

## Shoreham Harbour Joint Area Action Plan Examination

### **Matters Statement 4: Housing and community (Policies SH2, CA2, CA3, CA7)**

***Issue: Whether the Plan has been positively prepared in respect of the scale and mix of housing to meet the identified needs of different groups in the community over the plan period?***

Please see the Matters Statement Explanatory Note (SHJAAP/MS/EX) for clarification of acronyms, abbreviations and other terms used in this statement.

#### **Need and Demand**

31. Having regard to the policies of the ALP and B&HCP(1), does the Plan adequately address the needs for all types of housing and the needs of different groups in the specific local community of the Plan area, in accordance with NPPF paragraphs 50 and 159?

#### ***Councils' response:***

- 31.1 The ALP and the B&HCP(1) set the framework for addressing the delivery of different types and tenures of housing in Adur and Brighton & Hove. Both plans include allocations for residential development and mixed use (residential and employment) sites. Policy 8 of the ALP and Policy DA8 of the B&HCP(1) designate the Shoreham Harbour Regeneration Area as a broad location for development. These policies include minimum targets for housing delivery of 1,100 homes in Adur and 300 homes in Brighton & Hove.

### Understanding housing needs:

- 31.2 Both ADC and BHCC have previously undertaken SHMAs which have since been updated by further housing assessments and evidence that support their respective local plans. The ALP draws on the Coastal West Sussex SHMA Update 2012 (SED04/04), which has subsequently been updated by the Adur Objectively Assessed Need for Housing Report 2015 (SED04/02) and the Objectively Assessed Needs Housing Update Report (2016) (SED04/01). The B&HCP(1) draws on the Strategic Housing Market Assessment (SHMA) 2008 (SED04/05) and Brighton & Hove Housing Requirements Study 2011 (SED04/06) and Update 2012 (SED04/07), which have been updated by the Objectively Assessed Need for Housing: Brighton & Hove 2015 (SED04/03). As such there has been an understanding of housing needs in the Adur and Brighton & Hove areas throughout the plan preparation process.
- 31.3 The coastal area as a whole has very high housing demand/ needs, but is subject to significant environmental and infrastructure constraints, resulting in a significant housing shortfall across the whole area. The councils together with other neighbouring planning authorities are working to address this through the West Sussex & Greater Brighton Strategic Planning Board (SPB). They have already produced two Local Strategic Statements, and are in the early stages of developing joint work to prepare a new Local Strategic Statement (to be known as LSS3) which will robustly and creatively explore options for meeting the area's unmet needs for housing, employment and infrastructure.
- 31.4 The two Councils, together with neighbouring councils have undertaken joint housing market studies including most recently 'Defining the HMA and FEMA' (GL Hearn Feb 2017) (SED03/04), which identified three main housing market areas including Coastal Urban Area HMA, extending from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks; and three Functional economic Areas, including the Coastal Urban Area FEMA – extending from Worthing to Newhaven and inland to Burgess Hill and Lewes.

### Planning for a mix of housing:

- 31.5 LPAs should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community in order to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities<sup>1</sup>.

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<sup>1</sup> Paragraph 50 (bullet 1) of the NPPF 2012. There are similar requirements in Paragraphs 60-62 of the NPPF 2018.

31.6 Policy SH4(2) of the Plan requires development to provide a mix of dwelling types, sizes and tenures in accordance with identified local needs. This policy should be read in conjunction with Policy 20: Housing Mix and Quality and Policy 21: Affordable Housing of the ALP; and Policy CP1: Housing Delivery, CP19: Housing Mix, CP20: Affordable Housing and Policy SA6: Sustainable Neighbourhoods of the B&HCP(1).

Identifying the size, type, tenure and range of housing:

31.7 LPAs should identify the size, type, tenure and range of housing that is required<sup>2</sup>. The Councils have published a range of evidence regarding housing need for the Examinations of the ALP and B&HCP(1).

31.8 Policies 20 and 21 of the ALP draw on evidence in the Adur Objectively Assessed Need for Housing Report 2015 (SED04/02) and the Objectively Assessed Needs Housing Update Report (2016) (SED04/01).

31.9 In terms of market housing paragraph 4.27 of the ALP concludes that, in general, across the Adur Local Plan area, the focus should be on the provision of family housing of two or more bedrooms, and sets out an appropriate mix of housing. However, the ALP explicitly states that the provision of smaller dwellings should be focused in and around the town centres and Shoreham Harbour, where higher densities are more appropriate. This is reflected in the housing mix proposed by paragraph 4.7.73 of the JAAP specifically for sites allocated at the Western Harbour Arm Waterfront:

- 1 bed 35%
- 2 bed 60%
- 3 bed 5%

31.10 This reflects the opportunity for high density development, and the stronger emphasis on smaller dwellings (in terms of number of bedrooms); and is consistent with the Adur OAN evidence.

31.11 It is anticipated that the strategic allocations identified in the Adur Local Plan will provide two, three and four-bedroom family housing in the main, whereas it is anticipated that residential development at Shoreham Harbour will consist primarily of smaller dwellings in the form of flatted developments. As such, a mix of residential development types to meet a range of needs can be achieved across Adur. The regeneration of the Western Harbour Arm, by delivering the smaller homes needed, will make a valuable contribution to the provision of new homes of the right type, tenure and size in Adur according to identified need.

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<sup>2</sup> Paragraph 50 (bullet 2) of the NPPF 2012. There are similar requirements in Paragraphs 60-62 of the NPPF 2018.

- 31.12 Policies CP19 and CP20 in the B&HCP(1) draw on the Objectively Assessed Need for Housing: Brighton & Hove 2015 (SED04/03) which updated earlier strategic housing market studies (the Strategic Housing Market Assessment (SHMA) 2008 (SED04/05) and Brighton & Hove Housing Requirements Study 2011 (SED04/06) and Update 2012 (SED04/07).
- 31.13 Paragraph 4.213 of the B&HCP(1) references the demographic analysis of the demand/need for homes in the city over the City Plan period 2010-2030 as set out in the Housing Requirements Study Update 2012. This indicates that an estimated 65% of the overall need/demand (for both market and affordable homes) will be for 2 and 3 bedroom properties (34% and 31% respectively); 24% for 1 bedroom properties and 11% for 4-plus bedroom properties. For market housing, the greatest demand is likely to be for 2 and 3 bedroom properties (35% and 36% respectively); while for affordable housing the majority of the requirement is likely to be for 1 and 2 bedroom homes (46% and 33% respectively) although there is also likely to be a considerable requirement for three or more bedroom sized properties. The more recent 2015 report looks at the dwellings requirement for the period 2014-2030 and generally confirms the conclusions of the 2012 report with regard to size mix requirements.
- 31.14 Policy CP19 in B&HCP(1) seeks to improve housing choice and ensure that an appropriate mix of housing (in terms of housing type, size and tenure) is achieved across the city, including addressing the accommodation requirements of groups with specific housing needs. It indicates that a housing mix (in terms of housing type, size and tenure) may be set for individual sites identified in the City Plan; Area Action Plans; Supplementary Planning Documents and Site Planning Briefs. Sites coming forward as 'windfall' development will be required to demonstrate that proposals have had regard to housing mix considerations and have been informed by local assessments of housing demand and need. All new residential development is required to have regard to the characteristics of existing neighbourhoods and communities to ensure that development makes a positive contribution to the achievement of mixed and sustainable communities.
- 31.15 The proposed JAAP allocations within the City Plan area are likely to be focused mainly (but not exclusively) towards delivering smaller homes, predominantly apartments with some terraced town houses and mews housing. This reflects the nature of the sites which are mainly small redevelopment opportunities, most of which are allocated for mixed use development involving commercial uses at ground floor level with residential on the upper floors only.

## Affordable housing:

- 31.16 LPAs should set policies for meeting identified needs for affordable housing<sup>3</sup>. Policy SH4(4) of the Plan requires new residential development to make provision for a mix of affordable housing, in accordance with the policies in the ALP and B&HCP(1).
- 31.17 Policy 21 of the ALP seeks the provision of 30% affordable housing on sites of 11 dwellings or more. Paragraphs 4.37 and 4.38 of the supporting text provides details of the tenure mix sought and the size of dwellings needed, based on the OAN studies referred to above. (In addition, the policy makes clear that the precise affordable housing mix on a particular site (in terms of size and tenure) will be determined through negotiation).
- 31.18 Adur District Council's Guidance Note 'Planning Contributions for Infrastructure Provision' (July 2013) addresses the delivery of affordable housing. The Adur Local Development Scheme 2018-20 (LPD01/05) explains that this will be updated soon to reflect revised national policy on affordable housing.
- 31.19 Policy CP20 of the B&HCP(1) seeks the provision of affordable housing on all sites of 5 or more dwellings (net) and states that the Council will negotiate to achieve 40% onsite affordable housing on sites of 15 or more (net) dwellings; 30% affordable housing on sites of 10-14 dwellings (net) whether onsite or as an offsite contribution; and 20% affordable housing as an offsite contribution on sites of 5-9 dwellings (net). The policy states that these targets may be applied more flexibly where the Council considers this to be justified subject to specified criteria (e.g for reasons of development viability). It also states that affordable housing should incorporate a mix of tenures and sets out a preferred unit size mix for affordable housing to be achieved across the city. Further guidance on the application of the policy is set out in the Council's Affordable Housing Brief (SED04/08).

## Conclusion

- 31.20 As noted above, the JAAP will make an important contribution to meeting the minimum housing provision targets which are already set within the ALP and B&HCP(1). The Councils propose a modification to Objective 4 of the JAAP to clarify this point.

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<sup>3</sup> Paragraph 50 (bullet 3) of the NPPF 2012. There are similar requirements in Paragraphs 60-62 of the NPPF 2018.

To **contribute to meeting the housing needs of Adur and Brighton & Hove** address shortfalls in local housing provision through delivering new homes of a range of sizes, tenures and types, including affordable and family homes as well as associated supporting community infrastructure.

- 31.21 The evidence on housing needs on which the JAAP relies is drawn from the studies supporting the two local plans. Within this context, the Councils consider that the Plan - in conjunction with the adopted ALP and B&HCP(1) - adequately addresses the needs for housing in accordance with NPPF paragraphs 50 and 159.
- 31.22 The Joint Area Action Plan has reflected the requirements of the NPPF in Policy SH4: Housing and Community, which states that new residential development will be expected to make provision for a mix of affordable housing, including social rented, affordable rented and intermediate housing in accordance with local plan policies.
- 31.23 The Joint Area Action Plan provides for a range of sites to accommodate housing needs, including affordable housing, through three allocations:
- Aldrington Basin (within CA2)
  - South Portslade (within CA3)
  - Western Harbour Arm Waterfront (within CA7)
- 31.24 The Housing Topic Paper submitted alongside the Plan sets out the background and approach to housing in detail. This demonstrates that the Plan has been positively prepared and has sought to meet objectively assessed development and infrastructure requirements as far as it is reasonable to do so and is consistent with achieving sustainable development in the regeneration area

32. Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with NPPF paragraphs 57, 58, 61 and 69?

***Councils' response:***

- 32.1 The NPPF highlights the importance of planning positively to achieve high quality and inclusive design.

- 32.2 Policy SH9 of the JAAP explicitly addresses place making and design quality. Buildings are required to have a high standard of architectural design. Public spaces must be designed in accordance with the Shoreham Harbour Streetscape Guide (LPD04/09). Waterfront development is encouraged to improve public access, and improve the quality, accessibility, security and legibility of public streets and spaces. Principles of good urban design, which development should address, are also listed.
- 32.3 The NPPF requirements for inclusive design and accessible environments are also addressed by adopted policies in both the ALP and B&HCP(1).

#### Adur

- 32.4 Policy 15 'Quality of the Built Environment and Public Realm' addresses such matters, including the need for development to enhance the local environment; include layouts and design which take account of the potential users of the site; incorporate the principles of securing safety and reducing crime through design, in order to create a safe and secure environment; and making a positive contribution to the sense of place, local character and distinctiveness of an area. Opportunities will be taken to improve the public realm through development; aiming to improve the quality, accessibility and legibility of public streets and spaces.
- 32.5 In terms of accessibility, it is important that new homes of all tenures provide sufficient internal space for everyday activities and their design should enable flexibility and adaptability by meeting the minimum nationally described space standards. Sufficient external space around and between new homes not only ensures adequate privacy and daylight to existing and new homes but contributes to the creation of a pleasant accessible environment.
- 32.6 Policy 20: Housing Mix and Quality of the ALP expects all new build dwellings to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings. In addition, the Council will require affordable dwellings to be constructed to Wheelchair Accessible Standards if a need is identified at the time a planning application is submitted.

#### Brighton and Hove City Plan

- 32.7 The B&HCP(1) includes a number of relevant policies, in particular Policy CP12 (Urban Design), CP13 (Public Streets and Spaces) and SA6 (Sustainable Neighbourhoods).

- Policy CP12 expects all new development to be inclusive, adaptable and accessible; ensure that the design of the external spaces is an integral element of the overall design approach, in a manner which provides a legible distinction between public and private realm; and incorporate design features which deter crime or disorder and the fear of crime.
- Policy CP13 promotes improvements to produce attractive and adaptable streets and public spaces, including encouraging active living and healthier lifestyles; and creating safe and inclusive public spaces.
- Policy SA6 seeks to create and maintain sustainable neighbourhoods and reduce inequalities between neighbourhoods, including by improving the quality and accessibility of public services and facilities, planning to deliver balanced communities, reducing health inequalities, and promoting access to employment, education and training.

32.8 The Council seeks to ensure that all new residential development meets the minimum Nationally Described Space Standards (NDSS). It also seeks to apply the standards for accessible and adaptable dwellings set out in Building Regulations M4(2) and requires that for proposals of 10 or more dwellings, 10% of the affordable residential units and 5% of all the residential units are suitable for occupation by wheelchair users in accordance with Building Regulation M4(3). In addition, all new residential development is expected to provide useable private outdoor amenity space appropriate to the scale and character of the development.

32.9 These standards are currently applied as an informal requirement for all new residential development, including residential extensions and residential accommodation falling outside Use Class C3. In accordance with B&HCP(1), Policy SA6 (A8), it is proposed to formalise these requirements through additional policy in the emerging City Plan Part Two (which was subject to public consultation during summer 2018).

## **Supply**

33. Does the Plan identify a supply of available, suitable and deliverable land sufficient to meet the housing requirement identified in the ALP and B&HCP(1) for the harbour area over the plan period? Are the identified and allocated sites either deliverable (years 1-5) or developable (years 6-10 and beyond)? What methodology was used for site selection and are the criteria clear, robust and justified? How has the housing capacity of individual sites been calculated?

### ***Councils' response:***

- 33.1 ALP Policy 3: Housing Provision states that over the period 2011-2032 a minimum of 1,100 dwellings will be developed as part of the Shoreham Harbour Regeneration Area Western Arm. This is echoed in ALP Policy 8 which identifies the Western Harbour Arm as a broad location for change. Similarly, Policy CP8 of B&HCP(1) states that 300 homes will be developed within the parts of the Shoreham Harbour Regeneration Area in Brighton & Hove.
- 33.2 With regards to the JAAP itself, this policy requirement is reflected in Policy SH4: Housing and community and Policy CA7: Western Harbour Arm. Character Area 7: Western Harbour Arm designates the area as a strategic mixed-use area. Discussions have been, and continue to be held, with relevant land owners and developers to progress development proposals on sites within the Western Harbour Arm.
- 33.3 The role of Strategic Housing Land Availability Assessments (SHLAAs) is to identify sites with potential for housing development, to assess their housing potential and estimate when they are likely to be developed. As noted above, both the ALP and the B&HCP(1) fall short of meeting full objectively assessed housing needs, so both local plans set capacity based housing targets which have been determined by the availability of developable sites identified in the respective SHLAAs. Both councils update their SHLAAs annually as part of the authorities monitoring report to inform the housing trajectory and five year housing land supply. The most recent published reports are the Adur SHLAA Update, Dec 2017 (SED04/10) and the Brighton & Hove SHLAA Update, February 2018 (SED04/11).
- 33.4 A trajectory has been provided below (see Q 35 and Appendix A to this Matters Statement) which gives details of the individual sites and their likely delivery timescales.

### **Site selection:**

- 33.5 The Plan includes three allocations for new residential and mixed use development; each comprised of several individual sites:
- Aldrington Basin (within Character Area 2)
  - South Portslade (within Character Area 3)
  - Western Harbour Arm Waterfront (within Character Area 7)
- 33.6 Site selection has been an iterative process. The proposed allocations have been identified through the following documents:

### Shoreham Port Masterplan:

- 33.7 The Department for Transport recommends that major ports should produce a masterplan<sup>4</sup>. Shoreham Port Authority (SPA) published the Shoreham Port Masterplan (2010) (LPD04/08) in 2008. This is not a statutory planning policy document. However it is a material consideration when considering proposals in and near to the regeneration area.
- 33.8 The Masterplan identified the Eastern Harbour Arm and Canal as the focus for future commercial port activity. Due to the significant reduction in port operations at the Western Harbour Arm, the Masterplan proposed that remaining port uses in the Western Harbour Arm be relocated and land released for other developments.
- 33.9 The Masterplan earmarked the Western Harbour Arm for significant change and the redevelopment of land for substantial new residential and employment uses. In relation to SPA owned sites, it identified the redevelopment potential for:
- Kingston Wharf (including Kingston Railway Wharf). This is allocated as site WH2 in the JAAP. This was fully owned by SPA, and is now owned by Hyde New Build Ltd.
  - Free Wharf. This is allocated as site WH5 in the Plan. This was partially owned by SPA. It is now owned by Southern Housing Group.
- 33.10 The Shoreham Port Masterplan Review (2017) (LPD04/07) reported that capital receipts from the release of the sites at the Western Harbour Arm have enabled the purchase of land in the Eastern Arm and Canal for employment and port operational uses.
- 33.11 The Masterplan Proposals Map includes proposed mixed residential and employment uses at The Western Harbour Arm Waterfront (allocated as sites WH1 to WH7) and Aldrington Basin (site AB4). The South Portslade allocation is outside the Masterplan area and is therefore not included.

### Shoreham Harbour Capacity and Viability Study (2011) (CD10/02):

- 33.12 Shoreham Harbour Regeneration Partnership was awarded funding under the second wave of the government's Eco-Towns programme in 2009 and a Capacity and Viability Study (2010) (CD10/02) was commissioned to explore its potential to meet the programme's criteria. The study identified parts of Aldrington Basin, South Portslade and the Western Harbour Arm as suitable for high-density mixed-use development.

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<sup>4</sup> *Guidance on the Preparation of Port Master Plans* (Department for Transport: 2008)

33.13 The study tested two scenarios: the 'Eco option', based on the Eco-town criteria; and the Quantum option based on a 'business as usual' approach. A partial realignment of Brighton Road (A259) at the Western Harbour Arm was also considered against retaining the existing road. These identified a range of potential housing capacities, as set out in the table below:

	Eco option		Quantum option	
	A259 realigned	A259 retained	A259 realigned	A259 retained
Aldrington Basin	158	158	181	181
South Portslade	162	162	186	186
Western Harbour Arm	1,088	831	1,597	1,254
<b>Total</b>	<b>1,408</b>	<b>1,151</b>	<b>1,964</b>	<b>1,621</b>

Table 1: Potential housing capacity identified in the Capacity and Viability Study (2010)

33.14 It should be noted that the indicative study area for the Capacity and Viability Study was larger than the Shoreham Harbour Regeneration Area. The study considered sites now outside the regeneration area, such as the former Adur Civic Centre site.

33.15 The study assumed that a large number of dwellings could be accommodated on waterfront sites at Aldrington Basin. However, this would be contrary to the Shoreham Port Masterplan (2010). The incompatibility of residential and port uses would have had serious consequences for the operations of the port.

33.16 The study further assumed it would be feasible to realign Brighton Road (A259). Whilst this would have provided a larger land area suitable for redevelopment at the Western Harbour Arm, this would have required significant public sector investment for land acquisition and construction.

### Shoreham Harbour Development Briefs (LPD04/03, LPD04/04):

- 33.17 The Capacity and Viability Study recommended that clear planning policy for the harbour was essential, including interim guidance. In order to further explore the capacity for development, refine the site selection, and provide policy guidance in advance of the JAAP, Shoreham Harbour Regeneration Partnership commissioned development briefs for the Western Harbour Arm, and South Portslade and Aldrington Basin. The Sustainability Appraisal of the Plan (CSD04/10) and Appendix A to Matters Statement 2 (MS-02) sets out the different options that were considered during the preparation of the development briefs.
- 33.18 Extensive engagement was carried out by the Councils during the production of the development briefs. This included workshops and exhibitions for stakeholders, including community and residents groups, businesses and landowners.
- 33.19 Individual sites were considered in greater detail than for the Capacity and Viability Study. This led to a number of sites being considered unsuitable for residential development. These include:
- AB1 to AB3. These sites are within the port area and adjacent to the main turning area for shipping. These sites were excluded due to noise issues and the potential impacts on the operations of the port
  - SP6 (front): This site is opposite an active safeguarded minerals wharf. It is also at the junction of Church Road and Wellington Road (A259). This site was therefore removed due to noise and air quality issues, and the potential impact on a safeguarded use.

### Strategic Land Availability Assessments (SHLAA)

- 33.20 Housing and mixed-use sites within the allocations proposed in the Plan are included in the SHLAAs prepared by both ADC and BHCC (SED04/12; SED04/13), which are updated annually. For further detail, please see the response to Question 31.

### Sustainability Appraisal

- 33.21 The recent stages of Sustainability Appraisal (SA) (CSD04/01, ECD01/02 and ECD02/02) have all included an assessment of the Character Area policies, which includes consideration of any site-specific constraints where relevant.

## Housing Capacity of Individual Sites

33.22 The capacity of individual sites has been developed through an iterative process, starting with the Capacity Study and Development Briefs referred to above. Average densities have been derived for each site, using the density policy of the JAAP (which seeks a minimum of 100 dwellings per hectare). However, constraints such as adjoining uses, the need to safeguard important views, and take account of urban design factors such as building heights have been considered.

34. How will the Plan contribute to the delivery of a 5 year supply of housing land within the Councils' administrative areas on adoption and throughout the lifetime of the Plan?

### ***Councils' response:***

34.1 The JAAP will make an important contribution to an ongoing 5-year housing land supply that will contribute towards meeting the minimum housing provision targets set in the ALP and B&HCP(1). Appendix A provides the most up to date trajectory presenting an updated assessment of the projected housing delivery over the Plan period. This identifies the potential to deliver a total of 1,790 net dwellings (comprising 1,455 dwellings in Adur and 335 dwellings in Brighton & Hove), which exceeds the JAAP minimum delivery requirement of 1,400 dwellings. Of this total, 8 dwellings have been completed, 849 dwellings are projected to be delivered over the 5-year period 2017-2022, and a further 933 dwellings expected to be completed in the remaining Plan period to 2032.

34.2 The discussion below provides analysis of the housing supply and projected delivery within Adur and Brighton & Hove and how this will contribute towards overall housing provision within each local plan area.

### Adur

34.3 West Sussex County Council monitors housing delivery in Adur through new permissions, commencements and completions; this is reported through the Adur Annual Monitoring Report, published each December.

- 34.4 The most recent Annual Monitoring Report (SED04/12), published in December 2017 includes the five-year housing land supply table covering the five-year period 2017-2022. It indicates that the Shoreham Harbour Broad Location (Western Harbour Arm) will contribute significantly to the first five years of housing delivery, with 630 dwellings to be completed in this period. Since the publication of this document, further progress has been made on sites within the Western Harbour Arm and the trajectory included as Appendix A now indicates that 731 new homes will be completed within the first five years.
- 34.5 The comprehensive evidence base used to inform the Adur Local Plan and this JAAP, together with continuous engagement and the encouragement for pre- application discussions with landowners and developers, gives the Council confidence that, whilst there is less certainty around the delivery timescales of sites in the latter part of the Plan period, a minimum of 1,100 new homes will be delivered within the Western Harbour Arm during the Plan period.

#### Brighton & Hove

- 34.6 The Brighton & Hove City Council SHLAA Update 2017 (SED04/13) presents the most recent annual review of housing land supply within the Brighton & Hove city area. The SHLAA Update identifies potential delivery of 124 dwellings from sites within the Shoreham Harbour Regeneration area over the five-year period 2017-2022. This forms a small proportion of the total five-year supply figure for the city (4,482 net dwellings), but is significant when set against the JAAP target delivery figure of 300 dwellings in Brighton & Hove. The SHLAA also identifies a further 70 dwellings on identified sites for delivery in the period 2022-2027.
- 34.7 It should be noted that the SHLAA Update 2017 did not include all of the housing and mixed-use sites that are proposed for allocation in the JAAP, but only those sites which had planning permission or had previously been identified in the Council's own SHLAA. Since publication of the SHLAA Update 2017, the City Council has included all of the proposed JAAP development allocations as proposed allocations in the draft City Plan Part Two which was published for consultation in summer 2018. When all of the JAAP sites are added to the supply figures, this increases the projected housing delivery figure for the Plan area within Brighton & Hove to 335 net dwellings. The updated housing trajectory at Appendix A shows the revised housing supply.

35. What has been the extent of housing delivery since the start of the plan period? Are the rates of planned housing development within the Plan area realistic and achievable in the context of previous rates of development and economic circumstances? Should the Plan include a housing trajectory setting out anticipated delivery across the plan period? How would any shortfall in delivery be addressed?

**Councils' response:**

What has been the extent of housing delivery since the start of the plan period?

Adur Housing Delivery

35.1 Housing delivery in Adur is monitored by West Sussex County Council and is reported in the Adur Annual Monitoring Report published each December. The most recent AMR was published in December 2017 and covers the monitoring period 1 April 2016 - 31st March 2017 (SED04/14)

35.2 Since the start of the Plan period in 2011, there have been no housing completions within the Western Harbour Arm. However, 146 new dwellings are currently under construction on two sites and will be completed in the monitoring year 2018/19:

<b>Planning Application Number</b>	<b>Address</b>	<b>Site total</b>	<b>Estimated Completion</b>
AWDM/0501/12	79/81 Brighton Road, Shoreham-by-Sea	132	2018/2019
AWDM/1625/16	63/67 Brighton Road, Shoreham-by-Sea	14	2018/2019

35.3 In addition, a further site has been granted consent and enabling work is due to commence on site on October 2018. This site will be delivered in phases with completion anticipated between 2020 and 2022:

<b>Planning Application Number</b>	<b>Address</b>	<b>Site total</b>	<b>Estimated Completion</b>
AWDM/1497/17	Free Wharf, Brighton Road, Shoreham-by-Sea	540	2020/2022

## Brighton & Hove Housing Delivery

35.4 Housing delivery in Brighton & Hove is monitored by the City Council and is reported annually in the Council's Authority Monitoring Report (AMR) and SHLAA Update. The most recent published reports are the 2016/17 AMR Residential Development (SED04/15) which records housing completions over the period 1 April 2016 - 31 March 2017 and the SHLAA Update 2017 (SED04/11) which identifies future housing commitments and supply as at 1 April 2017.

35.5 Since the start of the JAAP period in 2011, there have been 8 net dwellings completed through redevelopment of one site within the Plan area.

<b>Planning Application Number</b>	<b>Address</b>	<b>Site total</b>	<b>Completion date</b>
BH2013/02047	1 Wellington Road, Portslade	8	2015/16

35.6 In addition, there are 73 dwellings currently under construction on 4 sites within the Plan area.

<b>Planning Application Number</b>	<b>Address</b>	<b>Site total</b>	<b>Estimated Completion</b>
BH2012/04044 & BH2015/04481	9-16 Aldrington Basin/Land South of Kingsway, Basin Road North, Portslade	52	Not known
BH2016/00784 (PA)	Britannia House, 336 Kingsway, Hove	6	2018/19
BH2015/04408	Britannia House, 332 Kingsway, Hove	9	2018/19
BH2016/02047	107 Boundary Road, Hove	6	2018/19

35.7 A further site at the Belgrave Centre, Clarendon Place, Portslade (JAAP Site Ref SP2) is currently subject to pre-application discussions for 100% affordable housing development by the Homes for the City of Brighton and Hove Design and Build Company, which is a joint venture formed by the City Council and Hyde Housing. The development would form part of the Council's Housing Revenue Account (HRA) funded programme 'New Homes for Neighbourhoods'. The site is Council-owned and the development of at least 45 dwellings is expected to be delivered within the 2017-2022 period.

35.8 It should be noted that one planning permission at 1 April 2017 for redevelopment for 6 dwellings at 79 North Street, Portslade has since expired without being implemented.

Are the rates of planned housing development within the Plan area realistic and achievable in the context of previous rates of development and economic circumstances?

35.9 The Council considers that the rates of planned delivery are realistic and achievable. The Regeneration Partnership is seeking a change in character in this waterfront location, with high density mixed use development. The main risks to delivery are the ability of developers to access finance and the availability of mortgage products to prospective purchasers, together with any detrimental impact that Brexit may have on the housebuilding industry. The Local Planning Authority has little control over these issues.

Should the Plan include a housing trajectory setting out anticipated delivery across the plan period?

35.10 The Councils do not consider that it is necessary to include a housing trajectory in the JAAP because a trajectory for each local authority area will be provided and updated annually as part of the AMRs published by Adur DC and Brighton & Hove Council. The Inspector examining the ALP concluded in paragraph 27 of his report "I agree that the Council's approach is pragmatic and appropriate because it enables the Council to monitor the trajectory and take any necessary remedial steps to boost the housing supply should they be required" (LPD02/20).

35.11 It is intended to monitor the JAAP within each of the two local authority monitoring reports. A trajectory has been included as Appendix A presenting an updated assessment of the projected housing delivery during the Plan period. This indicates that housing completions since 2011, current planning permissions and sites proposed for allocation in the JAAP are currently projected to deliver a total of 1,790 net dwellings (comprising 1,455 dwellings in Adur and 335 dwellings in Brighton & Hove). This figure comfortably exceeds the JAAP minimum delivery requirement of 1,400 dwellings.

35.12 The Councils suggest that if the Inspector would like to see reference to the trajectory in the Plan. This could be addressed through a minor modification to paragraph 5.1.25 which addresses monitoring of the Plan

How would any shortfall in delivery be addressed?

- 35.13 Neither the ALP nor the B&HCP(1) are able to meet their full, objectively assessed housing needs figures and each LPA has a capacity based housing target. As adopted plans, the strategies and housing delivery targets of the respective plans have been endorsed by their examining Inspector.
- 35.14 The JAAP allocates a range of sites for housing and mixed uses. However, the JAAP is not intended to meet in full the needs for all types of housing within its plan area. Rather, delivery of these sites will contribute to meeting the minimum targets for delivery of housing identified in the ALP and B&HCP(1). The Councils consider that this approach accords with paragraphs 50 and 159 of the NPPF, as these requirements apply to the local planning authority areas as a whole. It should also be noted that the updated housing trajectory for the Plan area, included at Appendix A, identifies potential housing delivery of 1,790 net dwellings which is well in excess of the JAAP minimum target of 1,400 dwellings.
- 35.15 Objective 4 of the JAAP: Housing and Community refers to 'addressing shortfalls in local housing provision...'. For clarification it is suggested that a modification is made to the wording of Objective 4 and para 3.4.2 to clarify that the JAAP is contributing to meeting the housing needs of Adur and Brighton & Hove rather than trying to address the shortfalls identified in the ALP and B&HCP(1) (see proposed modification in response to Q. 31)