



POSITION STATEMENT of the South Downs National Park Authority

MATTER 4 – Overall Housing Need and Supply

DATE: October 2018

- 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?

KEY DOCUMENTS for cross-reference:

- Supply of Homes Background Paper (SDNPA, 2018) (TSF 07)
 - Housing Update Background Paper (SDNPA, 2018) (TSF 07a)
 - Strategic Housing Land Availability Assessment (SDNPA, 2016) (TSF 10)
 - Duty to Cooperate Statement (SDNPA, 2018) (SDLP 11)
 - Gypsy, Traveller and Travelling Showpeople Background Paper (SDNPA, 2018) (TSF 14)
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1. Introduction

1.1 This Position Statement responds to the Inspector's invitation to submit a statement in relation to matters to be discussed at the hearing sessions (INSP.4). In the case of Matter 4, reliance is chiefly placed on the Background Papers and core documents of which the key ones are listed above. The specific issues that the SDNPA consider may benefit from further detail are issues b, e, f and g as set out in INSP.4 and duplicated below.

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

2.1 In the first instance, please refer to the Supply of Homes Background Paper (TSF 07), in particular paragraphs 4.4 to 4.10 in relation to the technical evidence, and paragraphs 5.1 to 5.5 in relation to how this evidence should be correctly interpreted and applied. The HEDNA (TSF 08) sets out the full workings behind the OAN.

2.2 The data underpinning the OAN is drawn from appropriate housing market areas. For the purposes of the HEDNA's, four separate housing market areas have been identified which are carried forward from the SHMA (TSF 09) – Central Hampshire, Coastal Sussex, Eastbourne and Northern West Sussex.

2.3 The HEDNA also recognises that a study commissioned by the West Sussex and Greater Brighton Planning Board¹ identified alternative HMA boundaries, most notably identifying a Chichester and Bognor Regis HMA distinct from the Coastal Sussex HMA. However that study did not cover the whole of the National Park area, therefore the HMAs previously identified in the SHMA have been used. Each HMA has been given an OAN within the National Park and have been used as the basis for market signals evidence in section 5 of the HEDNA (Section 5).

2.4 The HEDNA's core output is the demographic-led estimate of need, which is derived from ward-based starting point with local authority based population and household projections that are produced at a national level.

2.5 Given that the SDNP area does not fit neatly with local authority boundaries, or indeed ward boundaries, it was necessary for the HEDNA to construct a best-fit of output areas to the National Park to gain an understanding of the age profile and then constrain the overall population to be consistent with published data about the population in the SDNP area.

2.6 The HEDNA caveats on page 16 that areas used for estimating need in many cases extend slightly beyond the SDNP boundary, and captures the population residing in a number of villages and built developments which are outside the National Park boundary. Specific statistics should therefore be treated with a degree of caution.

¹ Defining the HMA and FEMA (GL Hearn, 2017) <https://www.adur-worthing.gov.uk/media/media.147057.en.pdf>

- 2.7 Nevertheless, the HEDNA's calculation of OAN was undertaken on the basis of a fine-grained output of household projections. It therefore reflects as close as possible a fit to the boundary of the National Park. The OAN reflects robust evidence based on appropriate geographies.
- 2.8 It is important to highlight that the OAN is a demographic-led projection, and not influenced by any proposed or expected strategic growth in employment. Draft Policy SD35: Employment Land provides for a total of 10.3 hectares of new employment land, which meets the relatively modest employment need identified in the Local Plan evidence base. The employment omission site put forward at Longmoor is not proposed for allocation, but if it were nevertheless to come forward would provide a further 8.4 hectares of employment land. However it is close to Whitehill & Borden, which is allocated as an eco-town in the East Hampshire Joint Core Strategy with 2,725 new homes and 9.5 hectares of new employment land, and would therefore relate to population growth outside the National Park.
- 2.9 With respect to affordable housing need, the methodology used is in line with the Affordable Housing Needs Assessment Model set out in planning practice guidance (paragraphs 023-027 Reference ID: 2a-023-20180913). The HEDNA (TSF 08, paragraphs 6.1 to 6.17) sets out the full methodology and sources of data, and provides a breakdown of this figure by local authority and by HMA. The use of an affordable housing need methodology as set out in planning practice guidance prior to September 2018 provides a robust estimate of the overall need in the National Park.
3. Issue 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?
- 3.1 The Inspector's question correctly identifies landscape as the starting point for assessing the overall capacity for housing provision in the National Park. The degree of constraint arising from the designated landscape is clearly identified in the Sustainability Appraisal report (SDLP 04), which found that a higher level of dispersed growth could not be absorbed without significant detrimental landscape and townscape impacts (see section 2.2.5 of the report).
- 3.2 The SDNP landscape evidence is based around the South Downs Integrated Landscape Character Assessment (SDILCA) (2011) (TLL 02) which is integrated with an early historic landscape character assessment (HLC). The HLC has been updated in 2010 covering Sussex (TLL 05) and 2017 for Hampshire (TLL 04) to provide an up-to-date evidence base that has informed the Local Plan, and in particular the SHLAA.
- 3.3 Paragraphs 3.114 to 3.122 of the Local Plan (The Spatial Strategy) explains the process used for a capacity-led approach to numerical housing provision. This is further detailed in paragraphs 7.17 to 7.21 (Introduction to Homes (Strategic Policies)) and the supporting text for Policy SD26: Supply of Homes. Further detail still is provided in the Supply of Homes Background Paper (TSF 07), in particular paragraphs 6.1 to 6.12.

3.4 It is important to emphasise that the Strategic Housing Market Assessment (SHMA) (TSF 09) was prepared at the start of the Plan preparation period, albeit updated by the HEDNA (TSF 08) in 2017. The Plan has had regard throughout its preparation to the substantial housing need, and in particular affordable housing need, evidenced by these studies. Hence there has been a comprehensive and thorough assessment of potential housing sites to meet the need as far as possible:

- The strategic allocations from previous local plans have been carried forward into the SDNP Local plan. Further landscape research has been undertaken to ensure that SDNP purposes are represented through their allocation.
- The SHLAA (TSF 10) has considered 541 sites. The vast majority of sites assessed in detail have been subject to a full landscape sensitivity assessment, carried out by the SDNPA landscape officer, responding to local character in the context of the purposes and duty.
- Neighbourhood Plans have identified sites at the local parish level.
- Public and parish council engagement has fed into the ‘call for sites’ and allocations.

3.5 The positive approach to addressing housing need has yielded a healthy housing provision figure that still responds appropriately to its landscape context. Nevertheless, it is very clear in the NPPF 2012 (paragraph 14 and footnote 9) (Nat 01) and the English National Parks Vision and Circular (Nat 03) that development in a national park should be restricted, to ensure conservation and enhancement of the landscape as designated.

4. Issue c. – is the choice of housing sites allocated in the Plan justified by robust evidence and selection methodology?

4.1 Please refer to the Sites and Settlements Background Paper (SS 01), and also the Sites and Settlements Route Map (SS 02).

5. Issue d. – is the distribution and amount of housing sites between settlements justified by robust evidence?

5.1 Please refer to the Supply of Homes Background Paper (TSF 07), in particular paragraphs 6.4 to 6.9 and Appendix 2. The Sustainability Appraisal also formed part of an iterative process – see paragraphs 4.19 & 4.20 and Appendix 1 of the background paper.

6. Issue 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?

6.1 Yes. The evidence as set out in the paragraphs below, and studies referred to, clearly show that demand for housing land in a National Park situated in the south east of England is at a premium, and the rate of delivery on permitted sites is high.

- 6.2 As part of preparing its annual Authority Monitoring Report (AMR), the SDNPA gathers together data on planning permissions granted for new housing. The latest AMR 2017 (IM 03) includes Indicator SDLP54: Dwellings with extant planning permission (net). This reports that as of 1 April 2017, there was extant permission for 1,840 dwellings (net). The updated figure as of 1st April 2018 is 1,593. There were also 296 dwellings completed over the period 1st April 2017 – 31 March 2018, which is a significant increase indicative of a healthy conversion of permissions to completions.²
- 6.3 The housing trajectory breaks this figure down into estimates of year-on-year delivery, based on officers' knowledge of the circumstances of larger sites (generally 5 or more dwellings), and an estimated build rate across all of the smaller sites (up to 4 dwellings). The Housing Update Background Paper (TSF 07a) sets out the housing trajectory (baseline 1 April 2017) in summary in Figure 4, and in detail in Appendix 1. Note that the annual figures for permissions granted incorporate a non-implementation discount of 10% on sites of 5+ dwellings, and of 20% on sites of 1-4 dwellings, to ensure that a precautionary approach is taken.
- 6.4 Whilst there can never be a cast iron guarantee of site delivery, the experience of recent years indicates strongly that nearly all permissions are implemented. For example, the Statement of Common Ground with East Hampshire District Council (SoCG 06) Appendix 2 shows that over 9 years, lapse rates for permissions has averaged 3.39% for small sites, and just 0.75% for large sites (overall average of 1.12% for all sites). Thus the non-implementation discount applied across the National Park as a whole of 10%/20% is highly precautionary. In reality one would expect delivery from permissions to be higher than suggested by the published trajectory.
- 6.5 The evidence above on the healthy delivery on National Park housing sites is further supported by evidence on market signals provided in the HEDNA (TSF 08) and market forecasting in the Whole Plan and Affordable Housing Viability Report (Core 13). The HEDNA provides evidence of a very strong market, with house median prices across the SDNPA increasing by an average of 40% between 2008 and 2016, exceeding the regional (37%) and national (26%) equivalents (see paragraph 5.23). The Viability Report (Core 13) identifies that house prices in all but one of the local authority areas in the SDNP continue to be well above the England average (paragraph 2.14 and Figure 2.14.1).
7. Issue f. – are the housing sites allocated by the Plan deliverable to an appropriate trajectory within the Plan period to meet the requirement of 250dpa?
- 7.1 Yes. This is evidenced in the SDNPA Housing Trajectory reported in the Housing Update Background Paper (TSF 07a). Paragraphs 6.1 to 6.4 above demonstrate the high build-out rate for permitted sites. The high rate of build-out can be seen both on large sites (for example at Petersfield) but also on small sites which make up a significant proportion of annual completions.

² 2018 figures taken from Authority Monitoring Report 2018 which at the time of writing is in preparation – publication expected Dec 2018.

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

- 8.1 The Duty to Cooperate Statement (SDLP 11) sets out the position as of April 2018, with respect to unmet housing needs in different parts of the SDNP. It can be seen from Table 1 of SDLP 11 that in some areas, the unmet need arising within the SDNP can be met by existing joint core strategies (for example East Hampshire, Winchester and Mid Sussex). However many local authority areas overlapping with the SDNP have a greater or lesser amount of unmet housing need. The table also shows that in most cases, only a relatively small proportion of this unmet need arises in the National Park itself, reflecting that a small proportion of most districts' populations fall within the National Park.
- 8.2 There are two local authorities co-located with the SDNP in which unmet need arising within the SDNP remains and is sizeable: Chichester and Lewes districts. The SDNPA has agreed Statements of Common Ground with both these partner authorities (SoCG 05 and SoCG 08 respectively).
- 8.3 In the case of Chichester, there is agreement that the District Council will assess its ability to meet some or all of the unmet need of 44 dwellings per annum within Chichester district, via the Chichester Local Plan Review.
- 8.4 With respect to Lewes, it has been agreed that objectively assessed housing needs in the whole district (including within the National Park) cannot be met within Lewes District without unacceptable environmental consequences, and there continues to be an unmet housing need whereby paragraphs 179-181 of the NPPF is engaged. The SDNPA further notes the Inspector's report who examined the Lewes Joint Core Strategy (see Ex 03a) that there is no realistic prospect of any material help in achieving new housing delivery from nearby councils in the near future.
- 8.5 Both SCGs note that unmet housing need is being addressed, as far as is consistent with the policies set out in the Framework, as part of the work of the West Sussex & Greater Brighton Strategic Planning Board. Details are set out in the SDNPA's Duty to Cooperate Statement (SDLP 11).
- 8.6 The SDNPA continues to work with all its partner authorities to address unmet housing needs. However it is widely accepted that the significant constraints that exist within the wider sub-region (including the National Park itself) pose significant challenges for all parties to meet the housing needs. Work on the West Sussex and Greater Brighton Local Strategic Statement 3 (LSS3) is ongoing, with a focus on the 20 year period 2030-2050, reflecting that most of the area has up-to-date Local Plan coverage to the period 2030.

9. Issue 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?

9.1 The Gypsy, Traveller and Travelling Showpeople Background Paper (TSF 14) sets out the SDNPA's position on need for, and supply of, this type of accommodation against a base date of 31 March 2018. Table 5.1 of this document summarised existing pitches in the National Park; this has been updated as per the revised version below. Table 6.5 showed that there remains a need for a further 14 pitches for Gypsies and Travellers and 9 plots for Travelling Showpeople, once future supply is taken account of.

9.2 The paper also set out calculations of under- and over-provision within the different study areas of the National Park. Table 8.1 showed that it is only the Brighton and Hove part of the National Park that has a significant unmet need of 13 pitches due to a lack of suitable and available sites. Conversely, more pitches have been supplied in the Coastal West Sussex area than the need identified in the relevant GTAA in recent years, due to the granting of permanent permission on some temporary sites, and also new sites permitted.

9.3 The SDNPA notes that some needs assessments pre-date the new definition of Gypsies, Travellers and Travelling Showpeople established in 2015 (as set out in TSF 15). Use of the previous definition is not considered to make a material difference to the outcome of these studies. If there were to be a difference, applying the new definition would have the effect of reducing the need element. Therefore application of the old definition in some studies essentially makes the unmet need calculation more precautionary, i.e. higher than it might otherwise be.

9.4 This area is a moving picture. Since publication of the background paper, the following changes in circumstances have occurred:

- Removal of temporary condition on Hawkley Gypsy and Traveller site, arising from planning permission SDNP/18/00440/CND – to make the planning permission for 2 Gypsy/Traveller pitches permanent.
- Permission granted for 2 additional pitches on an existing site at Offham Barns near Lewes (planning reference SDNP/17/04678).
- Permission granted for 1 additional pitch on an existing site at Market Gardens, Fulking, Mid Sussex (planning reference SDNP/17/03762/CND).
- A previously unauthorised site at Three Corner Piece, Nyewood, South Harting (Chichester district) has been granted temporary planning permission on appeal. The Coastal West Sussex GTAA Update (TSF 19) recognized this as an unauthorised site (1 pitch), however the status is now updated such that it is an element of need arising from a temporarily permitted site. The overall calculation of net need for Coastal West Sussex, and for Chichester, remains the same.

9.5 The granting of these permissions means that Table 5.1 of the background paper needs to be updated. The updated table is shown below:

[UPDATED] Table 5.1: Existing Gypsy, Traveller and Travelling Showpeople sites in the SDNP as of 1 October 2018

	Permanent	Temporary	Notes
Authorised Gypsy & Traveller Pitches	48 53	5 4	Almost all are in private ownership. The Small Dole Caravan Site is located almost entirely within the Horsham District Planning Authority area, including all pitches. A very small part of the site boundary is located within the South Downs National Park, no figures for that site are therefore included within this study.
Authorised Gypsy & Traveller Transit Pitches	30	0	In addition there are 9 transit pitches available at Westhampnett in Chichester District just to the south of the National Park boundary. All are in Local Authority ownership.
Authorised Travelling Showpeople Plots	4	0	All are privately owned.
Current Unauthorised Sites (Gypsy, Traveller and Travelling Showpeople)	There is 1 unauthorised Travelling Showpeople site within the South Downs National Park. There are also a number of unauthorised encampments in the Brighton area which are seasonal and predominantly consist of visiting Irish Travellers, a smaller number of Romany Gypsies and New Age Travellers. The transit site at Horsdean has space available most of the year.		

9.6 The allocation site Half Acre, Hawkley has now become a permanent permitted site for 2 pitches. Hence it no longer counts as an unmet need. The allocation Policy SD75: Half Acre, Hawkley, is proposed to be deleted (SDNPA.3, MM68 & MM69). However as the allocation was for 3 pitches, this does reduce the future supply of pitches from allocations by 1. Nevertheless, there are already sufficient sites allocated to meet the remaining need in East Hampshire for 4 pitches, therefore the theoretical loss of 1 pitch from the Hawkley site does not generate a need for any further allocations. Updates are proposed to Figure 7.6 (as amended in SDNPA.3, main modification MM13) are shown below (figures that have changed are shown in **bold**):

[UPDATED] FIGURE 7.6: SUMMARY OF LOCAL PLAN ALLOCATIONS AND PERMANENT PITCH NEED WITHIN THE NATIONAL PARK FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE AS OF 1 OCTOBER 2018

Area (Within National Park)	Permanent Gypsy & Traveller Pitch Need	Permanent Showpersons' Plot Need	Allocations in the Local Plan	Remaining unmet need
Brighton & Hove*	13 (2016—2028)	0	0	13 <u>Gypsy and Traveller</u>
West Sussex				
Coastal West Sussex (Arun, Adur, Chichester, Worthing)*	0	0	0	0
Horsham	0	0	0	0
Mid Sussex	0	0	0	0
East Sussex				
(Lewes, Eastbourne, Wealden)*	<u>6</u> (2016—2028)	0	5	<u>1 Gypsy & Traveller</u>
Hampshire				
<u>East Hampshire</u>	<u>4</u>	<u>9</u>	<u>5</u> (Gypsy & Traveller)	<u>9 Travelling Showpeople</u>
<u>Winchester</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Total	<u>23</u>	<u>9</u>	<u>10</u>	<u>14 Gypsy & Traveller, 9 Travelling Showpeople</u>

*This requirement is based upon a GTAA undertaken before the change in definition introduced in the 2015 Planning policy for Traveller Sites

9.7 Two transit traveller sites exist in East Sussex at Horsdean (Brighton & Hove) and Bridies Tan (Lewes). These provide a total of 30 pitches. At the current time, there are almost always vacant transit pitches at the Horsdean site. It is considered that reasonable transit pitch provision exists in the East Sussex area to meet identified need.

9.8 It should be noted that the level of need for Travelling Showpeople plots is generated by a single unauthorised site at Warren Barn, Priors Dean. This is single family site that has recently been refused permission, and which is currently the subject of enforcement action.

9.9 **In summary**, the Gypsy and Traveller Background Paper (TSF 14) together with the above updates demonstrates that unmet need is being addressed in the National Park and its immediate surrounding area, insofar as is achievable against the constraints posed by the national park designation and landscape capacity. Opportunities have been taken to convert temporary sites to permanent, and to

allow further pitches on existing sites. The Local Plan allocates four sites within the National Park to increase supply by a further 10 pitches. A remaining need for Gypsy and Traveller pitches in the Brighton and Hove area, and for Travelling Showpeople plots in the East Hampshire area, is identified, however there are no known suitable and deliverable sites at the current time to meet these needs.

- 9.10 The background paper is updated by the information set out above. It should be noted that a Minor Edit has been entered into the Minor Edits Schedule SDNPA.3A to reflect the change to Figure 7.6.

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