
Examination Statement

South Downs National Park Authority

Emerging Local Plan

Land at Sweetlands, Steyning

CALA Homes

Examination Statement

Land at Sweetlands, Steyning



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1. Introduction

- 1.1. This Examination Statement is submitted by Savills on behalf of CALA Homes. CALA Homes are promoting the Land at Sweetlands, Steyning in conjunction with the landowner (herein referred to as 'the Site'). The location of this Site and its merits as a sustainable location for residential development are outlined in the Regulation 19 representation (summarised below). The Site is within the National Park boundary but adjoins the settlement of Steyning which is within Horsham District.
- 1.2. Prior to the submission of the emerging Local Plan, CALA Homes submitted representations to the Regulation 19 consultation in November 2017 held by the South Downs National Park Authority (SDNPA). These representations highlighted a number of concerns in respect of the emerging Local Plan including:
- Insufficient consideration of settlements outside the National Park in the Spatial Strategy and inadequate assessment of sites for allocation;
 - Potential overreliance on Neighbourhood Plans to deliver “non-strategic” allocations and no flexibility should a Neighbourhood Plan be delayed or not produced;
 - Removal of wording from Policy SD25 as originally drafted in the 2015 Preferred Option Plan which provided flexibility for small sites within the National Park on the edge of settlements that are themselves outside the Park to come forward;
 - The need to include adjacent settlements, such as Steyning, within Policy SD25 and to provide a housing target for such settlements where they can deliver housing within the National Park;
 - Consider allocation of additional residential sites;
 - Housing targets in Policy SD26 should be reworded to be a “minimum” target;
- 1.3. CALA Homes are a member of the Home Builders Federation (HBF) and this Examination Statement supports and builds upon evidence submitted in the statement made by HBF to the Local Plan Examination.

2. Response to Inspectors Questions

Duty to Cooperate & Housing Need

Has the Plan been prepared in accordance with the Duty to Co-operate (DtC) with prescribed bodies, with reference to the DtC Statement [SDLP.11] and the several Statements of Common Ground (SOCGs) with neighbouring and partner authorities and other bodies [SCG series] and with respect in particular to:

a. the supply of housing land to accommodate unmet housing need within the SDNP;

- 2.1 CALA Homes support the comments made by HBF, in their Examination Statement, in respect of the duty to cooperate and the “failure of the NPA to identify how any unmet needs arising from the national park will be addressed elsewhere”. The SDNPA acknowledge that the Park cannot meet its housing needs and that the unmet need will need to be elsewhere but there is no clear method of ensuring the delivery is met. It is also important to note that the unmet need is based on the OAN which as discussed below is considered to be too low and therefore the unmet need may in fact be higher than set out by SDNPA.
- 2.2 SD.11 includes no clear outcomes from the cross boundary working between authorities and no housing supply has been identified to meet the unmet needs. This must also be considered in the context of a wider Housing Market Area which already has significant unmet housing need.

Matter 2 – Strategy – Policy SD25

Is the Development Strategy for the SDNP and its Town and Village Centres, put forward by Policy SD25 of the Plan, appropriate and justified by robust evidence, with respect in particular to:

b. the functional relationships between communities inside and outside the SDNP boundary.

- 2.3 No. Policy SD25 has not taken an adequate consideration of the functional relationships between communities inside and outside of the SDNP boundary and CALA Homes highlight this with reference to the settlement of Steyning. The Local Plan identifies Steyning as a Gateway to the National Park which are defined as “Settlements around the South Downs with good bus, ferry or rail links to the wider region and beyond, and bus and cycle links into the National Park”(pg 535). However, SDNPA have not considered how this settlement could provide the opportunity to deliver development to support both the National Park and the local community of Steyning.
- 2.4 With respect to the Land at Sweetlands, the Site is within the National Park but directly adjacent to the Horsham District boundary within which the majority of the settlement of Steyning falls. SDNPA have failed to adequately assess sites in these peripheral areas of the National Park which are supported by sustainable settlements. The approach to such sites, which fall close to or on the boundary of the National Park and neighbouring authorities, has led to development opportunities being overlooked through a lack of cross

boundary and strategic thinking. The Site and other similar sites, have the potential to deliver housing within the National Park which would reduce the unmet need of the wider area. In the case of Steyning the designated Neighbourhood Plan boundary straddles both the authorities of Horsham District and the SDNP and the Local Plan must not constrain the preparation of the Neighbourhood Plan or the allocation of the most sustainable sites within the designated area. The SDNPA must ensure that they have comprehensively considered this issue to ensure that plans are positively prepared and contribute to the achievement of sustainable development.

- 2.5 It is important to consider whether the emerging Local Plan would restrict the growth of settlements outside of the Park. In relation to Steyning, this settlement is relatively constrained in relation to locations for settlement growth. To the west of the settlement, is the boundary of the National Park and other than the Land at Sweetland, there appear to be no other appropriate sites between the western edge of the settlement and the National Park Boundary. To the east and north of the settlement, is the Steyning Bypass (A283) which forms a significant defensible boundary for the settlement. Further to the south west is the settlement of Bramber and Bramber Castle which is a Site of Archaeological Importance and a Historic Park and Garden. The surrounding constraints leave very few available sites around Steyning which are suitable for residential development. If the Local Plan does not adequately consider these issues at Steyning and other settlements there is potential for the Plan to not only constrain housing delivery within the National Park but also constrain the sustainable growth of settlements that adjoin the National Park boundary.

Matter 4 – Overall Housing Need and Supply

Policies SD26 and SD33

- 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)?
- 2.6 No. CALA Homes support the evidence submitted by the HBF in respect of the OAN and the methodology used by SDNPA to calculate this. It is acknowledged that the National Park is unlikely to be able to meet its full objectively assessed need, however opportunities to maximise the delivery of housing without compromising landscape quality have not been taken or fully assessed. The SDNPA appear to have taken a negative stance in terms of meeting the housing needs and this does not constitute the positive planning required by the National Planning Policy Framework (NPPF). As set out by the HBF, alongside the need to protect the National Parks landscapes, it also has a duty to “*seek to foster the economic and social wellbeing of the local communities within the National Park*”. The under delivery of the housing has the potential to have negative implications on the communities of the National Park, in relation to economic and employment growth, delivery of infrastructure and community facilities and social wellbeing.
- 2.7 CALA Homes support the comments made by the HBF in relation to the housing requirement, set out in Policy SD26, being expressed as a ‘minimum’. This reflects the policies of the NPPF and recognises the unmet needs within the Park. The wording would allow SDNPA to positively opportunities for additional development if they arise through the plan period. This could also be strengthened by securing additional

flexibility in the source of sites and reducing the overreliance on Neighbourhood Plans, as outlined in the CALA Homes Regulation 19 representations.

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?

2.8 No. In respect of questions 1b & 1c this focuses primarily on whether the SDNPA have adequately considered the development capacity of the Park and adequate sites for housing. This is not considered to have been assessed robustly by the SDNPA leading to under delivery being exacerbated. The HBF calls for the re-assessment of submitted sites to consider maximising delivery within the Park and this must consider the potential for mitigation to overcome issues which led to sites being rejected. This is strongly supported by CALA Homes and the Land at Sweetlands should be included within this re-assessment. The SHLAA is considered to be out of date having been produced in 2016 and therefore in the 2 years since its production new sites such as Land at Sweetlands have been promoted and not assessed by SDNPA. It is therefore not evidenced that all options for maximising development have been considered.

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

2.9 No. As outlined above the distribution of housing sites at settlements has overlooked settlements, such as Steyning, which are outside but on the boundary of the National Park. Such settlements have not been considered by the SDNPA to be capable of delivering development which would support the Park as well as the communities located on its boundaries. Steyning is designated in Policy 3 of the Horsham Strategic Planning Framework as a Small Towns and Larger Villages (Tier 2) which are defined as:

“these are settlements with a good range of services and facilities, strong community networks and local employment provision, together with reasonable rail and / or bus services. The settlements act as hubs for smaller villages to meet their daily needs, but also have some reliance on larger settlements / each other to meet some of their requirements”

2.10 Such settlements therefore provide important services and facilities to wider communities and must be able to continue to sustainably grow.

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

2.11 No. As outlined above in respect of the Duty to Cooperate the SDNPA have not secured adequate certainty that the need will be met by neighbouring authorities. In addition, and as outlined in the Regulation 19 representations submitted by CALA Homes, the Local Plan places an overreliance on Neighbourhood Plans delivering additional development. The allocation and delivery of site allocations by Neighbourhood Plans is supported by CALA Homes however there is practical implication which must be considered. The production of a Neighbourhood Plan is a considerable undertaking for a local community and can take a significant amount of time to be prepared which could delay the delivery of development. In addition, whilst the Local

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Plan supports the production of Neighbourhood Plans, there is no guarantee that the local community will produce and adopt a Plan. Therefore there is the possibility of such areas having no site allocations and no flexibility in the Local Plan to bring forward appropriate sites via alternative methods.

3. Conclusions

- 3.1 The emerging Local Plan in its current form is not considered to have adequately evidenced its overall spatial strategy and could result in the suppression of delivery of housing. This would have resulting negative impact on economic and employment growth and the social wellbeing of local communities and would increase the pressure on neighbouring authorities to meet the unmet need.
- 3.2 The emerging Local Plan could however be amended via Main Modifications and the production of additional evidence in order to rectify these identified issues. SDNPA should consider the following amendments:
- Undertake additional work in respect of the capacity of sites to deliver development and the reassessment of available sites including any potential mitigation in order to increase the supply of housing delivered within the Park over the plan period and thus reducing the unmet need. This should include assessment of the Land at Sweetlands;
 - Reconsider the relationship between communities inside and outside of the National Park and how these communities rely on one another to deliver development and services. This includes the settlement of Steyning which is directly adjacent to the National Park boundary and which is constrained in terms of land available to deliver development. Opportunities to secure development which would result in benefits to communities inside and outside of the Park should be reconsidered by the SDNPA;
 - Inclusion of a “minimum” housing target in policy SD26;
 - Reconsider the calculation of the objectively assessed need of the National Park in line with relevant Planning Practice Guidance and duty of the National Park to foster economic and social wellbeing;
 - Secure additional flexibility in Policy SD25 and SD26 to ensure that there is not an overreliance on Neighbourhood Plans to deliver new development especially those which are cross boundary;
- 3.3 The proposed amendments outlined would ensure that the Local Plan is based on robust and up to date evidence and secures the maximum development possible in order to support the National Parks local communities and those outside the Park. This will ensure the long term sustainable development of the National Park and can be achieved whilst protecting the special landscapes of the National Park.

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