

SOUTH DOWNS NATIONAL PARK LOCAL PLAN EXAMINATION

REPRESENTOR 245 - CPRE Sussex

Position Statement re Matter 4 -Overall Housing Need and Supply (SD26 and SD33)

Policy SD26 and Policy SD33

We are concerned that there may be an element of ‘double counting’ in relation to the OAN itself. The Strategic Housing Market Assessment (2015) by GL Hearn identifies in para 4.16 that for many of the Local Plans recently adopted/close to adoption ‘the identified level of need includes the parts of those districts within the SDNPA.’ In other words, these local plans (such as Adur) identify the OAN for the whole district and then plan for that need within the part of the district not covered by the SDNPA. In effect, the only function of the SDNPA local plan is to try and accommodate the ‘unmet need’ of these neighbouring authorities if this is possible within the landscape-led development capacity of the park.

We agree with the Park’s view as set out in the ‘Supply of Homes Background Paper’ (SDNPA 2017) that the NPPF (2012) makes very clear that the requirement to meet the full OAN does not apply where specific policies in it indicate development should be restricted, for example in National Parks (footnote 9 to paragraph 14) and that the Vision and Circular (paragraph 78) states that “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.” We support the approach taken by the park in prioritising affordable housing to meet identified local needs. We believe that the landscape-led assessment of development capacity is justified by robust evidence.