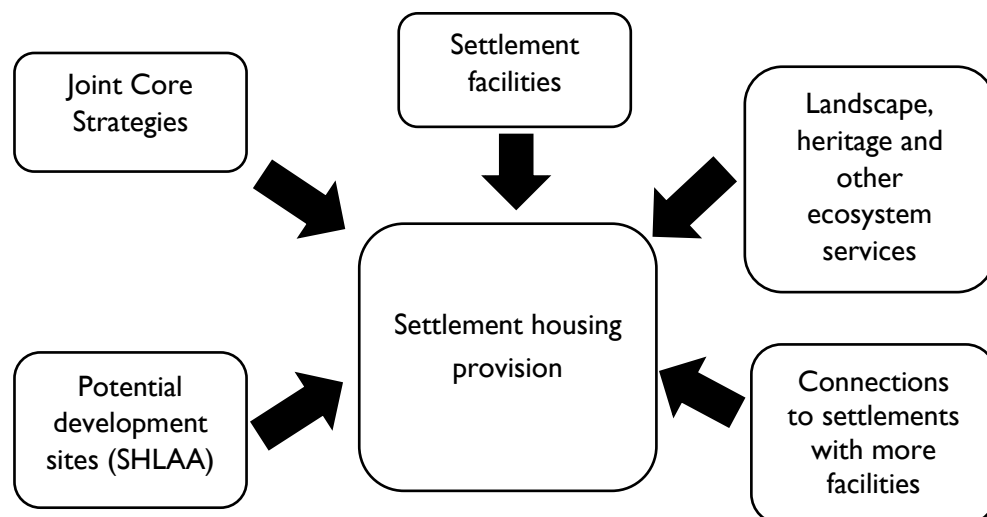
6. ROUTE MAP FOR POLICY FORMULATION

- 6.1** In considering the case for a defined housing supply figure for the local plan, it was first important to recognise the overriding influence of the National Park statutory purposes and duty. As stated in the National Parks Vision and Circular, this means that national parks are not suitable locations for unrestricted housing, and Government policy does not therefore provide general housing targets for them. Nevertheless, to ensure the socio-economic duty is met, it was decided that a housing provision figure was appropriate given the context and history of the South Downs National Park as a living, evolving entity with significant housing needs.

⁹ See the Housing Update Background Paper (April 2018) for information on the housing trajectory

- 6.2** It was therefore recognised at an early stage that a **capacity-based provision**, within a landscape-led and constraint-based approach, was appropriate. Whilst a significant OAHN had been identified in the SHMA (and confirmed in the HEDNA), both documents clearly state that **the emphasis in NPPF on meeting the full objectively assessed need does not apply in national parks where it can be shown that this conflicts with the statutory purpose of conserving and enhancing.**
- 6.3** Hence there were two main influences on the way in which an overall housing target was derived. Essentially, the overall supply figure is derived from a ‘bottom-up’ approach, reflecting careful analysis of supply anticipated from individual sites and settlements. The figure also incorporated the levels of growth already planned within the National Park in the joint core strategies. However the figure was also sense-checked against the historical year-on-year amount of housing development within the National Park (as shown in Figure 1).
- 6.4** At an early stage of plan preparation, it was decided that setting settlement-specific housing provision figures in accordance with the development strategy would provide certainty to local communities, and set a positive framework for neighbourhood planning, where relevant. It is noted that the recent publication of a Government consultation on reviewing national policy and guidance specifically recognises the value of this approach, where this is needed to allow progress to be made with neighbourhood planning¹⁰. The process of arriving at settlement specific housing provision numbers is summarised in Figure 3.

FIGURE 3: KEY CONSIDERATIONS FOR DETERMINING SETTLEMENT HOUSING PROVISIONS



- 6.5** An initial set of numbers was arrived at in Policy SD23 in the Preferred Options version of the Local Plan, using the above methodology. Some of these are shown as ‘asterisked settlements’, indicating that whilst the overall level of development was considered appropriate for that

¹⁰ Planning for the right homes in the right places: consultation proposals (CLG, Sep 2017) (see paragraph 96)

settlement, there was not yet sufficient evidence of sites being available to deliver on the provisional figure. The non-asterisked settlements were either based on draft allocations recommended in the Preferred Options (Section 9), or on draft allocations or policies contained in neighbourhood plans. Since that time, the SHLAA 2016 has identified further sites with potential for housing development, which has allowed the numbers to be refined and finalised.

- 6.6** It is important to note that the process of arriving at settlement specific numbers has been an iterative process. That is to say, the final list of site allocations has sought to broadly meet the numbers that were set out in the Preferred Options Policy SD23. However in a number of cases, the site or sites selected for allocation have led to a different number in Pre-Submission Policy SD26 to the one presented in the Preferred Options, reflecting the sites' approximate capacities. For some settlements, it was evident that maintaining the original Preferred Options exact number would have resulted either in good housing sites being artificially excluded from the allocations, or the capacity or boundary of the site(s) identified being artificially reduced. Neither of these outcomes would have reflected the 'positive planning' approach advocated in the NPPF.
- 6.7** The result has in some cases been that in simplistic percentage terms, there has been a significant increase or decrease for a single settlement compared with the Preferred Options figure. However this reflects that one is dealing with relatively small numbers, and does not represent a departure from the spatial strategy. It further reflects an evidence-led approach which is responsive to changing circumstances over the period of Local Plan preparation.
- 6.8** Whilst prospective allocation sites were found to provide an appropriate level of housing for the majority of 'asterisked' settlements, it became evident that there were no suitable sites that could be identified for others. These settlements were therefore, regrettably, removed from Policy SD26. The removed settlements are Chawton, Compton, Hambledon, Northcapel and Rodmell.
- 6.9** Appendix 2 provides brief commentaries on the rationale behind arriving at the final settlement housing provision figures.
- 6.10** The outcome of the allocation of housing sites in the Local Plan, combined with neighbourhood plans, existing 'commitments' (i.e. extant planning permissions where an allocation is not deemed necessary), windfall housing supply and housing completions in the first two years of the Plan period, was shown in Figure 7.3 in the Pre-submission Local Plan. However as of December 2017 when the new AMR, including data for the 2016/17 period, was published, this became out-of-date. Given that the figures in this table will change annually, it was decided to delete this table from the Submission Local Plan, and instead publish an annual update in the AMR or a supplementary paper. The current position is shown in Figure 4 below.

FIGURE 4: KEY CONSIDERATIONS FOR DETERMINING SETTLEMENT HOUSING PROVISIONS

| | Element of Delivery | Dwellings |
|----------|--|------------------|
| a | Allocations in the Development Plan, including those to come forward in NDPs and on strategic sites | 2,676 |
| b | Implementation of extant planning permissions on sites that have not been proposed for allocation*, or completed *Sites of 5 homes or more that were granted planning permission on or after 1 April 2015 have generally been allocated | 898 |
| c | Anticipated windfall development | 663 |
| d | Completions in the first 3 years of the Plan period (2014/15 to 2016/17) | 761 |
| | Total | 4,998 |

6.11 The total anticipated supply figure from all these sources over the Plan period is a 4,998 net increase in dwellings, which is similar to the 4,977 shown in Table 7.3 of the Pre-submission Local Plan. However the Authority has also had regard to historical trends. As shown in Figure 1 (13-year completions trend), there has been an average of 264 dwellings per annum built over the last 13 years for which data is available. Much of this development was permitted before the National Park became the Local Planning Authority in April 2011. An assumption has therefore been made that the annual supply may well reduce slightly in future, reflecting the greater level of constraint, and unforeseen challenges arising on allocated sites due to landscape or environmental sensitivities.

6.12 Therefore, the National Park Authority has determined that an appropriate housing provision to work to is 250 dwellings per annum, or 4,750 over the Plan period.

7 CONCLUSIONS

7.1 The South Downs Local Plan proposes a detailed and robust approach to housing supply, which addresses the National Park statutory duty whilst prioritising the preservation of the special qualities. The approach builds on the development strategy and adopts a ‘bottom-up’ approach, which arrives at the overall supply from a detailed consideration of the capacity and sustainability of individual settlements. It has been informed in particular by the identification of suitable housing sites through the SHLAA, together with assessment of settlement facilities, and regard to historic development trends. Above all, a landscape-led approach has been taken, with overriding regard to the objective of preserving and enhancing the special landscape character of the National Park.

7.2 The outcome is that Policy SD26 sets a housing provision of 4,750 dwellings for the Plan period within the National Park, equivalent to 250 dwellings per annum. This will be delivered through a combination of Local Plan allocations, Neighbourhood Plans (NDPs), existing commitments and modest windfall development. Whilst the objectively assessed housing need is substantially higher than the provision made in the Local Plan, it is nevertheless a substantial contribution to housing needs in the wider area, given its national park status.

APPENDIX I: PREFERRED OPTIONS SUSTAINABILITY APPRAISAL, TABLE 7.5

| Settlement | Option 1: Dispersed High | Option 2: Dispersed Medium +60% | Option 3: Concentrated Medium | Option 4: Dispersed Medium | Option 5: Dispersed Medium - Sustainable Transport |
|--------------------------------|-------------------------------------|--|--|---------------------------------------|---|
| Alfriston | 24 | 10 | 0 | 6 | 11 |
| Amberley | 24 | 10 | 0 | 6 | 20 |
| Binsted | 48 | 19 | 0 | 12 | 0 |
| Buriton | 28 | 11 | 0 | 7 | 11 |
| Bury | 24 | 10 | 0 | 6 | 11 |
| Chawton | 24 | 10 | 0 | 6 | 16 |
| Cheriton | 24 | 10 | 0 | 6 | 0 |
| Coldwaltham | 80 | 32 | 0 | 20 | 0 |
| Compton | 24 | 10 | 0 | 6 | 0 |
| Ditchling | 60 | 24 | 0 | 15 | 0 |
| Droxford | 44 | 18 | 0 | 11 | 0 |
| Easebourne (ES) | 80 | 32 | 0 | 20 | 20 |
| East Dean and Friston | 44 | 18 | 0 | 11 | 11 |
| East Meon | 60 | 24 | 0 | 15 | 15 |
| Falmer | 0 | 0 | 0 | 0 | 30 |
| Fernhurst (not incl. Syngenta) | 44 | 18 | 0 | 11 | 30 |
| Syngenta (strategic site) | 200 | 200 | 0 | 200 | 0 |
| Finchdean | 0 | 0 | 0 | 0 | 20 |

| Settlement | Option 1: Dispersed High | Option 2: Dispersed Medium +60% | Option 3: Concentrated Medium | Option 4: Dispersed Medium | Option 5: Dispersed Medium - Sustainable Transport |
|--|-------------------------------------|--|--|---------------------------------------|---|
| Findon | 80 | 32 | 0 | 20 | 20 |
| Fittleworth | 24 | 10 | 0 | 6 | 0 |
| Glynde | 0 | 0 | 0 | 0 | 14 |
| Greatham | 120 | 48 | 0 | 30 | 30 |
| Hambledon | 24 | 10 | 0 | 6 | 0 |
| Itchen Abbas | 32 | 13 | 0 | 8 | 8 |
| Kingston Near Lewes | 44 | 18 | 0 | 11 | 11 |
| Lavant (incl. Mid Lavant, East Lavant) | 80 | 32 | 0 | 20 | 45 |
| Lewes (not in NSQ) | 1677 | 672 | 626 | 420 | 485 |
| North Street Quarter | 415 | 415 | 415 | 415 | 415 |
| Liss (incl. West Liss and Liss Forest) | 220 | 220 | 220 | 150 | 220 |
| Meonstoke and Corhampton | 44 | 18 | 0 | 11 | 0 |
| Midhurst | 599 | 240 | 264 | 150 | 85 |
| Northchapel | 24 | 10 | 0 | 6 | 0 |
| Petersfield | 805 | 805 | 805 | 700 | 820 |
| Petworth | 599 | 240 | 248 | 150 | 85 |
| Pyecombe | 32 | 13 | 0 | 8 | 6 |
| Rodmell | 44 | 18 | 0 | 11 | 11 |
| Rogate | 44 | 18 | 0 | 11 | 11 |
| Selborne | 24 | 10 | 0 | 6 | 6 |
| Sheet | 80 | 32 | 0 | 20 | 11 |
| South Harting | 32 | 13 | 0 | 8 | 0 |
| Southease | 0 | 0 | 0 | 0 | 11 |

| Settlement | Option 1: Dispersed High | Option 2: Dispersed Medium +60% | Option 3: Concentrated Medium | Option 4: Dispersed Medium | Option 5: Dispersed Medium - Sustainable Transport |
|-------------------|-------------------------------------|--|--|---------------------------------------|---|
| Stedham | 24 | 10 | 0 | 6 | 6 |
| Stroud | 44 | 18 | 0 | 11 | 11 |
| Steep | 0 | 0 | 0 | 0 | 11 |
| Twyford | 80 | 32 | 0 | 20 | 50 |
| Warningcamp | 0 | 0 | 0 | 0 | 11 |
| West Meon | 64 | 26 | 0 | 16 | 0 |
| Total | 6,087 | 3,429 | 2,578 | 2,578 | 2,578 |

APPENDIX 2: COMMENTARY ON SETTLEMENT SPECIFIC HOUSING PROVISION

| Settlement | Preferred Options Proposed Housing Requirement | Final Proposed Housing Requirement | Commentary |
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| Alfriston | 6* | 15 | Wealden JCS requires a minimum of 6 dwellings to be provided at Alfriston. The Settlement Facilities Study gave a score of 9.5 – the 9th highest score for all SDNP settlements. Therefore it was deemed appropriate to further facilitate the use of suitable and available sites in the village. The SHLAA 2016 identified two sites with potential for housing totalling 15 dwellings. |
| Amberley | 6* | 6 | A small, compact village which is prominent in views from the nearby scarp slope and various viewpoints. Has some facilities. The village is approximately 1km from Amberley Rail Station albeit access on foot is along unlit pavement for much of its length. The Amberley Neighbourhood Plan was made on 15 June 2017 and allocates a site for 6 dwellings, which is considered appropriate for the scale and context of the village. |
| Binsted | 12 | 11 | A village with limited facilities. There are limited connections to facilities elsewhere, but a community desire to modestly increase housing stock to help sustain the local facilities that do exist. The SHLAA 2015 identified a potential for 12 dwellings and this site capacity has been refined in working up the final allocations. |
| Buriton | 7 | 10 | A village with limited facilities and some transport connections to Petersfield. The SHLAA 2015 identified a potential for 11 dwellings, which was refined to 7 dwellings on the site in the Preferred Options due to landscape sensitivities. Work on the final allocations has identified an alternative site with slightly greater capacity for approximately 10 dwellings, which is considered more suitable than the draft allocation. |
| Bury | 6* | 6 | A village with some facilities. Limited connections to facilities elsewhere. The SHLAA 2016 identified a site with capacity for 20 dwellings. However a neighbourhood plan was already well progressed which planned for a net increase of 6 dwellings, which is appropriate for the size of the village. |

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| Chawton | 6* | 0 | A village with some facilities and some connections to Alton. Both iterations of the SHLAA concluded that there are no sites suitable for a potential housing allocation. |
| Cheriton / Hinton Marsh | 6* | 14 | A village with some facilities and limited connections to facilities elsewhere. The SHLAA 2016 identified two potential sites, however one was found subsequently to be unavailable, and the other found to have constraints that were more limiting than had been identified in the SHLAA. An alternative site has been identified for a housing allocation, which has capacity for approximately 14. |
| Cocking | 0 | 0 | A village with limited facilities and limited connections to facilities elsewhere. Not considered suitable for a housing requirement. |
| Coldwaltham | 20 | 28 | A village with limited facilities. However it is close to Pulborough which has a rail station and many shops and facilities, and a site has been identified that would deliver public benefits such as improved access to open space. |
| Compton | 6* | 0 | A village with some facilities. There are limited connections with other towns. The SHLAA concludes that there are no sites suitable for a potential housing allocation. |
| Ditchling | 15 | 15 | Requirement in Lewes JCS prior to quashing of Policies SPI and SP2 within the SDNP. This is the figure that is being worked to in the emerging NDP. The settlement was ranked within the top 10 settlements in the Settlement Facilities Assessment. |
| Droxford | 11* | 30 | A village with some facilities, which scored 6 in the Settlement Facilities Study. There are limited connections with other towns. A site was identified in the SHLAA close to the village school and centre, which has subsequently been taken forward as an allocation for approximately 30 homes. |
| Easebourne | 20* | 50 | A village with some facilities. The village is contiguous with Midhurst, and is approximately 0.5 to 1 km from Midhurst centre (dependent on which end of the village is measured from). The SHLAA identified sites with potential to accommodate around 50 dwellings. The increase in the number of dwellings reflects that Easebourne is sustainably located in close proximity to Midhurst which has many facilities and services, and the village also has a new, modern primary school which is larger than the old primary school. The three sites proposed for allocation are very suitable in respect of delivering the National Park's objectives, and avoid a concentration of development on a single site. |

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| East Dean | 11* | 11 | Existing requirement in the Wealden JCS. The site identified to deliver this number now has planning permission. |
| East Meon | 15* | 17 | A village with some facilities. The SHLAA 2014 identified a potential for 14 dwellings. Subsequently, a NDP has been well advanced which provides for 17 dwellings. |
| Fernhurst | 211 | 220 | A village with some facilities. The Fernhurst NDP has been made and includes provision for approximately 220 dwellings, 200 of which are to be delivered on the Syngenta strategic site. |
| Findon | 20 | 30 | A village with a range of facilities which scores highly (6.5) in the Settlement Facilities Study. The SHLAA 2016 identified potential for 37 dwellings, however refinement of the evidence on potential sites has enabled the identification of two sites considered the most suitable of the site options to take forward as allocations. These together have capacity to provide approximately 30 dwellings, which is considered an appropriate number to be accommodated in a dip slope settlement with notable landscape constraints, but which is well provided for in terms of facilities and public transport. |
| Fittleworth | 6 | 6 | A village with limited facilities. The SHLAA 2016 identifies potential for 27 dwellings. However given there are few facilities, and the Fittleworth NDP (which is well advanced) is working to provision of 6, this is considered an appropriate provision for the village. |
| Funtington | 0 | 0 | A village with no facilities and some transport connections to other towns/facilities. The SHLAA concludes that there are no sites suitable for a potential housing allocation. Not considered suitable for a housing requirement. |
| Greatham | 30 | 38 | A village with some facilities. There is some connection to facilities in Petersfield. A site has been identified with a capacity of approximately 38 dwellings. This site is close to the centre of the village, and would re-utilise a nursery site which already has built structures covering much of its area. |
| Hambledon | 6* | 0 | A village with some facilities. Limited transport connections to other towns/facilities. The SHLAA concludes that is no suitable land currently identified. |
| Itchen Abbas | 8 | 9 | A village with limited facilities. Some connections to facilities elsewhere. A single site suitable for housing development is identified, which has capacity for approximately 9 dwellings. |

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| Kingston | 11* | 11 | A village with some facilities which is within cycling and walking distance to Lewes. A site has been identified and recommended for allocation, with capacity for approximately 11 dwellings. |
| Lavant (including Mid Lavant and East Lavant) | 20* | 20 | Two villages in close proximity with limited facilities (no facilities in East Lavant) but in close proximity to Chichester (a half-hourly bus service connects the village to the centre of Chichester). The SHLAA 2016 identifies potential housing sites with combined capacity of approximately 17. The Lavant NDP has recently been made, and provides for 65 homes in the part of the parish falling within the National Park. |
| Lewes | 835 | 875 | The Lewes NDP makes provision for 875 homes in Lewes. This includes the strategic sites/allocations of North Street Quarter and Old Malling Farm. Whilst Policies SP1 and SP2 of the Lewes Local Plan have been quashed in the High Court, the evidence supporting this figure is considered sufficiently robust to carry forward the JCS figure into the SDLP. The SDLP is supported by a robust HRA which considers the in-combination effects of development on internationally designated sites in the wider area. |
| Liss (including West Liss and Liss Forest) | 150 | 150 | The figure is carried forward from the East Hampshire JCS. |
| Lodsworth | 0 | 0 | A village with limited facilities. Limited connections to facilities elsewhere. The SHLAA concludes that is no suitable land currently identified. Not considered suitable for a housing requirement. |
| Lower and Upper Farringdon | 0 | 0 | A village with limited facilities and limited connections to facilities elsewhere. The SHLAA concludes that there are no sites suitable for a potential housing allocation. Not considered suitable for a housing requirement. |
| Meonstoke and Corhampton | 11* | 18 | Two villages in close proximity with limited facilities (a single convenience store). There are extant planning permissions for a total of 18 new homes on contiguous sites close to the village centre. The housing provision reflects these permissions. |
| Midhurst | 150* | 175 | Midhurst is one of the largest settlements in the National Park, with a range of facilities and services, and good public transport (bus) connections to a number of other settlements, including Chichester, Guildford, Petersfield, Petworth and Worthing. The SHLAA 2016 identified the potential for approximately 172 dwellings. The selection of sites for housing allocation has been refined in the course of local plan preparation, and whilst some sites |

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| | | | fell away, the capacity of other medium to large sites has been increased. All but one of the sites are previously developed. There is capacity on the allocated sites to accommodate approximately 175 new homes, which is an appropriate number given the nature of the settlement. |
| Northchapel | 6* | 0 | A small village with limited facilities. The SHLAA concludes that there are no sites suitable for a potential housing allocation. Not considered suitable for a housing allocation. |
| Petersfield | 700 | 805 | The Preferred Options housing provision figure reflects the East Hampshire JCS. Since adoption of the JCS, the Petersfield NDP has been made. The NDP allocated sufficient sites to accommodate 805 new dwellings on a number of sites. The SDLP provision for Petersfield therefore carries forward this number. |
| Petworth | 150 | 150 | Petworth is one of the larger settlements in the National Park, with a good range of services and facilities (albeit convenience retail is limited). The SHLAA 2016 identifies the potential for 128 dwellings. However the Town Council is keen to deliver a significant number of homes at Petworth to improve the sustainability of the community and facilitate enhanced services for the town. The Petworth NDP is well advanced and will be allocating sites to accommodate approximately 153 dwellings. This is considered to be an appropriate housing provision for the town, and broadly in line with other larger settlements i.e. Liss and Midhurst. |
| Poynings | 0 | 0 | A small village with limited facilities and some transport connections to other towns/facilities. The SHLAA concludes that there are no sites suitable for a potential housing allocation. Not considered suitable for a housing provision. |
| Pyecombe | 8 | 8 | A small village with limited facilities. Some connection to facilities elsewhere. Planning permission has been granted for a development of 8 new homes, which is considered an appropriate number overall in the context of the settlement |
| Rodmell | 11* | 0 | A village with limited facilities (primary school). Some connections to facilities in Lewes. Whilst the SHLAA 2015 identified a potential for 10 dwellings, this has been superseded by the SHLAA 2016 which, on further detailed consideration, concluded that the site previously identified was important to retain as undeveloped land in order to maintain the integrity of the Rodmell Conservation Area and overall character of the settlement. Therefore there are no sites suitable for a potential housing allocation, and a housing provision of nil is concluded. |

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| Rogate | 11 | 11 | A village with some facilities. Within reasonable proximity to Petersfield, and public transport (bus) connections to Midhurst and Petersfield. The SHLAA 2016 identifies a potential for 11 dwellings. |
| Selborne | 6* | 6 | A village with some facilities. Some connections to Alton and, to a lesser extent, Petersfield. The SHLAA identified a potential for 8 dwellings, but the site allocation is reduced to 6 following more detailed consideration of the site. |
| Sheet | 20* | 31 | A village with some facilities in close proximity to Petersfield. The SHLAA 2016 identifies potential for 37 dwellings. Two of the sites identified were carried forward for allocation; however one has been granted planning permission and is being built out. The remaining site has capacity for approximately 31 homes which is considered in line with the context of the settlement. |
| Singleton | 0 | 0 | A village with some facilities. Limited transport connections to other towns/facilities. The SHLAA concludes that there is no suitable land currently identified. Not considered suitable for a housing requirement. |
| South Harting | 8 | 13 | A medium size village with some facilities. Limited connections to facilities elsewhere. The SHLAA 2016 identifies two sites with a combined capacity of 14 dwellings; the two site allocation policies combined provide for between 11 and 14 dwellings. |
| Stedham | 6* | 18 | A village with some facilities and close to Midhurst. The SHLAA identifies a site which is previously developed land, adjacent to the village school, and suitable for mixed use development. The residential element of this site is considered to have capacity of approximately 18 dwellings. This is appropriate given the location and context of the village, and to complement the employment development that is also proposed for the site. |
| Stroud | 11* | 28 | A small village with limited facilities (primary school). Some connections to facilities in Petersfield (around 1.5 miles from centre and possible to access on foot). The SHLAA currently identifies a potential for approximately 30 dwellings (on a single site); the site allocation policy provide for 26-30 dwellings. This is considered appropriate for the settlement and also reflects proximity to Petersfield. |
| Twyford | 20* | 20 | A village with a range of facilities. Some connections to facilities in Winchester and close to Train Station. The SHLAA 2016 concludes that there is potential for 35 dwellings (see also SHLAA Erratum, May 2017). At the time of the SHLAA 2016 publication, work on the |

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| | | | Twyford NDP was already well advanced and is working to a figure of 20. This is considered an appropriate number for the settlement. |
| Washington | 0 | 0 | A village with some facilities. Limited connections to facilities elsewhere. The SHLAA 2016 concludes that there are no suitable potential housing sites. Not considered suitable for a housing requirement. |
| Watersfield | 0 | 0 | A village with limited facilities and limited connections to facilities elsewhere. The SHLAA 2016 identifies a potential for 6 dwellings. However the closely neighbouring settlement of Coldwaltham has an allocation for approximately 28 homes which is an appropriate number to meet the needs of both settlements. Not considered suitable for a housing requirement. |
| West Ashling | 0 | 19 | The village has limited facilities and some public transport (bus) connections to other towns/facilities, notably Chichester, which is in fairly close proximity. The SHLAA identifies a site suitable for housing with capacity for approximately 19 dwellings. This is an appropriate scale of development which reflects the context of the existing built form, and relative proximity to Chichester. |
| West Meon | 16 | 11 | The village has limited facilities and some limited public transport (bus) connections to other towns/facilities Two sites were identified as having potential in the SHLAA 2016, however further investigation in the course of Plan preparation has seen one of these sites fall away, whilst the other has been found to have capacity slightly higher than previously identified. The 11 dwellings allocated reflect the allocated site's capacity and is appropriate in the context of the settlement. |