

Planning Policy Team
Adur and Worthing Councils
Town Hall
Chapel Road
Worthing
BN11 1BR

20 June 2017

adurplanningpolicy@adur-worthing.gov.uk

Dear Sir / Madam

Adur Local Plan 2016 Main Modifications

Thank you for consulting the Home Builders Federation (HBF) on the Proposed Main Modifications to the Adur Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year.

We support the Main Modifications proposed that relate to our representations (e.g. the increase to the OAN, the affordable housing threshold and Part M). However, we note that the Council has not included among its main modifications any added text relating to a review of the Local Plan. The HBF considers that a commitment to an early review is necessary to address the question of its own unmet housing need (which the examination has now identified to be 3,107 homes over the plan period) plus those of the wider sub-region, which includes the housing market areas of the West Sussex Coast authorities and the North Sussex authorities (Horsham, Crawley and Mid Sussex).

It is the HBF's view that the Local Plan must contain a requirement for the Council to review its local plan as part of a wider sub-regional exercise that tries to address the unmet housing needs of the sub-region in full (that is the West Sussex coastal authorities and the north Sussex authorities of Crawley, Horsham and Mid Sussex). This is necessary so that the Local Plan is sound in terms of meeting the positively prepared and effectiveness tests of the NPPF (addressing the OAN of the HMA in full). Adur, in due course, having worked with the other authorities, will need to produce a new local plan that will ensure that it can meet the OAN in full. The Local Plan should include this as a requirement and this should be added to the end of paragraph 2.23.

As we stated in our representations, we noted that in paragraph 3.29 of the Council's *Duty to Cooperate Statement March 2016* that the Council has stated that it would embark upon an early review of the local plan. We would support this intention, but the Local Plan itself need to reflect this intention to ensure that the review will be undertaken – i.e. it needs to be written onto the face of the Local Plan. This would include a timetable for action showing when the reviewed plan will be submitted to the Secretary of State. We consider that this review should be completed by 2021 so that the issue of the large unmet housing need is catered for as soon as possible.

Yours sincerely

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