



GL Hearn

Housing Study (Duty to Co-operate) Executive Summary

Sussex Coast HMA Partners

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Prepared by

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1 EXECUTIVE SUMMARY

- 1.1 The Housing Duty to Cooperate Study has been commissioned by the local authorities of Adur, Arun, Brighton and Hove, Chichester, Lewes and Worthing which fall within the Sussex Coast Housing Market Area (HMA) together with the South Downs National Park Authority. It pulls together evidence from a range of studies to provide a consistent and objective assessment of housing requirements in each authority and across the HMA, addressing the need and demand for market and affordable housing.
- 1.2 The Study also assesses residential land supply and capacity in each area including environmental, landscape and infrastructure constraints to consider the balance between potential supply and demand, to quantify and consider the implications of a potential shortfall in housing provision across the HMA against assessed needs, and how this might be addressed. The Study has included a robust testing process which has examined the potential for additional development in the HMA including provision to meet unmet requirements from adjoining authorities.
- 1.3 The Study has been prepared in view of the duty to cooperate introduced in the 2011 Localism Act. This requires local authorities and other bodies to engage constructively, actively and on an on-going basis in the preparation of development plans and associated activities such as the evidence base which underpins these. This is a legal duty. The National Planning Policy Framework (NPPF) also outlines that authorities will be expected to demonstrate that they have effectively cooperated to plan for issues with cross-boundary impacts when their plans are submitted for examination. This is one of the soundness tests against which plans are assessed, with plans expected to make provision for meeting unmet development and infrastructure requirements from adjoining authorities where it is reasonable to do so and consistent with achieving sustainable development. Cooperation is intended to be a continuous process of engagement through the development and delivery of development plans.
- 1.4 The Study points to a number of authorities around the country whose draft plans have been found to be inconsistent with the NPPF. There are a number of nationally-significant development constraints within the Sussex Coast HMA which affect the potential to accommodate development needs. Against this context it will be important to demonstrate that a robust testing process has been undertaken to explore options for further development, including joint working on longer-term strategic development options, and that there is a clear audit trail regard how potential options for housing provision in Local Plans have been considered and tested through Sustainability Appraisal.

SOUTH EAST PLAN

- 1.5 The South East Plan will be revoked in March 2012. However many of the issues regarding the potential of the HMA to accommodate development were explored and examined through the process of preparing the regional plan.
- 1.6 The South East Plan identified the extensive environmental designations of national and international importance which cover significant parts of the Sussex Coast area, including the South Downs Area of Outstanding Natural Beauty (AONB) which was designated a National Park in November 2009, the Chichester Harbour AONB, Heritage Coast, Ramsar sites, Sites of Special Scientific Interest (SSSI) and areas of Ancient Woodland. A number of areas in the sub-region are also vulnerable to fluvial, coastal and groundwater flooding and there are coastal management issues. The sub-region also suffers from poor quality transport infrastructure and services.
- 1.7 The physical and environmental characteristics of the area were recognised in the Panel Report following the examination of the plan, as well as key infrastructure constraints on development including waste water treatment capacity and the capacity of the A27 and A259. It recognised particular issues of capacity around the A27 Chichester Bypass, with the Plan premised on the expectation that funding priority would need to be given to addressing these to support the levels of proposed development in this area. Indeed the plan identified a pressing need for substantial improvement in the sub-region's strategic transport infrastructure and services particularly east-west links.
- 1.8 The significant development constraints which existed led to a spatial strategy for distributing development which was strongly driven by the capacity for development in existing urban areas and the potential for different towns to accommodate sustainable urban extensions (particularly in Chichester and Arun Districts).
- 1.9 The South East Plan noted that as a result of the area's age structure, with an excess of deaths over births, population and household growth was particularly driven by net in-migration from London and the rest of the South East. It was however accepted through the South East Plan that as a result of the strategic development and infrastructure constraints which existed in the sub-region, it would not be able to meet its full development needs based on population trends, with the Panel concluding that "given its geography and high quality environment and infrastructure deficiencies, the Sussex Coast is not a sub-region that should be expected to make a substantial contribution to meeting wider needs in the South East." The plan was based on an expectation that the capacity and demographics of the area would lead to a reduction in net in-migration over time.

- 1.10 The underlying strategic environmental and infrastructure constraints which were recognised in the South East Plan as limiting the range of options for locating future development in the Sussex Coast sub-region continue to exist today.

OBJECTIVELY-ASSESSED DEVELOPMENT NEEDS

- 1.11 The need for additional housing provision in the sub-region is driven by people living longer and a growing older population, plus net in-migration from other parts of the region. The NPPF makes clear that Local Plans should seek to meet the full objectively-assessed development needs for both market and affordable housing in the HMA, as far as is consistent with policies in the Framework.
- 1.12 The Study has sought to draw together the evidence from existing studies to provide an objective assessment of development needs. It has considered demographic projections in existing studies, including the alignment of demographic and economic-driven scenarios; together with evidence of affordable housing needs and the contribution which the private rented sector is playing to meeting these. The conclusions drawn regarding development needs take account of these, together with market signals, and in some cases have include provision to meet a backlog of affordable housing identified in addition to household growth where there is robust evidence that it would be appropriate to do so.
- 1.13 Looking at the sub-region as a whole the Coastal West Sussex SHMA indicated a housing requirement of between 3,169 – 3,493 dwellings per annum over the 2011-31 period based on past demographic trends, rising potentially to 3,866 homes per annum based on forecast employment growth. The employment growth projection however was based on maintaining 2001 commuting patterns. Jobs densities data however indicates that looking at the sub-region as a whole there should be potential to support enhanced employment growth through some reduction in out-commuting. Arguably it would not be sustainable to plan on a continuation of past commuting trends, and a clear policy objective of the South East Plan was to reduce net out-commuting.
- 1.14 Looking at the range of evidence the Study identifies the following as a reasonable and objective assessment of (unconstrained) housing requirements based on existing studies.

Figure 1: Objective Assessment of Housing Requirements

	Low	High	Median
Arun	550	650	600
Adur	215	245	230
Chichester	480	590	535
Worthing	430	480	455
Brighton & Hove	800	1000	900
Lewes	430	450	440
HMA Total	2905	3415	3160

- 1.15 The figures for Brighton and Hove and Adur include an allowance for meeting the significant backlog of affordable housing provision, and reflect a significant historical under-supply in this area. The Study points to slightly stronger housing market performance in Chichester District but cautions against the risk that housing provision in Arun Districts could run faster than employment growth, resulting in a further deterioration in jobs density, growth in out-commuting and an enhanced ageing of the population profile.
- 1.16 It should be noted that the analysis does not however take into account information from the 2011 Census. A full set of population projections taking into account 2011 Census data has not yet been issued by ONS. However based on the information currently available and the local-level demographic modelling undertaken, the analysis would suggest a housing requirement for between 2,905 – 3,415 homes per year across the Sussex Coast Housing Market. The median figure within this range is for provision of 3,160 homes per annum.

CAPACITY FOR & CONSTRAINTS TO HOUSING DEVELOPMENT TO 2031

- 1.17 The Study next considers evidence (on an authority by authority basis) of residential land supply, development constraints and the potential for strategic development. It considers policies in current and emerging plans, but also considers the potential for further development over and above this and the sustainability of this.

Adur District

- 1.18 Adur is one of the smallest local authority in the sub-region sandwiched between the sea to the south and the South Downs National Park to the north. The north of the District falls largely within the South Downs National Park. The area to the south of this, between the National Park and the Sea, is relatively built-up. Adur District Council is preparing a Local Plan which will cover this area.
- 1.19 In addition to capacity within the existing urban area, considerable work has been undertaken to consider development potential at Shoreham Harbour. The Council is already considering the

potential for significant development outside of the build-up area boundaries within the Lancing/Sompting-Worthing and Lancing-Shoreham Green Gaps through the preparation of its new Local Plan. The potential for development within these areas is affected by both tidal and fluvial flooding, infrastructure and landscape capacity. Nonetheless the Draft Adur Local Plan 2012 has consulted on the potential for development at four locations in these areas and the Council is continuing to work to consider development potential in these areas. The Council is evidently making serious attempts to meet its own development needs.

- 1.20 In setting housing targets within the Adur Local Plan, the Study identifies that it will be important to take account of potential delivery risks associated with bringing forward development in the District, including the potential for some SHLAA sites to not come forward because of site-specific constraints, landowner intentions or market/ viability issues; potential challenges in bringing forward development within Shoreham Harbour related to the timing and costs associated with land assembly, potential infrastructure required to support development and the viability of schemes including improvements to the A259; and key infrastructure dependencies for strategic sites, particularly in the Lancing/Sompting – Shoreham Green Gap related to the funding and delivery timescales for improvements to A27 access and the Adur Tidal Walls Scheme.
- 1.21 In the advance of the completion of detailed technical work and consultation on development options, we consider that it would be reasonable to assume that delivery of a maximum of 180 – 200 homes per annum across the plan area might be achievable (subject to further detailed assessment). This includes development within the built-up area boundary, on greenfield sites within the urban fringe, and at Shoreham Harbour. This represents a shortfall on assessed needs for 215 – 245 homes per annum. Even delivery of 180 – 200 homes per annum would be ambitious and, in our view, require public sector support and intervention.

Arun District

- 1.22 Arun District Council is in the process of preparing a draft local plan covering the parts of the District which fall outside of the South Downs National Park. Development potential in the plan area is affected by strategic environmental designations and other policy constraints to development in the Plan Area. These include Sites of Special Scientific Interest (Bognor Reach, Climping Beach, Felpham & Pagham Harbour). Pagham Harbour is also designated as a Special Protection Area (SPA) under the EC Wild Birds Directive and is a Ramsar site. These represent nationally significant development constraints.
- 1.23 Parts of the District are also affected by flooding, including from the sea, rivers and groundwater. A large proportion of developable land in the District suffers from potential groundwater flooding linked to its coastal location. We understand that Bognor Regis is at risk of flooding from the sea; whilst

Barnham has experienced significant foul and surface water flooding. Development potential in the 'five villages' area is likely to be affected by the high water table.

- 1.24 In physical terms, those parts of Arun District which fall outside of the National Park have a higher theoretical capacity for development than other parts of the sub-region. However there are a number of notable infrastructure constraints which are likely to have an impact on the scale of development which could be accommodated in the District. This includes congestion along the A27 (particularly through Arundel and around Chichester), along the A259, and on key north-south routes, particularly where these cross the Coastway Rail Line. This includes the A29 at Woodgate and A284 at Wick. There are also some notable sewage capacity constraints, which particularly affect the west of the District.
- 1.25 The Draft Plan identifies the following potential strategic locations for growth:
- The main (coastal) towns of Littlehampton and Bognor Regis;
 - The villages of Barnham, Eastergate and Westergate;
 - Areas in and around Angmering.
- 1.26 The Draft Local Plan proposes delivery of at least 2,000 homes across the Barnham-Eastergate-Westergate area and at least 490 homes at Angmering. These are in addition to parish allocations. The Study identifies that while theoretically additional development could be brought forward in the five villages area, subject to detailed assessment and the completion of further studies, the character of this area – primarily of small settlements – would be significantly affected; and if a higher level of development was progressed, could result in a significant requirement for infrastructure investment. It also identifies serious reservations as to whether the market could support a higher level of development in the five villages area.
- 1.27 The Study also notes existing studies which have identified potential for additional strategic development, beyond that identified in the 2012 Draft Local Plan, at North-West Bognor Regis and Littlehampton West Bank for at least 2,000 homes. Further development in these broad locations or the five villages area could potentially make some contribution over the medium-to-long-term to meeting any shortfall in housing provision which might arise in adjoining authorities subject to detailed assessment of the feasibility of delivering supporting infrastructure and market capacity.

Brighton and Hove City

- 1.28 Development potential in Brighton and Hove is affected by the City's geography with the urban area bounded largely by the sea and the South Downs National Park. It is a relatively intensely developed urban area, with much higher development densities than in other parts of the sub-region. It does not have a significant legacy of derelict or brownfield sites.

- 1.29 Land supply in Brighton and Hove is clearly restricted. The housing requirement for 11,300 homes (565 per annum) in the Submission City Plan Part I does not fully meet the City's objectively-assessed development needs for between 800 – 1000 homes per year. Indeed it seems likely that housing provision will fall significantly short of meeting the City's needs.
- 1.30 The level of housing provision proposed was informed by the 2012 SHLAA Update, and is reliant on a recovery in housing delivery over the short-term. Whilst there is potential for additional supply to come forward from windfall sites, this is offset against risks associated with the timing and pace of recovery in the market for higher density flatted development.
- 1.31 In developing the City Plan Part I, the City Council has carefully considered a range of sources of potential land for residential development including employment land, open space and development in the urban fringe. The Plan identifies a strategic site for development in the urban fringe at Toads Hall Valley with capacity for 700 dwellings. It sets out policies for minimum densities of 100 dwellings per hectare within identified development areas and 50 dwellings per hectare outside of these to maximise development potential.

Chichester District

- 1.32 Chichester District is preparing a Local Plan for those areas of the District which fall outside of the South Downs National Park. We understand that the draft Plan will make provision for just under 7,000 homes over the period to 2029 in the plan area, of which around 200 are expected to be in the north-east of the District and 6,800 in the south of the District (outside of the National Park).
- 1.33 Strategic constraints to development in the district include waste water treatment capacity, which is a major obstacle to strategic development in the Chichester area; highways capacity and traffic congestion particularly around the A27 Chichester Bypass, as well as the environmental designations with Chichester and Pagham Harbours designated as SPA and Ramsar sites, and Chichester Harbour as an AONB. There are also major areas of flood risk (particularly on the Manhood Peninsula and around Chichester City, and landscape sensitivity relating to the setting of the National Park and Chichester City. Noise impacts associated with Goodwood Aerodrome and Motor Circuit are also a potential constraint on residential development on the north eastern side of Chichester City and at Westhampnett.
- 1.34 The draft Plan looks to achieve the early delivery of housing sites at Southbourne, Selsey and East Wittering/Bracklesham which are less constrained by the wastewater capacity issues in the short term. There is also scope to develop at Shopwyke (which is already subject to a planning application) by utilising the existing remaining wastewater capacity at Tangmere Waste Water Treatment Works. Development at the other strategic sites at Chichester City and Tangmere is planned to follow the proposed expansion of the Tangmere treatment works in 2019.

- 1.35 Given the sub-regional land supply constraints which exist, there is a strong strategic case for major infrastructure investment and funding in and around Chichester.
- 1.36 We estimate a housing requirement for around 125 homes in the National Park, and between 355 – 465 homes in the remainder of the District. The draft Chichester Local Plan makes provision for an average of 395 homes per year for the part of the District outside the National Park. It is thus broadly meeting the needs of the Plan Area.

Lewes District

- 1.37 Lewes District Council in partnership with the South Downs National Park Authority has published a Proposed Submission Joint Core Strategy for consultation. Just over half of Lewes District falls within the South Downs National Park, including Lewes Town and the downland area to the north of the coastal towns. In addition there are 16 SSSIs and 2 SACs which cover parts of the District; with 11.1% of the District within Flood Zone 2.
- 1.38 Development potential is further affected by infrastructure constraints; with capacity of the highways network, particularly the A259, limiting development potential in Newhaven, Peacehaven and Telscombe. The level of growth in this area proposed in the Plan is the maximum which could be achieved taking into account what improvements to the A259 are considered feasible. The growth of Seaford is also constrained by the tight boundary of the National Park around the urban area.
- 1.39 The Council and National Park Authority has explored through the development of the plan the scope for development around the Districts main settlements, as well as around Burgess Hill and Haywards Heath (working with Mid Sussex District Council). It has also undertaken a scoping exercise considering the potential for a new settlement of 5000+ homes. Various options for development have been assessed through Sustainability Appraisal which has informed the identification of a housing requirement for 4,500 planned dwellings (225 per annum) over the 2010-30 period. This falls significantly below its objectively assessed needs for 430-450 homes per annum and it seems unlikely that the District will be able to meet its own development needs.

South Downs NPA

- 1.40 The South Downs National Park Authority is also at an early stage in preparing a National Park Local Plan. The Authority has a statutory duty to conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and promote opportunities for the understanding and enjoyment of the special qualities of the Park by the public. National policy sets out that housing provision is expected to be focused on meeting affordable housing requirements, supporting local employment and key services. The NPPF makes clear that great weight should be given to conserving landscape and scenic beauty in these areas, and that this may mean restricting development. The

NPPF recognises that it may not be possible for National Parks to meet their own objectively-assessed development needs.

- 1.41 The Authority is unable to indicate as to the level of housing provision that is likely to be proposed in the National Park by the Local Plan; or to disaggregate what level of development might come forward within the Sussex Coast local authority areas. This information is unlikely to be available until late 2014.
- 1.42 Within the Sussex Coast HMA, the SDNPA has been working to prepare a Joint Core Strategy for Lewes District. There is a relatively limited population in Adur, Worthing or Brighton and Hove which live within the Park. The Study's assessment, focused on Chichester and Arun Districts, suggests that levels of development similar to those in the past within the National Park are likely to fall short of meeting objectively-assessed development needs. However this is not inconsistent with national policy and the NPPF recognises that there may to be circumstances in National Parks where meeting objectively-assessed needs is not compatible with sustainable development or the statutory duties of the NPA.

Worthing

- 1.43 Worthing is a relatively small local authority. The urban area is sandwiched between the sea to the south and the South Downs National Park to the north. Most of the land outside of the built-up area to the north of the town falls within the South Downs National Park.
- 1.44 Development potential is also affected by two river flood zones, and significant congestion on the A259 and the A27, which runs as a single carriageway road through much the Borough.
- 1.45 Worthing Borough Council adopted its LDF Core Strategy in April 2011. The SDNPA has also adopted the Core Strategy. It makes provision for delivery of at least 4,000 dwellings over the 2006-26 period (200 per year) in accordance with the South East Plan.
- 1.46 The Study has included consideration of development options outside of the urban area. The main further opportunity which the Core Strategy does identify is the West Durrington Potential Future Development Area (PFDA). This area, located to the north of the main West Durrington Strategic Allocation is identified as having capacity to accommodate a further 375 dwellings.
- 1.47 Worthing Borough Council intends to progress work in the short-to-medium term to consider other realistic development opportunities in the Borough, including a review of its SHLAA and full analysis of landscape and infrastructure capacity and sustainability issues. This may identify scope for some additional development. Our initial analysis would however suggest that it is unlikely that delivery of

more than 250 homes per annum over a sustained period can realistically be achieved in the Borough. Further detailed assessment will be required to establish development potential.

- 1.48 Should additional sustainable development opportunities be identified through this further work, the Council might wish to consider the development of an Allocations DPD to provide policy certainty to support housing delivery particularly of any edge of settlement greenfield sites.
- 1.49 Given the significant differential between the potential land supply in Worthing and assessed housing requirements for around 430-480 homes per annum, it seems likely that the Borough will not be able to meet its own identified development needs. This remains consistent to the position when the South East Plan was developed.

OVERALL CONCLUSIONS

- 1.50 This Study demonstrates that it is highly unlikely that this level of development can be achieved across the sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel.
- 1.51 Parts of Arun and Chichester Districts together with the north of Lewes District are slightly less constrained in environmental terms, however in these areas infrastructure provision, along with a lack of potential development capacity and in some instances locally sensitive landscapes, are particular issues and constrain the scale of development which can be accommodated.
- 1.52 Strategic infrastructure constraints in the sub-region remain consistent to those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity. Waste water treatment capacity is also a strategic constraint to development in parts of the sub-region, most notably in Chichester and Arun Districts.
- 1.53 Drawing the analysis in the report together, the table below seeks to provide an indicative assessment of development potential (in terms of levels of housing which we consider could realistically be delivered based on current evidence) and compared this against the objectively assessed development needs.

Figure 2: Indicative Comparison of Housing Needs against Maximum Potential Supply Levels

	Requirement (Minimum)	Maximum Delivery considered achievable	Minimum Likely Shortfall	20 Year Shortfall
Adur	215	200	15	300
Arun*	550	700	-150	-3000
Chichester*	480	470	10	200
Worthing	430	250	180	3600
Brighton & Hove	800	565	235	4700
Lewes	430	225	205	4100
Total	2905	2410	495	9900

*Includes high level estimates of potential supply within the South Downs National Park based on past completions levels

- 1.54 The analysis suggests that housing delivery over the period to 2031 across the HMA, based on current evidence, is likely to fall at least 20% below objectively assessed needs. A significant shortfall equivalent to at least around 495 dwellings per year arises¹.
- 1.55 The most significant likely shortfall against assessed needs is expected to arise in the centre of the sub-region in the City of Brighton and Hove, Lewes District, Adur and Worthing. This is a function of geography with limited development potential in areas between the National Park and the sea.
- 1.56 Constrained land supply is likely to moderate in-migration to the area, and could feasibly see an increase in commuting to the area (and particularly Brighton and Hove as a strongest economic hub), including commuting to Brighton from Northern West Sussex. Outside of Brighton and Hove, constrained land supply can be expected to result in a more notable ageing of the population, and constrained growth in labour supply. This could impact on economic growth potential. Provision of affordable housing and smaller market homes would help to mitigate this.
- 1.57 In the west of the sub-region, it seems more feasible that the areas in Arun and Chichester Districts which fall outside of the South Downs National Park could meet their own development needs over the period to 2031.
- 1.58 In the South of Chichester District the pace at which housing development could be brought forward is likely to be influenced by key infrastructure constraints; and should these be addressed additional development could potentially be accommodated to provide flexibility to respond to market demand and contribute to wider sub-regional needs. There is a strong strategic case for investment in

¹ If the median requirement figures are used this rises to 740 per year

improving the A27 Chichester Bypass and addressing sewage treatment capacity around Chichester as a priority.

- 1.59 In Arun District, while there might be potential to accommodate additional development in physical terms, this needs to be carefully balanced on a number of levels. This includes the potential for infrastructure to support development, including highways impacts and flooding issues. It also includes issues associated with housing market capacity and the Council's emerging Local Plan vision which focused on economic regeneration with a strategic aspiration to reduce out-commuting from the District. The Study recommends that Arun District Council tests, through Sustainability Appraisal, the potential to sustainably accommodate additional growth in the District to contribute to meeting the likely shortfall of housing provision against assessed needs in the sub-region.
- 1.60 The under-provision of housing across the sub-region is likely to have a number of implications. At a sub-regional level, it would likely constrain the scope for in-migration to the area. In market terms this would likely favour older households who have built up equity in existing homes who can out-compete other groups in the market.
- 1.61 It seems likely that the supply-demand balance over the longer-term could support further house price growth in real terms (stripping out inflation), subdued household formation and continued growth in private renting – particularly of people in their 20s and 30s. Provision of affordable homes will help to mitigate this.
- 1.62 The constrained land supply and the implications of this on demography may well have some impact on economic competitiveness and over the longer-term it seems likely that the labour market will be 'tight.' We could well see some further changes to commuting dynamics as a result, including potentially increased commuting to the sub-region from Northern West Sussex and South Hampshire. To mitigate these potential impacts, continuing investment in skills and training will be important.
- 1.63 The supply-demand imbalance reinforces the case for housing targets to be considered as minima in each local authority, which should be exceeded where this can be achieved in accordance with the presumption in favour of sustainable development.
- 1.64 It is however important to recognise that there are significant constraints to delivering housing in the sub-region, and the impacts of higher housing development would be significant. It would impact on quality of place and the environment, and particularly the attractive character of the National Park and Coast which is an economic asset and supports the attractiveness of the area as a place to live in the first place. It would also increase congestion on the local and strategic road network which

could harm not just the sub-regional economy and quality of place, including the role which the A27 plays in supporting movement across the region.

Next Steps

- 1.65 There are some clear next steps for the sub-regional partners to take forward. It will be important that the Strategic Planning Board consults on the findings of this report with the relevant statutory bodies. Once this has been undertaken the Board should seek to engage with other adjoining authorities in accordance with the Duty to Cooperate.
- 1.66 The Study also points to the need for cross-authority working to consider longer-term options for strategic development including both within the HMA and in adjoining areas.
- 1.67 The Study has identified a number of areas where targeted investment in infrastructure could help to enhance the pace of development (and thus the potential development which could be delivered in the period to 2031). These include:
- Shoreham Harbour
 - Potential urban extensions in Adur District
 - Urban extensions to Chichester
- 1.68 In a number of these areas the pace of development is significantly influenced by infrastructure delivery interdependencies. There is a strong case for investment in addressing these as a priority and the commissioning authorities should work together in seeking to secure funding for these.
- 1.69 The Study also points to a number of options for development or enhanced development over the longer-term, subject to detailed feasibility testing. These are particularly focused at options for development on land to the north-west of Bognor Regis, at Littlehampton West Bank or an enhanced level of development in the five villages area in Arun.
- 1.70 It however seems unlikely that even if all of these options supported enhanced delivery over-and-above current proposal that the full objectively-assessed development needs would be met within the HMA. Furthermore, development options in the west of the sub-region are likely to make a limited contribution to meeting the identified shortfall in provision in the Brighton Sub-Market.
- 1.71 Against this context it would be appropriate to consider with adjoining authorities longer-term development options, potentially working jointly with other authorities within Northern West Sussex. This might include joint work to assess strategic development options, including the potential for a new settlement, in areas to the north of the National Park.