

**Position Statement on behalf of Ms J Manson, Mr W Knight and Mr G Watson,  
the landowners of the 'Stedham Sawmill' site**

**MATTER 4: Overall Housing Need and Supply  
Policies SD26 and SD33**

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**a. Are the OAN figures of 447 dwellings per annum (dpa) (8,493 total) and 293dpa affordable, established by the HEDNA, justified by robust evidence drawn from appropriate housing market areas (HMAs)?**

No comment.

**b. Is the landscape-led assessment of development capacity and the housing requirement of 250dpa (4,750 total) set by the Plan justified by robust evidence?**

No.

The South Downs National Park Authority (SDNPA) has not provided evidence that a greater number of dwellings couldn't be accommodated without harm to National Park objectives.

For example, at the 'Stedham Sawmill' site, Stedham, there is no robust evidence to suggest that a limited or mixed-use development as allocated would be less harmful under a landscape-led approach than a more comprehensive housing development as proposed by its landowners.

As reviewed in detail in our submitted representations (Comment ID references 1367, 2457 and 2458) the capacity-led bottom up approach (as opposed to starting with OAN and working downwards) is inappropriate / conflicts directly with the court's interpretation of the 2012 NPPF paragraph 47. There has been no analysis of the extent to which OAN can be met in this area notwithstanding the National Park designation.

**c. Is the choice of housing sites allocated in the Plan justified by robust evidence and selection methodology?**

No.

SDNPA's methodology is wrong by not following guidance and mis-applying a bottom up landscape capacity led approach. The definition of landscape capacity is inconsistent between sites.

**d. Is the distribution and amount of housing sites between settlements justified by robust evidence?**

No. SDNPA has underestimated the potential offered by previously developed sites / sites with approved employment use that are more appropriately used for housing development. It has not evidenced in full the opportunities that exist by reference to specific settlements.

For example, SDNPA describes the 'Stedham Sawmill' site at Stedham as 'commercial; undeveloped open space' and suggests that only the eastern portion of land is previously developed land. This disregards accurate evidence i.e. the planning history of the site, which firmly suggests in principle a greater potential for development at the site. This in turn demonstrates the greater opportunity that exists at Stedham for additional residential development.

Furthermore, the SDNPA Employment Land Review update, 2017 (Core document library reference TSF30), finds that the site is "*not fit for purpose*", and concludes there is need to "*consider alternative uses*" for Stedham Sawmill "*such as housing*" as it is a "*very poor quality under occupied site*".

**e. Is there robust evidence that the portion of the existing housing land supply of the SDNP from sites already permitted but yet to be built out will be delivered?**

No comment.

**f. Are the housing sites allocated by the Plan deliverable to an appropriate trajectory within the Plan period to meet the requirement of 250dpa?**

No comment.

**g. Is there robust evidence that the unmet housing need of the SDNP will be met by neighbouring authorities, Local Plans and Neighbourhood Plans?**

The plan is placing an unnecessary additional burden on neighbouring authorities by not optimising the ability of suitable development sites to deliver housing within the national park.

**h. Does the Plan make appropriate provision for accommodation for Gypsies and Traveller and Travelling Showpeople, based on robust evidence of need and available sites?**

No comment.