



Matter 4 Overall Housing Need and Supply
Claremont Planning for EPV E Sussex
Representor No. REP/37

MATTER 4 EXAMINATION STATEMENT

**EUROPEAN PROPERTY VENTURES
(EAST SUSSEX)**

REPRESENTOR REP/37

**OVERALL HOUSING NEED AND SUPPLY
*POLICIES SD26 AND SD33***



This Statement for Matter 4 will seek to address the Inspector's Questions identified below:

It is noted that:

The provision of new housing accounts for the largest proportion of development need within the SDNP.

By virtue of the exception provided by footnote 9 to the applicable NPPF of 2012, the requirement of paragraph 14 to grant permission for development where relevant policies are out of date does not apply in the SDNP, even if the NPA cannot demonstrate a five-year supply of deliverable housing sites, in terms of paragraphs 47 and 49.

However, the requirement of paragraph 47 to identify the full objectively assessed need (OAN) for market and affordable housing in the housing market area still applies. It is accordingly necessary for the NPA to have first determined the OAN before assessing the development capacity of the SDNP to meet identified market and affordable housing needs and then establishing where and how any unmet need will be met outside the SDNP.

In qualitative terms, the evidence base of the Plan is predicated upon the SDNP not meeting its OAN for housing.

However, it is for this Examination to assess quantitatively the following issues:

- 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)?
- 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? –
- c. Is the choice of housing sites allocated in the Plan justified by robust evidence and selection methodology?
- d. Is the distribution and amount of housing sites between settlements justified by robust evidence?
- 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? -
- f. Are the housing sites allocated by the Plan deliverable to an appropriate trajectory within the Plan period to meet the requirement of 250dpa?
- g. Is there robust evidence that the unmet housing need of the SDNP will be met by neighbouring authorities, Local Plans and Neighbourhood Plans?
- 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? -



Matter 4 – Overall Housing Need and Supply

1. The recognised need as established through the Local Plan only represents delivery of 58% the total growth required within the South Downs National Park. Whilst initially this is expected given the landscape constraints within the Park and the primary objectives of the plan in conserving the natural beauty and landscape value of the designated area, the Plan fails to adequately seek sites to meet the identified need within the Authority area. This is further exacerbated by the reliance on cross-boundary delivery of the need of the Authority and given that this will be needed in any context due to the constraints of the Park, it is inappropriate of the Plan to not fully explore options for maximum delivery within the Park.
2. Identification of sites has relied upon the development strategy that has relied upon a hierarchy of settlements and centres within the National Park. These locations are regarded as the most suitable, and sustainable, in terms of accommodating growth and numbers to contribute towards the recognised need of the SDNPA. It is recognised that these sites have also been selected on the basis of landscape-led assessment to ensure that any allocations made do not result in substantial harm to the sensitive landscape of the South Downs. Given this, the sites identified do not meet the overall required as found through the HEDNA and SHMA process in informing the emerging Local Plan. As such, the Plan must rely on cross boundary delivery of sites to contribute towards the need of the South Downs. If this is to be the case, the Plan needs to provide specificities that indicate as to how, where and when these cross-boundary sites will be delivered so that the need can be adequately met. Presently the Plan does not provide this and therefore does not seek an effective strategy in ensuring the need can be met and that an ensured supply can be identified.
3. The Plan distributes growth and housing numbers throughout the Park based upon the recognised hierarchy and makes allocations through a landscape-led assessment to identify those locations that are of a lower sensitivity and a higher landscape capacity to accommodate development. This strategy ensures that the principle of development can be established at least within the National Park in itself, but the strategy is ineffective in terms of being fully landscape led as it fails to identify locations with limited landscape contributions or areas in need of improvement. Such locations, especially where they are adjacent to existing settlements, have the potential to accommodate development alongside mitigation. The size of the park, up to 1,600 sqkm in size results in a varied landscape and with areas of higher and lesser sensitivity. This is demonstrated by the site under control by European Property Ventures East Sussex at Lower Hoddern Farm, Peacehaven.
4. The site at Peacehaven falls within the South Downs National Park area, but at its extreme margins and its directly adjacent to the built up edge of Peacehaven. In that sense, the site is in a good example of a cross-boundary site, with the site bordering both Lewes and the South Downs National Park Authority. Assessment undertaken by EPV has demonstrated that the site does not have a highly sensitive landscape to development and so does not meet the same highly valued characteristics as recognised nationally to warrant special protection through National Park status. As such, this demonstrates that the landscape-led assessment that has underpinned the strategy of distribution within the National Park has been ineffective given that it has not identified sites such as at Lower Hoddern Farm.
5. The site at Peacehaven has been recognised as with a greater capacity to accommodate growth, it is directly adjacent to existing built form and is under single ownership. With access



easily arranged, this site demonstrates a highly deliverable site that can quickly and significantly contribute towards the identified need of the National Park. Demonstration of the site's suitability undermines the landscape-led assessment that has underpinned the development distribution strategy of the Plan given its failure in understanding and identifying the spatial nuances within the Park and the differing landscape sensitivities of it.

6. This has subsequently resulted in an over-reliance on cross-boundary delivery and growth within neighbouring LPA's to meet the unmet requirement arising from the National Park. The Plan therefore does not demonstrate effectiveness in seeking appropriate sites for development and has not justifiably explored the opportunities that marginal sites such as at Peacehaven can provide in terms of development and growth. In turn this provides an inappropriate reliance on the delivery sites beyond the SDNPA's jurisdiction which does not guarantee delivery mechanisms for their realisation.
7. The Plan fails to identify opportunity areas at the margins of the National Park at locations where settlements outside the Park directly adjoin its boundaries. These areas are of a poorer landscape value and therefore demonstrate a higher capacity to accommodate growth which can contribute to both the arising need from the SNPA, but as well as from outside authorities such as Lewes DC. As it stands, the Plan overly curtails capacity and ignores the advantageous context of settlement edge development and this obtuse strategy ignores the principles of sustainable development.
8. Furthermore, the Plan fails to address the issues faced by neighbouring authorities and unjustifiably focusses on the presumption that cross-boundary provision will be met these authorities to satisfy the requirement arising from the unmet need in the Park. Neighbouring districts such as Lewes are severely constrained by the presence of the Park itself, the coast, heritage considerations as well as increasing development pressures from their own need as well as the cascaded unmet need from Greater London. Therefore, with the Plan not identifying sites such as at Peacehaven which provide a greater opportunity to exploit a lesser constrained site at the boundary of an adjoining settlement, the Plan demonstrates its ineffectiveness in acknowledging the constraints of its adjoining authorities.
9. The site under control by EPV East Sussex should be recognised as a location suitable for deliverable growth within the South Downs National Park and that it is able to demonstrate the principles of sustainable development in themselves, but also in the specific context of the South Downs National Park which experiences unique constraints and highly protected assets. If the Plan is to remain sound and demonstrate effectiveness, the inclusion of sites such as at Peacehaven will better inform the development strategy of the SNPA and ensure its practical application across the National Park.

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