

SDNP HOUSING NEED
17th July 2025 12-2pm
Butser, South Downs Centre, Midhurst

Attendees: Kerry Parr (AECOM); Olivia Carr (AECOM); Tim Slaney (SDNPA); Claire Tester (SDNPA); Katharine Stuart (SDNPA); Nadeem Din (L&EC); Adam Harvey (EHDC); Adrian Fox (WCC); Emma Betteridge (WDC); Claire Potts (CDC); Andrew Marsh (MSDC); Mark Pengelly (ADC); Tal Kleiman (HDC); Norman Kwan (HDC); Moira Hayes (A&WC); James Webster (WDC); Steve Tremlett (BHCC).

AGENDA

Agenda Item	Action Points
1) Introductions	
<ul style="list-style-type: none"> • Roundtable introductions. • Claire Tester (CT) SDNPA explained that changes to the NPPF and PPG in December 2024 allowed for National Parks and constituent local authorities to develop a local housing needs assessment as their planning authority areas do not align with the geography used in the Standard Method. CT had met with colleagues from Lewes, Chichester, East Hampshire and Winchester (on 7/1, 10/2, 3/3 and 31/3) to agree the brief and commission the study to provide an evidence base for this local housing needs assessment. CT also wrote to all the other affected local authorities on 4th April 2025 explaining the work and inviting comments. • A draft report has been produced by AECOM, and this was circulated to attendees in advance of the meeting. This presents two scenarios based on 'top down' approaches which mirror the Standard Method. • SDNPA are also working with the wider national park family on an alternative 'bottom up' approach to housing needs which reflects national park characteristics. It is likely that SDNPA would present both methods through the examination of the South Downs Local Plan Review. • The focus of this meeting is to ask any questions we may have for AECOM regarding the draft report and to discuss and seek to come to a consensus on the appropriate 'top down' method. 	
2) AECOM Study	
Presentation	
<ul style="list-style-type: none"> • Kerry Parr (KP) AECOM introduced the work that has been undertaken and explained the two scenarios (see slides). 	

- KP explained that the draft report deliberately does not give a conclusion on either scenario, but it does state strengths and challenges of the two approaches. There is a high degree of confidence in the dwelling stock figures of scenario 1. However, scenario 2, whilst a logical and reasonable approach to producing bespoke affordability ratios, does have some data limitations.

Discussion

- General agreement that the points raised at the end of the presentation regarding pros and cons/limitations would benefit from being more clearly and directly picked up in the report.
- Nadeem Din (L&EC) asked whether we are likely to get an update on the 2020 data used in Scenario 2? AECOM advised that it has been hoped for a while but there are no signs yet and referred to the PPG that confirms use of the data in the absence of other robust data.
- Adam Harvey (EHDC) noted that bespoke affordability may need to be looked at regularly depending on where LPAs are in the plan-making process.
- Adam Harvey (EHDC) also noted that the message to communities outside of the NP could be challenging to get across in regards Scenario 2 vs Scenario 1 – the Scenario 2 output may show less of a LHN figure outside the Park, but the issue of unmet needs from inside the Park still needs addressing.
- Tim Slaney (TS) SDNPA gave update on NPA work:
 - The National Park Authorities are working together to produce some principles for housing needs in National Parks. It will depend on each NPA as to how some of these principles will be tuned / applied.
 - The principles will be promoted to MHCLG and PINS.
 - The government is seeking an increase in homes nationally, but the thrust of this is different in National Parks where the drivers are for local needs and vibrancy of National Parks.
 - The principles will be shared when finalised.
- Adrian Fox (WCC) suggested including POS for promotion / endorsement of the principles.
- Risk of different treatment at examinations: It was noted that PINS and MHCLG have demonstrated some inconsistency in their approach to matters at examination. There is a risk that an approach to housing need may be agreed at the SDNPA examination, but a different approach is taken by PINs for

Action 1 – AECOM to more clearly draw out in the report the pros and cons / limitations of the two approaches.

Action 2 – SDNPA to share principles when finalised.

Action 3 – SDNPA to also share principles with POS.

other local authority LP examinations. Tim Slaney (SDNPA) recognised this risk and the intention of the work engaging with PINS/MHCLG is hoped to minimise the risk.

- **Development Management:** It was noted that there would also be potential challenge of any housing need scenario in the short term when used for DM / Housing Delivery Test. It was noted that EDHC and LDC already using a housing need figure adjusted for proportion of housing stock as part of their five year housing supply position.
- **Housing Supply:** It was noted that there is a gap between the Housing Need figures in both scenarios in the AECOM report, and the provision of homes in the Regulation 18 South Downs Local Plan Review and it was queried whether the AECOM report should address this? Claire Tester (SDNPA) advised that need is “policy off” and is the starting point with other factors then brought it to determine how much of that need can be met, such as National Park purposes. AECOM confirmed that addressing this supply would be beyond the scope of this work. It was agreed that explanation would be provided in the report that the housing need scenarios are “policy off” and then policy consideration on how need is met are for the next stage of plan-making work.
- **Some discussion on relative pros and cons between scenario 1 and 2:**
 - It was noted that the number was not vastly different between them.
 - Scenario 1 represents a local approach that meets government requirements.
 - Scenario 1 allows for new geographies from Local Government Reorganisation (LGR) to immediately understand figures and this would also help future Spatial Development Strategies (SDS).
- There was a general consensus in the room that Scenario 1 was more robust and easier to defend at local plan examination and for housing land supply purposes. It would also be easier for LPAs to keep up-to-date with changes to housing stock and affordability ratios without needing repeated external studies.
- General agreement that the wording in report about the PPG and the use of alternative methods needs rephrasing as it doesn't just apply to National Park Authorities but also to councils where part of their area is in a National Park.

Action 4 – AECOM to explain in the report that the housing need scenarios are “policy off” and the policy considerations on how need is met are for the next stage of plan-making work.

Action 5 – AECOM to review and rephrase.

<p>Next steps</p> <p>To finalise the report.</p> <ul style="list-style-type: none"> ○ Agreed for all to put comments on a shared document held in AECOM Sharepoint. ○ Agreed a deadline of 2 weeks from the date of the shared document being available (6th August). ○ Due to leave commitments AECOM will reissue the document in approximately 1 month from this meeting. <p>Agreed to explore holding a joint online briefing for key councilors/members in early September. It was agreed the briefing would be held first and then the report circulated and published.</p> <p>Ultimately the goal is to have a Statement of Common Ground (SoCG) or Memorandum of Understanding (MoU) between all 13 LPAs setting out the agreed scenario to use for the top down method of assessing local housing need.</p>	<p>Action 6 – AECOM to provide Sharepoint Link. Action 7 – ALL to input comments by 6th August.</p> <p>Action 8 – AECOM to check whether a member webinar is already in the scope.</p> <p>Action 9 – SDNPA to explore arranging the member webinar.</p>
<p>3) Housing Supply and Unmet Housing Need</p>	
<ul style="list-style-type: none"> • An overview of SDNPA supply and unmet need: <ul style="list-style-type: none"> ○ The adopted Local Plan currently has a provision figure of 250 dwellings per annum. ○ The Regulation 18 Local Plan Review document consulted on a slight uplift of that, noting that windfall wasn't included in the Reg 18 document. This included some sites within but near the edge of the National Park boundary where landscape and sustainability considerations support this. ○ SDNPA are hoping to achieve a further uplift with new site submissions made at Regulation 18. However, it will not be possible to meet 1,000+ dwellings per year as this is not compatible with National Park purposes and so there will be unmet need arising if measured against the top down method. ○ SDNPA welcomes peer review of their site assessments in the Land Availability Assessment and is willing to meet with any local authority to discuss the sites in their areas with a view to reaching an agreed position on sites and provision levels within the National Park. <p><u>Discussion</u></p> <ul style="list-style-type: none"> • Moira Hayes (Adur & Worthing) requested that cross boundary discussions be held on edge sites to ensure infrastructure needs are appropriately considered. 	

<ul style="list-style-type: none"> • CDC and LDC confirmed they would like to meet and discuss sites. B&H to follow up on potential LPA sites. • It was noted that some LPAs, due to pressures of housing numbers, would be considering sites nearer to the boundary of the National Park. Claire Tester (SDNPA) confirmed that there is no blanket position on sites in or near the setting and instead SDNPA considers responses on individual merits. • It was noted that we collectively are a group of LPAs with significant constraints, and all authorities are finding meeting their own needs challenging. • General discussion on the merits of consistent or shared methodology for evidence with upcoming LGR and SDS. In the future, LPAs may want to have an agreed methodology for site selection similar to the joint methodology being developed in East Sussex for Gypsy, Traveller and Travelling Showpeople sites. 	<p>Action 10 – SDNPA to arrange meetings with AWC, CDC and LDC to discuss sites and infrastructure.</p> <p>Action 11 – All other LPAs to contact SDNPA if they would like a meeting.</p> <p>Action 12 – Brighton & Hove to follow up with SDNPA on potential sites in BHCC ownership.</p>
<p>4) Next Steps</p>	
<p>SDNPA will circulate notes from today.</p> <p>Agreed actions to be completed.</p>	