



Gladman Developments Ltd – Rep 59

Adur Local Plan Examination

Issue 1 – The Duty to Co-operate (Legal Requirement) and the Council’s Broad Spatial Strategy (policy 2)

Qn1.1 Has co-operation between Adur District Council and other nearby local planning authorities been a continuous process of engagement from initial thinking? What evidence is there of effective co-operation (NPPF1 paragraph 181) and of joint working on areas of common interest being diligently undertaken for the mutual benefit of neighbouring authorities (NPPF paragraph 178)? Is there a long-term commitment to co-operation?

- 1 Whilst Gladman are sure the Council will be able to demonstrate evidence that a range of meetings have taken place between authorities, what is really in question and what is of significant concern within the housing market area (HMA), and neighbouring housing markets areas is the persistent failure of the authorities to meet housing needs and address the issues of unmet need.

- 2 As Gladman have raised in previous representations we have serious concerns about the effectiveness of the cooperation undertaken in the HMA. The persistent failure to deal with the growing levels of unmet need from Adur and its neighbouring authorities is a growing problem, and one which will continue to negatively influence housing choice and housing affordability. Given the scale of unmet housing needs in the region and the Government’s continued and renewed vigour to tackling the housing crisis, reducing high housing costs and resolving falling

social mobility¹ it is incumbent upon every authority to do everything it can to meeting its housing needs and arriving at a solution for its unmet housing needs.

Qn1.3 Are any mechanisms in place to enable the unmet housing needs of the District to be met elsewhere?

- 3 The HMA has consistently failed to adequately deal with the problems of unmet need that are present. Whilst Gladman acknowledge the constraints in Adur the issues within the HMA and the neighbouring HMA need to be grasped and dealt with. The levels of unmet housing need now emanating from Brighton and Lewes are on a par with those seen in Birmingham (43,000 unmet need) and exceed those in Coventry (17,800 unmet need). In those particular HMAs Inspectors have taken significant steps to ensure that housing needs are not going unmet. In the case of Coventry this has led to the coordination and development of significant levels of joint evidence and a signed memorandum of understanding from the HMA members outlining who will deal with the unmet need². In the case of Birmingham the unmet need is now been transferred to adjoining authorities, with the first public example being within the North Warwickshire Draft Local Plan (July 2016) which is planning to take 3,790 units from Birmingham.
- 4 Clearly such decisions are complex, however there must come a point when a line is reached and the only sensible solution is to deal with the issue. Continuing to pass plans which fail to identify any solution to meeting unmet needs is not solving the problem and the authority and the rest of the HMA must be forced to deal with these issues. The recent and ongoing examination of the Mid Sussex Local Plan is another clear indication of problems with HMAs failing to deal with their housing needs and pressures continuing to substantially grow. In that HMA the failure of an Inspector at the Horsham Examination to properly and soundly consider housing needs has led to problems in surrounding districts and multiplied the pressures which already existed in that HMA and neighbouring HMAs. The relationships between the HMA in which Adur sits and the Horsham/Mid Sussex HMA is one which has not been fully explored to consider how unmet housing needs can be accommodated within the various authorities.
- 5 The issue of unmet needs emanating from HMAs was a key issue outlined by LPEG in their findings published earlier this year, the government is due to publish a housing white paper in January which will likely contain further guidance on these issues. The Council and its HMA partners should be alive to considering the issues discussed in that white paper. In the meantime Gladman consider it essential that the issue of unmet housing needs is tackled and not just passed to be dealt with by the next plan. Continually ignoring such issues is not sound

¹ Prime Minister's , Speech to Conservative Party Conference 2016
(<http://press.conservatives.com/post/151378268295/primeministerthe-good-that-government-can-do>)

² https://www.rugby.gov.uk/download/meetings/id/.../agenda_item_5_-_appendix_1 (Retrieved 21/12/16)

planning and does not respond to the governments need and desire to boost the delivery of housing and to tackle the growing crisis in housing affordability. Whilst therefore Gladman do not contend that Adur should be forced to meet its full OAN within its boundary, we do not consider that the Duty to Cooperate has been met. The full housing needs of the HMA have not been adequately and fully considered and the HMA and the linked HMAs around it have not given sound and proper consideration to what happens to the unmet needs which are arising. It is vital that such issues are fully understood and dealt with before the plan can be found sound.