

## Home Builders Federation

### Duty to Co-operate and Matter 4

#### SOUTH DOWNS NATIONAL PARK LOCAL PLAN EXAMINATION

##### Duty to co-operate

Our representations outlined our concerns regarding the duty to co-operate and the failure of the NPA to identify how any unmet needs arising from the national park will be addressed elsewhere. Whilst it would appear that the Council has prepared statements of common ground with many of the relevant authorities there does not appear to have been any progress in relation to ensuring the unmet needs arising within the national park have been addressed. The NPA's paper on the Duty to Co-operate continues to identify that housing needs in both the national park and in a number of authorities that cut across the park cannot meet housing needs. There is recognition of this fact in statements of common ground but no action to address this issue. An example of this can be found in the Statement of Common Ground with Chichester where it was agreed that:

*"... there is an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework is engaged."*

However, we would expect that the operation of these paragraphs would lead to a positive outcome rather than an agreement that nothing should be done. Paragraph 9-001-20140306 outlines that co-operation should: "...produce effective and deliverable policies on strategic cross boundary matters." Elsewhere in PPG paragraph 9-010-20140306 states that inspectors are required to examine the "outcomes of co-operation and not just whether local authorities have approached others." The result of the NPAs co-operation in relation to housing needs has not achieved any outcomes other than statements that needs will not be met or considered at some unspecified later date. No supply has been identified outside of the NPA to meet its housing needs and without such positive outcomes there must be some doubt the level of co-operation and the outcomes from this co-operation are not sound against the policy tests established in the NPPF or PPG.



## **Matter 4 – Overall Housing Need and Supply. Policies SD26 and SD33**

In our representation we recognise that it is likely that housing delivery in the NPA will be constrained. However, our concern is that in assessing its housing needs and setting its housing requirement that NPA has not looked to maximise delivery whilst maintaining landscape quality in the park but has looked to use this evidence as a reason for limiting development. Whilst it is important that the landscape of the South Downs is protected it is also important to recognise the NPA duty to foster the economic and social wellbeing of local communities within the national park. The Council refer to this duty within paragraph 5.1 of the Supply of Homes Background Paper emphasising the word “local” and suggests the OAHN goes beyond the consideration of individual communities’ socio-economic needs as it factors in past population trends and projection of future growth that include in-migration.

We would disagree that the OAHN goes beyond the duties in this regard. In fact, through the consideration of population growth and the need to address key issues facing the NPA such as the increasingly unaffordable housing in the area the OAN provides a clear indication as to what the NPA must do to foster economic and social wellbeing of its communities. Lower levels of housing delivery will not prevent in-migration, but it will lead to increasingly higher house prices that can only be afforded by people who currently live and work outside the national park. With this in mind it is therefore important that the NPAs OAHN conforms to the approach set out in PPG.

We recognise the difficulties that the National Park Authority (NPA) have in seeking to identify housing needs for an area that cuts across a significant number of authorities and housing market areas. It would appear from the Housing and Economic Needs Assessment (HEDNA) published in 2017 that the OAN is based on a robust evidence but we are concerned that the Council has not used this evidence on market signals in the manner established by PPG in arriving at its final assessment of need. Planning Practice Guidance sets out in paragraph 2a-020-20140306 that an upward adjustment to the demographic starting point should be made where there is a worsening trend in any of the market signals for an area. What is evident from the HEDNA is that there are significant affordability pressures within the NPA. However, despite this evidence the decision was made not to apply a market signals uplift when assessing housing needs on the basis that the level of housing delivery will be based on capacity and landscape constraints. Given that the assessment of housing needs should be considered on a ‘policies off’ basis would suggest the NPA’s assessment of housing need is not consistent with national policy.

By not meeting the full OAN there could also be impacts on economic growth within the NPA that requirement in paragraph 2a-018-2014036 of Planning Practice Guidance to ensure that housing provision supports sustainable commuting patterns and the resilience of local businesses. However, the HEDNA states that “the scenario of economic led growth is particularly inappropriate for a National Park” and that the objective of supporting economic well-being is subsidiary to and overridden by the purpose of protecting landscape and conserving heritage.

The HEDNA estimates that an existing employment level of 49,225 jobs in 2014 and projects a net growth of jobs of 5,986 to 2033. In order to produce this level of job growth a housing supply of 541-620 dpa would be required. The HEDNA also sets out were no change in the economically active population, of between 276 - 350 dpa. This approach is not considered to reflect need or a positive and effective planning system regardless of the need to protect the National Park. Even at the very lowest housing need, Policy SD26 represents a shortfall in housing need indicating that there is likely to be a suppression in employment growth. Even the “zero employment growth” scenario which would see no growth in the employment age population would require housing growth of between 276 and 350 dpa.

Had the Council properly considered housing needs as set out in PPG the level of need, and the subsequent unmet needs, would have been significantly higher than is being suggested by the NPA. This will require other authorities to increase the level of housing delivery within their areas to meet needs or the NPA must re-consider any submitted sites to try and maximise delivery. In particular the Council must consider whether there are effective mitigation measures that could allow sites to come forward that have previously been rejected. We would suggest that consideration is given to the potential to mitigate the visual impact of development on the landscape and integrate schemes into existing settlements to minimise any potential harm. It would appear from the Strategic Housing Land Availability Assessment (SHLAA) that such considerations did form part of the assessment on each site put forward for allocation. However, we could find no indication in the methodology as to how such considerations were undertaken and the type of mitigation that would be considered appropriate.

It is also important to recognise that the housing requirement set out in SD26 is a minimum. By setting this requirement as a minimum the NPA are recognising that there are substantial unmet needs within the national park and that where appropriate opportunities for further development arise they will act positively when making any decisions. We appreciate that the NPPF allows for the fact that the full OAN may not be met in some areas this does not mean that the NPA should not seek to ensure that needs are met.

### **Unmet housing needs**

Table 1 in paragraph 4.18 of the NPA’s Duty to Co-operate statement outlines the level of unmet needs in each of district. Our first concern with regard to this assessment is that it reflects the capacity constrained OAN. As outlined above the NPAs assessment of needs has not included an adjustment for market signals and economic growth indicators that would mean a much higher OAN across the national park. As such the level of unmet housing needs across the national park is significantly higher and there is no evidence to suggest this level of need will be addressed outside of the NPA. In fact, the districts which form part of the NPA or border it are also constrained by geography or other landscape designations.

#### **Conclusions on matter 4**

Given the scale of need within the NPA and inability of other authorities to support the NPA in meeting this need it is essential that housing delivery in the national park is not restricted unnecessarily and that more is done to identify land for development. Whilst we recognise that national parks have additional constraints with regard to conservation of landscape, wildlife and heritage the NPA must not forget their responsibility to foster economic and social well-being. In particular we do not consider sufficient consideration has been given to the potential to mitigate any visual impacts on landscape arising from development sites within the national park. Further assessments on this issue are required given the significant level of unmet needs in the NPA. In addition, the Council must set its housing requirement as a minimum to ensure that the NPA takes a positive approach to decision making that is required by the NPPF.

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