

Amendments to the Proposed Submission Adur Local Plan (2016)

Duty to Co-operate Statement

March 2016



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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 co-operation 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 Co-operate 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 co-operation. It states that '*Local planning authorities will be expected to demonstrate evidence of having successfully co-operated 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. Local Planning Authority councillors and offices are responsible for leading discussion, negotiation and action to ensure effective planning for strategic matters in their Local Plans. This requires a proactive, ongoing and focussed approach to strategic planning and partnership working (paragraph 004 of the National Planning Practice Guidance).
- 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 (following additions to this in 2014 and 2015) now includes representatives from the LPAs of Adur, Arun, Brighton & Hove, Chichester, Horsham, Lewes, Mid Sussex, the South Downs National Park, West Sussex County Council and Worthing (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 Co-operation 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 to the revocation of the South East Plan was delivered through work on developing an employment and infrastructure strategy, which was commissioned by the Coastal West Sussex Partnership (CWSP)¹ [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 co-ordinated 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 co-ordinate 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 both up-dated in 2015 and agreed in January 2016 [Annex 6, Ref 2.2 and 2.3]. The up-dated versions have been agreed by all the relevant

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

authorities. The Board 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:

- (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 The Board 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, the Coast to Capital Local Enterprise Partnership² (particularly in relation to the LEP's priorities in the Strategic Economic Plan) and the Greater Brighton Economic Board. 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' 2013 [Annex 6, Ref 4.2], 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 2013 study referred to above, and through stakeholder engagement [Annex 6, Ref 3.5]. The final version set out a shared *vision*, four overarching *Strategic Objectives* and five *Spatial Priorities*, building on the 'place-based' approach recommended by Parson's Brinckerhoff. At the time, it was the intention to produce a Monitoring Framework and Delivery and Investment Framework to support its implementation on an ongoing basis, and ensure local plan policies arising from the agreed strategic priorities remained viable and could be delivered.

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

Subsequently, as part of the refresh of the LSS in 2015/16 (see below), a Monitoring and Delivery Framework has been produced and the first monitoring report (which forms an annex to the LSS) was considered and approved by the CWS and GB Strategic Planning Board in January 2016.

- 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 own local plans and strategies, to meet their objectively assessed needs as far as are 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 [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. A number of evidence studies have been completed since 2013 including an assessment of the needs of Gypsies, Travellers and Travelling Showpeople³ [Annex 6, Ref 6.1 and 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, review and delivery of the LSS, which will be aligned to the individual local plan monitoring and delivery frameworks. This will include work with adjoining strategic planning areas where relevant.

Review of the Local Strategic Statement

- 2.13 The Coastal West Sussex and Greater Brighton Strategic Planning Board undertook a 'refresh' of the LSS in 2015 (Annex 6, Ref 3.7), in order to reflect the progression of local plans in the area, the Greater Brighton City Deal, and the fact that the strategic geography covered by the LSS now includes the districts of Mid-Sussex and Horsham (which joined the CWSGB Strategic Planning Board in 2014 and 2015 respectively). Evidence to inform the review was commissioned and completed by consultants Nathaniel Lichfield and

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

Partners (NLP) in 2015. This covered the economy, housing and transport [Annex 6: Refs 4.4, 5.3 and 5.4]

(<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=855&Mid=5735&Ver=4>)

2.14 The review was managed as a focussed ‘refresh’ rather than a full review since the LSS (2013) is still considered to provide a reasonable approach to the significant challenges the area faces. The main changes to the existing LSS are:

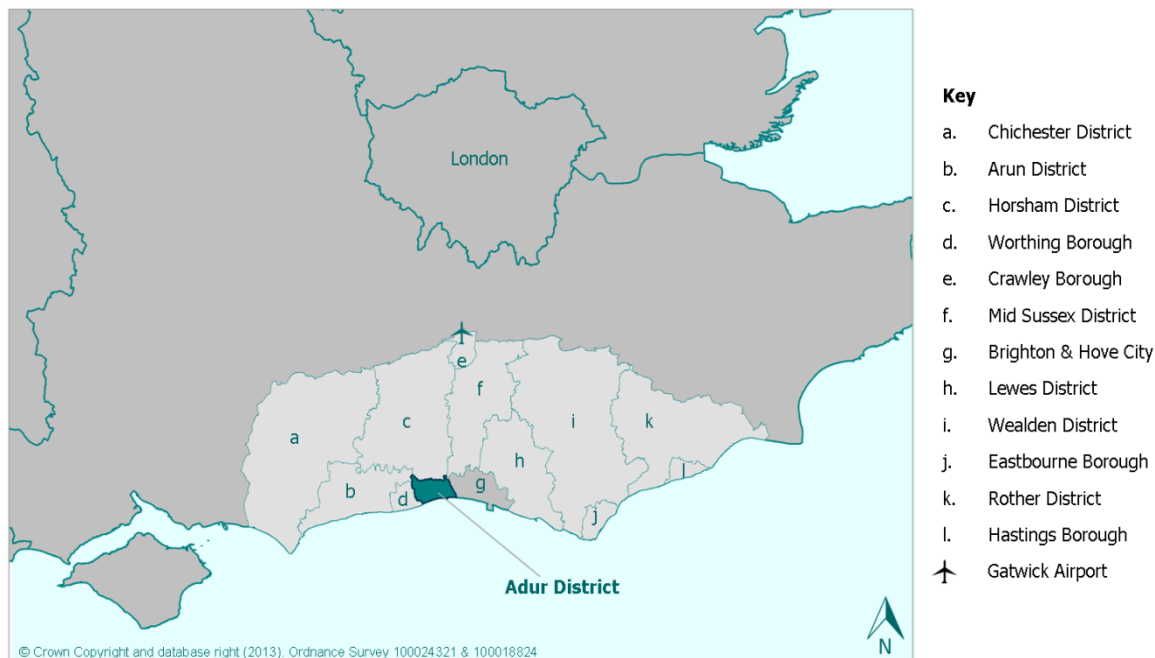
- New Spatial Priorities for Brighton (Seafront and Brighton City Centre); Burgess Hill, Newhaven and Rural Sussex - increasing the number of priorities to 9.
- Added emphasis on implementation with new implementation sections under each Strategic Objective and Spatial Priority.
- New (draft) Monitoring and Delivery Framework.

However there is recognition that a full review will be required at some point in the near future to address the longer term issues and this may require a different spatial strategy. The strategic context and priorities are likely to change given Government policy changes, particularly in relation to housing, as well as current devolution proposals from Greater Brighton (see para 3.14 in section 3) and also from Three Southern Counties (West Sussex, East Sussex and Surrey). The review will have to address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment. A report setting out the options for taking this work forward will be presented to the Strategic Planning Board in April 2016.

2.15 The refreshed LSS covers the Local Planning Authorities of Arun DC, Adur DC, Brighton and Hove CC, Chichester DC, Horsham DC, Lewes DC, Mid-Sussex DC, the South Downs National Park Authority, West Sussex CC and Worthing BC. The refreshed LSS sets out the long-term, integrated strategic planning and investment priorities for the CWS&GB area, and supports the monitoring requirement of the Growth Deal. The refreshed LSS was approved by the CWS&GB Strategic Planning Board supported by the CWS partnership and Greater Brighton Economic Board in January 2016. Individual local authorities approved the LSS in the first part of 2016.

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. Adur is a relatively small district covering 41.5 square kilometres and has a population of approximately 61,334 (ONS mid 2011 population estimate⁴), 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. Over half of Adur District (53%) lies within the South Downs National Park and this area is not covered by the emerging Adur Local Plan but by the Local Plan being produced by the National Park Authority.
- 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

⁴ ONS (2012-based) subnational population projections

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 District Council at the north western tip.⁵ 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 (via letters and/or attendance at workshops) further afield with relevant authorities in Surrey and Hampshire and also with the Greater London Authority.
- 3.4 That part of Adur which lies within the South Downs National Park is being addressed through the South Downs Local Plan, by the South Downs National Park Authority. See paragraph 3.1 above.

Preparation of the Adur Local Plan

- 3.5 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.
- 3.6 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 emerging Plan sets out a vision and strategy and looks at the planning issues the district is facing, and proposes policies for addressing them.
- 3.7 The Local Plan covers Shoreham-by-Sea, Southwick, Fishersgate, Lancing and Sompting, and identifies Shoreham Harbour and Shoreham Airport as key regeneration sites. As stated above, the Local Plan does not cover the South Downs National Park.

⁵ Mid Sussex to the north east has a boundary close to that of Adur but this is not shared.

- 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 and traveller 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):
- **The need to facilitate the regeneration of Adur**
 - **The need to improve infrastructure**
 - **The need to balance development and regeneration requirements against the limited physical capacity of Adur without detriment to environmental quality**
 - **The need to meet identified housing needs**
 - **The need to address demographic pressures**
 - **The need to address deprivation**
 - **The need to address road congestion and related pollution – air and noise - whilst improving the existing transport network and facilitating the development of sustainable transport measures**
 - **The need to address climate change and flood risk**
 - **The need to work towards achieving sustainability**
 - **The need to improve health and wellbeing**
 - **The need to maintain and enhance the quality of the built, historic and natural environment**

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) (paragraphs 016 and 017) offers further advice on the implementation of the Duty to Co-operate. This includes the advice that one way to demonstrate effective co-operation, 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 with a range of statutory and non statutory bodies (see Appendix 1), Adur District 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 Strategic Economic Plan** - 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 via the Growth Deal 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 and the Environment Agency submitted a successful business case to the LEP to use funding for flood defences. The Local Growth Fund awarded £13.78m for the Shoreham Area Transport Package. Further investment is also committed by the LEP to support Highways England in improving road infrastructure in Adur. Transport and other infrastructure requirements are also being investigated by the West Sussex Strategic Infrastructure Framework being developed and also by the Infrastructure Plan being developed by the Greater Brighton Economic Board. The Growth Deal with Central Government also secured up to £7m to develop a new Centre of Excellence at Ricardos engineering firm at Shoreham Airport
- **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, Worthing Borough Council and East and West Sussex County Councils, working together. The Deal transfers specific powers, funding and responsibilities to the local authorities in return for a commitment to support growth. 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.
- **Greater Brighton Proposed Devolution Agreement** – The freedoms and flexibilities given to local authorities as part of the City Deal are now being developed through a proposed devolution agreement between the local authorities and Central Government for the devolution of further

responsibilities to support growth. The deal aims to facilitate the use of the tightly constrained land opportunities in Greater Brighton, particularly brownfield sites and publically owned land and assets and to ensure a range of housing is provided. Further, the Greater Brighton Prospectus states that it will explore opportunities to strengthen co-operative and strategic working across its planning authorities. There is also a commitment to strengthen local governance and accountability moving towards a Greater Brighton Combined Authority. A complimentary approach to supporting growth is also being negotiated as part of the Three Southern Counties (East Sussex, West Sussex and Surrey) devolution prospectus which covers the wider Coastal West Sussex Area. The devolution bids will be submitted to Government in March 2016.

- **Place Plans** – In March 2016, a Place Plan will be agreed for each of the West Sussex local authority areas to help West Sussex County Council manage its investment priorities to support growth more effectively. These are being aligned with the Local Plans and will help to deliver the strategic planning and infrastructure priorities in the LSS.
- **Greater Brighton Economic Board** - This was established in May 2014 as a joint committee which brings together the City Region's 5 local authorities, 2 universities, 4 FE colleges, 3 business partnerships, the LEP and the South Downs National Park. The Board works on economic issues that affect the area and has responsibility for overseeing the Greater Brighton City Deal and the Devolution bid. Together with the CWS&GB Strategic Planning Board, it commissioned the three background papers (referred to in paragraph 2.13 above) in 2015 on the economy, housing and transport to develop a greater understanding of the economic geography of the area and to form part of the common evidence base to inform the refresh of the Local Strategic Statement.
- **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)** was established in 2012 to facilitate joint working on strategic planning priorities. Councillors with responsibility for planning matters participate in this, on behalf of each Local Planning Authority. As referred to in section 2, the CWSP has produced a Local Strategy Statement (LSS) (updated in 2015 and agreed in January 2016) to create an agreed, consistent set of objectives and priorities in relation to growth - to help deliver regeneration, housing and infrastructure. This LSS has formed, and continues to do so, 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, Mid Sussex, Horsham 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 District Council, jointly with Brighton & 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 District Council is working with the Environment Agency and the LEP to implement flood defences along the River Adur to address existing and future flood risk. A Project Board and an officers working group progress this project. Funding has been secured from the LEP for delivery. The planning application has been submitted to the Council and if approved, construction is due to commence in 2016 with completion in 2018.
- **Transport - A27 and A259** – Adur District Council is working with West Sussex County Council (in liaison with Highways England) 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. Transport and other infrastructure requirements are also being investigated by the West Sussex Strategic Infrastructure Framework being developed and also by the Infrastructure Plan being developed by the Greater Brighton Economic Board.
- 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 have already been implemented such as the up-date of the LSS, and others are being taken forward by the West Sussex LPAs (see below - paragraph 3.23). Following these earlier workshops, Horsham held a workshop in March 2015 on incorporating strategic issues into Local Plans. Discussions focussed on how local authorities can support economic growth and housing provision in the context of the duty to co-operate and also what mechanisms are required to take things

forward. The value of joint evidence was discussed and the need to update existing statements of common ground.

- **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. Whilst the Councils are separate political administrations, they are jointly involved in a variety of bodies set up to address strategic issues for the Coastal West Sussex and Greater Brighton area with the aims of securing economic growth, more housing as well as improved and new infrastructure provision. Both authorities share common planning issues and problems including the difficulty of providing new homes to meet future needs within a highly constrained environment and with infrastructure problems, particularly in relation to transport. The recognition of this as well as the need to find solutions has fostered a culture of partnership and willingness to work together and ‘make things work’.
- **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 Historic England)
 - 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, including the Greater London Authority 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 (LEPs) and Local Nature Partnerships are not subject to the requirements of the Duty but are important bodies that have an important role in strategic planning (paragraph 006 of the National Planning Practice Guidance). LEPs have a key role to play in delivering local growth through their Strategic Economic Plans. These bodies 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 (including the recent bid for devolution) and the Planning Advisory Service Duty to Co-operate workshops at Horsham District Council. The Strategic Economic Plan (SEP) produced in 2014 for the LEP reflects the growth

aspirations of the 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 (in relation to the South Downs National Park)
- Water and Waste Water
- Flood risk and defences
- Green infrastructure
- Minerals and Waste

- 3.21 A number of the above issues are defined as key issues since they are spatially wide ranging (with cross boundary impacts) 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.

- 3.22 The above issues have been discussed at specific duty to co-operate meetings held during 2013, 2014 and 2015 with planning officers and lead Members for planning with Brighton and Hove CC, Worthing BC, Arun DC and Mid Sussex DC (see Appendix 2 - 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 – meetings and activities log). 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. At various stages and in addition to consultation on the Adur Local Plan, letters have been sent to the relevant local authorities in the sub region to inform these of Adur's strategic needs and duty to co-operate requirements.

3.23 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 issues. 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. (This has been on-going)
- Up-dating the CWS&GB Local Strategic Statement with new transport, housing and employment studies (completed and approved by the CWSGB SPB in January 2016).
- Reviewing the membership of the CWS&GB Strategic Planning Board to better reflect the cross boundary strategic issues that the Board deals with. (The Board was widened initially to include Lewes DC and Brighton and Hove CC and latterly to include Mid Sussex DC in 2014 and Horsham DC in 2015.)
- Greater involvement of the Coast to Capital LEP in the planning work of the CWS&GB SPB and the Greater Brighton Economic Board and the Greater Brighton City Deal. (This has been implemented and the LEP is also involved in the current devolution bids.)
- Agreeing transport infrastructure priorities via the CWS&GB SPB. (This is also being progressed via the CWSGB Economic Board and via infrastructure studies being undertaken by the LEP and WSCC to inform investment priorities. In addition, the Place Plans being progressed also address transport needs).
- Agreements on duty to co-operate issues formalised via MoUs and Statements of Common Ground between the local planning authorities. (MoUs and Statements are in place between a number of local authorities as referred to later in this Statement.)

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

Major Strategic Matters - Housing Needs and Provision

- 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 (SHMA), 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 SHMA 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 (Adur, Arun, Chichester and Worthing) 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 the 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 LSS refresh of 2016 also refers to the constrained geography and infrastructure of the coastal and Greater Brighton area which reduces the ability to meet objectively assessed needs for housing. The background paper on Housing produced in 2015 by NLP to inform the refresh of the LSS highlighted the fact that a 50% increases in current completions would be needed to meet objectively assessed needs (paras 4.19 and 5.3) (<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=855&MId=5735&Ver=4>). The refreshed LSS refers to measures currently being taken forward to address short to medium term delivery issues through the devolution process. These aim to maximise the potential of all suitable land in the sub-region and make existing sites 'work harder'. The Draft Greater Brighton Devolution Prospectus lists a number of key initiatives for Greater Brighton to help deliver housing and employment growth including a Housing and Property Investment Plan; a Property Board; a Strategic Planning Unit and a Housing

Company. However, to address longer term needs beyond 2025, the LSS (2016) refers to the recognition of the local authorities that a new, robust approach to planning across the area will be needed and ***are committed to working together to develop a joint understanding of the issues and potential responses to these, including long term spatial options*** (para 2.20). However, the LSS states that given the advanced stage of many of the local plans as well as the need for robust shared evidence, this work will inform the next full review of the LSS to provide a framework for the next round of local plan reviews. In summary, joint measures are being progressed by the Strategic Planning Board and the Economic Board for the sub region to address short and medium term housing delivery whilst the LSS full review and local plan reviews will address longer term delivery in order to meet assessed needs. A number of these reviews may need to be earlier to address needs (as recommended by the Inspector of the examination of Horsham's Planning Framework).

- 3.27 A number of assessments of Objectively Assessed needs for housing have been undertaken by Adur District Council. The most recent, Objectively Assessed Housing Need: Adur District (GL Hearn 2015) (<http://www.adur-worthing.gov.uk/media/media,135774,en.pdf>) indicates a requirement of 291 dwellings per annum which equates to 5820 dwellings over the plan period (2011-2031). This up-date study takes account of the 2012-based Sub National Population Projections issued by ONS in March 2014 and the 2012-based Household Projections published in February 2015. The study also takes into account recent academic research and improvements in the modelling approach. The annual dwelling requirement for Adur up to 2031 takes account of firstly, population and household projections (an annual need for 276 dwellings). Account is then taken of predicted workforce growth and affordable housing needs (also addressing housing market signals) which result in a need to up-lift the figure to a small degree (an annual need for 5 and 10 dwellings respectively).
- 3.28 In setting a delivery figure for the Adur Local Plan, a number of sources have been carefully considered which maximises development on brownfield land and totals 2531 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 1080 dwellings. In total, 3611 dwellings can be delivered over the Plan period which equates to an annual average of 180 dwellings. Consequently, a shortfall of approximately 2209 dwellings remain against the full objectively assessed need figure of 5820 over the Plan period.
- 3.29 Consultation and engagement has continually 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 Hampshire and Surrey were contacted in 2012 informing them of the CWS 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. Consultants NLP in the Housing Background paper (paragraph 6.2 of the paper) to the LSS refresh, highlighted that housing provision opportunities should be explored with neighbouring authorities outside of the Coastal West

Sussex and Greater Brighton area to meet longer term housing needs. This will be an issue for the full review of the LSS and will need to be supported by further robust evidence. Also, as recommended by the Inspector into the London Plan (see later paragraph 3.31), an early review of this Plan is required to address needs. This will necessitate working with relevant local authorities outside of London impacted by its housing needs.

- 3.30 As at 2014, when the Proposed Submission Adur Local Plan 2014 was published, the following LPAs within the above housing market areas were 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. Subsequently, in 2016 at the time of publication of the Amendments to the Proposed Submission Adur Local Plan (2016), the situation is that with the exception of Horsham and Mid Sussex, the above authorities (excluding Arun at this stage which is undertaking further work on the local plan) still cannot meet their objectively assessed needs (see more details below) through provision in their local plans. As detailed below, both Horsham and Mid Sussex aim to address the needs of Crawley as part of the NW Sussex Housing Market Area.

- 3.31 In order to help address Adur's housing shortfall, the following measures have been progressed (including details as to how the Council has engaged with other authorities on this matter) as set out below:

Mid Sussex District Council:

(Mid Sussex DC is represented on the CWS&GB Strategic Planning Board)

- An original MoU was agreed with Mid Sussex DC in October 2014. This was up-dated and agreed by Mid Sussex, Adur and Worthing in January 2016 (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.
- MSDC undertook an assessment of neighbouring authorities' unmet housing needs and 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 were shared with the neighbouring authorities in 2014. Mid Sussex has also shared with neighbouring authorities, including Adur, the results of its up-dated work on housing need and supply. The evidence was revised in November 2015 (following the publication of the Mid Sussex Pre-submission Local Plan in the summer of 2015) which indicated an objectively assessed housing need of 695 homes per annum (for the period 2014 to 31) and a potential supply of 800 homes per annum. The surplus, as advised by the sustainability appraisal work, is most likely to be absorbed by Crawley and Brighton and Hove which have stronger

economic and functional links with Mid Sussex. Taking this evidence into account, as well as the NPPF and the national context of the Government drive for more housing, this increase in housing provision was incorporated in an amended Pre-Submission Draft District Plan which was subject to consultation from November 2015 to January 2016. The Plan states that the increase in housing provision will enable the Council to make a contribution to meeting housing needs of neighbouring authorities but these would principally be directed to Crawley which is within the same housing market area. The Plan will be submitted to the Secretary of State in early 2016.

- 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.

Horsham District Council

(Horsham DC is represented on the CWS&GB Strategic Planning Board)

- A MoU with Horsham DC was signed in October 2014 (see Appendix 4). This stated that the two LPAs have shared evidence and have sought to understand the housing needs of their areas. At that time, Horsham DC informed the Coastal Authorities that Horsham was able to meet its own need (through the Horsham District Planning Framework Submission Draft) and offered additional sustainable capacity that may be available subject to more details on needs being provided. As shown in Appendix 3⁶, further details to quantify this need were provided to Horsham (as well as to all the local planning authorities in the CWS&GB area as well as Crawley, Horsham and Mid Sussex) in the autumn of 2014. It was 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.
- Following the agreement of the MoU, the Horsham District Planning Framework was submitted in August 2014, an Examination held and the Inspector's report published in October 2015. During this period, consultation on Main Modifications, including an increased housing target, (from 650 to 750dpa) was undertaken. The delivery figure was further increased to 800dpa (following the Inspector's recommendation) for the period of 2014 to 2031 to address approximately half of Crawley's shortfall. In his report, the Inspector states "*I remain unconvinced of any considerable degree of overlap between the North West Sussex HMA and that of the coastal authorities to the south.*"(Paras 40 and 41). The

⁶ Appendix 3 details the needs in 2014. Up to date needs are detailed in the body of this Statement

Inspector recommends an early review of the Framework to identify housing for the latter part of the Plan period, and states: “*A joint approach involving all the relevant Councils is required on a co-operative basis to fully address the OANs of at very least the three Council areas in one overall SHMA and possibly to include consideration of other updated needs outside the SHMA including those of the coastal area authorities and possibly London.*” (Para 53) The Horsham District Planning Framework was adopted on 27 November 2015.

Brighton and Hove City Council

(Brighton and Hove CC is represented on the CWS&GB Strategic Planning Board)

- Brighton and Hove CC in 2013, in support of the draft City Plan at this time, 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. Since this time, the examination into the City Plan was held in 2013, letters received from the Inspector and further modifications made to the Plan which included an increase in the objectively assessed housing needs in the Plan as well as an increase in overall housing provision. Within Brighton & Hove, the Council acknowledges that there is a significant housing shortfall (the Plan provides for a total of 13,200 units up to 2030 against the objectively assessed housing requirement of 30,120 dwellings to 2030). Further proposed modifications to the Plan in June 2015 referred to the Council continuing to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. ‘This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.’

- The Inspector’s report was submitted to the Council in February 2016 and this concludes that the Council has complied with the Duty to Co-operate. She accepts that given the physical and environmental constraints of the

City, there are very limited opportunities to increase the supply of land for housing (paragraph 29 of the report). With modifications, the Inspector considers the City Plan sound.

Lewes District Council

(Lewes DC is represented on the CWS&GB Strategic Planning Board)

- In July 2015, Lewes District Council published its main modifications to the Lewes District DC and South Downs National Park Authority Joint Core Strategy, in response to Hearing sessions and the Inspector's findings via letter. Whilst the housing provision in the Plan has been increased for the period 2010 and 2030 from 5,600 to 6,900, this does not meet the OAN of between 9,200 and 10,400. A Statement of Common Ground (Duty to co-operate: Statement of common ground - Cross boundary working and meeting housing needs) (see Appendix 4) was produced and signed in October 2014 by 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. The Statement 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 term solutions to meeting the housing needs of the Sussex Coast HMA. In this vein, the Council and the SDNP have proposed a modification to the Joint Core Strategy which states that 'if a longer-term potential solution which affects the Plan area is agreed, the DC and the SDNPA are committed to a review of the Core Strategy if this is necessary to deliver it.'

The South Downs National Park Authority (SDNPA)

(The SDNPA is represented on the CWS&GB Strategic Planning Board)

- Consultation took place on Preferred Options for the Local Plan for the National Park throughout September and October 2015. Publication of the Plan is anticipated for October 2016 with submission in February 2017. The Plan proposes a site allocation for 15 dwellings at Hoe Court which is adjacent to the existing settlement of Lancing. This may help to contribute to Adur's housing provision and discussions are taking place with the SDNPA in this regard. Whilst the opportunities to address Adur's unmet housing needs will be limited in the National Park, on-going discussions take place under the duty to co-operate as the Local Plans progress. Both Adur Council and the SDNPA have commented on the Local Plans during consultation stages. Co-operation also occurs via various bodies including the CWS&GB Strategic Planning Board and via a number of strategic officer groups.

Worthing Borough Council

(Worthing BC is represented on the CWS&GB Strategic Planning Board)

- The OAN for housing (July 2015) is significantly higher (at 636 pa) than the housing provision currently being planned for in the adopted Core Strategy (250 pa) for Worthing. A Local Plan review has commenced to consider how this need can be met. However, given the constraints and lack of available land, there is no realistic prospect of Worthing meeting its full OAN. Worthing Borough Council has been working with Adur District Council to address housing provision shortages via the Duty to Co-operate and an MoU between the two local planning authorities was signed in March 2016. This emphasises the close working arrangements and joint approach (as a result of the merged Adur and Worthing Council services) between the two authorities to jointly address planning issues in the area. Agreements and commitments for joint working between all other relevant local authorities (but also including Adur District Council) within and beyond the housing market area are in place via MoUs, a Statement of Common Ground and the refreshed LSS.

Arun District Council

(Arun DC is represented on the CWS&GB Strategic Planning Board)

- Arun DC submitted its Local Plan in January 2015 which included a housing provision figure of 580 dwellings pa up to 2031 which the Council considered went some way to meeting the OAN. Since this date, a new housing needs study has been undertaken (issued in March 2015) which estimates the OAN at 758 pa. Following a procedural meeting with the Inspector in July 2015, the Council agreed in September 2015 to the principle of suspending the Local Plan Examination for a period of 12 to 18 months to work towards meeting the higher OAN figure and for public consultation to take place on the revised OAN report (which took place at the end of 2015). A public hearing (relating only to OAN issues) took place in January 2016 and the Inspector's conclusions were submitted to the Council on 2 February 2016. He concludes that an OAN of 845 pa is appropriate in line with the housing needs study (but not allowing for a discount to account for an over estimate of migration rates in the past). The Inspector has formally suspended the examination of the Plan to allow further work to take place on meeting the revised OAN and to address other issues. The Inspector concludes that the suspension may offer an opportunity to explore any potential scope for the Plan to achieve greater alignment with the requirements of relevant neighbours – to be addressed more urgently than through a review of the Local Plan (as was stated in the Plan). Modifications will be consulted on in late 2016/early 2017 and submitted to the Inspector in March 2017.
- Various meetings with Arun Council have taken place over the last 3 years and letters sent as part of consultation on the Arun Local Plan to highlight Adur's housing needs (see activities log in Appendix 2). Further meetings and liaison will take place to ensure that both Adur's (as well as

Worthing's) and Arun's OAN can be considered together as part of the further work Arun is currently undertaking on the Local Plan

Greater London Authority

- A letter (see Appendix 5) was sent to the London Mayor on April 2014 on behalf of the CWS&GB Strategic Planning Board as well as the Gatwick Diamond and East Sussex planning authorities in response to consultation on the Further Alterations to the London Plan. This expressed concern that meeting London's housing needs should not be met from the wider area beyond London given housing pressures in this area and that London should look more closely at increasing housing supply from within London. The letter urged the Mayor to work with the relevant local authorities to understand the constraints and opportunities which exist and to help develop a sustainable approach to addressing the challenges which face all the local authorities in the area. Also the letter stated that there should be no assumption regarding ability and capacity of existing infrastructure within the relevant local authorities to accommodate any proposed unmet housing needs of London. The London Plan was published in 2015 but in line with the Inspector's recommendations, the Plan states that a full review of the Plan (to commence in 2015) is needed to address the city's population growth.

Summary

3.32 In summary, from the information above, in order to help address Adur's housing shortfall, the following measures/agreements have been put in place with some proposed for the future:

- The updated and agreed CWS&GB MoU establishes a framework for co-operation between the 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 CWS&GB Local Strategic Statement and its refresh in 2015/16 guides strategic planning decisions for the area
- 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 all the local planning authorities in the CWS & GB area as well as to Crawley.
- Continuous consultation and engagement has taken place with those Local Authorities within the functional housing market area and with those in North

West Sussex (Crawley, Horsham and Mid Sussex – with the latter two now part of the CWS&GB Strategic Planning Board). Communication has also taken place with a number of Local Authorities in Hampshire and Surrey as well as with the GLA regards the London Plan.

- Agreed MoUs with Horsham and Mid Sussex (albeit that as a result of the Inspector's recommendation on the Horsham Planning Framework, surplus housing provision in their local plans is to meet the needs of Crawley). An MoU with Worthing has also been agreed.
- Agreed Statement of Common Ground with Lewes, the South Downs National Park Authority and with Brighton and Hove.
- 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, means that the contribution to provision through any available headroom is limited (with Mid Sussex and Horsham's surplus provision to meet the needs of Crawley). Many of the Local Plans in the area are at advanced stages with some recently adopted (Crawley and Horsham) with some nearing adoption (Brighton and Hove and Lewes). Whilst a number of joint measures to help housing delivery in the short to medium term are being explored via the CWS&GB Strategic Planning Board and the Economic Board, longer term housing needs can only be addressed via a full review of the LSS and local plan reviews. A number of these reviews may need to be earlier to address needs (as recommended by the Inspector of the examination of Horsham's Planning Framework).

Major Strategic Matters - Gypsy and Traveller Accommodation

- 3.33 A Gypsy and Traveller Accommodation Needs Assessment (GTAA) was undertaken on behalf of the CWS LPAs together with the South Downs National Park Authority in 2013. An update to this report was published in 2014 which revised the pitch requirement and identified a need for 4 public pitches and 1 Travelling Showperson plot up to 2027 in Adur (see Annex 6, Ref 6.1). The Gypsy and Traveller 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 the plan period (1 pitch required up to 2017). However, it is likely that the Withy Patch site will need to be relocated in the locality due to the requirement to construct a new roundabout to serve a strategic allocation at New Monks Farm. This may provide an opportunity to meet the need for additional pitches through an extension to the relocated site. It is premature to allocate a site at this stage until it is confirmed that the land has been raised to take it out of Flood Zone 3. The details will be progressed through a DPD. 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 (as constituted at the time) and also with Horsham, Mid Sussex and

Crawley. The MoUs signed with Mid Sussex DC, Horsham DC and Worthing BC refers to this need (Appendix 4).

- 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 has been constructed at Westhampnett in Chichester District.

Major Strategic Matters – 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 Adur 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&GB MoU establishes a framework for co-operation between the ten local planning authorities with respect to strategic planning and development issues.
 - The CWS&GB Local Strategic Statement and its refresh guides strategic planning decisions for the area
 - The details of Adur's employment shortfall, as at September 2014 (in terms of amount, type, preferred locations for new employment and the impacts of not addressing this shortfall) were provided to Mid Sussex DC and copied to all the local planning authorities in the CWS GB area at the time as well as to Crawley and Horsham (see Appendix 3).
 - It is accepted that in the longer term 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. Account also needs to be taken of the economic and regeneration objectives for the coast and the planned growth centres as reflected in the CWS&GB refreshed Local Strategic Statement (2016) as well as the Greater Brighton City Deal and the Devolution bids. Any provision further afield to meet shortfalls in Adur would need to fit within this context.

- Continuous consultation and engagement has taken place with those Local Authorities within the coastal area and with those in North West Sussex. Communication has also taken place with a number of Local Authorities in Hampshire and Surrey as well as with the GLA regards the London Plan.
- An up-dated MoU (2016) 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. The Mid-Sussex Pre-Submission Draft District Plan acknowledges the significant projected unmet employment land needs from neighbouring local authorities in the Gatwick Diamond and wider Coast to Capital LEP area and refers to the 30ha employment allocation.
- An MoU (2014) with Horsham District Council (see Appendix 4) describes Adur's employment shortfall and states that this is 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. Since this time, further details as to Adur's employment land needs have been supplied to Horsham and other relevant Local Authorities (see Appendix 3) and the Horsham Planning Framework has been adopted (subject to an early review as recommended by the Inspector).
- Agreed Statements of Common Ground with Lewes and the South Downs National Park Authority (October 2014 and with Brighton and Hove (June 2014).
- Many of the Local Plans in the area are at advanced stages with some recently adopted (Crawley and Horsham) and some approaching adoption (Brighton and Hove and Lewes). Opportunities for further employment growth are being promoted through the LEP, the Greater Brighton City Deal and via the GB Devolution Bid in areas adjacent to Adur - in Brighton and Hove as well as in Worthing and Mid Sussex. This includes proposals for enhanced sustainable transport infrastructure to help improve access to these opportunities. This will help provide sustainable employment opportunities for Adur. The Draft Greater Brighton Devolution Prospectus lists a number of key initiatives for Greater Brighton to help deliver employment growth including a Property Board, institutional investment vehicles and a Strategic Planning Unit.
- Longer term employment needs can only be addressed via a full review of the LSS informed by evidence work across the wider area and local plan reviews. A number of these reviews may need to be earlier to address needs (as

recommended by the Inspector of the examination of Horsham's Planning Framework).

Major Strategic Matters - Minerals and Shoreham Harbour

- 3.37 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 being 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 Shoreham 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 Sussex 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 to secure new homes and employment. On the Western Harbour Arm, there are two currently safeguarded wharves - Free Wharf and Kingston Wharf (also known as Railway Wharf East).
- 3.38 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 Minerals Local Plans.
- 3.39 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. West Sussex County Council is currently preparing a new Statement to up-date the current Statement.

- 3.40 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.
- 3.41 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.
- 3.42 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.

Major Strategic Matters – Transport

- 3.43 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 and second addendum in 2016. These studies (Annex 6, Refs 7.4 and 7.5) have been shared with the Highways Agency (now Highways England). The CWS&GB 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. The Highways England Delivery Plan 2015 – 2020 includes the commitment to take forward the Worthing to Lancing A27 Improvement Scheme which includes improvement schemes across the A27 to help relieve congestion at a number of hot spots including at Lancing. 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). The strategy will be published and made available in the summer of 2016 at the same time as the publication of the Shoreham Harbour Draft Area Action Plan for consultation.

- 3.44 Meetings have taken place 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

- 3.45 Together with Shoreham Harbour, Shoreham Airport is a key regeneration site proposed as a strategic allocation in the emerging 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 of improved flood defences along the river Adur (the Adur Tidal Walls) (likely to commence in 2016) 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, Highway England, West Sussex County Council, Brighton and Hove City Council and Worthing Borough Council. Historic England as a statutory consultee on the Adur Local Plan requested a Heritage Assessment be undertaken of the impact of proposed development at the Airport on its heritage assets. This has been undertaken and has informed the Amendments to the Proposed Submission Adur Local Plan (2016). 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

- 3.46 Approximately half of Adur District is included within the South Downs National Park and this area is being covered by the Park Authority's emerging Local Plan. 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 several 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

- 3.47 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

- 3.48 Flood risk is a key issue for Adur and limits the amount of development which can be accommodated in the Local Plan area. 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 emerging Adur 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 Rivers Arun to Adur Flood and Erosion 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. The Shoreham Harbour Flood Risk Management Guide Supplementary Planning Document (SPD) has been produced to provide details as to the flood defences required and the design of these for Shoreham Harbour. This was adopted by both Adur District Council and Brighton & Hove City Council in 2015.

Green Infrastructure

- 3.49 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 South Downs National Park Authority (involving joint work with these authorities). Adur District Council (and a number of other authorities) have been working with the South Downs National Park to produce the South Downs Green Infrastructure Framework. This framework aims to set out a roadmap for green infrastructure planning for the South Downs National Park and the wider region and is likely to be completed in 2016. 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. That part of Adur (east of the river) is also part of the Brighton Biosphere and Adur Council will be working in partnership with Brighton and Hove City Council on future enhancement projects. The City Council was involved in the Ecology and green Infrastructure study for Shoreham Harbour and will also be involved in the green corridor project and vegetated shingle habitat creation at Southwick and Portslade beaches.

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. Many of the Local Plans in the area are at advanced stages with some recently adopted (e.g. Crawley and Horsham) and some nearing adoption (e.g. Brighton and Hove and Lewes). Whilst a number of joint measures to help housing and employment delivery are on-going via the CWS&GB Strategic Planning Board and the Economic Board, longer term housing and employment needs can only be addressed via a full review of the LSS and by early local plan reviews.

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

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome ***
PART A				
Supporting sustainable Economic Growth	CWS &GB Authorities, SDNPA, CWSP, C2CLEP	<p>Oct 2012: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters.</p> <p>2013: Preparation and agreement of 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 and GB Economic Board and Strategic Planning Board agree in 2015 to commission NLP consultants to undertake evidence studies to inform LSS refresh.</p> <p>18 Jan 2016: Final version of Refreshed LSS agreed by the Strategic Planning Board.</p> <p>Monitoring and Delivery Framework produced in 2015 which forms Annex 4 of Refreshed LSS 2016.</p> <p>The Greater Brighton City Deal, awarded in 2014, formed by the local authorities of Brighton & Hove City Council, Adur District Council, Lewes</p>	<p>CWS&GB Up-dated Memorandum of Understanding (2016) <i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB Refreshed LSS 2016: Strategic Objective 1 – Delivering Sustainable Economic Growth <i>[Annex 6, Ref 3.7]</i></p> <p>CWS&GB Refreshed LSS 2016: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham <i>[Annex 6, Ref 3.7]</i></p> <p>Developing an Employment and Infrastructure Strategy <i>[Annex 6, Ref 5.1]</i></p> <p>NLP Economy Background Paper 1 May 2015 <i>[Annex 6, Ref 5.3]</i></p> <p>Greater Brighton City</p>	<p>Local Plan:</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 allocates 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).</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</p>

		<p>District Council, Mid-Sussex District Council and Worthing Borough Council, working together.</p> <p>Devolution Bids/Agreements (with Central Government) being prepared by Greater Brighton and the three Counties of East Sussex, West Sussex and Surrey to support growth. To be submitted March 2016.</p>	<p>Deal 2014 [Annex 6, Ref 3.9]</p>	<p>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).</p>
<p>Making provision for the objectively assessed housing needs of the area</p>	<p>CWS&GB Authorities, SDNPA, CWSP, C2CLEP, Gatwick Diamond Authorities, EA, HCA</p>	<p>Oct 12: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters.</p> <p>2013: Preparation and agreement of a joint strategic framework (LSS) to:</p> <ul style="list-style-type: none"> • 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. • identify any potential shortfall over the OANs and agree a process for addressing this over the longer term. <p>CWS and GB Economic Board and Strategic Planning Board agree in 2015 to commission NLP consultants to undertake evidence studies to</p>	<p>CWS&GB Updated Memorandum of Understanding (2016) [Annex 6, Ref 2.3]</p> <p>CWS&GB Refreshed LSS 2016: Strategic Objective 2 – Meeting Strategic Housing Needs [Annex 6, Ref 3.7]</p> <p>CWS&GB Refreshed LSS 2016: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham [Annex 6, Ref 3.7]</p> <p>Coastal West Sussex Strategic Housing</p>	<p>A consistent approach to assessing housing provision needs across the Sussex Coast HMA.</p> <p>Local Plan: Overall housing provision in the local plan (Policy 3).</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</p>

		<p>inform LSS refresh.</p> <p>18 Jan 2016: Final version of Refreshed LSS agreed by the Strategic Planning Board.</p> <p>Monitoring and Delivery Framework produced in 2015 which forms Annex 4 of Refreshed LSS 2016.</p> <p>Ongoing: Working collaboratively with LPAs in wider sub-region, particularly Gatwick Diamond Authorities, to understand longer term development needs and what the opportunities are for meeting these outside CWS&GB.</p> <p>Devolution Bids/Agreements (with Central Government) being prepared by Greater Brighton and the three Counties of East Sussex, West Sussex and Surrey to support growth. To be submitted March 2016.</p>	<p>Market Assessment (SHMA) 2012 <i>[Annex 6, Ref 4.1]</i></p> <p>Housing Study (Duty to Co-operate) Sussex Coast HMA 2013 <i>[Annex 6, Ref 4.2]</i></p> <p>Assessment of Housing Development Needs Study: Sussex Coast HMA 2014 <i>[Annex 6, Ref 4.3]</i></p> <p>NLP Housing Background Paper 2 May 2015 <i>[Annex 6, Ref 4.4]</i></p>	<p>within Adur up to 2031. Also includes supporting infrastructure and a comprehensive flood solution to be delivered (Policy 8: Shoreham Harbour Regeneration Area).</p> <p>Specific housing allocations in the Local Plan at New Monks Farm (Policy 5) and West Sompting (Policy 6).</p>
Delivering strategic infrastructure priorities	CWS & GB Authorities, SDNPA, CWSP, C2CLEP, HA (now HE)	<p>Oct 12: Establish a Strategic Planning Board for CWS&GB to facilitate joint working on strategic matters and engage effectively with infrastructure enablers and providers.</p> <p>2013: Preparation and agreement of a joint strategic framework (LSS) to identify strategic investment priorities in transport and other infrastructure</p>	<p>Updated Memorandum of Understanding (2016) <i>[Annex 6, Ref 2.3]</i></p> <p>CWS&GB Refreshed LSS 2016: Strategic Objective 3- Investing in Infrastructure <i>[Annex 6, Ref 3.7]</i></p>	Allocation policies in the Local Plan as above and a specific policy on Delivering Infrastructure – Policy 30.

		<p>required to 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>CWS and GB Economic Board and Strategic Planning Board agree in 2015 to commission NLP consultants to undertake evidence studies to inform LSS refresh.</p> <p>18 Jan 2016: Final version of Refreshed LSS agreed by the Strategic Planning Board.</p> <p>Monitoring and Delivery Framework produced in 2015 which forms Annex 4 of Refreshed LSS 2016.</p> <p>Devolution Bids/Agreements (with Central Government) being prepared by Greater Brighton and the three Counties of East Sussex, West Sussex and Surrey to support growth. To be submitted March 2016.</p>	<p>CWS&GB Refreshed LSS 2016 Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham [Annex 6, Ref 3.7]</p> <p>C2C LEP Strategic Economic Plan 2014 [Annex 6, Ref 8.1]</p> <p>Advice to Support the Development of a Delivery and Investment Framework [Annex 6, Ref 5.2]</p> <p>CWS&GB Monitoring and Delivery & Framework (Annex 4 of Refreshed LSS 2016) [Annex 6, Ref 3.8]</p> <p>NLP Transport System Background Paper May 2015 [Annex 6, Ref 5.4]</p>	
Management of environmental resources	CWS&GB Authorities, SDNPA, EA, EN, Sussex Local Nature Partnership	<p>Oct 12: Establish a Strategic Planning Board for CWS&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>Updated Memorandum of Understanding (2016) [Annex 6, Ref 2.3]</p> <p>CWS&GB Refreshed</p>	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

		<p>2013: Preparation and agreement 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>18 Jan 2016: Final version of Refreshed LSS agreed by the Strategic Planning Board.</p> <p>Monitoring and Delivery Framework produced in 2015 which forms Annex 4 of Refreshed LSS 2016.</p>	<p>LSS 2016: Strategic Objective 4 – Managing Environmental Assets and Natural resources [Annex 6, Ref 3.7]</p> <p>CWS&GB Refreshed LSS 2016: Spatial Priority 1: Shoreham Harbour and Brighton Airport, Shoreham [Annex 6, Ref 3.7]</p> <p>CWS&GB Monitoring and Delivery & Framework (Annex 4 of Refreshed LSS 2016) [Annex 6, Ref 3.8]</p>	32).
Meeting the needs of Gypsies and Travellers	CWS Authorities, SDNPA and other West Sussex Authorities	<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 & Travelling Showpeople Accommodation Assessment Phases 1 and 2 (2013). Update Report to Phase 1(2014) [Annex6, Ref 6.1]</p> <p>Study into Transit Accommodation in West Sussex [Annex 6, Ref 6.2]</p> <p>CWS&GB Monitoring</p>	<p>Policy 2:Provision for Gypsies, Travellers and Travelling Showpeople.</p> <p>A permanent transit site has been provided at Westhampnett in Chichester District.</p>

			and Delivery & Framework (Annex 4 of Refreshed LSS 2016) <i>[Annex 6, Ref 3.8]</i>	
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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

***The LSS and the Adur Local Plan have progressed in parallel, each document informing the other.

Annex 2: Summary of Strategic Planning Activities in Adur

Strategic Planning Issue	Strategic Partners	Strategic Response*	Evidence **	Outcome
PART B				
Housing Needs and Provision	<p>Coastal West Sussex and Greater Brighton LPAs of Adur, Arun, Brighton and Hove , Chichester, Horsham, Lewes, Mid Sussex and Worthing as well as West Sussex CC and the South Downs National Park Authority.</p> <p>Remaining West Sussex LPA of Crawley BC</p> <p>Developers of proposed strategic development allocations in the Adur Local Plan.</p>	<p>Studies to assess objectively assessed needs have been undertaken, the most recent being Objectively Assessed Housing Need: Adur District (GL Hearn 2015). 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 (see Appendix 2: Meetings and Activities log). MoUs and Statements of Common Ground have been signed.</p>	<p>Objectively Assessed Housing Need: Adur District 2015 (GL Hearn) <i>[Annex 6, Ref 7.6]</i> which updates previous housing need figures for Adur.</p> <p>ADC Strategic Land Availability Assessment 2014 <i>[Annex 6:Ref 7.7]</i></p> <p>MoU with Horsham District Council 2014 (appended to this Statement)</p> <p>MoU with Mid Sussex District Council 2016 (appended to this Statement)</p> <p>MoU with Worthing Borough Council 2016 (appended to this Statement)</p> <p>Statement of Common</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>Ground with Lewes District Council and SDNPA 2014(appended to this Statement)</p> <p>Agreed Statement of Common Ground with Brighton and Hove City Council (2013) (appended to this Statement)</p>	
Gypsy and Traveller Accommodation	<p>Coastal West Sussex and Greater Brighton LPAs of Adur, Arun, Brighton and Hove , Chichester, Horsham,Lewes, Mid Sussex and Worthing as well as West Sussex CC and the South Downs National Park Authority.</p> <p>Remaining West Sussex LPA of Crawley BC</p> <p>Developers of proposed strategic</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 (see Appendix 2: Meetings and Activities log).</p> <p>MoUs and a Statement of Common Ground have been signed.</p> <p>Discussions have taken place with the Developers of proposed strategic development allocations. A new junction to serve the strategic allocations of New Monks Farm and Shoreham Airport necessitate the relocation of the existing Withy Patch gypsy site and this may provide an</p>	<p>CWS Gypsies, Travellers & Travelling Showpeople Accommodation Assessment (Phases 1 & 2) and Up-date Report (to phase 1) <i>[Annex6, Ref 6.1]</i></p> <p>Study into Transit Accommodation in West Sussex <i>[Annex 6, Ref 6.2]</i></p> <p>MoU with Horsham District Council 2014 (appended to this Statement)</p> <p>MoU with Mid Sussex District Council 2016 (appended to this Statement)</p>	Informed Local Plan: Policy 24 Provision for Gypsies, Travellers and Travelling Showpeople.

	development allocations in the Adur Local Plan.	opportunity to provide additional pitches on this relocated site to meet assessed needs subject to flood risk being overcome. The details of this will be progressed through a Gypsy and Traveller DPD.	MoU with Worthing Borough Council 2016 (appended to this Statement) Agreed Statement of Common Ground with Brighton and Hove City Council (2013) (appended to this Statement)	
Employment Needs and Provision	<p>Coastal West Sussex and Greater Brighton LPAs of Adur, Arun, Brighton and Hove , Chichester, Horsham, Lewes, Mid Sussex and Worthing as well as West Sussex CC and the South Downs National Park Authority.</p> <p>Remaining West Sussex LPA of Crawley BC</p> <p>Developers of proposed strategic development</p>	<p>An Employment Land Review (2014) has informed the Local Plan. This has assessed objectively assessed needs and 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 Coast to Capital LEP Strategic Economic Plan 2014.</p> <p>Adur DC is part of the Greater Brighton City Deal and emerging GB Devolution bid.</p>	<p>Adur Employment Land Review 2014 [Annex 6, Ref 7.1]</p> <p>Coast to Capital Strategic Economic Plan 2014 [Annex 6, Ref 8.1]</p> <p>Coast to Capital Growth Deal 2014 [Annex 6, Ref 8.2]</p> <p>MoU with Horsham District Council 2014 (appended to this Statement)</p> <p>MoU with Mid Sussex District Council 2014 (appended to this Statement)</p> <p>MoU with Worthing</p>	<p>Informed Local Plan:</p> <p>Policy 2 Spatial Strategy</p> <p>Policy 4 Planning for Economic Growth</p> <p>Policy 5 New Monks Farm</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>

	<p>allocations in the Adur Local Plan.</p> <p>Adur and Worthing Business Partnership</p> <p>The Coast to Capital LEP Greater Brighton Economic Board</p>		<p>Borough Council 2016 (appended to this Statement)</p> <p>Agreed Statement of Common Ground with Brighton and Hove CC (2013) (appended to this statement)</p> <p>Coast to Capital Strategic Economic Plan 2014 <i>[Annex 6, Ref 8.1]</i></p>	
Minerals at Shoreham Harbour	<p>Shoreham Port Authority</p> <p>Brighton and Hove City Council</p> <p>West Sussex County Council</p> <p>East Sussex County Council</p>	<p>Study undertaken in 2014 by consultants to update 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 has taken place to refine the above information and to address safeguarding issues (This</p>	<p>West Sussex Wharves and Railheads Study 2014 <i>[Annex 6, Ref 7.2]</i></p> <p>Statement of Common Ground signed between the Shoreham Harbour Planning Authorities and Shoreham Port Authority in 2014 (this will be up-dated shortly). <i>[Annex 6, Ref 7.3]</i></p>	<p>Informed Local Plan: Policy 8: Shoreham Harbour Regeneration Area</p> <p>Informing the draft Joint Area Action Plan for Shoreham Harbour</p>

		will be made available in due course)		
Transport	<p>Highways Agency (now Highways England)</p> <p>West Sussex County Council</p> <p>Developers of proposed strategic development allocations in the Adur Local Plan.</p> <p>CWS Strategic Planning Board</p> <p>Coast to Capital LEP</p> <p>Greater Brighton Economic Board</p>	<p>Parsons Brinckerhoff consultants were commissioned in 2013, 2014 and 2015 to carry out transport studies for the Adur Local Plan. These put forward mitigation measures to address traffic impacts at a number of key junctions. Sustainable transport measures also proposed. Highways England and the County Council have agreed the studies and findings as evidence to support the local plan.</p> <p>Adur DC inputted into the Coast to Capital Strategic Economic Plan 2014 produced by the LEP. This 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>Meetings with the developers of the proposed strategic allocations have addressed transport requirements and mitigation measures for the sites.</p> <p>A Transport Strategy (2014) has been produced for Shoreham Harbour which includes junction improvements together with measures to encourage sustainable travel for the next 15-20 years.</p>	<p>The Adur Local Plan and Shoreham Harbour Transport Study 2013; the Report Addendum 2014 and Second Addendum 2016 [Annex 6 Ref 7.4]</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>

		Adur DC is part of the Greater Brighton City Deal and emerging GB Devolution bid.		
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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.

9 October 2014: CWS&GB Strategic Planning Board

Mid Sussex District Council invited to be formal member of the Board.

13 July 2015: CWS&GB Strategic Planning Board

Horsham District Council invited to be formal member of the Board

18 January 2016: CWS&GB Strategic Planning Board

Up-dated Memorandum of Understanding and Terms of Reference agreed

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.

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

13 July 2015 CWS&GB Strategic Planning Board

Agrees to commission consultant to refresh/up-date the LSS

April 2015:

NLP commissioned jointly by CWS&GB Authorities and the GB Economic Board to undertake background evidence studies (Background Papers) for the LSS up-date.

3 February 2015:

Stakeholder Workshop held by NLP

May 2015:

NLP completes Background Papers on the Economy, Housing and Transport.

November and December 2015:

Stakeholder and Officer Workshops held for the LSS up-date.

18 January 2016: CWS&GB Strategic Planning Board

Approves the LSS up-date 2016

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.

July 2014: CWS&GB Strategic Planning Board

The Board notes the study which up-dates the assessment of housing needs in the Sussex Coast Housing Market Area

(Please see section 2 above - of this Annex 3 - for subsequent timelines for the refreshed LSS and background evidence)

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 pro-forma 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.

17 Oct 2013: CWS&GB Strategic Planning Board

The Board agrees the Local Strategic Statement for the area.

(Please see section 2 above - of this Annex 3 - for subsequent timelines for the refreshed LSS and background evidence)

5. 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 (Phases 1 and 2)

The CWS Gypsy, Traveller and Travelling Showpeople Accommodation Assessment 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) in 2013, the CWS authorities were then required (phase 2) 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.

In 2014, an Up-date Report (Dec 2014) to phase 1 was produced.

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.

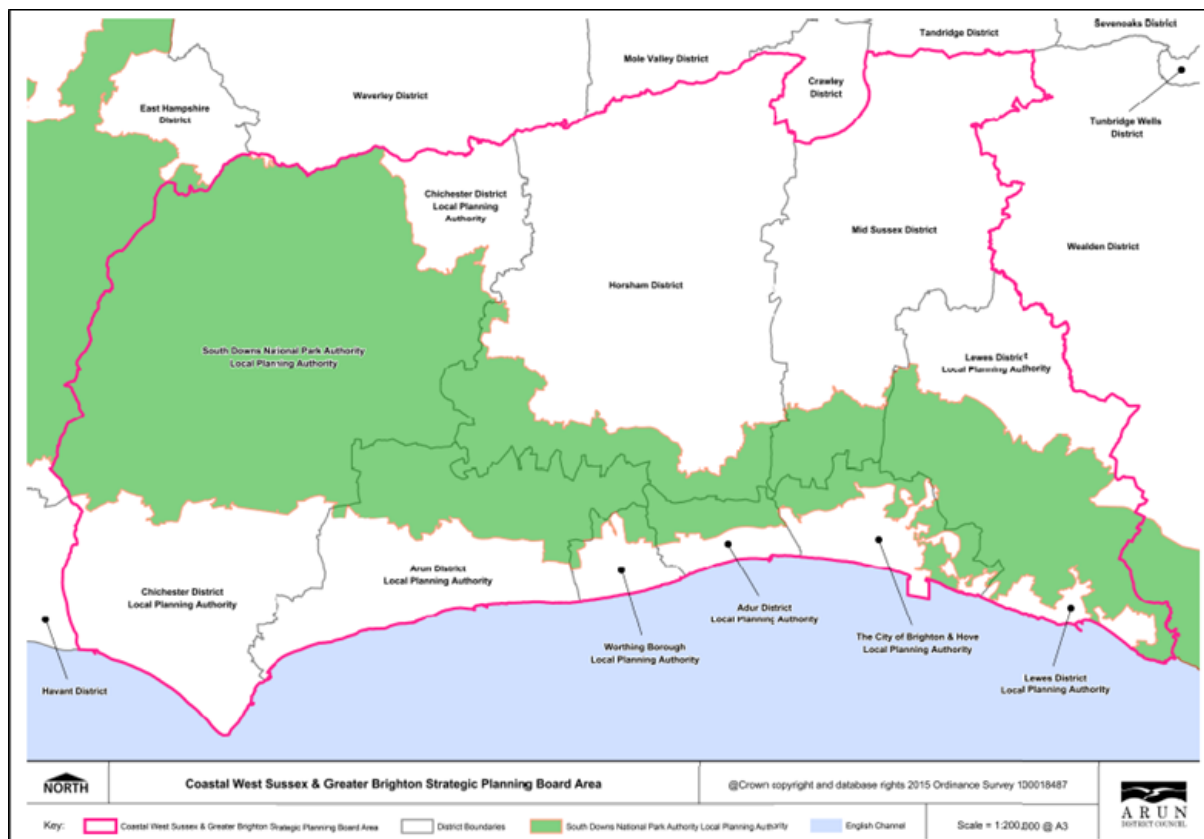
Chichester DC has provided a transit site at Westhampnett in Chichester district. It should be noted that no other suitable site across West Sussex has been identified for this purpose, despite an extensive search of Council land records and a public 'call for sites' associated with the Local Plan process.

Annex 4: Formal Endorsement of the Local Strategic Statement

Adur & Worthing	<p>Original LSS (Oct 2013):</p> <p>Joint Strategic Committee: 3 December 2013 http://www.adur-worthing.gov.uk/media/media,119295,en.pdf</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> <p>Updated LSS (Jan 2016): Approval by a Decision of Executive Members for Regeneration: March 2016</p>
Arun	<p>Original LSS (Oct 2013):</p> <p>Full Council: 8 January 2014 http://www.arun.gov.uk/mediaFiles/downloads/83329178/Minutes_080114_2014_Final.pdf</p> <p><u>Decision:</u> The Council resolved that the Coastal West Sussex and Greater Brighton Local Strategic Statement be adopted.</p> <p>Updated LSS (Jan 2016): Local Plan Sub-Committee: 19 January 2016</p>
Brighton & Hove	<p>Original LSS (Oct 2013):</p> <p>Economic Development & Culture Committee: 23 January 2014 http://present.brighton-hove.gov.uk/Published/C00000705/M00004664/\$\$\$Decisions.doc.pdf</p> <p><u>Decision:</u> The Committee resolved to approve the Coastal West Sussex and Greater Brighton Local Strategic Statement including the ToR and MoU</p> <p>Updated LSS (Jan 2016): Economic Development and Culture Committee: 10 March 2016</p>
Chichester	<p>Original LSS (Oct 2013):</p> <p>Cabinet: 7 January 2014 http://www.chichester.gov.uk/index.cfm?articleid=22978</p> <p><u>Decision:</u> Cabinet resolved the Coastal West Sussex and Greater Brighton Local Strategic</p>

	<p>Statement be agreed.</p> <p>Updated LSS (Jan 2016): Cabinet: 8 March Full Council: 17 May</p>
Horsham	<p>Original LSS (Oct 2013): NA</p> <p>Updated LSS (Jan 2016): Cabinet: 24 March 2016 Full Council: 27 April 2016</p>
Lewes	<p>Original LSS (Oct 2013):</p> <p>Cabinet: 6 January 2014 http://cmispublic.lewes.gov.uk/Public/Meeting.aspx?meetingID=657</p> <p><u>Decision:</u> Cabinet agreed to endorse the Coastal West Sussex and Greater Brighton – Local Strategic Statement.</p> <p>Updated LSS (Jan 2016): Cabinet: 21 March 2016</p>
Mid Sussex	<p>Original LSS (Oct 2013): NA</p> <p>Updated LSS (Jan 2016): Council: 27 Jan 2016</p>
SDNP	<p>Original LSS (Oct 2013):</p> <p>Endorsement of LSS delegated to Director of Planning</p> <p>Updated LSS (Jan 2016): Planning Committee: 11 February 2016</p>
West Sussex CC	<p>Original LSS (Oct 2013):</p> <p>Executive Decision: 23 January 2014 http://www.westsussex.gov.uk/your_council/meetings_and_decision-making/executive_decisions.aspx</p> <p>Cabinet Member for Highways and Transport agreed the LSS on behalf of the Council</p> <p>Updated LSS (Jan 2016): Approval by a Decision of Executive Member for Highways and Transport: March 2016</p>

Annex 5 Map of CWS and GB Strategic Planning Board Area



Annex 6: References to key documents

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
- 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) <http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 2.2 CWS & GB Strategic Planning Board: Updated Terms of Reference 2016
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 2.3 CWS & GB Strategic Planning Board Updated Memorandum of Understanding 2016
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 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: (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-board/>
- 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-board/>
- 3.7 Local Strategic Statement Up-date 2016:
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.8 CWS and GB Monitoring and Delivery Framework (Annex 4 to LSS Refresh 2016)
<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>
- 3.9 Greater Brighton City Deal 2014
<http://www.gov.uk/city-deal-greater-brighton>

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,114125,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>
- 4.4 NLP Housing Background Paper 2 - May 2015
<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=855&Mid=5735&Ver=4>

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 NLP Economy Background Paper 1 - May 2015
<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=855&Mid=5735&Ver=4>

- 5.4 NLP Transport System Background Paper 3 - May 2015
<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=855&Mid=5735&Ver=4>

6. Gypsies, Travellers & Travelling Showpeople

- 6.1 Gypsies, Travellers & Travelling Showpeople Accommodation Assessment 2013 (Phases 1 & 2) and Up-date Report 2014 (to phase 1) –
<http://www.adur-worthing.gov.uk/planning-policy/adur-background-studies-and-info/housing/>
- 6.2 Study into Transit Provision in West Sussex 2013
www2-westsussex.gov.uk/ds/mis/050214cw7b.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
- 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, Report Addendum 2014 and Second Addendum 2016
<http://www.adur-worthing.gov.uk/media/media,116970,en.pdf>
- 7.5 Objectively Assessed Housing Need: Adur District (GL Hearn 2015)
<http://www.adur-worthing.gov.uk/planning-policy/adur-background-studies-and-info/housing/#assessment-of-objectively-assessed-housing-needs-study-2014>
- 7.6 ADC Strategic Land Availability Assessment 2014
<http://www.adur-worthing.gov.uk/media/media,127921,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.yxL6iqbW.dpbs>
- 8.2 Coast to Capital Growth Deal with central government July 2014
<http://www.coast2capital.org.uk/strategic-objectives/strategic-economic-plan.html#sthash.4eIXWfvL.hCjVGIGv.dpbs>

Appendix 1

1. Specific Consultation Bodies for the Local Plan process.

NHS Coastal West Sussex Clinical Commissioning Group	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 (now Historic England)	Environment Agency
Highways Agency (now Highways England)	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	

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

West Sussex PCT	EDF Energy
English Heritage (now Historic England)	Environment Agency
Highways Agency (now Highways England)	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 (now Highways England)
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 (now Highways England)	Environment Agency
Highways Agency (now Highways England)	Horsham District Council

England)	
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 (now Highways England)
Mid Sussex District Council	NHS Property Services
Natural England	South Downs National Park Authority
Southern Water	West Sussex County Council

6. Specific Consultation Bodies who responded to the Proposed Submission Draft Adur Local Plan 2014.

Sport England	Natural England
Environment Agency	Worthing Borough Council
Arun District Council	Brighton and Hove City Council
West Sussex County Council	East Sussex County Council
Mid Sussex District Council	Southern Water
Highways Agency (now Highways England)	Marine Management Organisation

5. Specific Consultation Bodies who responded to the Proposed Amendments to the New Monks Farm Allocation within the 2014 Proposed Submission Adur Local Plan

Environment Agency	West Sussex County Council
Natural England	Historic England

Appendix 2

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

Date/venue	Title/ attendees	Purpose of meeting	Outcome(s)
12/9/2011 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.
13/9/2011 Meeting at Hove town hall	Informal meeting on Duty to Co-operate between Brighton & Hove, Lewes, Adur and Worthing.	Duty to Co-operate general discussion	
21/2/2012 Meeting at Arun Civic Centre	Coastal West Sussex LDF Officer leads - Chichester, Arun, Worthing,	To consider the Duty to Co-operate requirements and particularly in relation	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

	Adur, SDNPA, WSCC, Lewes and Brighton and Hove City.	to housing (the social and economic impacts of not meeting housing needs).	do the housing work explored a bit (notes made at meeting).
26/4/2012 Meeting at Arun Civic Centre	Coastal West Sussex - Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present.		Discussed development sites and infrastructure needs.
23/5/2012 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.	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.
18/6/2012 Meeting at Hove Town Hall	Authorities within the Brighton & Hove Strategic Housing Market Areas - Adur, Brighton & Hove, Crawley, East Sussex, Eastbourne, Horsham, Lewes,	Officer meeting to scope out issues and agree the next steps.	Agreed to carry on meetings.

	Mid Sussex, SDNPA Authority Worthing West Sussex.		
27/6/2012 Meeting at Worthing town hall	Coastal West Sussex - Strategic Planning Board inception meeting. Chichester, Arun, Worthing, Adur, SDNPA, WSCC and Brighton and Hove City.	The need to establish the SPB and presentation by consultant Catriona Riddell on appropriate governance arrangements and also on Duty to Co-operate.	Agreed to draft terms of reference for the group and for LPAs to consider formal reps on the Board
6/9/2012 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.
8/10/2012 Meeting at Adur Civic Centre	Coastal West Sussex LDF lead officers meeting Adur, Worthing, Lewes, Brighton & Hove, Arun,	Inception meeting with consultant G L Hearn re Duty to Co-operate Housing study	Questions asked and comments made on methodology etc.

	Chichester, SDNPA		
9/10/2012 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
13/11/2012 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	
6/12/2012 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.
24/1/2013 Meeting at	CS&GB Strategic Planning Board		Draft MoU considered. Also agreed consultant to begin development of the LSS.

Worthing Town Hall	Coastal West Sussex authorities.		
1/2/2013 Meeting at Adur Civic Centre	Coastal West Sussex Officer Meeting Coastal West Sussex authorities.	For G L Hearn consultants to present draft Duty to Co-operate housing study.	
5/3/2013 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.	
19/3/2013 Meeting at Worthing Town Hall	CWS&GB Strategic Planning Board.	Presentation to Board by consultants of Duty to Co-operate housing study.	
27/3/2013 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.	
18/4/2013 Meeting at Adur Civic Centre	Meeting requested by Brighton and Hove Council. Present were planning officers and Cllr P McAfferty (B	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.

	and H), Pat Beresford (Adur) and Bryan Turner (Worthing).		
23/5/2013 Meeting at Adur Civic Centre	Coastal West Sussex workshop – officers and members Coastal West Sussex authorities.	To discuss the emerging Local Strategic Statement – contents and implementation.	Views of Officers and Members taken forward by consultant
13/6/2013 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.	
18/7/2013	CWS&GB SPB meeting.		Agreed final MoU.
9/8/2013 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.

7/10/2013 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.
17/10/2013 Meeting at Worthing town hall	CWS&GB Strategic Planning Board meeting.	To agree the Local Strategic Statement.	Agreed the LSS. Lewes DC invited to be a formal member of the Board.
4/11/2013	Email received from Arun DC.		Email stating that Members concerns re: Coastal West Sussex SHMA have been dropped (at their Local Plan sub-ctte 31 st October 2013).
11/11/2013 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.
21/11/2013 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	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. .

	Member for Regeneration.		
2/12/2013 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 Arun Local Plan and opportunity for comments.	Agreed that comments on Plan to be submitted by Xmas 2013.
3/12/2013 Meeting at Adur Civic Centre	Joint Strategic Committee for Adur and Worthing.	Committee meeting. Agenda includes CWS LSS.	Local Strategic Statement agreed.
03/12/2013 Portland House Worthing	Meeting with the Marine Management Organisation (Pete Cosgrove) attended by officers from Adur and Brighton and Hove.	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.
9/1/2014	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.	

22/1/2014 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.
24/1/2014	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.
29/1/2014	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.
4/3/2014	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"> • To update participants on key strategic issues and recent examination cases. • To consider 	Action Plan produced with recommended actions needed relating to communication, evidence gathering and working together on duty to co-operate issues.

		<p>adequacy of existing joint working arrangements and agree the principles of future joint working arrangements particularly in relation to economy and housing.</p> <ul style="list-style-type: none"> • To prepare an action plan. 	
8/4/2014 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.
10/4/2014	Letter sent to Boris Johnson Mayor of London from the Gatwick Diamond, Coastal West Sussex and Greater Brighton Strategic Planning Board and the East Sussex Planning Authorities	Letter comprises the official response from the Sussex authorities to the Draft Further Alterations to the London Plan.	<p>The letter addresses three areas of concern with the London Plan;</p> <ul style="list-style-type: none"> • The need for a more robust mechanism through which London co-operates with local authorities across the South East. • The need for London to do more to meet the projected shortfall in housing supply. • Infrastructure Investment. <p>The Inspector's report concludes:</p>

	re the London Plan.		<p>'The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015. In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city.' The Mayor proposes to adopt the London Plan in 2015 and is committed to its early review in the same year.</p>
23/4/2014 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.
27/5/2014 Meeting at Lewes DC	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.
27/6/2014	Letter sent to Horsham District Council (with approval of AD and WBC Cabinet Members for regeneration).	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.
1/7/2014 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.
3/7/2014	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</p>

			to the London Plan with respect to housing shortfalls and impact for areas beyond.
31/7/2014 at Arun District Council offices	Officer meeting requested by Horsham District Council. Attended by Adur, Brighton and Hove, Worthing, Arun and Chichester.	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 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.
5/8/2014	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.
20/08/2014	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.
27/8/2014	Meeting at Portland House (Worthing) of Adur and Worthing	To further discussions on duty to co-operate based on information	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.

	and Mid Sussex planning officers and Cabinet Members with responsibility for planning for Mid Sussex and Worthing (apologies from Adur Member).	in needs template (see above). Discussed needs and capacity constraints with respect to housing, employment and gypsies and travellers. To provide Mid Sussex with more details as to type of unmet needs in Adur and Worthing.	
11/9/2014	Draft Statement of Common Ground and Duty to Co-operate Statement sent by Lewes DC.		Statement of Common Grounds signed by Adur and Worthing Members for Regeneration in November 2014. Sets out how Lewes 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. 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.
3/10/2014	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.
9/10/2014	CWS&GB SPB meeting.		Mid Sussex DC invited to be a formal member of the Board.
10/10/2014	Draft MoU 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.
11/11/ 2014	Statement of Common Ground from Lewes DC signed by Cabinet Members for Regeneration for Adur and Worthing.		Statement of Common Ground (as above) signed by Adur and Worthing Members for Regeneration.
1/12/2014	Representation sent on the Proposed Submission Adur Local Plan by Brighton and Hove City Council.		Due to the City not being able to meet its own objectively assessed housing needs and recognising that housing provision is a key cross boundary issue within the sub region, on-going co-operation with Adur District and other authorities within West Sussex and elsewhere is welcomed to address housing and other strategic planning issues. Brighton and Hove City Council confirms that constructive discussions and joint work have taken place between both authorities in particular through the sub-regional groupings

			of Coastal West Sussex Planning Board, the Greater Brighton Economic Board and Local Economic Partnership. The Council states that this work is positive and ongoing.
2/12/2014	Meeting of Adur and Worthing planning officers with Mid Sussex planning officers at Portland House.	To discuss the work MSDC commissioned on the Sustainability Appraisal of Cross Boundary Options to inform the emerging Mid Sussex District Plan.	Comments on methodology and results.
11/12/2014	Letter sent to Simon Meecham at Arun District Council in response to proposed publication draft of the Arun Local Plan.		Letter supports the Plan but outlines Adur and Worthing's housing and employment shortfalls and refers to the importance of an early review of the Arun Plan and asks if scope to bring forward an earlier consideration of the allocations at Ford, Fontwell and Littlehampton growth area.
10/12/2014	Comments sent from, Adur and Worthing officers to Claire Tester and John Cheston at Mid Sussex District Council on the work they commissioned by consultants on the Sustainability Appraisal of Cross Boundary Options (to		Useful comments sent to Mid Sussex DC on the methodology and results. Email to Mid Sussex hoped that they would find these comments to be constructive and looked forward to working with Mid Sussex as our respective Plans are progressed.

	inform the emerging Mid Sussex District Plan).		
13/1/2015	Letter sent to Claire Tester and John Cheston at Mid Sussex District Council in response to the Mid Sussex District Plan Consultation Draft.		The letter states that Adur and Worthing Councils have no substantive comments to make on the Plan noting that the Plan does not include proposed housing provision figures at this stage which will be set out in Policy DP5 in the pre-submission of the Plan once ongoing work on the housing land supply and an assessment of the unmet development needs of neighbouring authorities has been completed. The letter welcomes the joint working that there has been with Mid Sussex on this assessment and requests that these discussions be on-going and include informal consultation about the proposed housing numbers for Mid Sussex prior to the Council agreeing its pre-submission District Plan.
3/2/2015	Greater Brighton Economic Board and Coastal West Sussex and the Greater Brighton Strategic Planning Board – stakeholder event. Attended by a planning officer each from Adur and Worthing.		Workshop to consider findings of consultants NLP – the papers focussed on: City Region Economy / Housing Market / Transport and will be used to create a ‘story of place’. This will inform the refresh of the Local Strategic Statement and be used by the Greater Brighton Economic Board. Discussion focussed on DTC and strategic issues. Feedback during workshop will help to inform changes made to papers and recommended outcomes. Slides to be circulated.
2/3/2015	Horsham District	Meeting followed	Gave update on key strategic issues and recent

	Council workshop – Incorporating Strategic Issues into Local Plans.	series of earlier PAS workshops designed to facilitate Horsham’s DTC engagement with other authorities. This event followed interim findings from the Inspector examining the Horsham District Planning Framework. Both the Adur and Worthing Cabinet Members attended, plus one officer representing both Adur and Worthing.	<p>examination into the Horsham Planning Framework.</p> <p>Discussions around: How authorities can support economic growth and housing provision in the context of DTC; and what mechanisms are required to take things forward? Discussions included the value of joint evidence. Suggestion that exiting statements of common ground, etc could be updated, particularly given updated evidence base.</p>
24/03/2015	Meeting with Arun District Council officers (Neil Crowther & Karl Roberts)	Meeting called for by WBC/ADC to provide general update and consider ‘gaps’. JA & IM attended.	<p>Arun provided brief update on their position. A set of testing issues / questions had just been received from their LP Inspector and they will be considering this before deciding on their next course of action. Apart from a OAN housing work update (which GLH are currently working on) Arun are not actively progressing or assessing other options or strategies at this time as this would jeopardise their submitted LP.</p> <p>IM / JA provided an overview of the current position for WBC/ADC and explained the context of ‘needs’ and significant shortfall. IM shared an Adur briefing note. IM set out position relating to WBC commitment to progress a new LP. In the context of need / shortfall IM, using a map, illustrated the lack of opportunities / sites around Worthing and therefore the need to test positively all options. This</p>

			<p>will include the last two green field areas of any note – the Goring gaps.</p> <ul style="list-style-type: none"> • Overview provided on interest in the gaps and work being undertaken to assess them • IM explained that a brief was being prepared to consider landscape / biodiversity etc. Arun understood the need for this work to consider land within Arun and would welcome the opportunity to view the brief etc. However, this should be a WBC study as there is no appetite in Arun at this time to consider the land as potentially meeting Arun's needs (there are sites elsewhere that would be preferable to this if additional land is required). <p>The outcome of the Arun LP Examination (and others) will influence the timetable / strategic planning across the sub-region. Agreed to keep each other informed of progress – particularly in relation to the gaps.</p>
4/6/2015	Workshop hosted by Horsham DTC and Coast to Capital LEP. Range of attendees including LPA officers.	Main aims; to consider emerging findings of Coast to Capital Infrastructure Study, (work undertaken to present growth agenda to Government). as well as updates on emerging WSCC and other studies.	Dissemination of information regarding early findings of C2C Infrastructure Study; role of WSCC Place Plans and Growth Plans; discussions around how LEP can compete with others to achieve growth.
5/6/2015	Meeting between	To update on progress	Mid Sussex updated that consultation will take place 12 th

	Mid Sussex DC, Adur DC and Worthing BC (officers).	with plan progression and DTC issues.	June- 24th July 2015 (intending to submit in Autumn and undertake examination in winter). Using recent CLG projection figures (no market adjustments). Recent Inspector's advisory visit seemed positive. Worthing updated regarding new LDS, progression of CIL and emerging evidence base (inc OAN update). Adur updated regarding progression of Local Plan, addressing G&T needs, and OAN update).
29/6/2015	CWS and Greater Brighton Planning officers Group Meeting.	Discuss NLP reports.	Catrionna Riddell presents overview of work to progress LSS2.
13/7/2015	CWS and Greater Brighton Strategic Planning Board Meeting		Horsham DC invited to be a formal member of the Board. Catriona Riddell presents overview of work to progress LSS2 with nod towards LSS3.
July 2015	WBC/ADC & MSDC.	Revised MOU agreed and submitted prior to close of MSDC consultation period.	Signed copy received 23/07/15
July 2015	WBC/ADC & Mid Sussex DC.	MoU Drafting	Work being progressed on the drafting of MoU
Aug 2015	WBC/ADC & Horsham DC.	Update.	General update relating to current position and identified needs was sent in response to a request for projects to add to the HDC Infrastructure Schedule (to inform their IDP).

Sep 2015	CWS&GB Planning and Economic Development officer workshop.	Refresh of LSS	Presentation of LSS refresh by Catriona Riddell. Discussion around amended and new spatial priorities.
Sep 2015	CWS and Greater Brighton Planning officers Group Meeting.	Discuss Terms of Reference / MOU and LSS Refresh report	Revisions to be made to be various documents to then be considered by SPB. Key discussion was around the 'hooks' in LSS which will help to act as a stepping stone to LSS3.
Oct 2015	DTC Meeting with Arun DC (WBC & ADC.) IM / MH / NC / KB	Update meeting.	Update provided by all parties on current position. Shortfall explained for Worthing and Adur. Arun examination currently on hold and further evidence being collected – including on 'Ferring East'. Arun officers were invited to the Worthing landscape presentation by H&D on 20 th Oct.
Oct 2015	CWS & GB Strategic Planning Board Meeting.		Consideration of LSS2 (election of new Chair - Cllr B Turner).
Oct 2015			Officer response to Arun OAN consultation sent. OAN not challenged but the opportunity was taken to flag up expected levels of housing shortfall.
28/10/2015	Representation made to SDNP Local Plan Reg 18 Consultation.		Officer level response (joint Adur and Worthing Councils) made. Indicated housing shortfalls experienced by A&W Councils, suggested that sites allocated on edge of National Park, abutting boundary may relate better to A&W HMA and should perhaps be considered as contributing to A&W housing figures; also made some site-specific comments.
12/11/2015 and	Coastal West	To consider proposed	Range of Stakeholders from updated LAA area, (plus

15/12/2015	Sussex and Greater Brighton LSS workshop: Refresh of Strategic Objectives and Spatial Priorities.	changes to LSS refresh.	wider), including officers and members, wider agencies such as JCA, also Surrey CC and East Sussex representatives. Discussion around proposed amendments; further revisions suggested. Made clear that LSS2 is a 'refresh'.
14/1/2016	Representation made to Mid Sussex DC	MOU updated	Representation (and MOU) made to MSDC focussed amendment consultation.
18/1/2016	CWS&GB Strategic Planning Board meeting.	To agree changes made to LSS refresh.	Board agreed to return refreshed LSS to respective LPAs for formal adoption. Next meeting to consider scope of LSS3.
21/1/2016	Meeting with Arun officers.	Update meeting	IM met with Arun officers to provide summary of key issues and emerging landscape study findings for Worthing. See note of meeting.
25/1/2016	MoU with Mid Sussex DC.		Signed version of Jan 2016 MoU update exchanged.
February/March 2016	MoU between Adur DC and Worthing BC drafted.	This MoU aims 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 two	Both authorities have communicated their unmet needs to each other and also to other local authorities within the Housing Market Area and beyond. The main strategic issues (where there are unmet needs) are housing, employment and jobs, and (with respect to Adur) gypsy and traveller needs. However, many of the Local Plans in the area are at advanced stages with some recently adopted and others are post examination and approaching adoption. In the meantime, liaison continues with Arun, Mid Sussex and the South Downs National Park Authority. Also, a

		<p>authorities. The MOU aims to set out the context and basis for co-operation and the principles of agreement in progressing the Adur and Worthing Local Development Plans. Although the two authorities have a long history of joint working and partnership (with merged services) and have common spatial issues and constraints, the Councils remain separate political administrations and it is therefore necessary to have an approved MOU in place between the two authorities.</p>	<p>number of joint measures to help housing and employment delivery are on-going via the CWS&GB Strategic Planning Board and the Greater Brighton Economic Board with discussions taking place on the need to progress a full review of the Local Strategic Statement and other measures to address unmet needs.</p> <p>The MOU states an agreement that the two 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>
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Appendix 3

Details of needs (shared with relevant local planning authorities in 2014)

ADUR – September 2014⁷

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

A. No (please complete table below)

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).	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?)	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).	Who else have you approached to meet these unmet needs?	What would be the implications for your area if these needs were not met?
Housing The Objectively Assessed Housing Need for Adur (Coastal West Sussex Housing Needs study of April 2014) is assessed as between 180-240 homes per	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-	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.	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.	Failure to meet Adur's OAN would be likely to result in the following: <ul style="list-style-type: none"> • A more acute level of those in housing need.

⁷ To note that the figures in the table relating to housing provision and gypsy and traveller pitch needs are as at September 2014 but have been up-dated since this date as detailed in section 3 of this Statement

<p>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</p>	<p>182 per 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 shortfall.</p>	<p>With regards to where in Mid Sussex the need for 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 of commuting patterns, transport impacts,</p>	<p>A number of joint studies 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 & 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 and</p>	<ul style="list-style-type: none"> • An increase in overcrowding / household suppression. • Increased demand for housing available will increase prices / rents which would then impact on affordability ratios. • Suppressed economic growth if an element of the labour force cannot be housed. • There would be less opportunity to deliver the type of housing to meet identified need (family housing / older people etc). • 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
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<p>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>In terms of the type of housing required, the 2012 CWS SHMA indicates that the main need is for family housing.</p>		<p>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.</p> <p>Active and 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.</p>	<p>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 Plan to ensure that the Capital provides</p>	<p>and the viability of services.</p> <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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			sufficient housing and to reduce pressures on those LPAs within the wider market area and within commuting distance.	
<p>Gypsies and Travellers – public pitches</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 a new roundabout to serve an adjacent strategic allocation as well as land raising of the Withy Patch site to bring it out</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, 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</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 National Park.</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>

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.		confirm this.		
<p>Employment</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 period. This includes 18,750 sq m to be relocated from Shoreham Harbour and expected to be provided within Adur. However, due to capacity</p>	There is no specific time period identified for where shortfalls are greater.	<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 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</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 employment land needs, constraints and opportunities across the sub-region(s).</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 of the area, less opportunities for up-skilling of the

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.		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 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.		workforce etc.
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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. 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 co-operate – 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 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 500,000ft² 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.


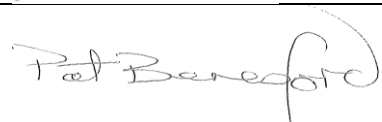
Agreement

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:19/9/14	Horsham District Council
Signed: Adur Cabinet Member for Regeneration		Dated: 10/10/14	Adur District Council

Duty to Cooperate

Memorandum of Understanding – January 2016

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.

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“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. There was public consultation on this draft Plan from November 2014 until January 2015. It was published in June 2015 and will be submitted to the Secretary of State in early 2016 following public consultation on a schedule of 'focused amendments' to the Plan from November 2015 until January 2016.

Mid Sussex District Council is also preparing a Traveller Sites Document for the period to 2031. There was a public consultation on this draft document in August/September 2014 and it is anticipated that it will be published in 2016 following further appraisal of potential suitable sites.

Adur District Council

Adur District Council published the Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014. Due to issues raised in relation to certain strategic sites, a brief regulation 18 exercise is being carried out from 9th December 2015 - 4th January 2016. This will be followed by proposed Amendments to the Proposed Submission Adur Local Plan 2014, which are likely to be published in early spring 2016 (Regulation 19) and submitted summer 2016.

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. The Council has adopted a revised Local Development Scheme (April 2015) which sets out a timetable for the progression of a new Local Plan to be

adopted in 2018. The Council's evidence base is currently being updated to inform the new Local Plan.

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:

- all three authorities are partners in the Coastal West Sussex and Greater Brighton Strategic Planning Board and are members of the Greater Brighton Economic Board and parties to the City Deal
- 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' meetings (1st July 2014, 4th December 2014, 2nd February 2015, 5th June 2015)
- Regeneration/Planning Portfolio Holders' meeting (27th August 2014)

Outcomes

Mid Sussex

Housing

Consultants commissioned by MSDC have undertaken a sustainability assessment of cross boundary options for the Mid Sussex District Plan and, as part of this process, MSDC wrote on the 5th August 2014 to neighbouring local planning authorities, including Adur & Worthing Councils, to establish whether they have unmet needs that they are seeking assistance with, and the detailed nature of any such needs. Adur & Worthing Councils responded on 20th August 2014 to say that

both Councils had housing needs which were not capable of being met internally within each District/Borough.

The results of the sustainability assessment were shared with the neighbouring authorities including Adur & Worthing Councils. MSDC has also shared the results of its updated work on housing need and supply. This evidence was revised in November 2015 and indicated an objectively assessed housing need of 695 homes per annum 2014-2031 and a potential supply of 800 homes per annum over the same period. The sustainability assessment advises that any supply in excess of local need (currently 105 homes per year) is most likely to be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex.

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.

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 Study was updated in 2015. This assessed Adur's need for housing as 291 dwellings per annum, which equates to 5820 dwellings over the plan period (2011-2031). (Previous work had indicated a requirement of 180-240 dwellings per annum, or 3,600-4,800 over the plan period.) In setting a delivery figure for the emerging Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and total 2531 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 1080 dwellings. In total 3611 dwellings can be delivered over the Plan period which equates to an annual average of 181 dwellings. Consequently, a shortfall of approximately 2200 dwellings remains against the full objectively assessed need figure over the Plan period. (These figures will form part of the proposed Amendments to the Proposed Submission Adur Local Plan 2014 which will be taken to Council in March 2016, and subsequently tested at Examination later that same year.) The details of this shortfall have been provided to Mid Sussex District Council.

Gypsy and Traveller Accommodation

The need in Adur is for 4 public pitches for Gypsy and Traveller accommodation (1 during the period 2012-17; 1 between 2018-22; and 2 between 2023-27). The Council is investigating the potential to address these needs but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation, as well as land raising to bring it out of flood zone 3. Until further work is undertaken to assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is

difficult to quantify. A separate Development Plan Document is timetabled after the adoption of the Adur Local Plan in early 2017 to progress this site.

In addition, one Travelling Showperson's plot is required in the period up to 2027.

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.

The Worthing Housing Study (June 2015) indicates that the Objectively Assessed Housing Need for Worthing (2013-2033) is 636 dwellings per annum. This is significantly higher than the level of housing currently planned for. As such, the Council now needs to assess all options to meet that need as part of the review of the Core Strategy. A timetable for the preparation of a new Local Plan for the Borough has been set within a revised Local Development Scheme (April 2015).

A full and positive review of the SHLAA has been 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

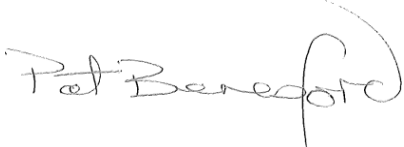


With regard to employment, the Worthing Core Strategy indicated a need to provide 780,000 sq ft of industrial and warehousing floorspace and 240,000 sq ft of office

space up to 2026. The 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 has been commissioned in July 2015. 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: January 2016</p>	<p>Signed:</p>  <p>Bryan Turner Cabinet Member for Regeneration, Worthing BC Dated: January 2016</p>	<p>Signed:</p>  <p>Andrew MacNaughton Cabinet Member for Planning Mid Sussex DC Dated: 19th January 2016</p>
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Duty to Cooperate

Memorandum of Understanding – March 2016

Parties to the Agreement

The Agreement involves the following local planning authorities:

- Adur District Council
- Worthing Borough 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.

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“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.”

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“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 authorities – Adur and Worthing. 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 two authorities.***

The two authorities have a long history of joint working and partnership and particularly over the last 10 years where this has become formalised:

- All services of the two Councils are merged, with officer teams working jointly to cover both Adur and Worthing. Since 2010, the Planning Policy team (managed by one Executive Head) has worked jointly on Adur and Worthing planning issues, projects, studies and policy/advice documents. Staff within the team work across Adur and Worthing projects depending on service priorities and staff availability / skills.
- A number of policy documents are jointly produced with shared methodology (albeit covering separately Adur and Worthing). Examples include Strategic Housing Land Availability Assessments , Open Space Studies and the Annual Monitoring Reports. There is also an approved joint Statement of Community Involvement - a single document covering both Adur and Worthing.
- Joint responses (although covering two separate areas) have been made and will continue to be made into a number of strategic documents including the Local Strategic Statement (and joint evidence studies to support this), the Strategic Economic Plan for the Coast to Capital LEP, the Greater Brighton City Deal and Devolution proposals. Joint responses are also submitted on Government consultations.
- The team works jointly on the separate development plans - progressing evidence studies (albeit these usually cover Adur and Worthing separately) for housing, open space and gypsy and traveller accommodation needs, sustainability appraisals, policy writing and progressing the Duty to Co-operate. The latter work is supported by joint attendance by officers in the team representing both Adur and Worthing at meetings with other local authorities and workshops. Representations to neighbouring authority plans are made jointly as is the progression of MoUs and Statements of Common Ground.

- There is a Joint Strategic Committee of Adur and Worthing Members which makes decisions on key policy documents, including Local Development Plans. This has enabled not only a greater understanding and appreciation of the spatial and planning issues across both authorities, but has also built up a good foundation for joint working and decision making. Whilst there are two separate Executive Members with responsibility for planning in their areas, they have a good working relationship, attending together meetings, workshops and conferences. They also sit together on various boards and committees (see below). They also jointly sign MoUs and Statements of Common Ground which have been used to demonstrate effective cross boundary working arrangements with other local planning authorities.

As such, the knowledge and understanding (built up over the years) within the planning team and at Member level of issues impacting on both authorities is significant and unique within the sub regional area. However, because the Councils remain separate political administrations with a Portfolio Member for each authority responsible separately for Adur and Worthing, it is necessary to have an approved MoU in place between the two authorities. This MoU aims to set out the context and basis for co-operation and the principles of agreement in progressing the Adur and Worthing Local Development Plans, in line with Government policy and advice on the duty to co-operate.

Working Arrangements

Whilst the Councils are separate political administrations, they are jointly involved in a variety of bodies set up to address strategic issues for the Coastal West Sussex and Greater Brighton area with the aims of securing economic growth, more housing as well as improved and new infrastructure provision. Both authorities share common planning issues and problems including the difficulty of providing new homes to meet future needs within a highly constrained environment and with infrastructure problems, particularly in relation to transport. ***The recognition of this as well as the need to find solutions has fostered a culture of partnership and a willingness to work together and ‘make things work’.*** The authorities are represented and participate together on the following strategic bodies and projects:

- The Coast to Capital LEP (Adur and Worthing Council Leaders are members of the Greater Brighton Economic Board set up to agree and implement the Strategic Economic Plan for the LEP)
- The Greater Brighton City Deal (together with Brighton and Hove, Lewes, Mid Sussex and East and West Sussex County Councils)
- The Greater Brighton Devolution Proposals
- Greater Brighton Economic Board (progressing City Deal, Devolution and the Strategic Economic Plan for the coastal area)

- The Coastal West Sussex Partnership (an economic partnership of business and public sector leaders and also including Members from Arun, Chichester and West Sussex County Councils)
- The Coastal West Sussex and Greater Brighton Strategic Planning Board (set up to address strategic planning issues and also including Members from Brighton and Hove, Chichester, Horsham, Lewes, Mid Sussex, West Sussex County Council and the South Downs National Park) with agreed MoU and Terms of Reference
- The Coastal West Sussex and Greater Brighton Local Strategic Statement 2013 and refreshed in 2016 (commissioned and approved by the above Strategic Planning Board) which sets out the long-term, integrated strategic planning and investment priorities for the area
- A number of officer working groups to inform the above bodies and their work

In addition to the above, both authorities (officers and Executive Members) have been and continue to be represented at duty to co-operate meetings with other local authorities in the CWS and GB area. As an example, they have participated jointly in the duty to co-operate workshops organised by Horsham District Council in July 2013, March 2014 and March 2015.

Adur and Worthing have jointly signed separate MoUs with Horsham District and Mid Sussex District Council. They have also jointly signed a Statement of Common Ground with Lewes District Council and the South Downs National Park Authority and similarly with Brighton and Hove City Council.

Formal consultation has taken place at appropriate stages as the respective local plans have progressed.

Both Adur and Worthing have jointly inputted into a number of evidence studies (and workshops) to support the Local Strategic Statement – in relation to housing, the economy and transport. Both authorities are working with WSCC and Highways England on proposals to improve the A27 and its junctions. This work has enabled a greater mutual understanding of the issues for both authority areas.

Current Local Plan Position

The current position with the Adur and Worthing Local Plans is as follows:

Adur District Council

Adur District Council published the Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014. Due to issues raised in relation to the strategic site allocation at New Monks Farms, a brief regulation 18 consultation exercise was carried out from 9th December 2015 - 4th January 2016. This will be followed by 'Amendments to the Proposed Submission Adur Local Plan (2016)',

which are likely to be published 31st March - 11th May 2016 (Regulation 19) and submitted July 2016.

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. A second Regulation 18 consultation exercise is proposed on the Area Action Plan in the summer of 2016.

Worthing Borough Council

Worthing has an adopted Core Strategy to cover the period up to 2026. However, significant changes to the planning system has meant that a review of the Core Strategy is required. The Council has adopted a revised Local Development Scheme (April 2015) which sets out a timetable for the progression of a new Local Plan to be adopted in 2018. The Council's evidence base is currently being updated to inform the new Local Plan and an Issues and Options consultation is expected to be published in May 2016.

Strategic Planning Issues

The following have been identified as current cross-boundary strategic planning issues relevant to Adur and Worthing 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 consequent congestion problems.

Outcomes

Adur

Housing

The Objectively Assessed Housing Need Study for Adur was updated in 2015. This assessed Adur's need for housing as 291 dwellings per annum, which equates to

5,820 dwellings over the plan period (2011-2031). (Previous work had indicated a requirement of 180-240 dwellings per annum, or 3,600-4,800 over the plan period). In setting a delivery figure for the emerging Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and total 2,531 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 1,080 dwellings. In total, 3,611 dwellings can be delivered over the Plan period which equates to an annual average of 181 dwellings. Consequently, a shortfall of approximately 2200 dwellings remains against the full objectively assessed need figure over the Plan period. (These figures will form part of the Amendments to the Proposed Submission Adur Local Plan 2016 which will be published in March 2016, and subsequently tested at Examination later the same year). The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

Gypsy and Traveller Accommodation

The need in Adur is for 4 public pitches for Gypsy and Traveller accommodation (1 during the period 2012-17; 1 between 2018-22; and 2 between 2023-27). The Council is investigating the potential to address these needs but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation, as well as land raising to bring it out of flood zone 3. Until further work is undertaken to assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is difficult to quantify. A separate Development Plan Document is timetabled after the adoption of the Adur Local Plan in early 2017 to progress this site.

In addition, one Travelling Showperson's plot is required in the period up to 2027. The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

Employment

The 2014 Adur Employment Land Review indicates that the Adur Local Plan should make provision for between 15,000 to 20,000m² net for offices and R&D, and between 35,000 and 40,000 m² for warehousing over the 2011 and 2031 period. This includes 18,750m² 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 41,000m² for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required. The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

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 – work to address this is well under way.

The Worthing Housing Study (June 2015) indicates that the Objectively Assessed Housing Need for Worthing (2013-2033) is 636 dwellings per annum. This is significantly higher than the level of housing currently planned for. As such, the Council now needs to assess all options to meet that need as part of the review of the Core Strategy. A timetable for the preparation of a new Local Plan for the Borough has been set within a revised Local Development Scheme (April 2015).

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

Although the review of greenfield sites 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. The details of this shortfall have been provided to Adur District Council and discussed as the local development plans progress.

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 780,000ft² of industrial and warehousing floorspace and 240,000ft² of office space up to 2026. The Worthing Employment Land Review Update (December 2013) concluded that the Council's protectionist policy towards the retention of employment land was 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. The details of this shortfall have been provided to Adur District Council and discussed as the local development plans progress.

As part of the full review of the Council's Core Strategy, a new Employment Land Review was commissioned in July 2015. When published in spring 2016, 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.

Summary of outcomes

Both authorities share common planning issues and problems including the difficulty of providing new homes and employment floorspace to meet future needs within a highly constrained environment and with infrastructure pressures. Both local authorities are constrained to meet their full objectively assessed housing and employment needs. Adur may also have a small Gypsy and Traveller

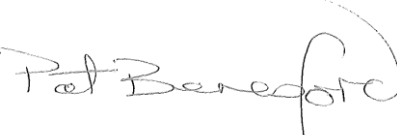

accommodation shortage subject to further work on the relocation of the Withy Patch site.

The knowledge and understanding between the two Councils of issues and constraints impacting on both authorities is significant and probably unique within the sub regional area. The recognition of the common constraints each authority faces and the inability to meet objectively assessed development needs places a great importance on finding solutions through partnership and joint working. This has meant that both Adur and Worthing Councils have placed emphasis on working with those authorities elsewhere which have a more realistic prospect of helping to meet those needs.

Both authorities have communicated these unmet needs to each other and also to other local authorities within the Housing Market Area and beyond. However, many of the Local Plans in the area are at advanced stages with some recently adopted (e.g. Crawley and Horsham) and others are post examination and approaching adoption (Lewes and Brighton and Hove City). In the meantime, liaison continues with Arun, Mid Sussex and the South Downs National Park authority. Also, a number of joint measures to help housing and employment delivery are on-going via the CWS&GB Strategic Planning Board and the Greater Brighton Economic Board with discussions taking place on the need to progress a full review of the Local Strategic Statement and other measures to address unmet needs.

Ongoing Cooperation

It is agreed that the two 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.

Signed:  Pat Beresford Cabinet Member for Regeneration, Adur DC Dated: March 2016	Signed:  Bryan Turner Cabinet Member for Regeneration, Worthing BC Dated: March 2016
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Brighton and Hove City Council

Provision of Housing – A Statement of Common Ground

This agreement is between:

- Brighton & Hove City Council
- Adur District Council
- Arun District Council
- Chichester District Council
- Crawley Borough Council
- Eastbourne Borough Council
- Horsham District Council
- Lewes District Council
- South Downs National Park Authority
- Wealden District Council
- Worthing Borough Council

1. Context

- 1.1 The Localism Act 2011 and the National Planning Policy Framework 2012 (NPPF) place a Duty to Cooperate on local planning authorities (LPAs) and other prescribed bodies to address strategic planning issues relevant to their areas in the preparation of Development Plan Documents and other Local Development Documents.

2. Purpose of the Statement of Common Ground

- 2.1 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 cooperation on strategic issues in the future.

3. Housing Market Area

- 3.1 Research has shown that housing market areas operate as a layered system of tiers and that it is not possible to precisely define the boundary of a specific housing market area due to the variety of methodologies that can be used⁸. Therefore a number of different permutations can potentially exist as Brighton & Hove's housing market area.
- 3.2 Brighton & Hove's local housing market area has been defined as encompassing the city together with the districts of Adur and Lewes⁹. The City Council considers that Brighton & Hove is unable to meet its objectively assessed housing need, and this will be tested at the City Plan Examination hearings. This local housing market area was the first considered by the City Council in seeking to locate the unmet need. As Adur and Lewes both face similar constraints and consider that they are also unable to meet their own objectively assessed needs, it was then necessary to consider broader strategic housing market areas.

⁸ Geography of Housing Market Areas Final Report, DCLG (2010)

⁹ Brighton & Hove Strategic Housing Market Assessment, DTZ (2008),

- 3.3 In the now revoked South East Plan a Sussex Coastal housing market area is illustrated as one area extending from Bognor Regis to Lewes/Seaford and centred on Brighton and Hove¹⁰. This is not to suggest that Bognor Regis is in the same housing market as Lewes, but that the housing markets in this coastal strip overlap to such a degree that one cannot draw sensible boundaries. Within this broad area a distinct Brighton Strategic Housing Market Area (SHMA) exists, potentially stretching from Newhaven in the east to Southwick in the west¹¹.
- 3.4 Broader SHMAs centred on Brighton & Hove have been identified more recently, as follows:
1. A Coastal Sussex SHMA stretching from Seaford in the east along the South Coast to East Wittering, and extending inland into the South Downs National Park to settlements such as Lewes and Midhurst¹². This SHMA covers the administrative areas of Chichester, Arun, Adur, Worthing, Brighton & Hove and Lewes.
 2. An alternative approach is a potential SHMA based on Brighton & Hove, Adur, Worthing, Horsham, Mid Sussex, Crawley, Lewes, Wealden and Eastbourne¹³.

4. Compliance with the Duty to Cooperate

- 4.1 In the absence of government guidance and but taking account of evidence arising from inspectors reports into Local Plans, along with the timescale for producing the City Plan, the City Council took a pragmatic approach to addressing the Duty to Cooperate issue by considering all the possible housing market areas detailed above, which led to some duplication.
- 4.2 A Coastal West Sussex Partnership (CWSP) had previously been set up to strengthen the coastal economy. The CWSP brings together business and the public sector to work across traditional boundaries and form the foundations of future infrastructure and growth. This existing partnership has been used to address Duty to Cooperate issues (see section 5 below) and a member level Coastal West Sussex Strategic Planning Board has been set up. Lead planning members for all the constituent authorities sit on the board, however the Board has no powers and decisions made have to be ratified by the individual authorities.
- 4.3 Additionally, the City Council has instigated a series of meetings specifically to address the Duty to Cooperate, to which all Local Planning Authorities that comprise the alternative potential SHMA detailed above in paragraph 3.4 were invited. These meetings facilitated constructive cooperation with the other authorities, in addition to existing mechanisms of cooperation such as consultation responses. The meetings were held with the purpose of establishing an overall picture of housing need over the sub-region and whether any LPAs had capacity to accommodate unmet demand from areas that were unable to meet their own needs, in particular Brighton & Hove.

¹⁰ South East Plan (2009), diagram H1.

¹¹ Brighton & Hove Strategic Housing Market Assessment, DTZ (2008), paras 2.10 and 2.11.

¹² Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012), para 2.34

¹³ Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012), para 2.10

- 4.4 The authorities agree that a series of planning officer meetings took place specifically to discuss the Duty to Cooperate:

Date	Attendees
June 18 2012	Brighton & Hove; Adur; Crawley; East Sussex; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs; Worthing; West Sussex
September 6 2012	Brighton & Hove; Adur; Horsham; Lewes; Mid Sussex; South Downs; Worthing
December 6 2012	Brighton & Hove; Adur; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs; Worthing

- 4.5 All nine authorities were invited to all three meetings. Wealden indicated that they wished to attend but were not able to due to previous commitments, but did receive any papers. The two County Councils were invited only to the first meeting but were copied in on papers. Any authority who did not attend only did so as they had no availability rather than lack of interest.

- 4.6 These meetings have been well attended by senior officers from all authorities that are considered to be within Brighton & Hove's SHMA, and took place with the intention of reaching agreement. Further meetings have also taken place, at both officer and member level, with individual LPAs adjoining Brighton & Hove to discuss more specific issues¹⁴. The following member level meetings have taken place:

Date	Attendees
7 th December 2012	Brighton & Hove, Mid Sussex
21 st January 2013	Brighton & Hove, Lewes
18 th April 2013	Brighton & Hove, Adur, Worthing
17 th May 2013	Brighton & Hove, Horsham

- 4.7 A formal request was made by the City Council to all other LPAs within this SHMA that they consider the extent to which they are able to assist in accommodating the unmet demand from Brighton & Hove. This was approved at member level at the City Council's Economic Development Committee on 20 September 2012. Following this request, no LPAs indicated they were able to assist in meeting Brighton & Hove's unmet need at the present time.
- 4.8 The Duty to Cooperate Compliance Statement produced to demonstrate that the City Plan has been produced in accordance with the Duty to Cooperate has been circulated to the other local planning authorities and no concerns have been raised. This document details the numerous other cross boundary and joint partnership relationships existing in the Brighton & Hove sub-region which have informed the preparation of the City Plan.
- 4.9 The authorities agree that cooperation is an ongoing process and dialogue will therefore continue to address this issue. Where a LPA has an unmet objectively assessed housing need, the LPA should demonstrate why and to what degree it cannot

¹⁴ Duty to Cooperate Compliance Statement, Appendix 2.

meet the need prior to approaching other appropriate authorities with regard to accommodating the unmet need.

5. Housing Requirements for the Coastal West Sussex Sub-Region

- 5.1 The Coastal West Sussex Strategic Planning Board was established with the intent of identifying the extent of housing need and looking at options to meet it. To facilitate cross-boundary cooperation in addressing the issue, a joint Housing Duty to Cooperate Study has been produced by the local authorities that comprise the Coastal West Sussex Strategic Planning Board¹⁵, as well as Lewes District Council.
- 5.2 The Study pulls together evidence from a range of individual studies produced by each authority to provide a consistent and objective assessment of housing requirements in each authority and across the Coastal Sussex Housing Market Area (see paragraph 3.4 above) addressing the need and demand for market and affordable housing.
- 5.3 The Study demonstrates that it is highly unlikely that the level of required housing development can be achieved across the sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the sub-region are still those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity.
- 5.4 There is agreement between the authorities that the analysis shows that, collectively, the Coastal West Sussex authorities are unable to meet their assessed housing requirements. The analysis suggests that it would be feasible to accommodate a maximum of 75% of assessed development needs in the sub-region based on current evidence¹⁶. A significant shortfall equivalent to at least around 485 dwellings per year arises¹⁷.
- 5.5 The most significant likely shortfall against assessed needs is expected to arise in the centre of the sub-region in the City of Brighton and Hove, Lewes District, Adur and Worthing. This is a function of geography with limited development potential in areas between the National Park and the sea, and in some cases very tightly drawn administrative boundaries around the existing urban areas.
- 5.6 This is a similar situation to that which existed during the preparation of the South East Plan. Levels of housing provision proposed for the sub-region in the South East Plan were at least 27-30% below demographic projections¹⁸.
- 5.7 The Study recommends that the Strategic Planning Board consults on the findings of the report with the relevant statutory bodies to which the Duty applies. Once this has

¹⁵ Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council and the South Downs National Park Authority.

¹⁶ Housing Duty to Cooperate Study, GL Hearn (2013), para. 6.13

¹⁷ If the median requirement figures are used this rises to 740 per year.

¹⁸ Housing Duty to Cooperate Study, GL Hearn (2013), paras. 3.36 to 3.38

been undertaken the Board will seek further engagement with other adjoining authorities in accordance with the Duty to Cooperate.

- 5.8 The Coastal West Sussex Partnership is also in the process of producing a Local Strategic Statement (LSS). The LSS will establish a strategic context and develop a clear set of ambitions for growth across the area to bring about a shared set of long term objectives that all partners are working towards. This will include the requirement to engage with areas north of the South Downs National Park about long term growth requirements. Following a period of consultation a revised draft of the LSS will be considered at a meeting of the Coastal West Sussex Strategic Planning Board on 17th October.

Local Authority: Adur and Worthing Councils

Signed:

A handwritten signature in dark ink, appearing to read 'C Blackett', with a stylized, cursive script.

Print Name: Colette Blackett

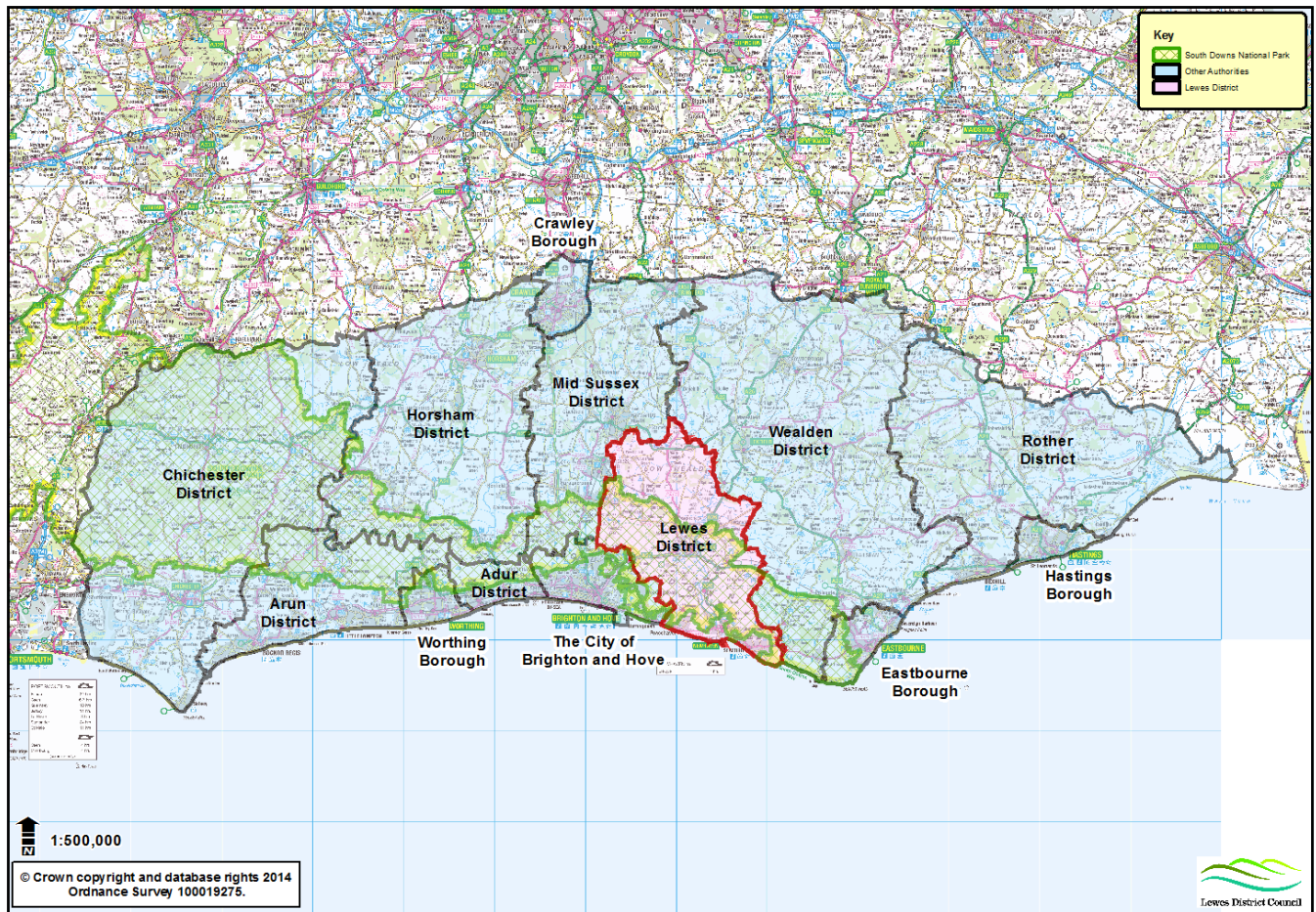
Date: 23/9/13

Duty to cooperate: Statement of common ground
Cross-boundary working and meeting housing needs

This agreement is between:

- Lewes District Council
- South Downs National Park Authority
- Adur District Council
- Arun District Council
- Brighton and Hove City Council
- Chichester District Council
- Crawley Borough Council
- Eastbourne Borough Council
- Hastings Borough Council
- Horsham District Council
- Mid Sussex District Council
- Rother District Council
- Wealden District Council
- Worthing Borough Council

Map 1: Lewes district in context



1. Background

- 1.1 Section 110 of the Localism Act 2011 places a legal duty on local planning authorities and other prescribed bodies to cooperate with each other on strategic planning matters insofar as they are relevant to their administrative areas throughout the preparation of their development plan documents. The National Planning Policy Framework (NPPF) 2012 reiterates this duty and requires an independent inspector to assess whether the development plan they are examining has been prepared in accordance with the duty to cooperate.
- 1.2 It is expected that engagement and cooperation will be constructive, active and ongoing in order to maximise effectiveness throughout plan preparation as well as implementation, delivery and subsequent review. The national Planning Practice Guidance confirms that this is not a duty to agree but that local planning authorities should make every effort to secure the necessary cooperation on cross-boundary strategic matters before submitting development plan documents for examination. The examination will test whether the duty has been complied with.

2. Purpose

- 2.1 This statement of common ground sets out how Lewes District Council and South Downs National Park Authority have actively and positively sought to comply with the duty to cooperate in the preparation of the Joint Core Strategy development plan document on strategic planning matters, with the main cross-boundary factor affecting Lewes district being housing provision.
- 2.2 A summary of the processes and meetings undertaken with all relevant organisations in undertaking the duty is set out in the associated submission document Joint Core Strategy: Duty to Cooperate Compliance Statement (August 2014). Other relevant information on seeking to meet housing need in Lewes district is explained in the Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
- 2.3 This statement also describes the established mechanisms for ongoing cooperation on strategic matters.

3. Housing Market Area (HMA)

- 3.1 Lewes district was identified in the South East Plan¹⁹ as forming part of the Sussex Coast HMA²⁰, which is focused on the city of Brighton and Hove and extends from Bognor Regis in the west to Seaford in the east. This is not to suggest that Bognor Regis is in the same housing market as Lewes, but that the housing markets in this coastal strip overlap to such a degree that distinct boundaries cannot be defined. The extent of this HMA was reconfirmed in the Strategic Housing Market Assessment²¹ undertaken for the coastal West Sussex authorities in November 2012.
- 3.2 Research by the Department for Communities and Local Government showed that HMAs operate as an overlapping system of tiers and that it is not possible to precisely define the boundary of a specific housing market area due to the variety of methodologies that can be used²². Therefore a number of different permutations can potentially exist as Lewes district's HMA.
- 3.3 Within the broad Sussex Coast area a distinct local HMA exists. This is focused on Brighton and Hove and exerts influence across most of Lewes district. Small parts of the district also have some overlap with the Eastbourne, High Weald and Crawley/Gatwick housing market areas, although for the vast majority of the district it is the Sussex Coast HMA that is of relevance²³.
- 3.4 Two broader strategic HMAs²⁴ have also been identified, again focused on Brighton and Hove.

¹⁹ South East Plan (2009) now revoked and archived

²⁰ South East Plan (2009), now revoked and archived, diagram H1

²¹ <http://www.arun.gov.uk/main.cfm?type=HOUSING#SHMA> 2012

²² Geography of Housing Market Areas Final Report, DCLG (2010)

²³ Housing Market Assessment of Lewes, DTZ (2008)

²⁴ Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012)

1. The administrative areas of Brighton and Hove, Lewes, Adur, Worthing, Horsham, Mid Sussex, Crawley, Wealden and Eastbourne.
 2. A broader Coastal Sussex HMA centred on Brighton and Hove stretching from Seaford along the coast to West Wittering and inland into the South Downs National Park to settlements such as Lewes and Midhurst, covering the administrative areas of Lewes, Brighton and Hove, Adur, Worthing, Arun and Chichester.
- 3.5 The District Council and National Park Authority have sought to work with all authorities forming part of the main Sussex Coast HMA, as well as those authorities in HMA's where there is a degree of overlap.

4. Meeting objectively assessed housing needs

- 4.1 Despite extensive work, the Council and SDNPA consider that, due to extensive and well documented environmental and infrastructure constraints, objectively assessed housing needs in Lewes district cannot be met within the sustainable development requirements of the National Planning Policy Framework. This position will be tested at the examination of the Joint Core Strategy.
- 4.2 In seeking to locate the unmet need elsewhere the local level HMA, whereby most of Lewes district relates intimately with Brighton and Hove, was considered first. This was followed by the wider Coastal Sussex HMA, starting with the most directly related authority areas. Unfortunately the other authorities face similar constraints to Lewes district, leaving them unable to meet their objectively assessed housing needs. It is very likely, as documented in the Sussex Coast HMA Duty to Cooperate Housing Study, that the Sussex Coast authorities will be unable to meet the combined housing need of the Sussex Coast HMA.
- 4.3 A 'no stone unturned' programme of additional work, seeking to reduce the gap between the district's identified housing capacity and its housing needs for the plan period, was agreed by the council's Cabinet. This work led to some focussed amendments to the proposed submission version of the Joint Core Strategy, including an increase in the proposed housing target from 4,500 to 5,600. Relevant information on seeking to meet housing need in Lewes district is explained in the paper, Justification for the Housing Strategy²⁵.
- 4.4 As, to date, neighbouring authorities and those authorities making up the Sussex Coast HMA have been unable to identify any potential to help meet Lewes district's housing needs, broader strategic housing areas and routes to more innovative solutions for meeting the collective strategic housing need have been explored and implemented.

²⁵ Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
http://www.lewes.gov.uk/Files/plan_HBP_May_2014.pdf

5. Compliance with the duty to cooperate

- 5.1 In the absence of government guidance (at the time) but taking account of evidence arising from Inspectors reports into Local Plans, together with the need to continue to progress the Joint Core Strategy, the council and SDNPA, together with partner authorities in the Sussex Coast HMA, took a pragmatic approach to addressing the Duty to Cooperate. This approach is considered to be consistent with the Planning Practice Guidance on the Duty to Cooperate, which was published in March 2014 after the cross-boundary cooperative working was already underway.
- 5.2 A Coastal West Sussex Partnership had previously been set up to strengthen the coastal economy, bringing together businesses and the public sector to work across administrative boundaries and form the foundations for future infrastructure delivery and growth. This existing partnership has been widened to include LDC and SDNPA as partners on the Coastal West Sussex and Greater Brighton Strategic Planning Board. Lead planning members for all the constituent authorities sit on the Board, which has an advisory remit and decisions made need to be ratified by the individual planning authorities.
- 5.3 The Strategic Planning Board is in place to:
- Identify and manage spatial planning issues that impact on more than one local planning areas across the Coastal West Sussex and Greater Brighton area; and
 - Support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area.
- 5.4 The Board has signed a memorandum of understanding²⁶ and agreed terms of reference²⁷ as a framework for cooperation. It has also a Local Strategic Statement²⁸ which sets out the long term strategic objectives for the period 2013-2031 and the spatial priorities for delivery in the medium term to support the delivery of regeneration, jobs and homes while protecting the high quality environment. It is proposed that the Local Strategic Statement will be reviewed and refreshed in October 2014.
- 5.5 Collaborative working among planning officers across East Sussex has been long-established through the channels of the Planning Liaison Group (chief planning officers), East Sussex Local Plan Managers Group and the East Sussex Development Management Forum. In addition, the East Sussex Strategic Planning Members Group (ESSPMG) was set up in 2013 to enhance and endorse cooperation at the political level. The group consists of the portfolio holders for planning assisted by officers from all local authorities in East Sussex, including SDNPA.

²⁶ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

²⁷ <http://www.coastalwestsussex.org.uk/wp-content/uploads/CWS-Strategic-Planning-Board-TOR-Oct-13-Final-Version.pdf>

²⁸ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-LSS-for-CWS-Gtr-Brighton-30-Jan-14.pdf>

- 5.6 All ESSPMG member authorities are signatories to a memorandum of understanding, which was drawn up to formalise and give direction to ensure active, constructive and ongoing joint working arrangements. The memorandum of understanding sets out the group's key purposes as raising awareness of cross boundary issues; and to explore any matters of concern to understand how they are affecting development and/or delivery of plans. Although the ESSPMG is primarily for East Sussex authorities, it is recognised that strategic planning issues do not constrain themselves to county boundaries and therefore neighbouring authorities attend meetings of the group if an issue is being explored that is relevant to that authority area.
- 5.7 Additionally the council and SDNPA have instigated or attended many meetings and events specifically or indirectly to address matters relevant to the duty to cooperate. A schedule of key meetings and joint-working, and their key outcomes, with local planning authorities and other organisations subject to the duty to cooperate is set out in Appendix 1 of the Duty to Cooperate Compliance Statement. These have facilitated constructive and active cooperation with the other authorities, in addition to existing mechanisms of cooperation such as consultation responses. These meetings include those held with the purpose of establishing an overall picture of housing need across the sub-region and determining whether any local planning authorities had spare capacity to accommodate unmet needs from areas that were unable to meet their own needs such as Lewes district.
- 5.8 The Duty to Cooperate Compliance Statement has been circulated to all local planning authorities in East and West Sussex and no concerns have been raised.
- 5.9 The authorities agree that a series of officer and member level meetings and events have taken place, as set out in Appendix 1 of the Duty to Cooperate Compliance Statement, during the production of the Joint Core Strategy, covering matters relevant to the duty to cooperate. To date, no local planning authorities have indicated that they have identified surplus housing capacity that could assist in meeting Lewes district's unmet housing needs.
- 5.10 The authorities agree that cooperation is an ongoing process and dialogue and partnership working will therefore continue in order to address cross-boundary strategic matters, including the issue of meeting development needs. Where a LPA has an unmet objectively assessed housing need, the LPA should demonstrate and justify why and to what degree it cannot meet the need prior to approaching other appropriate authorities with regard to accommodating the unmet need.
- 5.11 The Coastal West Sussex and Greater Brighton authorities are committed to cross-authority working in the pursuit of sub-regional and longer term solutions to meeting the housing needs of the Sussex Coast HMA. In this vein the Council and SDNPA 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.

6. Housing Requirements for the Coastal West Sussex and Greater Brighton Sub-Region

- 6.1 The Coastal West Sussex and Greater Brighton Strategic Planning Board was established with the intent of identifying the extent of housing need and looking at options to meet it. To facilitate cross-boundary cooperation in addressing the issue, a joint Housing Study (Duty to Cooperate)²⁹ has been produced by the local authorities that comprise the Coastal West Sussex and Greater Brighton Strategic Planning Board³⁰.
- 6.2 The study pulls together evidence from a range of individual studies produced by each authority to provide a consistent and objective assessment of housing requirements in each authority and across the Sussex Coast HMA addressing the need and demand for market and affordable housing.
- 6.3 The study concludes that the Sussex Coast HMA is highly unlikely to be able to deliver the full level of required housing development in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the Sussex Coast HMA are still those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity.
- 6.4 There is agreement between the Coastal West Sussex and Greater Brighton authorities that the evidence shows that, collectively, they are unable to meet the full objectively assessed housing needs. Current evidence implies that it may be feasible to accommodate a maximum of around 75% of the assessed level of need across the sub-region³¹.
- 6.5 The most significant shortfall against objectively assessed needs is expected to arise in the area of the sub-region centred on the City of Brighton and Hove, including Lewes district, Adur and Worthing. This is primarily a function of geography with limited development potential in the areas between the national park and the sea.
- 6.6 This situation persists from that which existed during the preparation of the South East Plan (now revoked), which resulted in the South East Plan's housing requirements for the authorities in the Sussex Coast HMA being set at least 27-30% below demographic projections³².
- 6.7 In August 2013 a meeting took place between the Council, SDNPA, the West Sussex district/borough councils and Brighton and Hove City Council. The purpose of the meeting was to discuss a way forward, in accordance with the

²⁹ Housing Study (Duty to Cooperate), GL Hearn (2013)

³⁰ Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council, Lewes District Council and the South Downs National Park Authority.

³¹ Housing Study (Duty to Cooperate), GL Hearn (2013)

³² Housing Study (Duty to Cooperate), GL Hearn (2013)

duty to cooperate, regarding seeking to meet the sub-region's housing needs in the light of the levels of provision likely to be achieved through the recently adopted and emerging Local Plans. It was acknowledged that most LPAs are unable to meet their objectively assessed housing needs in their Local Plans because of recognised capacity constraints. Those authorities that anticipated being able to meet their own housing needs also experience capacity constraints such that they are unlikely to be in a position to accommodate the anticipated shortfalls arising in the other authority areas.

- 6.8 It was agreed that the authorities would continue to work together in order to identify, if possible, longer term strategic solutions to the identified shortfall of housing provision across the sub-region, including necessary strategic infrastructure and appropriate delivery mechanisms. This work would be undertaken on the understanding that each authority would look to meet future housing needs within their own local housing market area(s) first before looking at options beyond their market area(s) if necessary. Subsequently the Coastal West Sussex and Greater Brighton authorities signed a memorandum of understanding and produced its Local Strategic Statement, setting out the commitment and framework through which they will actively cooperate in seeking to address the sub-region's housing needs on an ongoing basis.
- 6.9 Wealden and Mid Sussex are neighbouring districts to Lewes but are not significant constituents of the Sussex Coast HMA. To date neither authority has identified that it may have capacity to help meet some of Lewes district's unmet housing needs. Mid Sussex is currently working on a revised District Plan. Before setting its proposed housing target, Mid Sussex is undertaking an assessment of neighbouring authorities' unmet housing needs and, as part of this process, Lewes District Council has provided details of its housing needs shortfall. This work will involve a sustainability appraisal, carried out by consultants, to assess the impacts of meeting unmet needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. It is currently too soon for Mid Sussex to indicate whether it will be able to assist in meeting some of Lewes district's unmet need. However collaboration at officer and Lead Member level is ongoing in accordance with the Memorandum of Understanding between the two councils and SDNPA.
- 6.10 Wealden has a Core Strategy (adopted February 2013) with a housing target that does not meet its own objectively assessed need, leaving Wealden unable to meet assist with meeting any of Lewes district's unmet needs at the current time. Wealden's Core Strategy will be subject to review in 2015 which will consider the environmental impact of potential development on sites of international importance and other constraints of the area. Wealden is currently at the early stages of undertaking a new Strategic Housing Market Area Assessment. While it is too early to know whether Wealden will be in a position to assist in meeting any of Lewes district's unmet needs in the future, Lewes District Council and SDNPA are engaging with Wealden in this process and will also continue to work collaboratively through the East Sussex Strategic Planning Members Group.

7. East Sussex Strategic Planning Members Group

- 7.1 With regard to housing provision ESSMPG has agreed to consider the definition of HMAs affecting East Sussex and to establish a protocol for early liaison and consistency on this work, which is expected to draw on the 2011 Census migration patterns. It is recognised that HMAs are likely to extend beyond the county boundary and the protocol should include engagement with adjoining authorities, especially to the north and west (including the CWSGB Strategic Planning Board). The principle of linked assessments of housing and employment needs in future reviews and a 'robustness review' of housing market indicators in the existing countywide housing monitoring/reporting framework, in line with the National Planning Practice Guidance, have also been agreed.
- 7.2 Through the ESSPMG work is actively underway on establishing a common evidence base and planning policy direction for specific topics that require detailed policies and have commonality across East Sussex. The currently identified topic areas are Development in the High Weald AONB; Older Persons Housing; Equestrian Development; Biodiversity and Green Infrastructure; Tourism; Sustainable Transport; Energy Development; and Community Facilities.
- 7.3 The topic areas are being progressed by working groups comprised of all East Sussex local planning authorities and currently consists of the identification of inconsistencies, gaps or other weaknesses in the evidence base and policy coverage. This will be followed by any necessary additional evidence gathering, identification of common policy elements and ascertaining reasons for any local variations. As the majority of the issues being explored are detailed in nature, this work is of greater relevance to the Development Management policies each planning authority is preparing.

Lewes District Council:

Signed:



Print Name: Cllr Tom Jones - Strategy and Development Portfolio

Date: 17 October 2014

Adur District Council:

A handwritten signature in black ink, appearing to read 'Pat Beresford', with a large, stylized flourish at the end.

Signed:

Print Name: Cllr Pat Beresford

Date: 11/11/14

Appendix 5



**Horsham
District
Council**

Boris Johnson, Mayor of London
(Further alterations to the London Plan)
GLA City Hall
The Queen's Walk
London SE1 2AA

Our ref: TBK/TC/scw

Your ref:

E-mail:

Direct line:

Contact:

Date: 10 April 2014

Dear Mr Johnson

Draft Further Alterations to the London Plan

We are writing on behalf of the Gatwick Diamond, Coastal West Sussex and Greater Brighton Joint Planning Board and the East Sussex Planning Authorities* in response to your consultation on the Draft Further Alterations to the London Plan.

We acknowledge your overarching vision and objectives which are carried forward from the original London Plan. However, we note the extent to which the context within which that vision is set has changed, particularly with respect to projected population growth. We believe that this requires you to look more fundamentally at how and where housing needs might be met within London and to work more closely with local authorities or groups of authorities from across the South East in order to understand and address the challenges facing the area as a whole. Accordingly we would like to make the following comments:

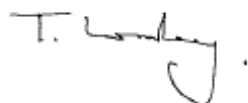
- **The need for a more robust mechanism through which London cooperates with local authorities across the South East.** The housing, employment and infrastructure issues with which London is concerned require cooperation across a wide area and engagement with authorities or groups of authorities from well beyond London's boundaries. We consider that the mechanisms currently in place do not do enough to ensure that these wider groups are properly involved in issues which, at least in the longer term, are likely to be of considerable concern to them. (Para 1.45, Policy 1.1, Policy 2.2 and other references).
- **The need for London to do more to meet the projected shortfall in housing supply.** Many local authorities within the South East, including those within the areas we are responding on behalf of, are already facing significant challenges in meeting their objectively assessed housing needs. The Further Alterations, as currently drafted, are likely to place further pressures on these areas. We do not consider it would be right to assume that pressures created by London's unmet housing needs can necessarily be met from within this wider area. We believe that you should look more closely at the options for increasing housing supply from within London, including reviewing brown field sites, open space and Green Belt, as others outside London have been doing. Alongside this, and in line with our comments above, we would urge you to work with us and other groups of local authorities to understand the constraints and opportunities which exist and to help develop a sustainable approach to addressing the challenges which face us all. In particular there should be no assumptions made as to the environmental carrying capacity of the above referenced authorities to accommodate any proposed unmet housing needs of London. (Policy 1.1, Paras 3.14A et seq. Policy 3.3 and other references).

- o **Infrastructure Investment.** We acknowledge the need for investment on London's infrastructure. However, taking into account the critical relationships between London and the South East, we believe you should be working with and supporting groups of local authorities, such as those on whose behalf we are writing, as they seek to secure investment in the infrastructure needed to support the area both as a place to work and as a place to live. In particular there should be no assumptions regarding the ability and capacity of existing infrastructure within the above referenced authorities, or indeed the likely deliverability and funding for future infrastructure, to accommodate any proposed unmet housing needs of London (Policy 2.2, Policy 2.3 Policy 6.4 and other references).

We understand that as the Plan is approaching its submission stage any comments are sought as formal representations on the further alterations now proposed to the London Plan. We believe that these issues and concerns can only be addressed by closer working and by a more widely considered evidence base including the testing of alternatives. They raise questions as to the soundness of the proposed alterations and we would wish to reserve the right to be heard before the appointed Inspector in examination of the London Plan.

I hope these comments are helpful. We would welcome the opportunity to work more closely with you both in the context of the London Plan and the longer term Infrastructure Plan which you are currently preparing, and in the context of our own reviews of our Local Strategic Statements and policies. If you would like to discuss any of these matters please contact the officers named below who are acting as coordinators for the three groups.

Yours sincerely



Tom Crowley
Chief Executive,
Horsham District Council
On behalf of the Gatwick
Diamond Local Authorities
Group



Councillor Ann Newton
Wealden District Council
On behalf of the East Sussex
Local Authorities Group



Councillor Ricky Bower
Arun District Council
On behalf of the Coastal West
Sussex and Greater Brighton
Joint Planning Board

* The Gatwick Diamond Local Authorities comprise: West Sussex County Council, Surrey County Council, Crawley Borough Council, Epsom and Ewell Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate & Banstead Borough Council and Tandridge District Council. With the exception of Epsom and Ewell Borough Council, which joined later, all the Authorities work within the terms of a Memorandum of Understanding agreed in 2012. A Local Strategic Statement, finalised in early 2012, was endorsed by all the Councils with the exception of Tandridge District Council and Epsom and Ewell Borough Council and is currently being reviewed and updated. The Gatwick Diamond Local Authorities link closely to, and on key economic issues form part of, the Gatwick Diamond Initiative, one of the spatial partnerships which make up the Coast to Capital Local Enterprise Partnership.

The Coastal West Sussex and Greater Brighton Joint Planning Board comprise Adur, Arun, and Chichester, District Councils, Worthing Borough Council, West Sussex County Council and the South Downs National Park Authority. Together with Brighton and Hove City Council and Lewes District Council, the Authorities work within the terms of a Memorandum of Understanding agreed in 2013 and have agreed a Local Strategic Statement for the 'Coastal West Sussex and Greater Brighton Area'. The Local Authorities work closely with the Coastal West Sussex Partnership (CWSP) and with the Brighton and Hove and Lewes Economic Partnership, two of the spatial partnerships which make up the Coast to Capital Local Enterprise Partnership.

The East Sussex Local Authorities comprise Hastings Borough, Eastbourne Borough, Rother District, Wealden District, Lewes District, and East Sussex County Councils

This letter has been prepared on behalf of the local authorities, as a group. Each Authority reserves the right to make its own representations and to be associated with representations by other groups of which they are part.

Contacts:

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East Sussex Local Authorities: David Phillips, Wealden District Council
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