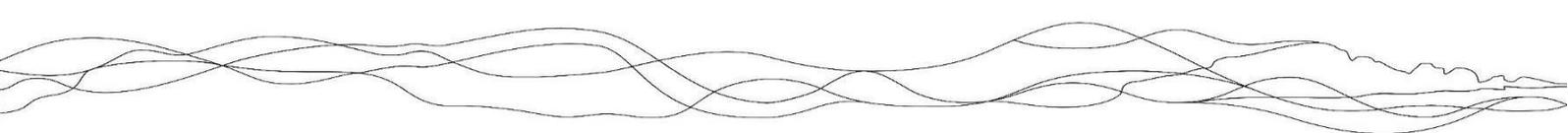




# **Affordable Housing Background Paper South Downs Local Plan**

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**September 2017**



# I. INTRODUCTION

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## Policies covered:

- **Policy SD28:** Affordable Homes
- **Policy SD29:** Rural Exception Sites

**1.1** This paper outlines the basis upon which Policy SD28: Affordable Homes and SD29: Rural Exception Sites have been developed. National policy is considered initially, then the local evidence and context of the South Downs National Park.

## 2. NATIONAL PARK PURPOSES & DUTY AND SPECIAL QUALITIES

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**2.1** Policies SD28 and SD29 relate primarily to the socio-economic duty, which is to seek to foster the economic and social well-being of the local communities within the National Park. The duty is articulated in the English National Parks Vision & Circular (DEFRA, 2010)<sup>1</sup> as set out below. The delivery of the right types of housing to meet local needs is a key part of meeting the socio-economic duty.

**2.2** The South Downs Partnership Management Plan (PMP)<sup>2</sup> includes an outcome that communities and businesses in the National Park are more sustainable with an appropriate provision of housing to meet local needs and improved access to essential services and facilities. The PMP also seeks the creation of more balanced communities, recognising the particular challenge of higher-than-average house prices for those on low incomes and for young people and young families. Therefore, the focus for the PMP and the subsequent Local Plan is to provide for the affordable housing needs of local people.

**2.3** Policies SD28 and SD29 also complement Special Quality 7: Distinctive towns and villages, and communities with real pride in their area set out in the Partnership Management Plan, Shaping the Future of your South Downs National Park 2014 – 2019.

## 3. NATIONAL POLICY

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**3.1** The National Planning Policy Framework (NPPF)<sup>3</sup> (paragraph 14 and footnote 9) sets a clear steer that certain areas, including national parks, are not expected to meet full objectively assessed housing needs. The NPPF also sets out that local authorities should widen choice and create sustainable, inclusive and mixed communities; this should include planning for the needs of different groups in the community.

**3.2** NPPF paragraph 50 (third bullet) states that where a need for affordable housing is identified, policies should be set for meeting this need on site, unless off-site provision or a financial

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<sup>1</sup> English National Parks and the Broads: UK government vision and circular 2010 (Defra, 2010)

<sup>2</sup> South Downs Partnership Management Plan 2014-19 (SDNPA, 2015)

<sup>3</sup> National Planning Policy Framework (CLG, 2012)

contribution of broadly equivalent value can be robustly justified, and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.

- 3.3** NPPF paragraph 54 sets out policy on rural exception sites. This supports rural exception sites where appropriate, and states that local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.
- 3.4** The Vision and Circular sets out national policy which is specific to the national park authorities. The policy is very clear that housing growth in the national parks should be primarily focused on affordable housing. The overall approach is set out in paragraphs 76 to 79; specifically, paragraph 78 states:

*“The Authorities have an important role to play as planning authorities in the delivery of affordable housing. Through their Local Development Frameworks they should include policies that pro-actively respond to local housing needs. 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.”*

## 4. NATIONAL PLANNING PRACTICE GUIDANCE, WRITTEN MINISTERIAL STATEMENT AND LEGAL JUDGEMENT

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- 4.1** In November 2014, the Housing and Planning Minister issued a Written Ministerial Statement (WMS)<sup>4</sup> stating that for sites of 10 dwellings or less, and which have a maximum combined gross floorspace of 1,000 square metres or less, affordable housing and tariff style contributions should not be sought. For designated rural areas under Section 157 of the Housing Act 1985, which includes national parks and areas of outstanding natural beauty, authorities may choose to implement a lower threshold of 5-units or less, beneath which affordable housing and tariff style contributions should not be sought. Within these designated areas, if the 5-unit threshold is implemented then payment of affordable housing and tariff style contributions on developments of between six to ten units should also be sought as a cash payment only and be commuted until after completion of units within the development. This statement was carried through into Planning Practice Guidance (PPG).
- 4.2** The introduction of new national policy by means of a WMS was challenged in the High Court by Reading and West Berkshire Councils. On 31 July 2015, a High Court judgement agreed with the plaintiffs that the introduction of these thresholds into PPG was legally incorrect. The relevant parts of the PPG were thereby quashed. The Secretary of State subsequently submitted a case to the Court of Appeal seeking to overturn the High Court judgement. This challenge

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<sup>4</sup> House of Commons: Written Statement (HCWS50) Written Statement made by: the Minister of State for Housing and Planning (Brandon Lewis) on 28 Nov 2014

succeeded<sup>5</sup>, and in May 2016 the PPG was reinstated, stating that the WMS should be taken into account having been given legal effect by the Court of Appeal ruling. The current PPG advice has Reference ID: 23b-031-20161116.

- 4.3** However the judgement handed down recognised that the WMS and PPG does not necessarily either outweigh the Local Plan, or prevent a different approach being taken through the plan-making process to respond to specific local circumstances. Specifically, the judgement stated in paragraph 31:

*“In our judgment, then, the policy stated in the WMS is not to be faulted on the ground that it does not use language which indicates that it is not to be applied in a blanket fashion, or that its place in the statutory scheme of things is as a material consideration for the purposes of s.38(6) of the 2004 Act and s.70(2) of the 1990 Act, and no more. It does not countermand or frustrate the effective operation of those provisions. The judge has, with respect, conflated what the policy says with how it may lawfully be deployed.”*

- 4.4** The detail of the judgement has generally been taken to mean that it remains legitimate for local plans to take a different approach to that set out in PPG with regards affordable housing thresholds, provided there is robust local evidence to support it. The sections that follow outline the local case for taking such a different approach, having regard to the specific circumstances of the South Downs National Park, and national policy other than the PPG and WMS. Further detailed evidence can be found in the evidence documents cited to support the approach taken in the South Downs Local Plan.

## 5. LOCAL CONTEXT AND EVIDENCE ON HOUSING NEED

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### **Affordable Housing in the South Downs National Park project**

- 5.1** This project seeks to drive actions towards significantly increasing affordable housing supply in the National Park. The main issues and drivers for affordable housing delivery have been identified, and an action plan put in place.

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<sup>5</sup> *Reading Borough Council and West Berkshire District Council v Secretary of State for Communities and Local Government* [2016] EWCA Civ 441 (Case no. C1/2015/2559)

**5.2** The main driver to the project is a substantial body of evidence, which shows that the affordability of homes in the National Park is very limited for those on average or lower incomes. This has led to a growing problem in respect of balanced and sustainable communities, as clearly reflected in representations made by numerous local communities across the National Park, including:

- More people and families are struggling to meet the rising cost of home ownership or private rent, which is impacting on affected people maintaining a decent quality of life, or forcing them to move away from family, friends and work;
- Younger working people are discouraged from remaining or settling in the National Park;
- This is resulting in an increasing skew in the make-up of communities towards older age groups, and in turn reducing the proportion of economically active people, and destabilising rural communities;
- Lack of affordability may be leading to more traffic movement and congestion as workers are forced to commute in from outside the area;
- Local services are being starved of employees and customers.

**5.3** Details of the project are set out in a committee report whose recommendations were approved by SDNPA Members on 15 December 2015<sup>6</sup>.

#### **South Downs Strategic Housing Market Assessment (SHMA) (GL Hearne, 2015)<sup>7</sup>**

**5.4** The SHMA 2015 assessed the need for affordable housing in the South Downs National Park, taking account of demographic household projections and market signals, using the Basic Needs Assessment Model set out in Planning Practice Guidance. The need was found to be a very significant 294 new affordable dwellings per annum. Recommendations were made on appropriate tenure split of 75:25% in favour of rented affordable tenures, and on sizes of homes (i.e. number of bedrooms). The SHMA 2015 has now been updated by the HEDNA (see below).

#### **Housing and Economic Development Needs Assessment (HEDNA) (GL Hearne, 2017)<sup>8</sup>**

**5.5** In relation to housing, the HEDNA updates the SHMA 2015 in assessing the overall 'objectively assessed housing need' (OAHN) for the South Downs National Park. It also separately updates the need for affordable housing in the National Park, again using the Basic Needs Assessment Model, but using updated demographic baseline data. The need for affordable housing was found to be virtually unchanged since the SHMA assessment 2 years previous, at 293 dwellings per annum. A recommendation is given that 75% of new affordable homes should be rented affordable tenure, to reflect the pattern of need, i.e. that most of those in need will not be able to afford even discounted owner-occupied housing. The figures have been calculated to relate to social/affordable rented and intermediate tenure, as shown in Figure 1.

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<sup>6</sup> Affordable Housing Project Update: Report PP24/16 to Policy & Programme Committee held 15 December 2016 (Item 11)

<sup>7</sup> Strategic Housing Market Assessment – South Downs National Park Authority (GL Hearne, 2015)

<sup>8</sup> South Downs National Park HEDNA – South Downs National Park Authority (GL Hearne, 2017)

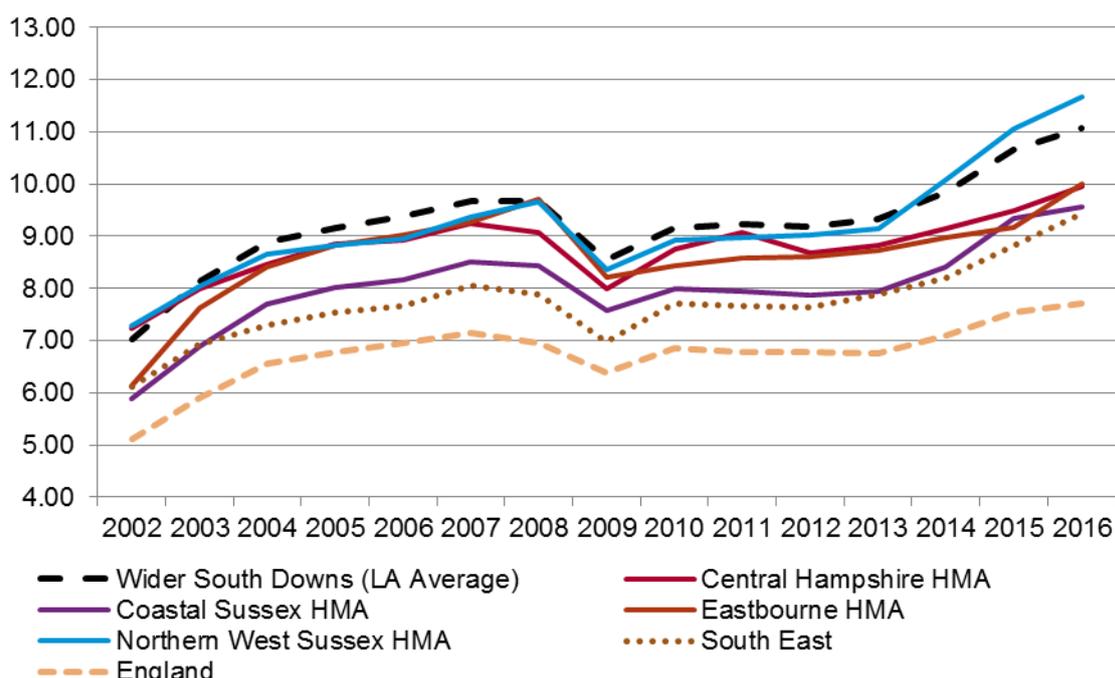
**FIGURE 1: ESTIMATED LEVEL OF HOUSING NEED (PER ANNUM) BY TYPE OF AFFORDABLE HOUSING**

Intermediate			Social/affordable rented		
Total need	Supply from Relets	Net need	Total need	Supply from Relets	Net need
103	9	94	565	366	199
32%			68%		

**5.6** The HEDNA also reports in detail on market signals to take into consideration when considering strategic housing needs. It identifies the following key evidence:

- Median house prices in 2016 within the National Park are £415,000 which is double the national median value. In addition, median house price in within the SDNP are up to 97% above the wider HMA figure; indicating that there is a premium for living in the National Park;
- House price growth in the SDNP has exceeded that seen nationally and regionally;
- Lower quartile house prices in the National Park are 11.08 times lower quartile earnings in 2016. This has continuously grown – illustrating house price growth has been outpacing earnings. The SDNP ratio is above the national (7.72) and regional (9.43) equivalents indicating significant local affordability issues (this is illustrated in Figure 2);
- Rental costs in the SDNP are similar to those in the South East but 25% above the national values. The rental affordability ratio (which is the ratio of monthly lower quartile rental costs against lower quartile earnings) was 10% above the national level in 2016 again indicating local affordability pressures (see Figure 3).

**FIGURE 2: LOWER QUANTILE AFFORDABILITY RATIO, 2002-2016**



Source: CLG, 2017

**FIGURE 3: RENTAL AFFORDABILITY RATIOS (RARS)\*, 2012-16**

	2012	2013	2014	2015	2016
<b>Wider South Downs (LA Average)</b>	37%	37%	38%	39%	39%
<b>Central Hampshire HMA</b>	36%	37%	37%	36%	36%
<b>Coastal Sussex HMA</b>	37%	37%	38%	40%	40%
<b>Eastbourne HMA</b>	36%	36%	37%	36%	37%
<b>Northern West Sussex HMA</b>	39%	38%	40%	43%	43%
<b>South East</b>	33%	34%	34%	35%	36%
<b>England</b>	28%	28%	29%	29%	29%

\* The rental affordability ratio (RAR) is the ratio of the monthly lower quartile rental costs of all type of property sizes as provided by VOA against the lower quartile earnings data from the annual survey of hours and earnings (ASHE). Higher percentages indicate that private rented accommodation is less affordable.

Source: HEDNA 2017, Table 15

**5.7** The HEDNA confirms that house prices in the National Park put the prospect of buying a house out of reach of most. Rental properties on the open market are also becoming progressively less affordable.

**5.8** The HEDNA concludes in paragraph 5.52 that the evidence points to a significant affordability pressure in the SDNP which for local authorities would ordinarily constitute a need to uplift their OAN. It states that the evidence points towards the need for a robust affordable housing target in the South Downs Local Plan that will help to deliver affordable homes for local people.

## Lloyds Bank National Parks Review<sup>9</sup>

**5.9** Lloyds Bank have issued research analysis of house price trends in the national parks of England and Wales. This has identified that house prices in the 12 National Parks surveyed were, on average, £118,711 (49%) above the average for their surrounding county. This was even starker within the SDNP where house prices in 2016 were 61% higher than the wider counties (£189,000). The study also identified the SDNP as having the fastest growing house prices of any National Park (45%) over the 2006-16 period.

### Local housing registers

**5.10** Local housing registers (LHRs) are maintained by local housing authorities (LHAs) (usually district councils), and provide details of the number of people seeking some form of affordable housing. Most LHAs break these down by level of priority need (based on factors such as income, risk of homelessness and family circumstances), and also by whether they have a local connection to the area (e.g. close family, or are employed locally).

**5.11** Figure 4 shows how many people were on the housing register as a 'snapshot' in the main settlements of the National Park, and within the four districts which together account for 77% of the National Park's area. Note the points in time to which these figures relate vary slightly, but are within the period April 2016-March 2017.

**FIGURE 4: SELECTED HOUSING REGISTER DATA, LOCAL CONNECTIONS ONLY**

District	Settlement	Total on housing register with a local connection
East Hampshire	Petersfield	256
	Liss	98
	Other towns and villages in or partly in SDNP part of East Hampshire	145
	E Hants Total	499
Chichester	Midhurst	103
	Petworth	44
	Other towns and villages in or partly in SDNP part of Chichester	263
	Chichester Total	410
Lewes	Lewes Town	122

<sup>9</sup> Press Release: National Parks command £119,000 house price premium (Lloyds Bank, November 2016) see <http://www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2016/161125-national-parks-release-final.pdf>

	Other towns and villages in or partly in SDNP part of Lewes	299
	Lewes Total	421
Winchester	All villages in or partly in SDNP part of Winchester	190

Source: Analysis of data provided to SDNPA by East Hampshire District Council, Chichester District Council, Lewes District Council and Winchester City Council

**5.12** These figures show how there is a very significant number of people with a local connection to a particular settlement, who are seeking affordable housing. Whilst the housing register is not a definitive record of ‘need’ as such (as anyone can apply to be entered on the housing register), it does provide evidence of the scale of the issue at hand. It should be noted also that these data sets are not a complete picture, as there will be many other people on housing registers for the other local housing authorities in the National Park that are not shown here.

### Evidence from Rural Housing Enabler

**5.13** The Rural Housing Enabler for Chichester has provided a brief analysis of affordable housing need, drawn from the housing register, data on allocations and lettings, and Right to Buy transactions. Together, these provide strong indication of affordable housing being in very short supply within the Chichester part of the SDNP, when compared with the level of need. The Rural Housing Enabler has said:

*“In April 2016 there were 416 households on the housing register who had claimed a local connection to a parish within the SDNP, this represents 29% of the districts housing register need. Yet there are only 6 affordable rented units coming forward from schemes with planning permission in the SDNP area... The turnover of the affordable rented units is also comparatively low compared to the rest of the district, of the 459 allocations in the year 15-16 only 155 were in the SDNP area. This represents a turnover of 4.3% of stock in the SDNP where the parishes outside of the park average a 6.5% turnover of stock. The right to buy figures show that 1388 affordable properties have been lost to the Right to Buy in the SDNP area, this equates to 36% of the total units lost in the District.”*

**5.14** This analysis succinctly demonstrates the scale of challenge faced in the largest district area in the National Park (some 33% of the National Park’s area falls within Chichester district).

### Feedback from the public, local communities and stakeholders

**5.15** The views of the community, and public generally, have clearly highlighted the importance of providing more housing to meet local needs. This reflects the challenges of finding affordable property as highlighted in the evidence above.

**5.16** The outcome of both the Options and Preferred Options consultations for the local plan suggested that there was strong support across the board for more to be done to deliver affordable housing to meet local needs, relating both to the need for more affordable tenures, and also for more smaller dwellings to encourage open market dwellings to be more affordable. This has been echoed by the Authority’s many discussions with parish and town councils across the National Park. The strength of feeling on the issue also comes across clearly in many of the Neighbourhood Plans being prepared, for example the emerging Lewes NDP has focused on increasing delivery of low-cost affordable homes as a key issue.

### South Downs Landowners' Conference, January 2017

- 5.17** In January 2017, the SDNPA held a Landowner's Conference, to explore in-depth the opportunities and barriers faced by landowners and developers with respect to affordable housing delivery. The overall message was very positive towards the need to do more to ensure local communities remain sustainable, and revealed a 'can-do' attitude to delivering more affordable housing on a range of sites within the National Park. This was seen as important to ensure rural businesses were supported in future by a locally based workforce, given increasing concern that the cost of accommodation to buy or rent on the open market is making it difficult for many to continue living in the local area.
- 5.18** A summary of outcomes from the Landowners' Conference is attached as Appendix I to this paper.

## 6. LOCAL CONTEXT AND EVIDENCE ON SUPPLY AND DELIVERABILITY

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### Supply of affordable housing in the South Downs National Park

- 6.1** The National Park Authority has produced two Authority Monitoring Reports (AMRs) to date. These have revealed the following in respect of delivery of affordable housing:

Monitoring year	Net affordable homes completed
2014/15	68
2015/16	35

Source: SDNPA AMR 2014/15 and AMR 2015/16

- 6.2** The AMR for 2015/16 reports that of extant planning permissions, just over 6% are for affordable housing (75 units in total). It is reported that this is, in part, due to the fact that permission for many sites was granted on the basis of old planning policies that pre-date the higher requirements for affordable housing in the joint core strategies and the emerging South Downs Local Plan.

### Site size analysis

- 6.3** In the experience of the National Park Authority, the great majority of housing sites that have been delivered since its creation as the local planning authority have been small (on sites of 10 units or less). In order to evidence this, the Authority has undertaken a simple analysis of data available from its monitoring of housing completions over a five-year period 2011-2016. One can also then calculate the supply of affordable housing that would have been achieved by applying the affordable housing policy SD28 proposed in the Pre-submission Local Plan (i.e. 50% affordable housing on sites of 11 or more, and a sliding scale applied to smaller sites). Note that this hypothetical analysis does not take account of the application where relevant of vacant building credit, or exemptions for self-build or affordable housing schemes. The results are shown in Figure 4.

**FIGURE 4: HOUSING COMPLETIONS BY SITE SIZE**

Net total on site	Net total delivered 2011-16	Number of sites	Affordable housing (Policy SD28)
1 or 2	282	268	0
3	36	15	Financial contribution
4	51	14	14
5	51	11	14
<b>5 or less total</b>	<b>420</b>	<b>308</b>	<b>28</b>
6	30	5	10
7	14	2	4
8	27	4	12
9	45	5	15
10	41	6	24
<b>10 or less total</b>	<b>577</b>	<b>330</b>	<b>93</b>
11 to 19	91	8	45
20+	270	10	135
<b>Grand total</b>	<b>938</b>	<b>348</b>	<b>273</b>

Source: SDNPA monitoring and analysis

**6.4** As can be seen from these figures, of a total 938 units delivered over this period, 577, or 62%, were on sites of 10 or less. If Policy SD28 were to have been applied, these sites would have yielded some 93 affordable units, making a total of 273 units across all sites. In other words, if no affordable units could be secured from sites of 10 or less, the amount of affordable housing would be 34% lower. With regards sites of 5 units or less, some 28 affordable units would have been lost as well as a significant amount of funds gathered from financial contributions in lieu of on-site provision.

#### **Viability Assessment: Community Infrastructure Levy & Affordable Housing (Dixon Searle Partnership, 2014)<sup>10</sup>**

**6.5** This viability assessment was undertaken at an early stage of the Local Plan process, and was intended to inform both the CIL charging schedule being developed at the time, and the affordable housing policy to be included in the Local Plan Preferred Options. The study brief recognised that both the affordable housing policy, and CIL, can have a significant impact on viability. The stated aim of the study was to provide the SDNPA with a broad picture on affordable housing viability with a view to setting suitable targets for that.

**6.6** The study found that, considered alongside CIL requirements, there would be potential to seek up to 40% affordable housing from schemes of 10 or more dwellings, with a sliding scale of

<sup>10</sup> Viability Assessment: Community Infrastructure Levy & Affordable Housing Final Report (Dixon Searle LLP, 2014)

reducing requirements for smaller sites beneath that. However, the recommendation was clear that this did not in any way fix the affordable housing policy positions at this level, but set out a suitable starting and potential base-point against which CIL and other aspects could also be considered.

### **Local Plan and Affordable Housing Viability Assessment (BNP Paribas, 2017)<sup>11</sup>**

- 6.7** In accordance with the NPPF, a viability assessment forms a critical part of the evidence base for the whole local plan. This gives assurance that the policies in the Local Plan are deliverable. The Viability Assessment updates the previously published CIL and Affordable Housing Viability Study, for example using the most up-to-date housing market and land value data, in light of National Park status having now been established for seven years. It has tested different options for policies that seek to deliver significant affordable housing in the National Park. The study looked at a number of different development ‘typologies’ ranging from very small to very large sites, and urban and non-urban previously developed sites, drawing on recent schemes approved by the National Park Authority.
- 6.8** The assessment concluded that most development typologies providing 11 or more units can viably provide 50% affordable housing. Three potential options were put forward applicable to sites of 10 or fewer units, one of which proposed a sliding scale of contributions, which was similar but not precisely corresponding to the emerging policy as of June 2017<sup>12</sup>. The approach to rural exception – to seek 100% affordable housing on these sites – was found to be robust, albeit relying to some extent on the flexibility of the tenure mix of the affordable housing. The conclusions noted that many of the appraisal assumptions are at the pessimistic end of the reasonable range, and schemes on the ground may consequently generate higher residual land values (i.e. more schemes on the ground are likely to be viable than is suggested by the assessment outputs). Overall, it was concluded that the Authority’s proposed policy approach would ensure that the objectives of providing for affordable housing needs, and ensuring that developments generate acceptable returns to willing landowners and willing developers, are appropriately balanced.

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<sup>11</sup> Local Plan and Affordable Housing Viability Assessment (BNP Paribas Real Estate, 2017)

<sup>12</sup> Draft Pre-submission South Downs Local Plan: Report PC32/17 to Planning Committee held 15 June 2017 (Item 7)

# 7. ROUTE MAP FOR POLICY FORMULATION

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**7.1** The starting point for developing a robust affordable housing policy was to have regard to the statutory socio-economic duty, alongside holistic consideration of national planning policy (which for the main constitutes the NPPF and the National Parks Vision and Circular). The key points were at the forefront of considerations from an early stage:

- The need to address a significant and growing housing crisis locally, as evidenced by market signals;
- The clear steer in national policy that housing delivery in national parks should be strongly focused on building affordable housing;
- The importance of developing a policy framework that was deliverable i.e. did not present viability barriers;
- The clearly expressed feeling from communities that more needed to be done in future;
- The contribution that most undeveloped greenfield sites make to the special qualities of the National Park, balanced against the contribution that new housing sites, including rural exception sites, could make to delivering local affordable housing.

**7.2** The Preferred Options version of the Local Plan included Policies SD24: Affordable Housing and SD25: Rural Exception Sites. Policy SD24 set a requirement for 40% of homes on sites of 11 or more units, and a financial contribution on sites of 6 to 10 units, with the types of homes (i.e. whether rented or low-cost ownership) to be determined by local evidence of need. This took account of the following:

- The CIL and Affordable Housing Viability Assessment;
- The WMS and PPG relating to affordable housing thresholds (however this was before the legal challenge and counter-challenge regarding these Government statements had taken place);
- Detailed discussion with partner local housing authorities, which drew attention to local need and deliverability issues;
- The perception of local communities that rural exception sites outside settlement boundaries should only be permitted if they provided exclusively for local affordable housing needs (i.e. exclusively to benefit the local community).

**7.3** Since publication of the Preferred Options, a number of things have changed, which has led to a refinement of the approach taken. These are explained more fully in the evidence presented earlier in this paper, and comprehensively set out in the full evidence base. To summarise:

- The National Park Authority has now been established for over 7 years, and has been the local planning authority for over 6 years. The principle of development constraint, in line with statutory purpose 1, and of the socio-economic duty, is now fully established. Four Joint Core Strategies have been adopted which also reflect this. This should now be fully reflected in landowners' and the communities' expectations.
- The HEDNA, and other separate sources, have starkly exposed the strength of market signals supporting a robust approach to affordable housing policy.
- Reflecting the above, a new Whole Plan Viability Assessment provides evidence that a higher affordable housing target is supportable, and would still allow most developments across the National Park to be viable.
- The legal judgement handed down from the Court of Appeal relating to affordable housing thresholds, which whilst upholding the Government's policy position, also confirmed the legitimacy of the plan-making process taking a different approach where this is justified by evidence.
- Positive and constructive liaison has taken place with those responsible for delivering affordable housing (i.e. local landowners, professional agents and housing associations) which suggest it is appropriate to adopt a stronger policy position, provided that the tools are available to make delivery happen.
- Reflecting the landscape-led context of the National Park, there is a predominance of housing supply being delivered on small sites.

**7.4** Policy SD28: Affordable Housing has been drafted to take account of all these factors. It is an evidence-led policy, which reflects the National Park's statutory duty by prioritising delivery of affordable housing, whilst recognising that much of the delivery will be dependent on cross-subsidy from market housing proposals. Policy SD29 also reflects the above in seeking 100% affordable housing on rural exception sites. Both Policies SD28 and SD29 incorporate flexibility to allow for local evidence on housing need to influence the mix of affordable housing. They also provide scope for evidence on viability, on a case-by-case basis, to exceptionally give flexibility for an alternative mix of tenures if required to enable a site to come forward.

## 8. CONCLUSIONS

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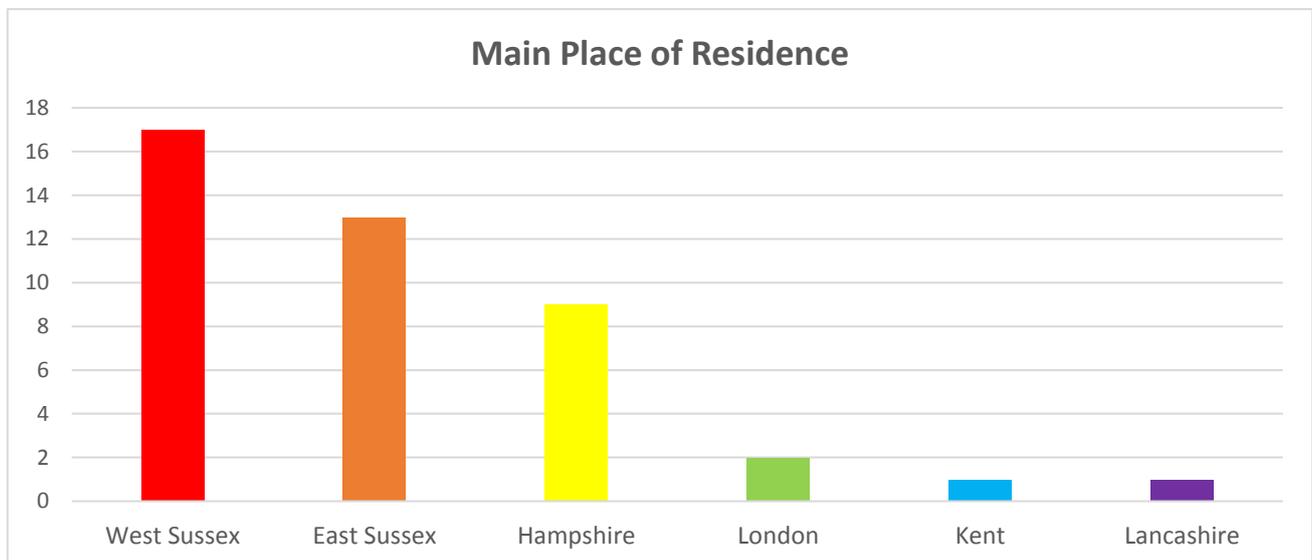
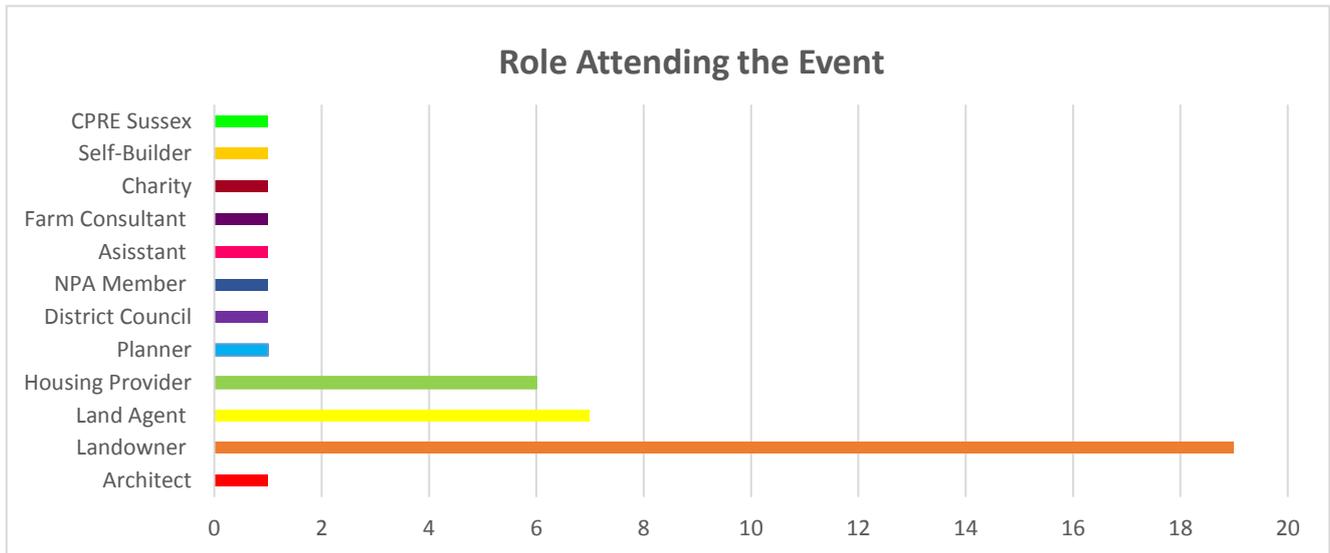
**8.1** The affordability of housing goes to the heart of the National Park's statutory duty, and is a major barrier to sustainable communities in the National park. A robust policy approach, focused on small as well as larger sites, is therefore required to meaningfully address this issues. A comprehensive evidence base has been developed to support the policies that have been developed and ensure they are deliverable.

# South Downs Landowner Conference: Working Together to Build More Affordable Homes

## Feedback Summary 2017



### 41 SURVEYS RETURNED

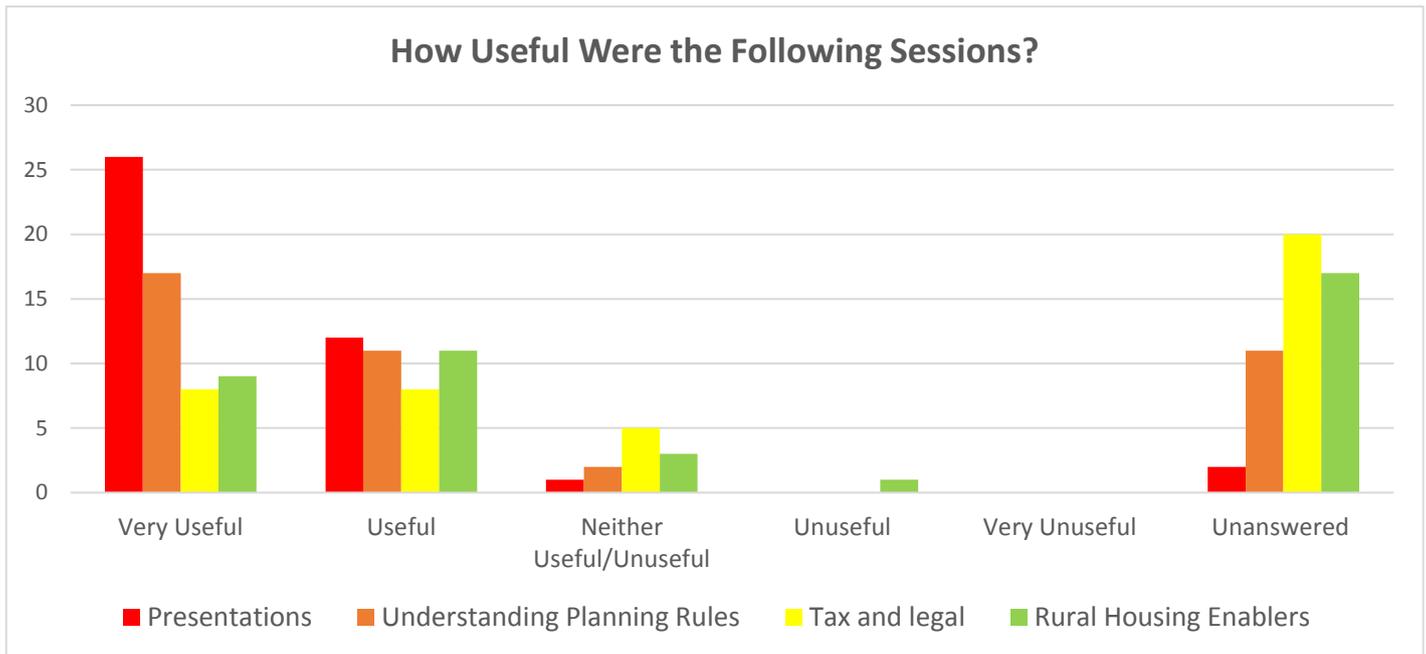


### What motivated you to attend today?

- *Planning guidance within the SDNP*
- *Interest in availability of local affordable housing to all working in connection with countryside in the Sompting area- whether in farming, ecology care, farming etc.*
- *We have land that may be suitable for affordable housing*
- *Interest in providing housing*

## South Downs Landowner Conference: Working Together to Build More Affordable Homes

- *To learn more about SDNP approach to rural housing and due to interest in shortfall of affordable homes for rural workers*
- *Long term interest in providing for low cost housing enabling the young to stay in our village*
- *Interested in affordable housing and small development in small village area*
- *Part of a workshop- useful as landowners' willingness to provide land for affordable housing is always a challenge. Local support is not really an issue*
- *Interest in housing (rural)*
- *To gain better understanding of planning issues in SDNP and rural areas*
- *Local planning and regulatory interest*
- *I have land which could be available for affordable housing*
- *Learn more about specific affordable housing issues from the NPA and meet with variety of people on issues affecting*
- *Learn more about the approach to planning, housing issues in the SDNPA*
- *An understanding of other uses of land*
- *Interested in affordable housing and the planning system*
- *The need for additional housing is of national importance but also exceptional local importance. I am dealing with these issues day in, day out*
- *Affordable housing is needed in Alfriston*
- *To understand planning issues*
- *Wiston whole estate plan*
- *Possibility of affordable housing in our location*
- *Topics interest me*
- *Understanding what rural exception sites are and how they might be attractive to clients*
- *Getting better understanding of how SDNPA is looking to tackle affordable housing and examples of how this might be achieved by landowners*
- *My interest in affordable housing provision*
- *To learn about SDNPA's approach to housing provision*
- *Want to offer land for affordable housing*
- *Provision of affordable housing*
- *? clubs are landowners- interest in SDNP policy on this topic*
- *Desire to understand affordable housing- both delivery as well as ownership*
- *Farm diversification and barn conversion*
- *I was part of the workshop*
- *The further the case for rural exception sites*
- *To understand how the SDNP are working with land owners and how the park will deal with the seal off of Eastbourne Downs (EDC was not present). Understand how SDNP are dealing with affordable housing in rural areas*
- *Relevance in the face of declining agricultural incomes*
- *Wish to promote affordable housing for local people in an environmentally, socially and economically sustainable way. Particular interest in Private Sector solutions and affordable homes owned and managed by Estates/private sector (private RSL etc.)- wish to understand CLTs.*
- *Connections with Hampshire Alliance for Rural Affordable Housing (HARAH)*



**What is the most useful piece of information you will take away from the conference today?**

- Information sharing and ideas sharing-excellent
- Affordable housing does not need to be owned and run through housing associations
- Contacts
- There is a lot of work to do!
- Contacts- Planning Policy Proposal for the Local Plan
- Policies
- I was pleased to hear replacement of one bungalow with perhaps two affordable units event if slightly bigger in square footage would be considered as a concept- that is an option to avoid 'Right to Buy'
- Stance of SDNP is interesting
- CLT
- How the SDNP view their role in addressing the housing crisis
- The Chief Executive and Chief Planner are forward thinking!
- Potential changes to planning policies through SDNOA local plan to innovate
- Provision for 100% affordable housing would often make it a non-starter
- The breadth and depth of interest in affordable housing
- Rights associated with?
- That we are miles away from solving the problems of affordable housing- the will is there but not the means
- The Community Land Trusts are much more flexible than I thought previously and could work well with our existing Estate objectives
- Understandings of tax position for affordable housing
- Type of sites being sought for affordable housing
- Not easy to specify- general knowledge
- Planning rules can be flexible- it's very difficult to devise viable schedules

## South Downs Landowner Conference: Working Together to Build More Affordable Homes

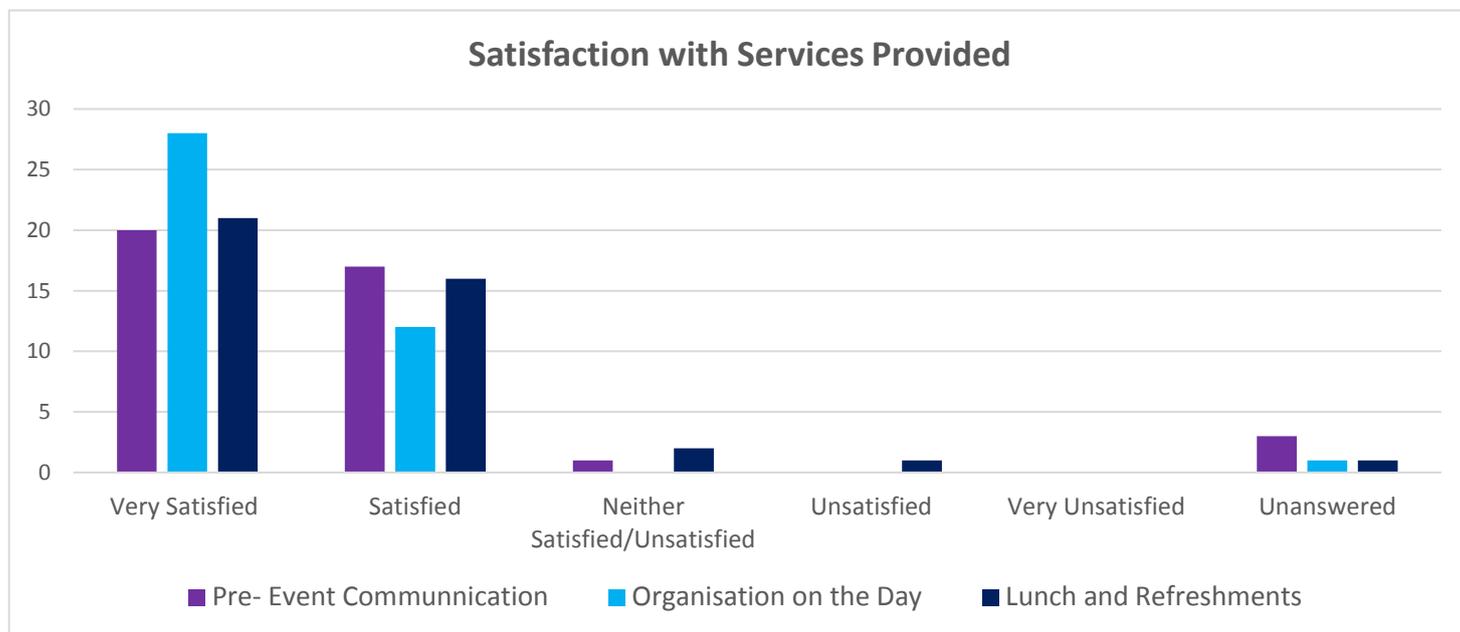
- *Info on current papers- initiatives for future resources*
- *The need for any building to respond to the local community*
- *Planners are 'on the case!'*
- *Tax stuff*
- *Great to put faces to names/names to faces and thank you for the contact list- we will use it*
- *Legislation around S106 structure of welfare*
- *Probably tax and ability for self-build affordable schemes*
- *Possible flexibility of ongoing changes*
- *Definition of affordable housing*
- *Networking and the different ways to fund the necessary local homes that we need to keep our villages alive*
- *SDNPAs rural housing enabling service will be welcomed*
- *Information given in Hastde presentation*
- *Rights associated with benefits in kind on key worker housing*
  - *Presentations by Sue Chalkley (Rural Housing Association)- further clarification by Tim Slaney of Planning Policy by SDNP on, affordable housing, conversion of barns/ redundant buildings (specific issues), Whole Estate Plans and why the SDNP included housing in the local plan when they were not legally required to do so*

### What topics would you like to see covered at future events?

- *Conversion of redundant buildings in the SDNP-non affordable housing in the SDNP*
- *Unutilised land and buildings*
- *Into an everything local plan*
- *Tax*
- *Especially on those covered*
- *How to deliver new forms of transport in the parl i.e. will electric cars be mandated on new housing schemes and will one car per household be another planning restriction*
- *Update us on the new plan!*
- *Landscape/viewshed- heritage and settings*
- *More on self-build potential for delivery*
- *Planning/self-build*
- *How to engage with philanthropic and charitable organisations without which the problem of affordable housing cannot be solved*
- *Planning for other uses- tourism, farming*
- *Planning more generally not just housing*
- *Similar topics with more progress made*
- *Self-build as possible affordable housing source*
- *Farming future in the National Park*
- *Updates on current projects and new relevant projects*
- *Specific guidance on how to work constructively with SDNPA to deliver value/benefit*
- *More on redundant farm building- is it really desirable to see old barns just crumble?*
- *Farm workers houses. Self-build help for groups who might be able to stay in the area*
- *Presentation from landowner and/or estate manager on real world scheme; hopes, fears, lessons learned, rules of thumb (including experience of WEP would be good too)*

## South Downs Landowner Conference: Working Together to Build More Affordable Homes

- *Whole Estate Plans, partnership between villages and rural housing associations , re-use of redundant farm buildings to avoid 'piecemeal' development, sustainable development and zero carbon buildings (low energy consumption building)*
- *A design workshop for architects and planners with input from landscape architects*



### Additional comments:

- I really enjoyed that day- it was informative and positive
- Affordable housing (social included) should a focus following the Housing White Paper- some villages need housing to keep them alive
- Thank you for getting excellent speakers and for devoting the time of so many of your colleagues
- Very good day but this is going to be a long process
- Another top quality initiative by the best of all parks!
- We need to think outside the box- delivering housing in rural areas needs to be innovative. There is not enough of it for landowners- too restrictive. Also could we have a mid-morning leg stretch next time? Excellent conference!
- Helpful in terms of general context but more difficult to address specific questions raised because of need for specific advice
- Hard to find out about this event. Once we had expressed our interest communication was very good. Perhaps we could have details of date circulated earlier. A very good conference- thank you
- No emphasis on ecohouse buildings
- Perhaps too focused for landowners not all in the room? i.e. stuff on tax etc.
- Great expertise shown by all. However, the moral aspect i.e. young people (and some old people) who can't afford to live in SDNP was not address. If it were to be addressed we might get some lift off (perhaps)
- Thank you for organising

## South Downs Landowner Conference: Working Together to Build More Affordable Homes

- Provide a lectern for speaker. Questions- get respondent to stand up. 4 x 1./2 presentations- too long without short break
- Look forward to receiving the papers
- More disappointed about land release due to 100% AFF and numbers required by housing association who don't want to pay or encourage sites to come forward
- A financial model to illustrate and motivate landowners, most of whom also have a community spirit, was missing
- A bit light on cold drinks (water issues noticed). Would like to have attended all three of the afternoon seminars/workshops
- Wonderful day, lots of information in a short period. Perhaps have a few minutes break between the presentations
- 5/10 minute break needed between first session
- Tea and coffee ran out- all a bit chaotic! (but I understand why)
- A very useful and well organised event. Well done!
- Excellent day- thanks
- I'd be interested in contributing to policy- how do I do this?