

**Proposed Submission Adur  
District Council  
Adur Local Plan 2014**

**Duty to Co-operate Statement**

**October 2014**



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# 1 Introduction

- 1.1 Local Planning Authorities (LPAs) are required under Section 110 of the Localism Act (Annex 6, Ref 1.3) to engage with relevant local authorities and specified bodies on strategic matters through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. Engagement on strategic matters should be *active, constructive and ongoing* throughout the plan preparation process and beyond into delivery and review, and should aim to maximise the effectiveness of cooperation on the local plan policies.
- 1.2 As part of the Examination process, LPAs must provide evidence demonstrating how they have met the legal requirements of the Duty to Cooperate and effectively addressed strategic matters in the plan. The National Planning Policy Framework (Annex 6, Ref 1.1) provides amplification as to what issues are likely to require strategic cooperation. It states that '*Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*' [Paragraph 81]. The National Planning Practice Guidance (Annex 6, Ref 1.2) provides further advice on meeting the legal requirements of the Duty.
- 1.3 This statement summarises the strategic activities of Adur District Council and the outcomes in terms of impact on the Adur Local Plan. Section 2 focuses on the activities that have been carried out on a joint basis with other LPAs in the Coastal West Sussex & Greater Brighton (CWS&GB) area, under the auspices of the CWS&GB Strategic Planning Board. The Board includes representatives from the LPAs of Adur, Arun, Brighton & Hove, Chichester, Lewes, the South Downs National Park and West Sussex County Council (see map in Annex 5). It also covers ongoing work between the CWS&GB authorities and those in the wider area to support delivery of strategic priorities, particularly housing. Section 3 focuses on strategic activities which are more specifically related to Adur and have not been part of the CWS&GB work programme.

## 2. Strategic Cooperation in Coastal West Sussex & Greater Brighton

- 2.1 Working across boundaries on strategic planning matters is not new territory for the CWS &GB Authorities. There is a long history of joint working through the South East Plan's Sussex Coast Sub-Regional Strategy and RPG9 before that. Following the demise of the South East Plan, the LPAs recognised at an early stage that there was a need for a new common approach to strategic planning (and investment) issues, which resulted in the preparation of a Local Strategic Statement (LSS). The following paragraphs set out the evolution of the LSS and the implications for local plans in the CWS&GB area and potentially in the wider area. Annex 3 provides further details of the details and timelines of key work strands that have influenced the LSS and local plans.

### Developing a Local Strategic Statement

- 2.2 Initially the strategic response was delivered through work on developing an employment and infrastructure strategy, which was commissioned by the Coastal West Sussex Partnership (CWSP)<sup>1</sup> [Annex 6, Ref 5.1] in 2011. However, this raised issues of governance in terms of delivering the proposed 'place-based' approach, highlighting the need for more formal joint working arrangements to ensure a coordinated approach to strategic planning and investment priorities, particularly in relation to infrastructure.

#### Developing an Employment and Infrastructure Strategy

(Parsons Brinckerhoff, Feb 2012)

**Recommendation 2:** That an appropriate governance structure be established to develop the "Place Based" delivery plans and to coordinate plans across CWS.

**Recommendation 3:** That the governance arrangements ensure that the development of the "Place Based" proposals are understood and supported by the local business community, local planning authority, and local communities so that they receive a wide measure of understanding and support as specific schemes come forward for consultation and delivery.

- 2.3 In response to the recommendations, the CWSP and West Sussex County Council commissioned a study into potential new governance arrangements for CWS&GB, which included a review of existing working arrangements within the area but also in West Sussex more generally [Annex 6, Ref 2.1]. As a result, the LPAs agreed to establish a new Strategic Planning Board with its inaugural meeting held in October 2012 [Annex 6, Ref 2.4].
- 2.4 The Board is governed by Terms of Reference and a Memorandum of Understanding [Annex 6, Ref 2.2 and 2.3] which have been agreed by all the relevant authorities. It comprises lead councillors from each of the local authorities and the South Downs National Park Authority, usually those with a planning portfolio. The Board's remit is to:

<sup>1</sup> Coastal West Sussex Partnership: <http://www.coastalwestsussex.org.uk/>

- (1) identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
  - (2) support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.
- 2.5 It is advisory only as decision-making remains with the individual ‘legally’ responsible bodies. However, critical to its success is the continuing close working relationship with the CWSP and the Coast to Capital Local Enterprise Partnership<sup>2</sup>, particularly in relation to the LEP’s priorities in the Strategic Economic Plan. This is not only achieved through cross-representation on both the Board and Partnership but also in the joint working between the LPA officers and the Partnership’s technical support groups.
- 2.6 In January 2013 the Board agreed that in order to fulfil its role, a new framework was needed to replace the Sussex Coast Sub-Regional Strategy and guide strategic planning decisions, and that this was to be in the form of a Local Strategic Statement (LSS) [Annex 6, Ref 3.2]. There was a clear commitment from all authorities to develop an LSS that had a direct influence on individual local plans but also highlighted the strategic challenges along the coast, with possible ways of addressing these.
- 2.7 It was also agreed that the LSS should be ‘evidence-based’ and deliverable, with significant importance attached to the need for a delivery plan [Annex 6, Ref 5.2]. A vital part of the evidence was a study undertaken by GL Hearn on behalf the LPAs to assess the housing needs of the area and any potential barriers to delivery. The ‘Duty to Cooperate Housing Study’ [Annex 6, Ref 4.1], which provided a critical review of the objectively assessed needs for each LPA, concluded that the area is highly constrained due to the fact that it is tightly bound by the English Channel and the South Downs National Park and that meeting the housing needs of the area will become increasingly challenging. It is intended that the results of this study will be updated at regular intervals and monitored through the LSS monitoring framework.
- 2.8 The LSS [Annex 6, Ref 3.1] was developed between January and October 2013, building on key evidence, such as the GL Hearn study, and through stakeholder engagement [Annex 6, Ref 3.5]. The final version sets out a shared *vision*, four overarching *Strategic Objectives* and five *Spatial Priorities*, building on the ‘place-based’ approach recommended by Parson’s Brinckerhoff. A Monitoring Framework and Delivery and Investment Framework are being developed to support its implementation on an ongoing basis, and ensure local plan policies arising from the agreed strategic priorities remain viable and can be delivered.
- 2.9 There are a number of clear challenges highlighted in the LSS, particularly in relation to infrastructure, but also in terms of increasing pressures on land supply. The LPAs acknowledge this and are working together, through their

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<sup>2</sup> Coast to Capital Local Enterprise Partnership: <http://www.coast2capital.org.uk/>

own local plans and strategies, to meet their objectively assessed needs as far as is possible in the short to medium term. They are also working closely with neighbouring authorities in the wider sub-region to consider what the longer term options are for meeting needs. This work is ongoing and will inform both the current and next round of local plan reviews and is governed by a clear commitment from all relevant authorities through an agreed memorandum (for the coastal authorities) [Annex 6, Ref 2.3].

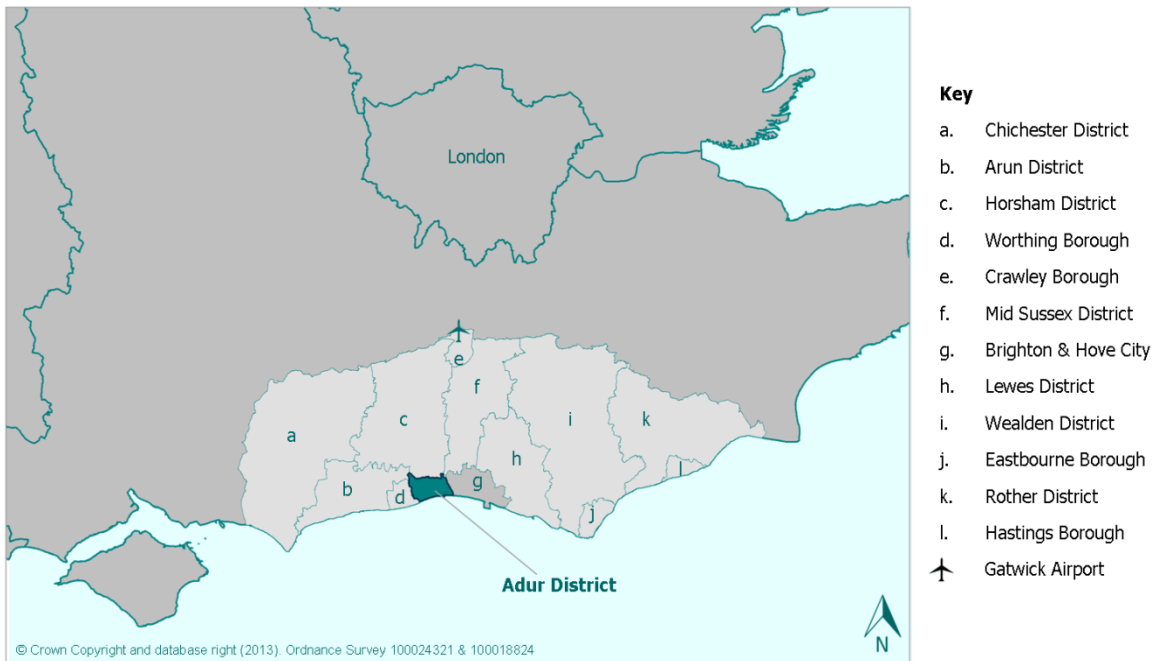
- 2.10 As well as developing and managing the implementation of the LSS, the Board has an agreed work programme to help steer other, strategically important, planning matters including assessing the needs of Gypsies, Travellers and Travelling Showpeople<sup>3</sup> [Annex 6, Ref 6.1-6.2]. Details of the Board's work programme are provided in Annex 1 of this statement. This sets out the evidence demonstrating how the strategic cooperation has worked in practice and what influence this has had on the local plans being prepared in the area.
- 2.11 There are also a number of other activities required as part of the plan making process to address more localised strategic issues which are not common across the CWS &GB area. A summary of these activities is contained in Section 3 and Annex 2 of this statement.
- 2.12 Strategic work will continue on an ongoing basis through the CWS&GB Strategic Planning Board's work programme and through the monitoring and delivery of the LSS, both of which will be aligned to the individual local plan monitoring and delivery frameworks. This will include work with adjoining strategic planning areas where relevant.

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<sup>3</sup> The CWS G&T work does not include Brighton & Hove or Lewes as they are part of similar work with other East Sussex Authorities.

### 3. Strategic Cooperation in Adur

c. Sussex and Surrounding Area



#### Adur – key facts

- 3.1 Adur District is located on the south coast of England, between Brighton & Hove City to the east, and Worthing Borough to the west. The South Downs National Park lies to the north. It is a relatively small district covering 41.5 square kilometres and has a population of approximately 61,300 (ONS mid 2011 population estimate), considerably smaller than its neighbouring urban areas. It is bounded by the South Downs to the north, and the English Channel to the south, with the low-lying land of the Adur Valley between, separating Lancing and Sompting to the west and Shoreham-by-Sea, Southwick and Fishersgate to the east.
- 3.2 Adur's main settlements are found on the coastal plain running east-west along the length of the District. Shoreham-by-Sea, Southwick and Fishersgate lie mainly to the east of the River Adur, which bisects the district. They form a continuous urban area with Portslade, Hove and Brighton. Lancing and Sompting lie to the west of the River Adur. A narrow strip of development along the coast joins Lancing with Shoreham Beach. Shoreham Harbour is located to the east of Shoreham-by-Sea town centre, and extends as far as Hove.

## **Who are our Neighbours?**

- 3.3 The local authority neighbours who share a boundary with Adur are, as shown on the above map, Worthing Borough Council to the west, Brighton and Hove City Council to the east, Horsham District Council to the north together with Arun at the north western tip. With the exception of Brighton and Hove City Council which is a unitary authority, the above are within the County of West Sussex. Given that the northern half of the district lies within the South Downs National Park, the Park Authority has been a consultee on the preparation of the Local Plan and has been involved in duty to co-operate discussions. Other Local authorities which are not immediate neighbours but share a number of strategic issues and are part of existing partnerships to address these, are Chichester District Council, (West Sussex), Mid Sussex District Council (West Sussex), Crawley Borough Council (West Sussex) and Lewes District Council (East Sussex). With regards to the duty to co-operate in relation to housing needs, communication has taken place further afield with relevant authorities in Surrey and Hampshire and more recently with the Greater London Authority.

## **Preparation of the Adur Local Plan**

- 3.4 The Adur Local Plan is a new plan which will provide a strategy for development in Adur up to 2031. It seeks to achieve a balance in meeting needs for development – such as housing, employment, retail and community facilities, while striving to protect and enhance the character and features of Adur which so many people value – its open spaces, landscape and historic features.
- 3.5 The Local Plan will play an important part in facilitating the regeneration of Adur, through indicating key sites and strategic locations for new development, and facilitating the delivery of appropriate infrastructure. This Draft Plan sets out a vision and strategy and looks at the planning issues the district is facing, and proposes policies for addressing them.
- 3.6 This Local Plan covers Shoreham-by-Sea, Southwick, Fishersgate, Lancing and Sompting, and identifies Shoreham Harbour and Shoreham Airport as key regeneration sites.
- 3.7 Over half of Adur District (53%) lies within the South Downs National Park and this area is not covered by the Local Plan. The National Park Authority is producing its own Local Plan (for adoption in 2017) which will include policies for this area of the Park.
- 3.8 The Local Plan is based on a range of up-to-date evidence studies (as referenced in the Plan) including those to assess objectively assessed needs in relation to housing, employment floorspace and gypsy accommodation.



## Key Issues for the Adur Local Plan

- 3.9. The key issues for Adur which are addressed by the Local Plan and which have involved on-going work and co-operation with other bodies (neighbouring authorities and/or prescribed bodies) are as follows (please refer to Part One of the Adur Local Plan for further details and evidence references):
- **Regenerating Adur** - There is a need to diversify the economy, safeguard existing employment locations, provide more opportunities for businesses to locate into or expand in Adur, and develop a strategy for economic development in the area. In addition, local residents need the opportunity to acquire better skills to improve their access to the labour market. The physical environment of parts of Adur also need upgrading so that it is more attractive to residents and businesses.
  - **Improving infrastructure** - Some of Adur's infrastructure is outdated and inadequate to meet modern needs (e.g. health and community facilities) and there is a need to ensure that new development is provided with appropriate new infrastructure (including 'green' infrastructure) at the right time, and in the right place. This is critical to ensure the delivery of key sites.
  - **Balancing development and regeneration requirements against the limited physical capacity of Adur without detriment to environmental quality** - The Local Plan will need to strike a balance between facilitating development, achieving regeneration and delivering infrastructure, whilst maintaining built and natural environmental quality, 'sense of place' and the character of Adur.
  - **Meeting the projected increase in households up to 2031 and some specific identified housing needs.** Adur needs to address a range of housing requirements including the projected increase in smaller households, more family housing and affordable housing.
  - **Addressing demographic pressures** - Adur's population is ageing, with a quarter of residents above retirement age. There is a need to ensure that young people are encouraged to remain in the area.
  - **Addressing deprivation** - Adur is the most deprived district in West Sussex. Action needs to be taken to reduce disparities between the most, and least deprived parts of Adur in education, health, skills and training.
  - **Addressing road congestion and related pollution – air and noise - whilst improving the existing transport network.** Parts of Adur experience road congestion and there is a high level of car dependence. The A27 and A259 are key routes which are congested at a number of junctions at peak times. If not addressed and with anticipated future development, congestion could lead to poorer air quality especially in Air Quality Management Areas.

- **Addressing climate change and flood risk** – Given the coastal location of the district and the presence of the River Adur, the risk of flooding from the sea and river is a serious issue. Due to the topology and geology, the majority of Adur also has high potential for groundwater and surface water flooding. A significant amount of land is designated as flood zone 2 (medium probability), 3a (high probability) and 3b (functional floodplain). It will be necessary to ensure Adur is resilient to the predicted impacts of climate change such as warmer, wetter winters, hotter, drier summers, sea level rise and more frequent extreme weather events.
- **Working towards achieving sustainability** – Matters such as energy efficiency, renewable energy, water efficiency, waste efficiency and sustainable construction techniques need to be encouraged and incorporated into development to help address climate change and make efficient use of limited resources.
- **The need to improve health and wellbeing** - Two Air Quality Management Areas are already designated in Adur; it will be important to ensure air quality is improved where possible. Although there are no fundamental deficiencies in open space or play facilities, access to open spaces and countryside must be maintained and improved where possible, as these resources can contribute to both physical health and wellbeing.
- **Maintaining and enhancing the quality of the built, historic and natural environment** - Adur has a number of natural and historic assets integral to the character of the area. The Council must also have regard to the purposes for which the National Park is designated.

## **Defining the duty to Co-operate in Adur**

- 3.10 The Duty to Co-operate requires local planning authorities as well as a number of other public bodies to work together on cross-boundary strategic issues. Local planning authorities and other public bodies are required to engage constructively, actively and on an on-going basis to develop strategic policies. The National Planning Policy Framework (2012) requires Plans to be positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 3.11 Joint working should be diligently undertaken for the mutual benefit of neighbouring authorities and enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. As part of this process they should consider producing joint planning policies on strategic matters and informal strategies. Co-operation should be a continuous process of engagement.

- 3.12 The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Co-operate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The NPPG states that:

*“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty”.*

- 3.13 The principle of joint working on a number of strategic issues was already well established across the sub region prior to the formal introduction of the Duty to Co-operate. Close working has regularly occurred with neighbouring authorities, the County Council and with other public bodies and infrastructure providers to help find solutions to cross boundary issues – as part of plan making, evidence gathering and as part of specific projects. In producing the Adur Local Plan, a continuous dialogue has taken place with neighbouring and other authorities in West Sussex as well as with Brighton and Hove City Council, Lewes District, the South Downs National Park Authority and West Sussex County Council on cross boundary issues. Views have also been submitted by this Council on Local Plans and Core Strategies when invited by other local authorities.

- 3.14 In addition to the on-going consultation on the emerging Adur Local Plan with neighbouring and other relevant local planning authorities as well as a range of statutory and non statutory bodies (see Appendix 1), Adur Council has been involved in the following projects and partnerships to address strategic issues:

- **Coast to Capital LEP** - The Coast to Capital Local Economic Partnership (LEP) extends as far north as Croydon and includes Chichester at its western end and Brighton & Hove and Lewes at its eastern end. The Strategic Economic Plan 2014 (SEP) for the Coast to Capital LEP sets out ambitions for sustainable economic growth; investments and proposals for realising these ambitions; the proposed Growth Deal with Government and the Local Growth Fund Investment required to 2020/21. The SEP identifies the Shoreham area as one of the strategic locations for growth. It builds on the Greater Brighton City Deal (see below) and links the delivery of employment growth and new housing across Shoreham Harbour, Shoreham Airport and strategic housing allocations in the Adur Local Plan. The SEP recognises the flood risk and transport constraints in delivering housing and employment growth and its bid to Government for funding focussed on

addressing the funding gap that currently exists in delivering flood defences for the River Adur (Adur Tidal Walls) and for Shoreham Harbour (on the Western Harbour Arm). In the summer of 2014, the LEP secured £9.5m for flood defence projects and transport access improvements. Further investment is also committed by the LEP to this infrastructure provision as well as by the Environment Agency (for flood defences). Adur District Council is currently working with the Environment Agency and West Sussex County Council to prepare business cases to the LEP to use this funding.

- **Greater Brighton City Deal** - The Greater Brighton City Deal, awarded in 2014, is formed by the local authorities of Brighton and Hove City Council, Adur District Council, Lewes District Council, Mid-Sussex District Council and Worthing Borough Council, working together. The Deal aims to enable the area to fulfil its economic potential and to become a high performing urban economy. The Deal focusses on a number of key areas to build on Greater Brighton's economic assets – its skilled workforce, its innovative businesses and its universities – and help the area move on from decades of economic underperformance. Shoreham Harbour and Shoreham Airport are identified as growth centres which will focus on environmentally driven technologies. Various funding measures including growth funding via the LEP is available to help secure regeneration and infrastructure.
- **Coastal West Sussex Partnership** - The Coastal West Sussex Partnership (CWSP) is a group of businesses and public sector organisations which aims to strengthen the economy – this includes addressing issues of infrastructure and growth. The CWSP is being used as a basis to address Duty to Co-operate issues, and a Coastal West Sussex and Greater Brighton Strategic Planning Board (CWS&GB SPB) has been established, with Councillors with responsibility for planning matters participating in this, on behalf of each Local Planning Authority. As referred to in section 2, the CWSP has produced a Local Strategy Statement (LSS) to create an agreed, consistent set of objectives and priorities in relation to growth - to help deliver regeneration, housing and infrastructure. This LSS forms an important basis for discussion with neighbouring authorities in relation to Duty to Co-operate issues.
- An **Officers Working Group** informs the CWS&GB SPB and undertakes relevant strategic policy work on behalf of the Board, addressing these on a joint basis where necessary. The Officers Group consists of lead planning policy officers from the authorities in the Coastal sub-region including Adur, Worthing, Arun, Chichester, Brighton and Hove and Lewes together with West Sussex County Council and the South Downs National Park Authority. The emphasis of this group is to focus on outcomes rather than process – to find solutions on a joint basis to issues which face the sub region.

- **Shoreham Harbour regeneration** - an Area Action Plan is being produced by Adur Council jointly with Brighton and Hove City Council and West Sussex County Council with the support of other partners including the Shoreham Port Authority to secure new housing and jobs at Shoreham Harbour. A planning officers working group, an officer Project Board and a Leaders Board (Leaders of the three Councils) steer this project also linking it to the LEP and the Greater Brighton City Deal Economic Board.
- **Adur Tidal Walls Project** – Adur Council is working with the Environment Agency and the LEP to implement flood defences (for completion in 2017) along the River Adur to address existing and future flood risk. A Project Board and an Officers Working Group progresses this project. Funding has been secured from the LEP for delivery.
- **Transport - A27 and A259** – Adur Council is working with West Sussex County Council (in liaison with the Highways Agency) together with Arun, Worthing, Brighton and Hove, Chichester and the SDNP to address congestion problems along the A259 and the A27 (with reference to the Local Strategic Statement, the SEP and the City Deal). This work is monitored and progressed by the CWS&GB SPB.
- A series of **Duty to Co-operate workshops** were held by the Planning Advisory Service in Horsham from July 2013 to March 2014 which were attended by planning officers and Council Members (with planning portfolios) from various local planning authorities in West Sussex, East Sussex and Surrey and including Brighton and Hove City. The LEP and the SDNPA were also involved. The outcome of these workshops was an action plan to address identified strategic issues. A number of measures in this action plan are being taken forward by the West Sussex LPAs (see below paragraph 3.22).
- **Adur and Worthing Councils joint services** – the Councils are merged at service level and the Planning Policy team works jointly on policy work including the Adur Local Plan, the joint Area Action Plan for Shoreham Harbour and the Worthing Core Strategy/new Local Plan. A Joint Strategic Committee of Adur and Worthing Members make decisions on key policy documents.
- **A Chief Planning Officers Group and a Planning Policy Officers Group** (officers with responsibility for progressing local plans and other policy documents) for West Sussex have been meeting regularly for many years to share ideas and develop joint approaches/strategies to planning issues including the duty to co-operate.

## **What are our strategic spatial issues and who have we co-operated with**

- 3.15 Other public bodies, in addition to local planning authorities, are subject to the duty to cooperate by being prescribed in the Town and Country Planning (Local Planning) (England) Regulations 2012. These bodies are:
- the Environment Agency
  - the Historic Buildings and Monuments Commission for England (known as English Heritage)
  - Natural England
  - the Mayor of London
  - the Civil Aviation Authority
  - the Homes and Communities Agency
  - each clinical commissioning group established under section 14D of the National Health Service Act 2006
  - the National Health Service Commissioning Board
  - the Office of Rail Regulation
  - Transport for London
  - each Integrated Transport Authority
  - each highway authority within the meaning of section 1 of the Highways Act 1980 (including the Secretary of State, where the Secretary of State is the highways authority)
  - the Marine Management Organisation.
- 3.16 A number of these bodies play a key role in delivering local aspirations and making Local Plans as effective as possible on strategic cross boundary matters. In producing the Adur Local Plan, all of the above bodies (with the exception of the London bodies) have been consulted and a number have been continuously involved and engaged depending on the issues of relevance to them.
- 3.17 Local Enterprise Partnerships and Local Nature Partnerships are not subject to the requirements of the duty but are important bodies that have been consulted at various stages of the Adur Local Plan. The Coast to Capital LEP has been involved via a number of mechanisms including meetings with planning officers at ADC, the CWS&GB SPB, via the Greater Brighton City Deal and the Planning Advisory Service Duty to Co-operate workshops at Horsham District Council. The Strategic Economic Plan (SEP) recently produced in 2014 for the LEP reflects the growth aspirations of the draft Adur local Plan with respect to the key employment opportunities at Shoreham Harbour and Shoreham Airport and the delivery of key flood defences and transport infrastructure to help deliver these sites as well as new housing.

- 3.18 In addition to the above, a range of other bodies have also been consulted and involved including utilities and groups representing a range of business, social and environmental interests (Appendix 1 lists those specific consultation bodies who responded to the Local Plan at various stages).

### **Strategic Spatial Issues**

- 3.19 Paragraph 56 of the NPPF states that local planning authorities should set out the **strategic priorities** for the area in the Local Plan. This should include strategic policies to deliver:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 3.20 The following is a list of the strategic spatial issues relevant to Adur:
- Housing Needs and Provision
  - Gypsy and Traveller Accommodation
  - Employment Needs and Provision
  - Regeneration – Shoreham Harbour and Shoreham Airport
  - Transport
  - Countryside
  - Water and Waste Water
  - Flood risk and defences
  - Green infrastructure
  - Minerals and Waste
  - Green Infrastructure
- 3.21 The above issues have been discussed at specific duty to co-operate meetings held during 2013 and 2014 with planning officers and lead Members for planning with Brighton and Hove CC, Worthing BC, Arun DC and Mid Sussex DC (see Appendix 2 of meetings and activities log). Officer meetings have been held with all West Sussex LPAs, the SDNPA, as well as with Lewes DC (see Appendix 2). The meetings, whilst covering a number of the above issues, focussed on the key issues of housing, employment and gypsy and traveller accommodation. The purpose of these meetings was to identify the cross boundary issues, to clarify how the issues were being addressed and the capacity of each authority to help address unmet needs. Measures to continue communication and engagement were also discussed .
- 3.22 The series of Duty to Co-operate workshops held by the Planning Advisory Service in Horsham from July 2013 to March 2014 (as detailed above) also

addressed a number of the above issue. The outcome of these workshops was an action plan to address identified strategic issues. A number of measures in this action plan are being taken forward by the West Sussex local planning authorities including the following:

- Communicating and sharing of evidence studies and details of unmet development requirements to meet needs.
- Up-dating the CWS&GB Local Strategic Statement with new transport, housing and employment studies.
- Reviewing the membership of the CWS&GB Strategic Planning Board – which has been widened to include Lewes DC and Brighton and Hove CC. This is to reflect the cross boundary strategic issues that the Board deals with.
- Greater involvement of the Coast to Capital LEP in the planning work of the CWS&GB SPB and the Greater Brighton City Deal Economic Board.
- Agreeing transport infrastructure priorities via the CWS SPB.
- Agreements on duty to co-operate issues are being formalised via MoUs and Statements of Common Ground between the local planning authorities.

3.23 A number of the above issues are defined as key issues since they are spatially wide ranging and/or more complex to deliver. The key issues are Housing Needs and Provision, Gypsy and Traveller Accommodation, Employment Needs and Provision, Minerals at Shoreham Harbour and Transport.



## **How have we co-operated on strategic matters and what have been the outcomes?**

### ***Major strategic matters***

#### **Housing**

- 3.24 The NPPF encourages local authorities to collaborate to meet housing need and demand within functional housing markets. As defined in the 2012 update to the CWS Strategic Housing Market Assessment(SHHMA), the functional housing market stretches from Lewes District in the east to Chichester District in the west. There are also inter-relationships to surrounding areas including Northern West Sussex and South Hampshire. The housing market divides into a number of sub-markets in which there is a reasonable level of travel to work self-containment. The SHLAA states that this functional housing market is sandwiched between the Sea and the South Downs National Park. There are some key challenges around land availability and infrastructure provision across the functional housing market.
- 3.25 The CWS&GB Local Strategic Statement (2013) makes clear that due to the significant environmental, landscape and infrastructure constraints to development which exist in the Coastal West Sussex area, that it is highly unlikely to meet its objectively assessed needs. 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. A Duty to Co-operate (Housing) Study for the Sussex Coast Strategic Housing Market Authority (HMA) partners (Chichester, Arun, Worthing, Adur) together with Brighton and Hove, Lewes, and the South Downs National Park Authority was completed in spring 2013 (see Annex 6, Ref 4.2). The main findings of the study are that it is highly unlikely that the level of objectively assessed housing need required in these local authority areas can be achieved in the sub-region in light of environmental, landscape and infrastructure constraints. Housing delivery up to 2031 across the HMA could fall at least 20% below the assessed needs.
- 3.26 The Objectively Assessed Housing Need for Adur is assessed as between 180-240 homes per annum over the plan period 2011 to 2031 (G L Hearn - Assessment of Housing Development Needs Study: Sussex Coast HMA - Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing Councils April 2014)(See Annex 6, Ref 4.3). The lower end of this range addresses suppressed household formation trends (due to declining affordability and the impact of the recession) over the decade 2001-2011. The higher end of the range would support stronger delivery of affordable housing (with 15-20 additional affordable homes delivered per year relative to the lower end of the range) and provide the potential for stronger growth in labour supply.
- 3.27 In setting a delivery figure for the Adur Local Plan, a number of housing sources have been carefully considered which maximises development on

brownfield land and totals 2558 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 930 to 1080 dwellings. In total, 3488-3638 dwellings can be delivered over the Plan period which equates to an annual average of 174-182 dwellings. Consequently, whilst potentially meeting the lower end of the objectively assessed need figure, a shortfall of 1162-1312 dwellings remain against the full objectively assessed need figure of 4800 over the Plan period.

- 3.28 Consultation and engagement has taken place with those LPAs within the functional housing market and also with those in Northern West Sussex (Crawley, Horsham and Mid Sussex). A number of LPAs within Hants and Surrey were contacted in 2012 informing them of the Duty to Co-operate housing study being progressed at the time and the likelihood that the coastal authorities would not be able to meet their housing needs. The following LPAs within the above housing market areas are unable to meet their own housing needs on the basis of environmental, landscape and infrastructure constraints and have stated that they are unable to meet Adur's needs: Worthing, Brighton and Hove, Arun, Chichester, Crawley (due to the possibility of a new runway at Gatwick Airport and the consequent impact on available land for housing) and Lewes.
- 3.29 Horsham District Council have informed the Coastal Authorities that Horsham District is able to meet its own need (through the Horsham District Planning Framework submission draft) and has offered additional sustainable capacity that may be available to help address the coastal housing needs. Adur DC has indicated its housing shortfall to Horsham DC and it is acknowledged that the southern part of Horsham District would be the most sustainable location that could achieve this due to recognised migration flows and travel to work patterns.
- 3.30 Mid Sussex District Council is currently undertaking further work to assess its housing needs and the capacity of the district to accommodate this. Until this work is completed later in 2014, opportunities to accommodate other LPA needs will not be known.
- 3.31 In order to help address the above housing shortfall the following measures have been progressed:
- As referred to in Part 2 of this statement, the CWS MoU establishes a framework for co-operation between the eight LPAs with respect to strategic planning and development issues. Its objectives include:
    - To help to secure a broad but consistent approach to strategic planning and development issues across the Coastal West Sussex and Greater Brighton area.
    - To identify and manage spatial planning issues that impact on more than one local planning area within Coastal West Sussex and the Greater Brighton area.
  - The recommendations of the CWS&GB Local Strategic Statement (2013 to engage with LPAs beyond the coastal areas (immediate neighbours and

those LPAs within the Coast to Capital area) are being progressed – see below.

- The details of Adur’s housing shortfall ( in terms of numbers, type of housing, preferred locations for new housing and the impacts of not addressing this shortfall) have been provided to Mid Sussex DC and copied to all the local planning authorities in the CWS GB area as well as Crawley, Horsham and Mid Sussex. (See Appendix 3)
- A MoU has been agreed with Mid Sussex DC (see Appendix 4). Its overall aim is to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the three authorities. Before Mid Sussex District Council sets its proposed housing provision number, it will be undertaking an assessment of neighbouring authorities’ unmet housing needs. Mid Sussex DC have commissioned consultants to carry out a sustainability appraisal to assess the impacts of meeting those needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. The results will be shared with the neighbouring authorities later in 2014. The MoU states that it is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
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- A MoU is being finalised with Horsham DC. This states that the two LPAs have shared evidence and have sought to understand the housing needs of their areas. Horsham DC have informed the Coastal Authorities that Horsham is able to meet its own need and has offered additional sustainable capacity that may be available. The MoU states that the Coastal area LPAs collectively cannot meet their objectively assessed need and have requested that they wish to explore whether some unmet capacity can be found in Horsham district. The Coastal LPAs are currently quantifying what this need is and how much they would like Horsham DC to try to accommodate. It is acknowledged that the southern part of Horsham District would be the most sustainable location that could achieve this due to recognised migration flows and travel to work patterns. The MoU states that both Councils are satisfied that they have co-operated to meet the legal duty and it is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
- Brighton and Hove CC, in support of the draft City Plan (currently at examination) produced a Statement of Common Ground on the provision of housing as part of the Duty to Co-operate Compliance Statement (June 2013): <http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf>). This agreement was between all the coastal authorities together with Crawley Borough Council, Eastbourne Borough Council, Horsham District Council, Lewes District Council, the South Downs National Park Authority and Wealden District Council. The Statement of Common Ground is a factual

statement setting out what steps have been taken to comply with the Duty with regard to housing provision, and areas of agreement regarding this key strategic cross-boundary issue affecting the Brighton & Hove sub-region. It provides a basis for further co-operation on strategic issues in the future.

- Lewes District Council has produced a draft Statement of Common Ground (Duty to co-operate: Statement of common ground. Cross boundary working and meeting housing needs) which sets out how the Council and the South Downs National Park Authority have sought to comply with the duty to co-operate in the preparation of the Joint Core Strategy on strategic planning matters (with housing being the main issue). The statement also describes the mechanisms for ongoing co-operation on strategic matters. Dialogue and partnership will continue in order to address cross-boundary strategic matters. It states that the Coastal West Sussex and Greater Brighton authorities are committed to cross-authority working in the pursuit of sub regional and longer terms solutions to meeting the housing needs of the Sussex Coast HMA. In this vein, the Council and the SDNP are committed to a review of Spatial Policies 1 and 2 of the Joint Core Strategy if any options for this are demonstrated to be deliverable within Lewes District. The statement is intended to be an agreement between the CWS&GB authorities together with Crawley Borough Council, Eastbourne Borough Council, Hastings Borough Council, Horsham District Council, Mid Sussex District Council, Rother District Council and Wealden District Council.

- 3.32 Taking into account the above, whilst there may be an opportunity to address some of Adur's unmet housing needs in Horsham and possibly in Mid Sussex (but subject to further work being undertaken), the overall level of unmet need across the coast as well as that in Crawley as well as the environmental and infrastructure constraints in the northern authorities, will mean that the contribution to provision through any available headroom will be limited. The options for addressing needs across the wider area in the longer term are being discussed and this may entail the need for a review of current local plans/policies at appropriate times.

## **Gypsy and Traveller Accommodation**

- 3.33 The gypsy and traveller accommodation need in Adur is for 7 public pitches and 1 Travelling Showperson plot up to 2027 as evidenced by a study undertaken on behalf of the CWS LPAs in 2013 (see Annex6, Ref 6.1) and further assessment work. The gypsy accommodation need largely arises as a result of family growth at an existing site at Withy Patch in Adur. It is unlikely that the Council can meet need in the first part of plan period ( 5 pitches required up to 2017). However, the Council is investigating the potential to extend the current site at Withy Patch but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation as well as land raising of the Withy Patch site to bring it out of flood zone 3. A separate development plan document is timetabled after the adoption of the Adur Core Strategy in 2015 to progress this site. Until further work is undertaken to

assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is difficult to quantify. Nonetheless, Adur DC has communicated and discussed the details of Adur's needs with the CWS&GB LPAs and also with Horsham, Mid Sussex and Crawley. The MoU signed with Mid Sussex DC refers to this need as also the table detailing employment , housing and gypsy needs (Appendix 3).

- 3.34 To meet the need for a transit site in the Coastal West Sussex area (as identified in the above coastal needs study , a site is being constructed at Westhampnett in Chichester District.

## **Employment**

- 3.35 The future employment floorspace requirement for the district as evidenced by the 2014 Employment Land Review for Adur is a range of between 47,221sqm to 57,221sqm net. This requirement is for B class uses and sui generis uses that normally require a business park/industrial estate location. The main allocations in the Adur Local Plan (New Monks Farm, Shoreham Harbour and Shoreham Airport) provide 41,000sqm of employment generating uses (although not specifically B class-uses, B uses are specified as part of the mix at Shoreham Airport and are generally envisaged at the other locations). As such, it is very difficult to know precisely what the shortfall will be in meeting projected B-class need also bearing in mind the potential for windfall employment development that will come forward in the future (as currently happens). However, there are very few additional options for further employment provision in the district without reducing housing numbers or having an unacceptable impact on the landscape.
- 3.36 The shortfall in employment provision (B class uses) above is being addressed through a variety of measures (similar to those listed above for housing):
- As referred to in relation to housing above and Section 2 of this statement, the CWS MoU establishes a framework for co-operation between the eight local planning authorities with respect to strategic planning and development issues.
  - The recommendations of the CWS&GB Local Strategic Statement (2013) to engage with LPAs beyond the coastal areas (immediate neighbours and those LPAs within the Coast to Capital area) are being progressed – see below.
  - The details of Adur's employment shortfall ( in terms of amount, type, preferred locations for new employment and the impacts of not addressing this shortfall) have been provided to Mid Sussex DC and copied to all the local planning authorities in the CWS GB area as well as Crawley, Horsham and Mid Sussex (see Appendix 3). It is accepted that further work is needed to see what areas could help address Adur's shortfall sustainably taking account of the needs of business, the location of new housing, skill requirements,

transport etc. As reflected in the CWS&GB Local Strategic Statement as well as the Greater Brighton City Deal, there are clear economic and regeneration objectives for the coast with growth centres identified in this coastal area. Any provision further afield to meet shortfalls in Adur would need to fit within this context. Further work is being commissioned by the Greater Brighton City Deal Economic Board on employment issues for the wider area which will also inform a review of the LSS by the CWS&GB Strategic Planning Board.

- A MoU has been agreed with Mid Sussex District Council (see Appendix 4). This states that the draft Mid Sussex District Plan includes provision for a 30 ha business park and additionally supports in principle a science park. There may be scope for these proposals to serve wider than local needs. It is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
  - A MoU is being finalised with Horsham District Council (see Appendix 4). This describes Adur's employment shortfall and states that this is currently being quantified and being discussed with Horsham, Mid Sussex and Crawley. The MoU states that both Councils are satisfied that they have co-operated to meet the legal duty and it is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
  - Opportunities for further employment growth are being promoted through the Greater Brighton City Deal in areas adjacent to Adur - in Brighton and Hove as well as in Worthing. This includes proposals for enhanced sustainable transport infrastructure to help improve access to these opportunities. This will provide sustainable employment opportunities for Adur.
- 3.37 Taking into account the above, whilst there may be an opportunity to address some of Adur's unmet employment needs in authorities in Northern West Sussex, the most sustainable opportunities are those on the coast. Through City Deal and the LEP, such coastal opportunities could be provided. However, further evidence work to look at employment needs and provision across the wider area in the longer term is needed and is currently being progressed.

## **Minerals and Shoreham Harbour**

- 3.38 Shoreham Harbour is a key regeneration site proposed for mixed housing and employment development together with leisure opportunities, improved public space and associated infrastructure including flood defences and transport improvements. The regeneration proposals will be facilitated by consolidating, reconfiguring and enhancing the operations of Shoreham Port. The site is begin taken forward through a broad location in the Adur Local Plan and a joint Area Action Plan with Brighton and Hove City Council and West Sussex County Council with the support of the Port Authority.

Minerals wharf capacity at Shoreham Harbour makes a significant contribution to meeting the needs for aggregate imports in to the sub-region. Paragraph 143 of the National Planning Policy Framework requires local planning authorities to safeguard existing, planned and potential wharfage for bulk transport of minerals. This policy is also reflected in policies in the adopted Minerals Local Plans for East and West Sussex. However, if this policy is applied to safeguarding of sites per se rather than overall capacity across the whole Harbour area, this severely restricts the potential of the harbour on the western arm (where there are two wharves - Free Wharf and Kingston Wharf aka Railway Wharf East) to secure new homes and employment.

- 3.39 All parties (East and West Sussex County Councils, the SDNPA, Adur DC, Brighton & Hove CC and the Port Authority) recognise the importance of maintaining sufficient wharf capacity at Shoreham Harbour in order to maintain the supply of aggregates and to cater for any future increase in demand. The parties are exploring how best to interpret the safeguarded sites policies at Shoreham Harbour to protect the overall wharfage capacity at the port whilst maintaining flexibility over which sites can contribute to meet aggregate needs. There are several larger safeguarded sites within the heart of the port operational area that are actively used to discharge aggregates which offer unused capacity and therefore potential to mitigate the loss of wharves elsewhere in the Port. In addition to this, the Port is able to accommodate greater capacity on a number of other sites in the port operational area if required which are not currently safeguarded within the Local Plan.
- 3.40 The Partnership, East Sussex County Council and the SDNPA have approved a Statement of Common Ground to establish co-operation and collaboration between the parties in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and their safeguarding at Shoreham Port. This Statement (Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority April 2014 - Annex 6, Ref 7.3) sets out matters of agreement and commitment to a future policy approach, reflecting the aspirations for regeneration at the harbour.
- 3.41 The purpose of this Statement of Common Ground is to underpin effective co-operation and collaboration between the parties in addressing strategic cross-boundary issues as they relate to planning for minerals infrastructure and safeguarding in Shoreham Harbour. It sets out matters of agreement and commitment to a future policy approach, reflecting the spirit of co-operation between the parties to the Statement. The broad aims of the statement are:
- to set out the commitment of each of the parties to an approach to mineral safeguarding in line with NPPF at Shoreham Harbour, recognising commercial considerations of the Port and the regeneration aspirations of the JAAP;
  - to indicate the approach to be taken by all parties to delivering this commitment.

- 3.42 In line with Policy WMP 15 of the adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan, the statement states that in order for proposals for alternative uses for wharves within Brighton & Hove to be acceptable, evidence would need to demonstrate that there would be no net loss of potential capacity for handling minerals within the port as a whole. Appropriate flexible arrangements could be used to compensate for the loss of capacity at a specific wharf, such as arrangements for the use of common user terminals within the port for minerals use.
- 3.43 Further work is currently underway to assess future demand for aggregates and meetings continue to take place between all the relevant parties to address the capacity at Shoreham harbour in the context of its wider regeneration.

## **Transport**

- 3.44 The Highways Agency and WSCC are statutory consultees on the Adur Local Plan. Close working with WSCC has taken place throughout the production of the Local Plan to address transport issues and impacts arising from its policies including the undertaking of a transport study in 2013 and its addendum in 2014. These studies (Annex 6, Refs 7.4 and 7.5) have been shared with the Highways Agency. The Coastal West and Greater Brighton Strategic Planning Board is prioritising transport schemes in the area which includes a package of sustainable transport measures for Adur. Through the Coast to Capital LEP Strategic Economic Plan and the Greater Brighton City Deal, Adur has identified a need for transport improvements on the A27 and the A259 together with sustainable transport measures – all of which will benefit the wider coastal area. A transport strategy has been produced for Shoreham Harbour by West Sussex County Council with the support and input by the partners, as part of the emerging joint Area Action Plan. This has involved consultation with a range of stakeholders and Council Members across all three Local Planning Authorities responsible for the Action Plan (Adur, Brighton and Hove and West Sussex).
- 3.45 Meetings have and will continue to take place with the developers/land owners of the proposed strategic allocations in the Adur Local Plan in order to address the transport issues and to agree appropriate transport mitigation measures to be put in place.

## ***Other strategic spatial issues, studies and areas of work***

### **Shoreham Airport**

- 3.46 Together with Shoreham Harbour, Shoreham Airport is a key regeneration site proposed as a strategic allocation in the Adur Local Plan to provide 15,000 sqm of additional employment floorspace for aviation and non aviation business. The airport freehold is jointly owned by Worthing Council and Brighton and Hove City Council. The site is one of the growth centres being promoted by the Greater Brighton City Deal. Delivery of new employment is



dependent on the construction in 2017 of improved flood defences along the river Adur (the Adur Tidal Walls) as well as improved access on the A27 to serve both the Airport and new homes proposed at new Monks Farm. As such, formal and informal consultation has taken place and is on-going with the Environment Agency, the Highways Agency, West Sussex County Council, Brighton and Hove City Council and Worthing Borough Council. The proposed allocation (given its location) has also been the subject of discussions and comments by the South Downs National Park Authority. Discussions are also taking place between the developers regarding joint access off the A27.

### **Countryside**

- 3.47 Approximately half of Adur District is included within the South Downs National Park and this area is being covered by the Local Plan being produced by the Park Authority. The Council has formally commented on the emerging Plan for the SDNP including evidence studies. The SDNPA has formally commented as a statutory consultee on all stages of the Adur Local Plan and officers have met regarding the duty to co-operate (see above and Appendix 2). The SDNPA is part of the CWS&GB Strategic Planning Board and has informed the work of this group including the LSS and gypsy and traveller accommodation studies. The SDNPA also sits on a range of officer and Member groups which are in place to steer respective policies and plans.

### **Water and waste water**

- 3.48 Local Plans have to take account of the Water Resources Management Plan for Southern Water and the River Basin Management Plan for the South East River Basin District (produced by the Environment Agency). These bodies have been formally consulted on all stages of the Local Plan.

### **Flood risk**

- 3.49 Flood risk is a key issue for Adur and limits the amount of development which can be accommodated in the district. Coastal flood risk and climate change have to be addressed jointly with other local authorities. Funding is in place (via the Environment Agency and growth funding via the LEP) for the implementation of flood defences along both sides of the river Adur. The Draft Local Plan has been informed by the Shoreline Management Plan from Beachy Head to Selsey Bill (2006) spanning the coast from Eastbourne to Chichester. Account has also been taken of the Arun to Adur Flood Management Strategy 2010-2020 (2010) as required by the Environment Agency. A Strategic Flood Risk Assessment (SFRA) was commissioned jointly between Adur and Worthing Councils in 2011 and at the same time an SFRA was also commissioned by Brighton & Hove City Council using the same consultants. This ensured a consistent approach to assessing flood risk across Shoreham Harbour which spans both Adur and Brighton & Hove. A Supplementary Planning Document (SPD) has been produced to provide details as to the flood defences required and the design of these for Shoreham Harbour and this will be approved by the end of 2014 by all parties.

## **Green Infrastructure**

- 3.50 The Adur Local Plan includes a policy on green infrastructure which refers to the need for a supporting SPD and a Green Infrastructure Strategy. This will need to address links to adjoining areas such as Brighton and Hove, Worthing and the SDNP (involving joint work with these authorities) . The support of West Sussex County Council will also be needed as well as that of bodies such as Natural England and the Environment Agency. An officers working group is taking forward the necessary work. Adur (that part of the district east of the river) is also part of the Brighton Biosphere and will work in partnership with Brighton and Hove CC on enhancement projects.

## **4. Conclusions**

- 4.1 In line with the Localism Act and the NPPF, this Statement has aimed to demonstrate the extent of positive and diligent co-operation and engagement that has taken place and continues to take place with relevant bodies including LPAs on those spatial issues which impact on areas outside of Adur and/or involve joint working and support. The report has specifically focussed on outcomes of such engagement, particularly on the key issues for Adur - Housing, Gypsies and Traveller needs, Employment, Minerals at Shoreham Harbour and Transport.
- 4.2 On-going co-operation through existing governance structures as well as through regular meetings is taking place with many of the bodies and LPAs referred to in the Statement to address issues. The Statement has also indicated where future work is required to address unmet needs.

### Annex 1: Summary of Strategic Planning Activities in Coastal West Sussex and Greater Brighton

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome
<b>PART A</b>				
Supporting sustainable Economic Growth	CWS &GB Authorities, SDNPA, CWSP, C2CLEP	<p><b>Oct 2012:</b> Establish a Strategic Planning Board for CWS&amp;GB to facilitate joint working on strategic matters.</p> <p><b>Oct 2013:</b> Agree a joint strategic framework (LSS) to prioritise strategic spatial and investment priorities to help maximise opportunities for long term sustainable economic growth</p>	<p>CWS&amp;GB Memorandum of Understanding [Annex 6, Ref 2.3]</p> <p>CWS&amp;GB LSS: Strategic Objective 1 – Delivering Sustainable Economic Growth [Annex 6, Ref 3.1]</p> <p>CWS&amp;GB LSS: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham (Annex 6, Ref 301)</p> <p>Developing an Employment and Infrastructure Strategy [Annex 6, Ref 5.1]</p>	<p>The Adur Local Plan provides for the focus of new development at Shoreham Harbour, Shoreham Airport and new housing development on the edge of the built up area in Lancing and Sompting (Policy 2 Spatial Strategy).</p> <p>The Local Plan allocate new employment floorspace at Shoreham Airport, New Monks Farm and Shoreham Harbour (Policy 4 Planning for Economic growth).</p> <p>The Local Plan allocates 15,000 sq m at Shoreham Airport together with transport improvements (including an improved junction on the A27) and flood mitigation measures (Policy 7: Shoreham Airport. Also Adur Infrastructure Delivery Plan and Coast to Capital Strategic Economic Plan 2014 ).</p> <p>The Local Plan identifies Shoreham Harbour as a broad location for regeneration including 1100 new dwellings and 16,000 sq</p>

				m of employment generating uses within that part of the Harbour within Adur District up to 2031. Also includes supporting infrastructure and a comprehensive flood solution to be delivered (Policy 8: Shoreham Harbour Regeneration Area). Also Adur Infrastructure Delivery Plan and Coast to Capital Strategic Economic Plan 2014).
Making provision for the objectively assessed housing needs of the area	CWS&GB Authorities, SDNPA, CWSP, C2CLEP, Gatwick Diamond Authorities, EA, HCA	<p><b>Oct 12:</b> Establish a Strategic Planning Board for CWS&amp;GB to facilitate joint working on strategic matters.</p> <p><b>Oct 13:</b> Preparation of a joint strategic framework (LSS) to:</p> <ul style="list-style-type: none"> <li>• set out an agreed overall growth ambition for the area in terms of housing provision, ensuring that individual authorities aim to meet OANs as far as is possible without significant adverse impact on the environment, infrastructure and economy;</li> <li>• identify any potential shortfall over the OANs and agree a process for addressing this over the longer term.</li> </ul> <p>(Date when started) Working collaboratively with LPAs in wider sub-</p>	<p>CWS&amp;GB Memorandum of Understanding [Annex 6, Ref 2.3]</p> <p>Duty to Cooperate Housing Study [Annex 6, Ref 4.1]</p> <p>CWS&amp;GB LSS: Strategic Objective 2 – Meeting Strategic Housing Needs [Annex 6, Ref 3.1]</p> <p>CWS&amp;GB LSS: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham (Annex 6, Ref 301)</p> <p>Coastal West Sussex</p>	<p>A consistent approach to assessing housing provision needs across the Sussex Coast HMA.</p> <p>The Adur Local Plan provides for the focus of new development at Shoreham Harbour, Shoreham Airport and new housing development on the edge of the built up area in Lancing and Sompting (Policy 2 Spatial Strategy).</p> <p>The Local Plan identifies Shoreham Harbour as a broad location for regeneration including 1100 new dwellings and 16,000 sq m of employment generating uses within that part of the Harbour within Adur District up to 2031. Also includes supporting</p>

		<p>region, particularly Gatwick Diamond Authorities, to understand longer term development needs and what the opportunities are for meeting these outside CWS&amp;GB.</p>	<p>Strategic Housing Market Assessment (SHMA) 2012 (Annex 6 Ref 4.1)</p> <p>Housing Study (Duty to Co-operate) Sussex Coast HMA (Annex 6, Ref 4.2)</p> <p>Assessment of Housing Development Needs Study: Sussex Coast HMA 2014 (Annex 6, Ref 4.3)</p> <p>MoU between Adur and Horsham DC Oct 2014 (Annex 6 Ref 4.4)</p> <p>MoU between Adur and Mid Sussex DC Oct 2014 (Annex 6 Ref 4.5)</p>	<p>infrastructure and a comprehensive flood solution to be delivered (Policy 8: Shoreham Harbour Regeneration Area. Also Infrastructure Delivery Plan and Coast to Capital Strategic Economic Plan 2014).</p> <p>Specific housing allocations in the Local Plan at New Monks Farm (Policy 5) and West Sompting (Policy 6)</p> <p>Informed overall housing numbers in the local plan, in particular Policy 3: Housing Provision.</p>
Delivering strategic infrastructure priorities	CWS & GB Authorities, SDNPA, CWSP, C2CLEP, HA	<p><b>Oct 12:</b> Establish a Strategic Planning Board for CWS&amp;GB to facilitate joint working on strategic matters and engage effectively with infrastructure enablers and providers.</p> <p><b>Oct 13:</b> Preparation of a joint strategic framework (LSS) to identify strategic investment priorities in transport and other infrastructure required to</p>	<p>Memorandum of Understanding [Annex 6, Ref 2.3]</p> <p>CWS&amp;GB LSS: Strategic Objective 3- Investing in Infrastructure [Annex 6, Ref 3.1]</p> <p>CWS&amp;GB LSS: Spatial</p>	<p>Informed the allocation policies in the Local Plan as above and a specific policy on Delivering Infrastructure – Policy 30. Also the Adur Infrastructure Delivery Plan.</p>

		<p>support delivery of strategic spatial priorities identified in LSS and LPS and to inform the priorities identified in the C2CLEP's Strategic Economic Growth Plan.</p> <p><b>Date:</b> Preparation of a Delivery and Investment Framework to align strategic priorities with funding opportunities ensuring these are deliverable.</p>	<p>Priority 1: Shoreham Harbour and Brighton Airport, Shoreham (Annex 6, Ref 301)</p> <p>C2C LEP Strategic Economic Plan 2014 [Annex 6, Ref 9.1]</p> <p>Advice to Support the Development of a Delivery and Investment Framework [Annex 6, Ref 5.2]</p> <p>CWS&amp;GB Delivery &amp; Investment Framework [Annex 6, Ref 5.3]</p>	
Management of environmental resources	CWS&GB Authorities, SDNPA, EA, EN, Sussex Local Nature Partnership	<p><b>Oct 12:</b> Establish a Strategic Planning Board for CWS&amp;GB to facilitate joint working on strategic matters and engage effectively with other organisations and bodies with a role in managing environmental assets.</p> <p><b>Oct 13:</b> Preparation of a joint strategic framework (LSS) to support the protection and management of key environmental assets that are valuable in terms of supporting sustainable growth and a high quality of life.</p> <p>Include cooperation with Sussex LNP where relevant</p>	<p>Memorandum of Understanding [Annex 6, Ref 2.3]</p> <p>CWS&amp;GB LSS: Strategic Objective 4 – Managing Environmental Assets and Natural resources [Annex 6, Ref 3.1]</p> <p>CWS&amp;GB LSS: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham (Annex 6, Ref 301)</p>	Informed the allocation policies in the Local Plan as above and specific policies on Adur's Countryside and Coast (Policy 13); Local Green Gaps (Policy 14); Green Infrastructure (Policy 31) and Biodiversity (Policy 32)

<p>Meeting the needs of Gypsies and Travellers [Note: this should refer to the similar work being undertaken by B&amp;H and East Sussex Authorities where relevant]</p>	<p>CWS Authorities, SDNPA and other West Sussex Authorities</p>	<p>Joint assessment of needs and working together to identify a sufficient supply of suitable sites across CWS.</p>   <p>Provision of transit accommodation</p>	<p>CWS Gypsies, Travellers &amp; Travelling Showpeople Accommodation Assessment <i>[Annex 6, Ref 6.1]</i></p> <p>Study into Transit Accommodation in West Sussex <i>[Annex 6, Ref 6.2]</i></p>	<p>Informed Policy 24: Provision for Gypsies, Travellers and Travelling Showpeople.</p>   <p>A permanent transit site has been provided at Westhampnett in Chichester District.</p>
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\*Further information on the Individual LPA decisions related to the LSS and MoU are contained in Annex 4

\*\*Timelines for key decisions related to evidence are set out in Annex 3

## Annex 2: Summary of Strategic Planning Activities in Adur

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome Individual Authorities complete – where possible outcome should include specific references to LP policies
<b>PART B</b>				
Housing Needs and Provision	<p>Coastal West Sussex and Greater Brighton LPAs of Arun, Brighton and Hove City, Chichester, Lewes DC and Worthing.</p> <p>Other West Sussex LPAs of Horsham DC, Crawley BC and Mid Sussex DC</p> <p>West Sussex County Council Developers of proposed strategic development allocations in the Adur Local</p>	<p>Studies to assess objectively assessed needs have been undertaken (see above housing section). The capacity of the district has been assessed (Duty to Co-operate Housing study 2013 and ADC Strategic Land Availability Assessment 2014).</p> <p>LPAs were formally consulted on the Adur Local Plan and a variety of meetings have taken place with a number of authorities with regard to addressing Adur's housing needs under the duty to co-operate.</p>	<p>Studies listed in Annex 6.</p> <p>MoU with Horsham District 2014 (appended to this Statement)</p> <p>MoU with Mid Sussex District 2014 (appended to this Statement)</p> <p>Emerging Statement of Common Ground with Lewes DC</p> <p>Agreed Statement of Common Ground with Brighton and Hove CC (2013) (<a href="http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf">http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf</a>).</p>	<p>Informed Local Plan: Policy 2 Spatial Strategy Policy 3 Housing Provision Policy 5 New Monks Farm Policy 6 West Sompting Policy 8 Shoreham Harbour Regeneration Area</p>



	Plan.			
Gypsy and Traveller Accommodation	<p>Coastal West Sussex and Greater Brighton LPAs of Arun, Brighton and Hove City, Chichester, Lewes DC and Worthing.</p> <p>Other West Sussex LPAs of Horsham DC, Crawley BC and Mid Sussex DC</p> <p>West Sussex County Council</p> <p>Developers of proposed strategic development allocations in the Adur Local Plan.</p>	<p>A study to assess needs has been undertaken for Coastal West Sussex LPAs</p> <p>LPAs were formally consulted on the Adur Local Plan and a variety of meetings have taken place with a number of authorities with regard to addressing Adur's gypsy and traveller needs under the duty to co-operate.</p> <p>Discussions have taken place with the Developers of proposed strategic development allocations. Developers of New Monks Farm and Shoreham Airport are discussing the new junction on the A27 to serve these developments and the potential to expand the current Withy Patch site.</p>	<p>CWS Gypsies, Travellers &amp; Travelling Showpeople Accommodation Assessment [Annex6, Ref 6.1]</p> <p>Study into Transit Accommodation in West Sussex [Annex 6, Ref 6.2]</p> <p>MoU with Mid Sussex District 2014 (appended to this Statement)</p> <p>Agreed Statement of Common Ground with Brighton and Hove CC (2013) (<a href="http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf">http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf</a>).</p>	Informed Local Plan: Policy24 Provision for Gypsies, Travellers and Travelling Showpeople.
Employment Needs and Provision	Coastal West Sussex and Greater Brighton LPAs of Arun,	An Employment Land Review (2014) has informed the Local Plan. This has assessed objectively assessed needs and	<p>Studies listed in Annex 6.</p> <p>MoU with Horsham District 2014 (appended to this Statement)</p>	Informed Local Plan: Policy 2 Spatial Strategy Policy 4 Planning for Economic Growth Policy 5 New Monks Farm

	<p>Brighton and Hove City, Chichester, Lewes DC and Worthing.</p> <p>Other West Sussex LPAs of Horsham DC, Crawley BC and Mid Sussex DC</p> <p>West Sussex County Council</p> <p>Developers of proposed strategic development allocations in the Adur Local Plan.</p> <p>Adur and Worthing Business Partnership</p> <p>The Coast to Capital LEP</p>	<p>capacity for the district.</p> <p>LPAs were formally consulted on the Adur Local Plan and a variety of meetings have taken place with a number of authorities with regard to addressing Adur's employment needs under the duty to co-operate.</p> <p>Adur DC inputted into the Strategic Economic Plan.</p> <p>Adur DC is part of the Greater Brighton City Deal.</p>	<p>MoU with Mid Sussex District 2014 (appended to this Statement)</p> <p>Agreed Statement of Common Ground with Brighton and Hove CC (2013) (<a href="http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf">http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/DtC%20Statement%20FINAL%20-%20SUBMISSION.pdf</a>).</p> <p>Coast to Capital Strategic Economic Plan 2014 (<i>Annex 6, Ref 8.1</i>)</p>	<p>Policy 7 Shoreham Airport</p> <p>Policy 8 Shoreham Harbour Regeneration Area</p> <p>Policy 26 Protecting and Enhancing Existing Employment Sites and Premises</p>
Minerals at Shoreham Harbour	Shoreham Port Authority	Study undertaken in 2014 by consultants to update	West Sussex Wharves and Railheads Study 2014 ( <i>Annex 6, Ref 7.2</i> )	Informed Local Plan: Policy 8: Shoreham

	<p>Brighton and Hove City Council West Sussex County Council East Sussex County Council</p>	<p>relevant information in the Wharves and Railheads Study (2008). This assesses the current and potential capacity of wharves and railheads and the likely future demand for aggregate imports to the wharves and railheads up to 2031. Part 2 of the study assesses the viability of existing and currently safeguarded sites at the Harbour and considers the reasons for and against safeguarding the wharves and railheads. Scenarios for safeguarding the wharves and railheads are proposed.</p> <p>Additional work is taking place to refine the above information and to address safeguarding issues.</p>	<p>Statement of Common Ground signed between the Shoreham Harbour Planning Authorities and Shoreham Port Authority in 2014. (<i>Annex 6, Ref 7.3</i>)</p>	<p>Harbour Regeneration Area</p> <p>Informing the draft Joint Area Action Plan for Shoreham Harbour</p>
Transport	<p>Highways Agency  West Sussex County Council  Developers of proposed strategic development allocations in</p>	<p>Parsons Brinckerhoff consultants were commissioned in 2013 and 2014 to carry out transport studies for the Adur Local Plan. This put forward mitigation measures to address traffic impacts at a number of key junctions. Sustainable transport measures also proposed.</p>	<p>Adur Local Plan and Shoreham Harbour Transport Study Final Report 2013 (<i>Annex 6 Ref 8.4</i>)</p> <p>Adur Local Plan and Shoreham Harbour Transport Study Report – Addendum 2014 (<i>Annex 6 Ref 8.5</i>)</p>	<p>Informed Local Plan: Policy 2 Spatial Strategy Policy 5 New Monks Farm Policy 5 West Sompting Policy 7 Shoreham Airport Policy 8 Shoreham Harbour Regeneration Area Policy 29: Transport and Connectivity</p>

	<p>the Adur Local Plan.</p> <p>CWS Strategic Planning Board</p> <p>Coast to Capital LEP</p> <p>Brighton City Deal</p>	<p>The Highways Agency and the County Council have agreed the studies and findings as evidence to support the local plan.</p> <p>The Strategic Economic Plan produced by the LEP includes a number of transport improvements on the A27 and A259 which has received some Government growth funding to support growth in the Adur area including that at Shoreham Harbour.</p> <p>A transport strategy has been produced for Shoreham Harbour which includes junction improvements together with measures to encourage sustainable travel.</p> <p>Meetings with the developers of the proposed strategic allocations have addressed transport requirements and mitigation measures for the sites.</p>		
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## **Annex 3: CWS & GB Strategic Planning Board: Key Project Timelines**

### **1. Establishment of CWS & GB Strategic Planning Board**

**February 2012: Emerging CWS Infrastructure and Employment Land Strategy recommends new governance arrangements to deliver strategic planning and investment priorities.**

The draft of CWS Partnership commissioned study by consultants Parsons Brinkerhoff highlights the need for new governance arrangements to help implement the recommendations. LPAs involved in study also considering implications of the Duty to Cooperate and new ways of working. Study therefore commissioned from Catriona Riddell Associates (CRA) to consider existing working arrangements in CWS and the wider West Sussex area and options for future arrangements to support management of strategic planning and investment priorities.

**26 April 2012: CWS&GB Officers' Meeting**

Officers consider draft recommendations from CRA report.

**27 June 2012: CWS&GB Authorities (Relevant Portfolio Holders and Officers) Meeting**

LPAs consider the recommendations of the CRA report and agree to establish a new Strategic Planning Board with a remit to:

- (1) identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB; and
- (2) support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

**9 October 2012: First meeting of the CWS&GB Strategic Planning Board**

The Board agree Terms of Reference and draft work programme, including development of a new strategic framework for the area. Formal members of the Board to include the LPAs of Adur, Arun, Brighton & Hove, Chichester, Worthing, South Downs National Park and West Sussex County Council. Lewes District Council invited to attend as 'observer'.

**24 January 2013: CWS&GB Strategic Planning Board**

Draft Memorandum of Understanding considered

**18 July 2013: CWS&GB Strategic Planning Board**

Final Memorandum of Understanding agreed

**17 October 2013: CWS&GB Strategic Planning Board**

Lewes District Council invited to be formal member of the Board.

### **2. Developing a Local Strategic Statement**

**24 January 2013: CWS&GB Strategic Planning Board**

Scope for LSS agreed and CRA appointed to take forward preparation with officers.

**27 March 2013: Workshop 1**

Officers from each of the CWS&GB LPAs considered form and content of LSS. Representation from Gatwick Diamond Authorities unable to attend but telephone discussion took place prior to meeting to ensure comments and experience of GD

Authorities in developing their LSS could be taken into account (feedback from discussion included in presentation).

**23 May 2013: Workshop 2**

Officers and councillors from the CWS&GB LPAs considered key issues for LSS, including links to Coast to Capital LEP's emerging Strategic Economic Plan.

**24 June 2013: Workshop 3**

Officers and councillors from the CWS&GB LPAs and key stakeholders (including Natural England, Environment Agency and Highways Agency) considered draft Strategic Objectives and Spatial Priorities for the LSS. Written comments from those attending invited including from representatives from C2C LEP and Sussex LNP who were invited but unable to attend..

**18 July 2013: CWS&GB Strategic Planning Board**

Draft LSS considered, particularly taking into account results of the GLH Housing Study.

**Include Ref to SA**

**14 August-18 September: Formal Consultation on Draft LSS and Draft Sustainability Appraisal**

CWS&GB LPAs, other adjoining LPAs and key stakeholders invited to comment on the final draft LSS.

**17 October 2013: CWS&GB Strategic Planning Board**

Final LSS agreed.

**30 October 2013: Letter from CW&GB SPB Chairman sent to LPAs and Partners**

Letter to CWS&GB LPAs, adjoining LPAs and other key stakeholders sent to formally present the Local Strategic Framework and set out next steps.

**November 2013- January 2014: Individual CWS&GB Authorities formally agree LSS**

**3. Coastal West Sussex Duty to Cooperate Housing Study**

**21 Feb 2012: Meeting of CWS LP lead officers**

Considered Duty to Co-operate requirements, particularly in relation to housing (the social and economic impacts of not meeting housing needs); scope for radical solutions post 2028, such as new settlements; need to link in to the rest of West Sussex; the need for MoU and position statement/strategy; and use of independent support to do the housing work.

**23 May 2012: Meeting of CWS LP lead officers**

Strategic issues identified and the need to co-operate on housing provision. Agreed to appoint consultant to do housing study on behalf of the CWS Authorities, Brighton & Hove CC, Lewes DC and the South Downs National Park Authority. The study would identify theoretical housing needs and compare this to actual capacity.

**October 2012: Study brief agreed and GL Hearn appointed**

**9 October 2012: CWS &GB Strategic Planning Board**

The Board is informed of the housing work and further amendments are made to the brief.

**11 January 2013: Adjoining authorities informed of the Study**

Letter sent to other LPAs in West Sussex, and to the Planning departments at the Councils of Havant, East Hants, Waverley, Southampton, Portsmouth, Rother, Hastings

(all within or close to the coastal housing market areas) and Wealden to inform them of the study and to ask for any housing information which may be of mutual benefit.

**Jan 2013: Preliminary study submitted by G L Hearn.**

**1 Feb 2013: Officers' meeting**

G L Hearn presented draft study (action points taken).

**5 March 2013: Officers' meeting**

Final comments made on draft study.

**19 March 2013: CWS&GB Strategic Planning Board**

Presentation of draft study findings by G L Hearn

**June 2013: Adjoining authorities informed of draft study findings**

Letter sent informing West Sussex LPAs and others close to the housing market areas (as above) about the study (with an intention to send the study when complete).

**May 2013: G L Hearn appointed to up-date study**

Study updated to take account of the 2011 Census and new population projection figures.

**July 2013: Final study produced** (following some further minor amendments (to the map)

**17 Oct 2013: CWS&GB Strategic Planning Board**

The Board agrees the Local Strategic Statement for the area which is informed by the Duty to Co-operate Housing Study.

#### **4. Developing an Employment and Infrastructure Strategy**

**12 September 2011: CWS Partnership Development and Infrastructure Group**

The DIG agreed there was a need for a spatial vision, linked to growth plans and infrastructure investment across CWS and commissioned Parsons Brinckerhoff to review the existing plans from each of the Authorities.

**29 September 2011: CWS Partnership Board**

The Board was updated on the Parsons Brinckerhoff work and the clear need for the CWS area to have a clear spatial vision linked to growth plans and infrastructure investment. The Board was to be kept informed of progress.

**23 November 2011: CWSP Development & Infrastructure Group**

The DIG reviewed the proforma to be used for collecting base line intelligence. It was agreed that the rationale for the work was to strengthen the image and identity of CWS and investigate opportunities for a collective approach to addressing the barriers to development so that the whole CWS area can benefit.

**10 January 2012: CWSP Development & Infrastructure Group**

Consideration of baseline information and next steps - validation of sites and infrastructure improvements required to help deliver economic growth. Agreed that this needed to be tested more broadly within individual authorities before being taken to the CWSP.

**21 February 2012: CWSP Development & Infrastructure Group**

Considered Parsons Brinckerhoff report and recommendations.

**29 February 2012: Developing an Employment and Infrastructure Strategy-**  
Parsons Brinckerhoff Report completed

**22 March 2012: CWS Partnership Board meeting**

The Board considered the Parsons Brinckerhoff which identifies the strategic sites and transport infrastructure improvements that, if delivered, could have potential to unlock the economic growth potential for CWS. The recommendations included the need to establish new governance arrangements to deliver the place-based approach set out in the report.

**27 June 2012: CWS&GB Authorities (Relevant Portfolio Holders and Officers)**

Agreed to establish new strategic planning arrangements to address the Duty to Cooperate and the recommendations of the Parsons Brinckerhoff report on governance.

**9 October 2012: CWS &GB Strategic Planning Board**

The Board considered a presentation on how best to take forward implementation of the Parsons Brinckerhoff report and agreed to develop a Local Strategic Statement.

**5. CWS&GB Delivery and Investment Framework**

To be drafted when available

**6. Planning for Gypsies, Travellers and Travelling Showpeople**

Note: this work covers West Sussex Authorities within the partnership only.

**Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (Phase 1)**

The Assessment assisted the CWS Authorities and SDNPA to determine an appropriate level of pitch and plot provision for the area to inform the policies and proposals of their respective Core Strategies/Local Plans and related development plan documents. The Phase 1 GTAA has been 'signed off' by the Gypsy and Traveller Project Group.

**Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (Phase 2)**

The CWS Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (Phase 2) was commissioned from Peter Brett Associates (PBA) to meet the requirements of the National Planning Policy Framework (NPPF) 2012, the Planning Policy for Traveller Sites (PPTS) March 2012 and the 2004 Housing Act.

Having gained an understanding of need (Phase 1) the CWS authorities were then required to:

- Identify and update annually, a supply of specific, developable sites sufficient to provide five years' worth of sites against their locally set targets;
- Identify a supply of specific, developable sites or broad locations for growth, for years 11-15

This work was agreed by the Strategic Planning Board in January 2014.



## **Study into Transit Provision in West Sussex**

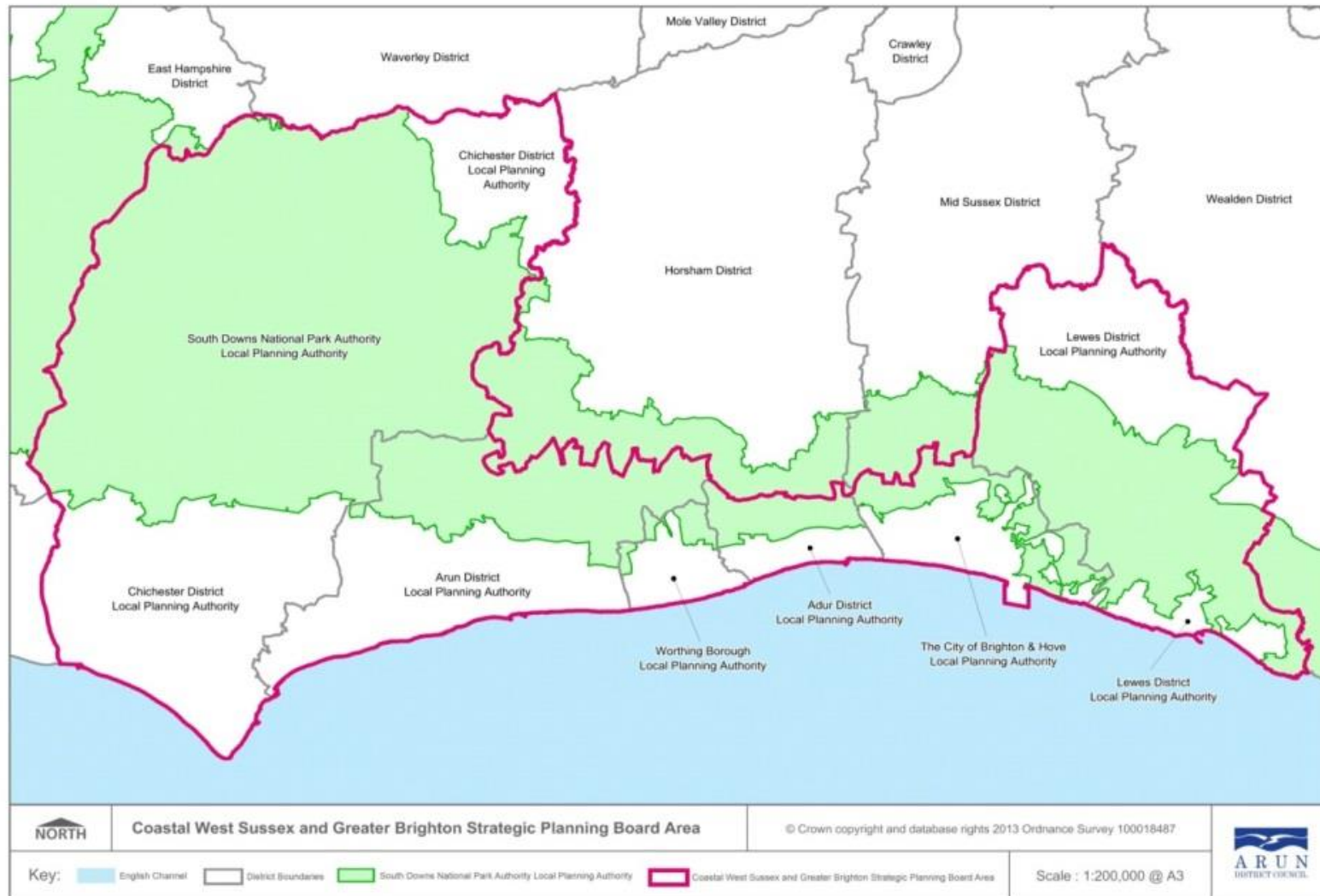
This study was undertaken by Opinion Research Services (ORS) on behalf of all the Chief Executives of West Sussex. The findings of the study have been discussed among the Leaders and the Chief Executives of West Sussex and they have all agreed to recommend to their Councils that they should enter into a West Sussex-wide multi-agency approach to managing Unauthorised Encampments (UEs). West Sussex County Council has agreed to be the lead authority for the multi-agency arrangements in respect of both the management of the transit site and enforcement activities. For this arrangement to be successful, a Transit Site, in public ownership and control, must be sited within the West Sussex County boundaries.

Chichester DC has provided a transit site at Westhampnett in Chichester district. It should be noted that no other suitable site across West Sussex has been identified for this purpose, despite an extensive search of Council land records and a public 'call for sites' associated with the Local Plan process.

#### Annex 4: Formal Endorsement of the Local Strategic Statement

Local Planning Authority	
Adur & Worthing	<p>Joint Strategic Committee: 3 December 2013  <a href="http://www.adur-worthing.gov.uk/media/media,119295,en.pdf">http://www.adur-worthing.gov.uk/media/media,119295,en.pdf</a></p> <p><u>Decision:</u>                      The Joint Strategic Committee:-                      (i) noted and approved the Coastal West Sussex and Greater Brighton Local Strategic Statement;                       (ii) noted and approved the Coastal West Sussex and Greater Brighton Memorandum of Understanding;                       (iii) noted and approved the Agreement for Joint Working between all Local Planning Authorities in West Sussex together with Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority.</p>
Arun	<p>Full Council: 8 January 2014  <a href="http://www.arun.gov.uk/mediaFiles/downloads/83329178/Minutes_080114_2014_Final.pdf">http://www.arun.gov.uk/mediaFiles/downloads/83329178/Minutes_080114_2014_Final.pdf</a></p> <p><u>Decision:</u>                      The Council resolved that the Coastal West Sussex and Greater Brighton Local Strategic Statement be adopted.</p>
Brighton & Hove	<p>Economic Development &amp; Culture Committee: 23 January 2014  <a href="http://present.brighton-hove.gov.uk/Published/C00000705/M00004664/\$\$\$Decisions.doc.pdf">http://present.brighton-hove.gov.uk/Published/C00000705/M00004664/\$\$\$Decisions.doc.pdf</a></p> <p><u>Decision:</u>                      The Committee resolved to approve the Coastal West Sussex and Greater Brighton Local Strategic Statement including the terms of reference and memorandum of understanding.</p>
Chichester	<p>Cabinet: 7 January 2014  <a href="http://www.chichester.gov.uk/index.cfm?articleid=22978">http://www.chichester.gov.uk/index.cfm?articleid=22978</a></p> <p><u>Decision:</u>                      Cabinet resolved the Coastal West Sussex and Greater Brighton Local Strategic Statement be agreed.</p>
Lewes	<p>Cabinet: 6 January 2014  <a href="http://cmispublic.lewes.gov.uk/Public/Meeting.aspx?meetingID=657">http://cmispublic.lewes.gov.uk/Public/Meeting.aspx?meetingID=657</a></p> <p><u>Decision:</u>                      Cabinet agreed to endorse the Coastal West Sussex and Greater Brighton – Local Strategic Statement.</p>
SDNP	<p>Endorsement of LSS delegated to Director of Planning</p>
West Sussex CC	<p>Executive Decision: 23 January 2014  <a href="http://www.westsussex.gov.uk/your_council/meetings_and_decision-making/executive_decisions.aspx">http://www.westsussex.gov.uk/your_council/meetings_and_decision-making/executive_decisions.aspx</a></p> <p>Cabinet Member for Highways and Transport agreed the LSS on behalf of the Council</p>

## Annex 5: Map of Coastal West Sussex and Greater Brighton



## **Annex 6: References to key documents (insert weblinks when available)**

### **1. National Planning Policy & Guidance**

- 1.1 National Planning Policy Framework (March 2012)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/6077/2116950.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)
- 1.2 National Planning Practice Guidance (March 2014)  
<http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/>
- 1.3 Localism Act (2011)  
<http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>

### **2. Coastal West Sussex & Greater Brighton Strategic Planning Board**

- 2.1 Review of Governance and Working Arrangements in Coastal West Sussex (CRA, April 2012) [insert reference]
- 2.2 CWS & GB Strategic Planning Board: Terms of Reference  
<http://www.coastalwestsussex.org.uk/wp-content/uploads/CWS-Strategic-Planning-Board-TOR-Oct-13-Final-Version.pdf>
- 2.3 CWS & GB Strategic Planning Board Memorandum of Understanding  
<http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>
- 2.4 CWS & GB Strategic Planning Board  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

### **3. Coastal West Sussex & Greater Brighton Local Strategic Statement**

- 3.1 Local Strategic Statement: Final version (Oct 2013)  
<http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-LSS-for-CWS-30-Jan-14.pdf>
- 3.2 Local Strategic Statement: Scoping Paper (CRA, Jan 2013)  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.3 Local Strategic Statement: Sustainability Appraisal (July 2013)  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.4 Local Strategic Statement: Summary of Consultation Responses (Sept 2013)  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>

- 3.5 Local Strategic Statement: Stakeholder Engagement Workshops  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-bpard/>
- 3.6 Letter from Cllr Ricky Bower, Chairman of CWS&GB SPB, 30 October 2013  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-bpard/>
- 3.7 Local Strategic Statement: Monitoring Framework - work in progress  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-bpard/>

#### **4. Strategic Housing Provision**

- 4.1 Coastal West Sussex Strategic Housing Market Assessment (SHMA) 2012  
<http://www.adur-worthing.gov.uk/media/media,114037,en.pdf>
- 4.2 Housing Study (Duty to Co-operate) Sussex Coast HMA 2013  
<http://www.adur-worthing.gov.uk/media/media,116009,en.pdf>
- 4.3 Assessment of Housing Development Needs Study: Sussex Coast HMA 2014  
<http://www.adur-worthing.gov.uk/media/media,124410,en.pdf>

#### **5. Strategic Infrastructure and Employment Land**

- 5.1 Developing an Employment and Infrastructure Strategy (Parsons Brinkerhoff, Feb 2012) <http://www.coastalwestsussex.org.uk/wp-content/uploads/2012/04/consolidated-strategy-and-appendix-1-2.pdf>
- 5.2 Advice to Support the Development of an Delivery and Infrastructure Framework (GVA, March 2013) <http://www.coastalwestsussex.org.uk/wp-content/uploads/2013/07/Coastal-West-Sussex-Strategic-Investment-Framework-GVA-Final-Report.pdf>
- 5.3 CWS GVA Delivery and Investment Framework (2013)  
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-bpard/>

## **6. Gypsies, Travellers & Travelling Showpeople**

- 6.1 Gypsies, Travellers & Travelling Showpeople Accommodation Assessment (Part 1 & 2) – <http://www.adur-worthing.gov.uk/media/media,114393,en.pdf>  
<http://www.adur-worthing.gov.uk/media/media,121400,en.pdf>
- 6.2 Study into Transit Provision in West Sussex  
<http://www.adur-worthing.gov.uk/media/media,114014,en.pdf>

## **7. Adur District Council**

- 7.1 Adur Employment Land Review 2014 – Update Report – July 2014  
<http://www.adur-worthing.gov.uk/media/media,127604,en.pdf>
- 7.2 West Sussex Wharves and Railheads Study 2014  
[http://www.westsussex.gov.uk/your\\_council/strategies\\_and\\_policies/policies/mineral\\_and\\_waste\\_policy/evidence\\_and\\_background/04\\_wharves\\_and\\_railheads.aspx](http://www.westsussex.gov.uk/your_council/strategies_and_policies/policies/mineral_and_waste_policy/evidence_and_background/04_wharves_and_railheads.aspx)
- 7.3 Statement of Common Ground between the Shoreham Harbour Planning Authorities and the Shoreham Port Authority April 2014 - <http://www.adur-worthing.gov.uk/shoreham-harbour-regeneration/jaap/>
- 7.4 Adur Local Plan and Shoreham Harbour Transport Study Final Report 2013  
<http://www.adur-worthing.gov.uk/media/media,116970,en.pdf>
- 7.5 Adur Local Plan and Shoreham Harbour Transport Study Report – Addendum 2014 <http://www.adur-worthing.gov.uk/media/media,126166,en.pdf>

## **8. Coast to Capital Local Enterprise Partnership**

- 8.1 Coast to Capital Strategic Economic Plan 2014 -  
<http://www.coast2capital.org.uk/strategic-objectives/strategic-economic-plan#sthash.yxL6igbW.dpbs>

## APPENDIX ONE

### 1. Specific Consultation Bodies for the Local Plan process.

Relevant local PCTs/ Commissioning Groups*	Clinical	Arun District Council
Brighton and Hove Council		British Gas
British Rail Property Board		British Telecom
Cable and Wireless		Cellnet
Chichester District Council		Crawley Borough Council
Department for Transport		EDF Energy
English Heritage		Environment Agency
Highways Agency		Horsham District Council
Mid Sussex District Council		National Grid
Natural England		Network Rail
Powergen		Scottish Power
South Downs National Park Authority		Southern Water
South East Water		Sport England
South East Coast Strategic Health Authority		Transco
West Sussex County Council		

\*Undergoing a process of reorganisation.

### 2. Specific Consultation Bodies who responded to Stakeholder Issues and Options 2010

Relevant local PCTs/ Commissioning Groups*	Clinical	EDF Energy
English Heritage		Environment Agency
Highways Agency		Natural England
Scottish Power		South Downs National Park Authority
Southern Water		West Sussex County Council

### 3. Specific Consultation Bodies who responded to Housing and Employment Options 2011.

Coal Authority	Highways Agency
Natural England	Southern Water
West Sussex County Council	

#### **4. Specific Consultation Bodies who responded to Draft Adur Local Plan 2012.**

Arun District Council	Brighton and Hove City Council
English Heritage	Environment Agency
Highways Agency	Horsham District Council
Mid Sussex District Council	South Downs National Park Authority
Southern Water	West Sussex County Council

#### **5. Specific Consultation Bodies who responded to Revised Draft Adur Local Plan 2013.**

Arun District Council	Brighton and Hove City Council
Environment Agency	Highways Agency
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council



Appendix 2

**ADUR AND WORTHING DUTY TO CO-OPERATE MEETINGS AND ACTIVITY LOG**

Date/venue	Title/ attendees	Purpose of meeting	Outcome(s)
12/9/11 Meeting at Field Place Worthing	Coastal West Sussex - Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present.		Report by Parsons Brinkerhoff submitted in Feb 2012 'CWS Developing and Employment and Infrastructure Study' Looked at main employment development opportunity sites and the infrastructure to deliver these as well as new housing.
13/9/11 Meeting at Hove town hall	Informal meeting on Duty to Co-operate between Brighton & Hove, Lewes, Adur	Duty to Co-operate general discussion	
21/2/12 Meeting at Arun Civic Centre	Coastal West Sussex LDF Officer leads - Chichester, Arun, Worthing, Adur, SDNPA, WSCC, Lewes and Brighton	To consider the Duty to Co-operate requirements and particularly in relation to housing ( the social and economic impacts	Discussed scope for radical solutions for meeting housing needs after 2028 such as new settlements. The need to link to the rest of West Sussex raised and the need for a MoU and position statement and strategy. Idea of a consultant to do the housing work explored a bit (notes made at meeting).

	and Hove City	of not meeting housing needs).	
26/4/12 Meeting at Arun Civic Centre	Coastal West Sussex - Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present.		
23/5/12 Meeting at Adur Civic Centre	Coastal West Sussex LDF Officer leads Chichester, Arun, Worthing, Adur, SDNPA, WSCC, Lewes and Brighton and Hove City	to discuss Duty to Co- operate issues and identify	Strategic issues identified at this meeting and the need to co- operate on housing provision. Recommended that a consultant is appointed to do a housing study on behalf of the four coastal Local Planning Authorities in West Sussex as well as Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority. Such a study to identify theoretical housing needs and to compare this to actual capacity.
18/6/12 Meeting at Hove Town Hall	Authorities within the Brighton & Hove Strategic Housing Market Areas - .Adur, Brighton & Hove, Crawley, East Sussex, Eastbourne, Horsham, Lewes, Mid Sussex, SDNPA Authority Worthing West Sussex	Officer meeting to scope out issues and agree the next steps.	Agreed to carry on meetings
27/6/12	Coastal West Sussex	The need to establish	Agreed to draft terms of reference for the group and for LPAs

Meeting at Worthing town hall	- Strategic Planning Board inception meeting. Chichester, Arun, Worthing, Adur, SDNPA, WSCC and Brighton and Hove City.	the SPB and presentation by consultant Catriona Riddell on appropriate governance arrangements and also on Duty to Co-operate.	to consider formal reps on the Board
6/9/12 Meeting at Hove Town Hall	Authorities within the Brighton & Hove Strategic Housing Market Area. Attended by Adur Brighton & Hove; Horsham; Lewes; Mid Sussex; South Downs National Park Authority and Worthing.	Officer meeting to discuss duty to co-operate progress and Brighton's proposed Statement of Common Ground	Brighton and Hove will make a formal request to other LPAs to assist in meeting housing requirements. Brighton to produced a Statement of Common Ground for comments.
8/10/12 Meeting at Adur Civic Centre	Coastal West Sussex LDF lead officers meeting Adur, Worthing, Lewes, Brighton & Hove, Arun, Chichester, SDNPA	Inception meeting with consultant G L Hearn re Duty to Co-operate Housing study	Questions asked and comments made on methodology etc

9/10/12 Meeting at Worthing town hall	CWS&GB Strategic Planning Board Chichester, Arun, Worthing, Adur, Brighton & Hove, SDNPA		Board is informed of the D to C housing work and further amendments suggested to the brief
13/11/12 Meeting at Adur Civic Centre	Coastal West Sussex Officer Meeting Adur, Worthing, Arun, Chichester, SDNPA plus GL Hearn (consultants)	To discuss D to C housing study with consultants	
6/12/12 Meeting at Hove Town Hall	Authorities within the potential Brighton &Hove Strategic Housing Market Areas. Attended by Brighton & Hove; Adur; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs National Park Authority and Worthing	Progress meeting and to discuss Brighton's DTC housing request letter and Statement of Common Ground.	Mid- Sussex unable to agree to the Statement of Common Ground due to its suggestion that Mid Sussex, Crawley and Horsham are part of the Brighton & Hove Strategic Housing Market Area (SHMA). Agreement made to hold a further meeting to explain how Brighton & Hove SHMA impacts on Mid Sussex, Crawley and Horsham.
24/1/13 Meeting at Worthing Town Hall	CS&GB Strategic Planning Board Coastal West Sussex authorities		
1/2/13 Meeting at	Coastal West Sussex Officer Meeting	For G L Hearn consultants to present	

Adur Civic Centre	Coastal West Sussex authorities	draft Duty to Co-operate housing study	
5/3/13 Meeting at Adur Civic Centre	Coastal West Sussex Officer Meeting. Coastal West Sussex authorities	Group to make final comments on the Duty to Co-operate housing study.	
19/3/13 Meeting at Worthing Town Hall	CWS&GB Strategic Planning Board	Presentation to Board by consultants of Duty to Co-operate housing study	
27/3/13 Meeting at Arun Civic Centre	Coastal West Sussex Officer Meeting Coastal West Sussex authorities	To discuss possible contents of the Local Strategic Statement with consultant	
18/4/13 Meeting at Adur Civic Centre	Meeting requested by Brighton and Hove Council. Present were planning officers and Cllr P Mcafferty (B and H), Pat Beresford (Adur) and Bryan Turner (Worthing).	To discuss Brighton and Hove City Plan and Adur and Worthing positions in relation to Duty to Co-operate.	An overview of capacity issues and constraints in both areas to aid mutual understanding of LPA positions
23/5/13 Meeting at Adur Civic Centre	Coastal West Sussex workshop – officers and members Coastal West Sussex	To discuss the emerging Local Strategic Statement – contents and	Views of Officers and Members taken forward by consultant

	authorities	implementation	
13/6/13 Meeting at Kings House, Hove Brighton & Hove, Adur, Worthing	Meeting of Adur, Brighton and Hove and Worthing Council planning officers	Mid Sussex District Plan submission draft and possible joint response.	
9/8/13 Meeting at Crawley BC	Meeting of CWS&GB LPAs LDF Officer leads and Executive Heads	To discuss a way forward regards housing needs and provision in Local Plans under Duty to Co-operate requirements.	The meeting agreed to a commitment to look at longer term solutions which would need to be addressed through reviews of Local Plans (a strategic overview of long term options possibly a strategy). Agreed useful to produce a MoU between the LPAs which demonstrates commitment between them to producing a strategy which covers both sub regions – Coastal West Sussex (including SDNPA, Brighton and Hove and Lewes) and the Gatwick Diamond. This MoU would state that each sub region would look within their own areas first for meeting future housing needs before looking beyond their housing market areas.
7/10/13 Meeting at Arun District Council	Arun SHMA Stakeholder event. Attended by officers from: Adur, Arun, Worthing, Chichester, SDNP, Lewes, Brighton and Hove.	To inform LPA stakeholders of progress of Arun's 'check' of Coastal West Sussex SHMA 2012	Projections will be circulated in due course. Arun SHMA sent to other LPAs
17/10/13 Meeting at Worthing town hall	CWS&GB Strategic Planning Board -	To agree the Local Strategic Statement	Agreed the LSS as well as an MoU for taking forward spatial planning issues and the duty to co-operate.

4/11/13	Email received from Arun DC stating that Members concerns re: Coastal West Sussex SHMA have been dropped. (at their Local Plan sub-ctte 31 <sup>st</sup> October 2013).		
11/11/13 Meeting in Portland House Worthing	Meeting of Cabinet Members for Regeneration - Cllr Beresford for Adur and Cllr Turner for Worthing.	To discuss duty to co-operate issues. Capacity constraints discussed.	Agreed the strategic issues and how these were being addressed via the Adur Local Plan and joint work. Agreed that evidence indicated that both LPAs could not meet housing needs and this would entail discussions with neighbouring and other LPAs in West Sussex.
21/11/13 Meeting in Mid Sussex Council offices in Haywards Heath	Meeting of Adur and Worthing Cabinet Members for Regeneration ( Cllr Beresford and Cllr Turner) with Mid Sussex Cabinet Member for Regeneration.	To discuss duty to co-operate issues. Capacity constraints discussed.	Agreed the strategic issues and how these were being addressed. All three Councils concluded that it was difficult to meet housing needs because of constraints but that solutions should be explored going forward. Some good measures are now in place for progressing the Duty to Co-operate.
2/12/13 Meeting at Arun DC	Meeting at Arun Local Plan stakeholder group	To help progress draft Arun Local Plan. Arun presented the pre submission draft of	Agreed that comments on Plan to be submitted by Xmas 2013.

		Arun Local Plan and opportunity for comments.	
3/12/13 Meeting at Adur Civic Centre	Joint Strategic Committee for Adur and Worthing	Committee meeting. Agenda includes CWS LSS	Local Strategic Statement agreed
03/12/13 Portland House Worthing	Sam Sykes Steve Tremlett Colette Blackett Moirra Hayes Pete Cosgrove (MMO Implementation Officer)	Discuss timeframe and policies of MMO South Plan, Adur Local Plan, Worthing Core Strategy Revision, and BHCC City Plan / Minerals Waste Plan. To identify any policy conflicts.	PC to send through some information regarding the overlap between the high / low water mark.
9/1/14	Horsham PAS event attended by reps of West Sussex LPAs and B&HCC. (MH attended)	Workshop entitled 'Incorporating Strategic Issues into Local Plans' To consider joint working arrangements and prepare an action plan.	
9/1/14	CWS&GB SPB meeting		Duty to Co-operate Statement agreed – to be used as template by each LPA. This sets out how strategic issues as identified in the Local Strategic Statement (housing, regeneration, infrastructure and environmental resources) are being addressed by CWS.  Phase 2 of the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment for CWS authorities presented and discussed.



22/1/14 Meeting at Horsham DC	Officer meeting between CBC/HDC/Adur DC and WBC	To discuss emerging local plans, strategic issues (especially housing) and duty to co-operate.	Meeting clarified issues and discussed what was needed to take forward options for meeting future housing.
29/1/14	Officer meeting between ADC/WBC and Arun DC	To discuss timetables, evidence, development opportunities and work programme.	Further sharing of evidence agreed. Discussions relating to development proposals on Arun and Worthing boundary. Timetable 'risks' for Arun as the housing evidence emerges in Worthing.
4/3/14	Horsham PAS event attended by officer and Member reps of West Sussex LPAs and B&HCC. LEP and some Surrey LPAs represented.	On Duty to Co-operate. Objectives were: <ul style="list-style-type: none"> <li>• To update participants on key strategic issues and recent examination cases</li> <li>• To consider adequacy of existing joint working arrangements and agree the principles of future joint working arrangements particularly in relation to</li> </ul>	Action Plan produced with recommended actions needed relating to communication, evidence gathering and working together on duty to co-operate issues.

		<p>economy and housing</p> <ul style="list-style-type: none"> <li>To prepare an action plan</li> </ul>	
8/4/14 Meeting at Portland House - Worthing	Planning officers from SDNPA, Adur and Worthing.	Meeting with SDNPA regards duty to co-operate strategic issues for both Adur and Worthing.	Discussed difficulties of meeting objectively assessed needs in the local plans given constraints. Also discussed sites in the National Park which could contribute to meeting the needs of Adur and Worthing rather than the needs of the Park as a whole.
23/4/14 Meeting at Portland House - Worthing	Meeting of officers from SDNPA, Adur and Worthing together with Cllr Turner (Worthing BC), Cllr Beresford (Adur DC).	Workshop to discuss SDNPA emerging Local Plan - Issues Document.	Opportunity for Councillors to comment on the document - comments made at meeting have fed into official response made by the Councils to the document.
27/5/14	Meeting with Lewes Planning Officers (together with other adjacent LPA planning officers)	To discuss progress of the Lewes Local Plan and associated issues.	Briefing paper produced which summarises the main changes to be made to the Proposed Submission Draft of the Lewes Local Plan to help avoid any significant problems with soundness at Examination. Some amendments have been made to address the requirements of the Duty to Co-operate and the need to plan to meet the level of Objectively Assessed Need for housing. More housing provided but unable to meet OA needs.
27/6/14	Letter sent to Horsham District Council (with approval of AD and	On the contents of the proposed submission draft.	Welcomes the Plan and the implied statement that provision in Horsham could help address housing needs from London and the coast. Letter sought further clarification as to this intention.

	WBC Cabinet Members for regeneration).		
1/7/14 Meeting at Mid Sussex DC	Planning Officer meeting attended by Mid Sussex DC, Adur DC and Worthing BC.	Meeting to informally discuss draft Mid Sussex Local Plan, the progress of the Adur Local Plan and the review work of Worthing and duty to co-operate issues including a draft MoU. Mid Sussex asked how it could help address our housing needs in terms of housing types etc.	Identified Housing need, gypsy and traveller accommodation and employment as the main strategic issues impacting across our LA boundaries. Housing capacity work is ongoing for Mid Sussex and will be shared with Adur and Worthing when completed this Summer 2014. A draft MoU circulated and comments made on this – awaiting revised draft for discussion.
3/7/14	CWS and GB Strategic Planning Board meeting		<p>Presentation of the updated housing OAN work for the sub-region (took account of 2011 Census and new ONS projections)</p> <p>Discussion on the PAS duty to co-operate work</p> <p>Agreed that some form of representation should be made to the London Plan with respect to housing shortfalls and impact for areas beyond.</p>
31/7/14 at Arun District Council	Meeting requested by Horsham District Council. Attended by Adur, Brighton and	To discuss the details of how the Horsham Local Plan can address coastal housing needs.	Horsham to produce a MoU and a Statement of Common Ground. LPAs agreed to forward details on objectively assessed needs - why cannot meet these, the type of housing needed, where need arising from and what the

offices	Hove, Worthing, Arun and Chichester.		impact would be if needs not met. 1/8/14 Horsham DC sent draft MoU to coastal LPAs and being finalised in October 2014 for final signing by Members..
5/814	Letter from Mid Sussex sent to Adur and Worthing Councils with attached table to be filled in by 20/8/14.	Formal letter requesting details of any unmet needs (for housing, employment and gypsy accommodation) Adur and Worthing may be seeking assistance with.	The information provided to be fed into the SA process on the Mid Sussex Local Plan to assess impact of meeting needs in the district. However, letter sent by Mid Sussex also refers to the recently published Mid Sussex Capacity Study which demonstrates that 96% of the District is covered by primary or secondary constraints, or is already built upon.
20/08/14	Letter from Crawley Borough Council sent to LPAs in the sub region	Letter requests assistance in meeting Crawley's unmet housing and employment needs.	Adur and Worthing replied by letter (signed by Cabinet Members for Regeneration) on 5/9/14 stating that cannot meet own needs, outlining the levels of unmet need and capacity constraints. However, letter concludes that Adur and Worthing have been engaging and co-operating with Crawley throughout all stages of respective plans and look forward to continuing this positive relationship.
27/8/14	Meeting at Portland House (Worthing) of Adur and Worthing and Mid Sussex planning officers and Cabinet Members with responsibility for planning for Mid Sussex and Worthing (apologies from Adur	To further discussions on duty to co-operate based on information in needs template (see above). Discussed needs and capacity constraints with respect to housing, employment and gypsies and travellers.	Work on housing needs and provision is on-going for Mid Sussex and when complete, a MoU will be drawn up and signed between LPAs.

	Member)	To provide Mid Sussex with more details as to type of unmet needs in Adur and Worthing.	
11/9/14	Draft Statement of Common Ground and Duty to Co-operate Statement sent by Lewes DC.		Being considered as at October 2014.
April 26th 2012 at Arun Civic Centre	Coastal West Sussex - Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present.		
3 October 2014	MoU signed by Mid Sussex DC and Adur DC		To agree the details of the strategic planning issues for Mid Sussex, Adur and Worthing. To agree liaison and working arrangements. Agree that the LPAS will continue to co-operate actively and diligently on all cross boundary planning matters to achieve the proper planning of the wider area.
October 2014	Draft MoU being signed by Horsham DC and Adur DC.		Outlines the strategic planning issues for Horsham and Adur with the main focus on housing. States that the LPAs have shared evidence. HDC offers additional sustainable capacity that may be available to help address coastal housing needs. Agree that the LPAS will continue to co-operate actively and diligently on all cross boundary planning matters to achieve the proper planning of the wider area.

## APPENDIX 3

### Details of Needs

#### ADUR – September 2014

**Q. Do you anticipate being able to meet all of your objectively assessed needs within your administrative boundary?**

**A. No (please complete table below)**

<b>Type of unmet need (i.e. housing, employment space etc) and details (i.e is it a particular type of housing or tenure, or type/scale of employment space).</b>	<b>Timing of requirements (i.e. can your own provision meet needs in the first part of your plan period so you are looking for any assistance after a particular time?)</b>	<b>Location of need (i.e. what part of your area is generating the need and what would be a reasonable distance from the source in order for additional supply to meet these needs).</b>	<b>Who else have you approached to meet these unmet needs?</b>	<b>What would be the implications for your area if these needs were not met?</b>
<b>Housing</b> The Objectively Assessed Housing Need for Adur (Coastal West Sussex Housing Needs study of April 2014) is assessed as between 180-240 homes per annum which totals 3,600 to 4,800 homes	Currently Adur does not have a 5 year HLS measured against OAN 240 homes pa. If and when the new Local Plan is adopted in 2015, this will contain the housing provision figure of 174-182 per	There is no particular part of the area where evidence illustrates any particularly high or low level of need when compared with the rest of the district.  With regards to where in Mid Sussex the need for	The Council has been working actively with all authorities within the sub-region to help meet the needs of the Duty to Co-operate. Housing has had a key focus in this work.  A number of joint studies	Failure to meet Adur's OAN would be likely to result in the following: <ul style="list-style-type: none"> <li>• A more acute level of those in housing need.</li> <li>• An increase in overcrowding / household suppression.</li> <li>• Increased demand for housing available will increase prices</li> </ul>

<p>over the plan period (2011-2031). In setting a delivery figure for the Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and totals 2558 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 930 to 1080 dwellings. In total 3488-3638 dwellings can be delivered over the Plan period which equates to an annual average of 174-182 dwellings. Consequently, whilst potentially meeting the lower end of the objectively assessed need figure, a</p>	<p>annum to be met mainly through the delivery of two large strategic allocations and a Broad Location at Shoreham Harbour from 2017 onwards until around 2023/24. If the Inspector approves the housing provision figure in the Local Plan and the monitoring of delivery against this target, then assistance in provision is needed towards the end of the plan period for the last 5 years – from 2026 to 2031. However, if monitoring has to be against the OAN, then assistance in provision is needed throughout the plan period since for each year there will be a</p>	<p>Adur might be met, it would obviously be preferable if delivery would be towards the south of the District – in reasonable proximity to the main settlements of Adur. However, it is acknowledged that the SDNP represents a significant constraint to development and that the smaller Downland villages that lie to beyond the SDNP may only offer limited opportunity for any significant level of growth.</p> <p>Further work would be required to make any more robust conclusions with regards to where development might be located in Mid Sussex that would help to meet Adur’s needs. This would include consideration</p>	<p>have been progressed and mechanisms have been put in place to formalise this dialogue and facilitate joint working. These processes, include the signing of a ‘Memorandum of Understanding’ between the CWS authorities.</p> <p>For Adur, LPAs that make up ‘Coastal West Sussex’ have formed the principle partners in these discussions. (Adur, Arun, Brighton &amp; Hove, Chichester, Lewes and Worthing Councils). However, discussions have also taken place with LPAs that lie outside those within the immediate housing sub-market area (e.g. Horsham, Mid Sussex District Council</p>	<p>/ rents which would then impact on affordability ratios.</p> <ul style="list-style-type: none"> <li>• Suppressed economic growth if an element of the labour force cannot be housed.</li> <li>• There would be less opportunity to deliver the type of housing to meet identified need (family housing / older people etc).</li> <li>• With fewer young people being able to remain or move into the area, this will lead to an increase in the ageing population with an impact on the labour force and the viability of services.</li> </ul> <p>Further work is required to make a more robust assessment of the impacts that might arise in the longer term should housing needs not be met.</p>
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<p>shortfall of 1162-1312 dwellings remains against the full objectively assessed need figure of 4800 over the Plan period. The details of this shortfall have been provided to Mid Sussex District Council.</p> <p>The capacity constraints to providing new housing development in Adur are highlighted in the Coastal West Sussex Housing study – Duty to Co-operate study of 2013. The wider constraints of the coast are also highlighted in the CWS Local Strategic Statement which recommends communicating and working with the neighbouring LPAs north of the coast under the duty to co-operate.</p>	<p>shortfall.</p>	<p>of commuting patterns, transport impacts, employment opportunities, infrastructure capacity and environmental impacts. The Greater Brighton City Deal Economic Board has recently considered the need for housing, economic and transport work to inform an updated Local Strategic Statement for the wider coastal area and this will help to inform the most appropriate locations in Mid Sussex to help meet development needs. Active and ongoing evidence gathering and strategy development on the larger than local issues – including housing needs will continue to be considered through the</p>	<p>and Crawley). MoUs are being produced and evidence being shared.</p> <p>Whilst the main focus of the early work to meet the needs of the ‘Duty’ has focussed on Coastal West Sussex it is acknowledged that it is also important to consider the needs and constraints within neighbouring housing market areas to the north, west and east (as highlighted in the CWS 2013 Housing study – Duty to Co-operate as well as the Local Strategic Statement). This work is on-going and will need to continue as Plans are advanced.</p> <p>Representations are being made on behalf of CWS and Greater Brighton on the London</p>	
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<p>In terms of the type of housing required, the 2012 CWS SHMA indicates that the main need is for family housing.</p>		<p>framework of Coastal West Sussex and Greater Brighton Strategic Planning Board.</p>	<p>Plan to ensure that the Capital provides sufficient housing and to reduce pressures on those LPAs within the wider market area and within commuting distance.</p>	
<p><b>Gypsies and Travellers – public pitches</b></p> <p>The need in Adur is for 7 public pitches for Gypsy and Traveller accommodation and 1 Travelling Showperson plot up to 2027. Adur is unlikely to meet this need in the first part of the plan period (5 pitches required up to 2017). However, the Council is investigating the potential to extend a current site at Withy Patch (Lancing) but this is dependent on the delivery of</p>	<p>Unlikely to meet need in first part of plan period ( 5 pitches required up to 2017). Investigating potential to extend current site at Withy Patch (Lancing) but dependent on delivery of a new roundabout to serve an adjacent strategic allocation as well as land raising of the Withy Patch site to bring it out of flood zone 3.</p>	<p>Some of the need is generated from Withy Patch site in Lancing. Other need is generated from elsewhere within Adur. The need could be satisfied from sites outside of Adur. The 2013 Coastal West Sussex Gypsy and Traveller and Travelling Show People Accommodation Assessment indicated that the main factor which determined their current location was strong connections to family in the area. As such,</p>	<p>The Coastal West Sussex Partnership formally commissioned the coastal and traveller assessment and has discussed the issues of need. A transit site has been provided in Chichester and on-going discussions are taking place with adjacent authorities to help address needs. Duty to co-operate meetings have been held with officers at Arun, Brighton and Hove, Worthing, Horsham, Crawley, Mid Sussex and the South Downs</p>	<p>Planning inspectorate advice is that Plan unlikely to be found unsound if need not met, but would need to demonstrate that other authorities have been approached. Also need to show progress/constraints to delivering extension at Withy Patch.</p>

<p>a new roundabout to serve an adjacent strategic allocation as well as land raising of the Withy Patch site to bring it out of flood zone 3. A separate development plan document is timetabled after the adoption of the Adur Local Plan in 2015 to progress this site.</p>		<p>a location close to Adur could be seen as preferable since this would help to sustain this connection. However, further analysis would be needed to positively confirm this.</p>	<p>National Park.</p>	
<p><b>Employment</b></p> <p>The 2014 Adur Employment Land Review indicates that the Adur Local Plan should make provision for between 15,000 to 20,000 sqm net for Offices and R and D and between 35,000 and 40,000 for Warehousing over the 2011 and 2031</p>	<p>There is no specific time period identified for where shortfalls are greater.</p>	<p>There is no particular part of the area where evidence illustrates any particularly high or low level of need when compared with the rest of the district. Further evidence would be needed on timing.</p> <p>Further work is needed to see what areas could</p>	<p>Whilst housing has formed the key focus of DTC considerations across the sub-region employment needs have consistently featured as part of these discussions.</p> <p>However, despite this, it is acknowledged that further work is required to better understand the</p>	<p>Further work to assess the sub-regional dimension of employment needs should relate to forecast housing growth etc. This work collectively will help to provide an understanding of the likely impacts should employment needs not be met. Possible impacts could be suppressed economic growth, an increase in out-commuting, young people move out</p>

<p>period. This includes 18,750 sq m to be relocated from Shoreham Harbour and expected to be provided within Adur. However, due to capacity constraints, the Local Plan can only provide for 41,000 sq m for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required.</p>		<p>help address the Adur shortfall sustainably taking account of the needs of business, the location of new housing, skill requirements, transport etc. As reflected in the CWS Local Strategic Statement as well as the Greater Brighton City Deal, there are clear economic and regeneration objectives for the coast with growth centres identified in this coastal area. Any provision further afield to meet shortfalls in Adur would need to fit within this context. As such, the further work considered by the Greater Brighton City Deal Economic Board (as above) will be crucial useful evidence. Active and</p>	<p>employment land needs, constraints and opportunities across the sub-region(s).</p>	<p>of the area, less opportunities for up-skilling of the workforce etc.</p>
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		ongoing evidence gathering and strategy development on the larger than local issues – including housing needs will continue to be considered through the framework of Coastal West Sussex and Greater Brighton Strategic Planning Board.		
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Please note that the duty to co-operate issues as outlined above will have a number of consequences for transport and other infrastructure which will need to be addressed by further work. Whilst transport has not been identified as a key duty to co-operate issue in the above table, it nonetheless is critical to ensure the delivery of new development north of the coast taking account of the existing trunk roads, local roads and the public transport network.

## **Appendix 4**

### **Duty to Co Operate**

#### **Memorandum of Understanding**

##### **Parties to the Agreement**

The Agreement involves the following Local Planning Authorities:

- Adur
- Horsham District Council

##### **Introduction**

Local Planning Authorities are required by the Localism Act 2011 to meet the 'Duty to Cooperate', that is to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. Section 33A(6) of the 2004 Act also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF details how it is expected that the Duty to Cooperate will function, and in particular states that

*“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position”.*

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Co-operate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The NPPG states that:

*“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty”.*

## **Objectives**

This Memorandum of Understanding relates to the preparation of local development plans in the two local planning authority areas set out above. Its overall aim is to ensure appropriate planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the Councils.

## **Current Position**

The current position is as follows:

In Horsham District there is currently a full suite of adopted LDF documents which form the Development Plan and provide the planning policies for the District up to 2018. The Horsham District Planning Framework (HDPF) is a new Local Plan up to 2031 but was started in 2009 as an update of the adopted LDF documents in an NPPF compliant form. As part of the preparation of the HDPF we have reviewed the evidence that supported the LDF documents and where necessary, undertaken further evidence gathering work. This evidence gathering has often, when appropriate, been undertaken jointly. The Horsham Core Strategy includes a locally set housing target as it was adopted before the publication of the South East Plan, however further work has been undertaken to assess Horsham's objectively assessed housing needs in accordance with the new requirement in the NPPF. As part of Horsham District lies within the South Downs National Park (which is a separate planning authority that are producing their own plan for this area) this portion of the District is excluded from Horsham District Council's plan making. The HDPF refers to the planning area as the HDPF area.

Horsham District Council wishes to continue to be a Plan led authority, working for Horsham District and collectively with neighbouring authorities, planning positively for growth. The District have had a history of delivering large scale strategic developments such as; the previous expansion of Horsham town to the north (now North Horsham Parish) and surrounding settlements. The smaller villages, and in particular those along the foot of the South Downs such as Pulborough, Storrington and Henfield have experienced considerable housing growth in recent years. Through the Core Strategy (2007) 2000 homes were allocated West of Horsham and it identified 2500 homes West of Crawley. The Joint Area Action Plan for the West of Bewbush planned for and is delivering the new neighbourhood, adjacent to Crawley within the boundary of Horsham District.

Adur District Council will be publishing its Pre-Submission Publication Local Plan under Regulation 19 in October 2014. That part of the district which is within the National Park (about half the district) is covered by the emerging local plan for the SDNP and not by the Adur local plan. The new Adur Local Plan covers the period up to 2031. When adopted in 2015, the Plan will replace the saved policies in the adopted Adur Local Plan (1996). The Plan takes account of objectively assessed needs (for new homes, employment and gypsy accommodation) but is unable to meet such needs in full on account of limited capacity arising from significant environmental constraints. Any new development has to be accommodated in a small area of land between the South Downs National Park to the north and the sea to the south. The district is also subject to fluvial, tidal and groundwater flood risk. There are also landscape constraints.

Adur Council is also working with Brighton and Hove City Council and West Sussex County Council with the support of Shoreham Port Authority and other partners, on a joint Area Action Plan for Shoreham Harbour. This is a large strategic regeneration site identified in the

Coast to Capital LEP's Strategic Economic Plan as well as the Greater Brighton City Deal. The site is proposed for 1,100 homes up to 2031 and 16,000 sqm of employment generating floorspace.

## Strategic Planning Issues

An action plan setting out all strategic issues was developed as a result of Duty to Cooperate workshops (organised by the Planning Advisory Service) held from July 2013 to March 2014. The full set of objectives which cover a wide range of topics involving all or some specific neighbouring authorities has been developed and is in the Duty to Cooperate Statement<sup>4</sup>. In this instance the following specific issues have been identified as strategic planning Issues between the two Councils subject to this agreement:

Ref	HDPF Issue	Resolution needed from DtC
	Housing	
H1	We need to bring together all evidence and to set a housing target in our policy that, if possible, meets the objectively assessed needs of the District	We need to share evidence with our neighbours and communicate how we got to our chosen figure.
H2	If we are able to meet our objectively assessed needs (which we already know that we can) we need to identify whether there is any headroom in capacity that we ought to offer as a means to meet our requirement to meet the needs of others.	As above and as a next stage we need to identify the headroom and in negotiation with our neighbours identify whether it is spatially and sustainably possible to meet the unmet needs of our neighbours.
H3	We need to understand the housing market in Horsham District and beyond to identify demand and preferences for housing which may be satisfied through housing delivery policies in the HDPF. Is it possible to deliver housing in Horsham that meets the needs of constrained areas beyond the District?	Need to agree the geographical area of the housing market. How can Horsham help our neighbour's needs to be asked and answered? If we build homes in Horsham will people move to these homes from areas where they cannot meet their need? Our "constrained" neighbours have and should in Duty to Cooperate conversations, let us know what the housing preferences and needs are in their area.

**Adur has recently identified two further strategic issues which require a duty to cooperate – Gypsies and Travellers Accommodation and Employment. Similar to Housing – these issues are currently being quantified and being discussed with Horsham, Mid Sussex and Crawley.**

## Outcomes

### Housing

The Objectively Assessed Housing Need for the HDPF plan area up to 2031 is assessed as falling between 11,000-11,900 homes (550 – 595 homes per annum). The proposed housing target in the HDPF 650 homes per annum. This target is based on sustainable development supporting the existing development hierarchy. Within this target therefore

<sup>4</sup> [http://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0004/9292/CD\\_LP\\_12\\_Duty-to-Cooperate-Statement-and-Action-Plan.pdf](http://www.horsham.gov.uk/__data/assets/pdf_file/0004/9292/CD_LP_12_Duty-to-Cooperate-Statement-and-Action-Plan.pdf)

there is some “headroom” to meet the needs of neighbouring authorities. The quantum of housing proposed in the HDPF is considered to be sufficient to meet the full objectively assessed need for housing without there being any dependency on other authorities.

The West of Crawley strategic location, which is developed through a joint area action plan with Crawley Borough Council, has been developed within Horsham District as an extension to Crawley as they cannot physically meet their housing needs within their administrative boundary. This includes 2500 homes, associated infrastructure and a neighbourhood centre. The Gatwick Diamond authorities, including Mole Valley District Council, acknowledge that this strategic allocation, in accordance with the Local Strategic Statement for the Gatwick Diamond meets the wider Gatwick Diamond needs.

The HDPF strategy is based on a hierarchy of settlements with Horsham town as the primary centre. The medium settlements at Broadbridge Heath, Southwater and Billingshurst play a role in supporting Horsham town whilst the rural villages fulfil a local need. There are large strategic sites being developed in the plan period North of Horsham town (2500 homes and a 500,000ft<sup>2</sup> new business park), Broadbridge Heath (2000 homes), Southwater (500 homes).

Horsham District experiences in-migration from neighbouring authorities, particularly those with unmet housing need, combined with other factors such as high affordability rates for housing. In the northern part of Horsham District there is a net flow of households from the constrained Green Belt authorities in Surrey and specifically a net flow for the immediate neighbour to the north, Mole Valley. It is likely and acknowledged that Horsham town as well as the strategic sites at north Horsham and Broadbridge Heath will attract people from neighbouring authorities to the north and may contribute to meeting their housing need. Unlike the West of Crawley site this relationship is more difficult to assess and quantify in absolute figures under the duty to cooperate.

In the southern part of the district there is a relationship between the coastal authorities which is indicated by travel to work patterns. The HDPF plans for more organic growth in this area as well as development as a result of Neighbourhood Planning. There is a significant amount of housing due to be delivered in the short term as a result of outstanding planning permissions as indicated in policy 14 a and b. The AMR housing trajectory attached shows past and future housing delivery. This may contribute to helping to meet the housing needs of the coast.

*Outcome – Through the development of the HDPF, HDC and Adur have shared evidence and have sought to understand the housing needs of their areas. The northern part of Horsham district where a number of strategic sites are being developed is acknowledged as meeting a wider need for the Gatwick Diamond. HDC have informed the Coastal Authorities that Horsham District is able to meet its own need and has offered additional sustainable capacity that may be available. The Coastal area collectively cannot meet their objectively assessed need and have requested that they wish to explore whether some unmet capacity can be found in Horsham District. The Coastal authorities are currently quantifying what this need is and how much they would like HDC to try to accommodate.*

*However, it is acknowledged that the southern part of Horsham District would be the most sustainable location that could achieve this due to recognised migration flows and travel to work patterns.*



## Agreement

The issues above have been agreed by the Coastal Authorities and Horsham District Council as the specific issues and objectives that need to be resolved between the two Councils for them to fulfil the Duty to Cooperate. Both councils are satisfied that they have co-operated to meet the legal duty and as far as possible Horsham district council have progressed to a stage that would enable them to put submit the HDPF for examination.

## Ongoing Cooperation

It is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

Signed:		Dated:	Horsham District Council
Signed:		Dated:	Other signatory

## Duty to Cooperate

### Memorandum of Understanding

#### **Parties to the Agreement**

The Agreement involves the following local planning authorities:

- Adur District Council
- Worthing Borough Council
- Mid Sussex District Council

#### **Introduction**

Local planning authorities are required by the Localism Act 2011 to meet the 'Duty to Cooperate', that is to engage constructively and actively on an ongoing basis on planning matters that impact on more than one local planning area. Section 33A(6) of the Planning and Compulsory Purchase Act 2004 also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. In addition, local planning authorities are required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF detail how it is expected that the Duty to Cooperate will function, and in particular state that:

*"Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position."*

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Cooperate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross-boundary matters. The NPPG states that:

*"Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty."*

#### **Objectives**

This Memorandum of Understanding relates to the preparation of local development plans in the three local planning authorities – Adur, Worthing and Mid Sussex. Its overall aim is to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the three authorities.

### **Current Position**

The current position is as follows:

#### Mid Sussex District Council

Mid Sussex District Council is preparing a revised version of its District Plan for the period 2014 – 2031. It is anticipated that there will be public consultation on this draft Plan from November 2014 until January 2015, that it will be published in May 2015 and submitted to the Secretary of State in July 2015.

Mid Sussex District Council is also preparing a Traveller Sites Document for the period to 2031. There was a public consultation on this draft Plan in August/September 2014 and it is anticipated that it will be published in December/January and submitted to the Secretary of State in March 2015.

#### Adur District Council

Adur District Council will be publishing its Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014 and submitting the Plan in March 2015. That part of the district which is within the National Park (about half the district) is covered by the emerging local plan for the South Downs National Park and not by the Adur Local Plan. The new Adur Local Plan covers the period up to 2031.

The Council is also working with Brighton and Hove City Council, West Sussex County Council with the support of Shoreham Port Authority and other partners, on a joint Area Action Plan for Shoreham Harbour. This is a large strategic regeneration site identified in the Coast to Capital Local Enterprise Partnership's (LEP) Strategic Economic Plan as well as the Greater Brighton City Deal.

#### Worthing Borough Council

Worthing has an adopted Core Strategy to cover the period up to 2026. Significant changes to the planning system means that a review of the Core Strategy is now required. Members support the progression of a new Local Plan and a timetable will be set for this by the end of 2014. Further work to assess housing need and capacity is currently being progressed.

In addition a number of Neighbourhood Plans are being progressed across Adur and Mid Sussex.

### **Strategic Planning Issues**

The following have been identified as current cross-boundary strategic planning issues relevant to Adur, Worthing and Mid Sussex Councils:

- Housing provision
- Gypsy and Traveller accommodation
- Employment and jobs

- Transport

Whilst transport is identified as a strategic issue, this is being addressed as part of meeting the above housing, employment and Gypsy and Traveller development needs. The main issue is the capacity of the A27 and links across the South Downs National Park.

#### **Liaison and working arrangements**

Adur District Council, Worthing Borough Council and Mid Sussex District Council have been working together through the following mechanisms:

- liaison between the Coastal West Sussex and Greater Brighton Strategic Planning Board and the Northern West Sussex Districts
- formal consultation as the respective local plans have progressed
- all three authorities are partners in the Coast to Capital LEP, and their Leaders are members of the Joint Committee set up to agree and implement the Strategic Economic Plan for the LEP

The following meetings were held just between the three authorities to discuss their emerging plans and agree this Memorandum of Understanding:

- Regeneration/Planning Portfolio Holders' meeting (21/11/13). At this meeting the strategic issues for our LPAs were agreed as was the need to explore solutions to housing needs as the respective local plans are progressed.
- Duty to Cooperate officers' meeting (1<sup>st</sup> July 2014)
- Regeneration/Planning Portfolio Holders' meeting (27<sup>th</sup> August 2014)

#### **Outcomes**

##### Mid Sussex

###### *Housing*

The Objectively Assessed Housing Need for Mid Sussex is assessed as 516 homes per annum (2014-2031). Before Mid Sussex District Council sets its proposed housing provision number, it will be undertaking an assessment of neighbouring authorities' unmet housing needs and, as part of this process, Adur and Worthing Councils have provided details of their development needs shortfalls. Mid Sussex District Council have commissioned consultants to carry out a sustainability appraisal to assess the impacts of meeting those needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. The results will be shared with the neighbouring authorities<sup>1</sup>. Once this information is prepared, the three councils will consider the need for a revision or addendum to this memorandum of understanding.

###### *Gypsy and Traveller Accommodation*

The need for permanent Gypsy and Traveller accommodation in Mid Sussex is assessed to be 34 pitches (2011-2031). No need exists for Travelling Show People accommodation. The quantum of sites proposed in the Traveller Sites Document is considered sufficient to meet this need without there being any dependency on other authorities.

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<sup>1</sup> Draft results are expected in late September 2014.

### *Employment*

The Mid Sussex District Plan includes provision for a 30 hectare business park and additionally supports in principle a science park. There may be scope for these proposals to serve wider than local needs.

### Adur

#### *Housing*

The Objectively Assessed Housing Need for Adur is assessed as between 180-240 homes per annum which totals 3,600 to 4,800 homes over the plan period (2011-2031). In setting a delivery figure for the Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and totals 2558 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 930 to 1080 dwellings. In total 3488-3638 dwellings can be delivered over the Plan period which equates to an annual average of 174-182 dwellings. Consequently, whilst potentially meeting the lower end of the objectively assessed need figure, a shortfall of 1162-1312 dwellings remains against the full objectively assessed need figure of 4800 over the Plan period. The details of this shortfall have been provided to Mid Sussex District Council.

#### *Gypsy and Traveller Accommodation*

The need in Adur is for 7 public pitches for Gypsy and Traveller accommodation and 1 Travelling Showperson plot up to 2027. Adur is unlikely to meet this need in the first part of the plan period (5 pitches required up to 2017). However, the Council is investigating the potential to extend a current site at Withy Patch (Lancing) but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation as well as land raising of the Withy Patch site to bring it out of flood zone 3. A separate development plan document is timetabled after the adoption of the Adur Local Plan in 2015 to progress this site.

#### *Employment*

The 2014 Adur Employment Land Review indicates that the Adur Local Plan should make provision for between 15,000 to 20,000 sq m net for offices and R&D, and between 35,000 and 40,000 sq. m for warehousing over the 2011 and 2031 period. This includes 18,750 sq m to be relocated from Shoreham Harbour and expected to be provided within Adur. However, due to capacity constraints, the Local Plan can only provide for 41,000 sq m for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required.

### Worthing

#### *Housing*

The Core Strategy seeks to deliver a total of 4,000 dwellings to 2026 (200 dwellings/year) which was the requirement set for the Borough within the South East Plan. However, the significant changes made to the planning system, in particular, how each authority must now assess its housing needs, means that a full review of the local policy position is required.

Initial work to assess the objectively assessed housing need for Worthing indicates a need of between 500 and 600 dwellings / year (April 2014 housing study). Further work

to assess the level of need has recently been commissioned. The outcome of this work will help to inform a revised LDS. This will be prepared for Members' consideration by the end of 2014 and will include a timetable for the progression and adoption of a new Local Plan for the Borough.

A full and positive review of the SHLAA is currently being undertaken and careful consideration will be given to the potential allocation of additional sites (including greenfield opportunities) to help meet development needs.

Although the SHLAA review has yet to be finalised, it is clearly apparent that opportunities to deliver new housing are extremely limited. Even though the development potential of every opportunity in and around Worthing will be tested, there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet objectively assessed housing need. Even if every realistic opportunity were to be developed, the lack of available land and other constraints will mean that there would still be a significant shortfall. Details of this shortfall have been provided to Mid Sussex District Council.

#### *Gypsy and Traveller Accommodation*

Evidence indicates that there is no need in Worthing for Gypsy and Traveller accommodation.

#### *Employment*

With regard to employment, the Worthing Core Strategy indicated a need to provide 780,000 sq ft of industrial and warehousing floorspace and 240,000 sq ft of office space up to 2026. A recent Worthing Employment Land Review Update (December 2013) concluded that the Council's protectionist policy towards the retention of employment land is still valid and that there will be a need to deliver additional employment land to help achieve economic growth. Due to the scarcity of available sites to deliver new employment needs, co-operation with neighbouring local planning authorities will be required.

As part of the full review of the Council's Core Strategy, a new Employment Land Review will be commissioned. This will provide more robust and up-to-date information on the type, scale and tenure of employment needs. This in turn will help to inform consideration of the location of this employment land within Worthing and within the context of the Duty to Co-operate.

#### **Ongoing Cooperation**

It is agreed that the three authorities will continue to cooperate actively and diligently on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

<p>Signed:</p>  <p>Pat Beresford Cabinet Member for Regeneration, Adur DC Dated: 1<sup>st</sup> October 2014</p>	<p>Signed:</p>  <p>Bryan Turner Cabinet Member for Regeneration, Worthing BC Dated: 1<sup>st</sup> October 2014</p>	<p>Signed:</p>  <p>Norman Webster Cabinet Member for Planning Mid Sussex DC Dated: 3<sup>rd</sup> October 2014</p>
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