

## **RESPONSE TO INSPECTOR'S HOMEWORK**

### **DAY 1 ITEMS 1 and 3**

#### **In light of the housing shortfall and the lack of a timetable regarding LSS3 would the Council agree that consideration should be given to an early review?**

The Council does not consider that the Submission Adur Local Plan (SALP) *requires* modification to make reference to a review of the Plan, on the basis that the strategy set out within the SALP is the most effective and deliverable approach to delivery of development (based on evidence) , and is therefore robust.

It is acknowledged by the Council that there is a significant shortfall in the Plan's proposed housing delivery figure (3,718 -see MM10A, CD07-4A) when measured against the OAN figure of 325 dpa 6,825 over the plan period (see Main Modification MM7, CD07-4A). This is due to the constraints referred to elsewhere in the Council's evidence which contribute to a lack of suitable land available for development. The fact that there will be some degree of shortfall due to constraints is accepted by all parties (although the extent of shortfall and the deliverability of certain 'omission' sites is not).

However what is not clear to the Council is what an early review of the Adur Local Plan will achieve in terms of meeting Adur's housing shortfall.

Given the constraints as referred to in the SALP itself (as well as the Council's evidence) it is not the case that significant amount s of housing (in addition to those sites already discussed at the hearings) would come forward through such a review. Some opportunities for redevelopment may arise but these are not likely to be significant. As such, the most likely way for Adur's current housing shortfall to be addressed is through working with other local authorities in the Greater Brighton and Coastal West Sussex Strategic Housing Market Area. This work is currently ongoing and has been referred to in the Council's evidence (ALP003 – ADC Response to Inspector's Additional Question 3 Current Progress on Local Plan Preparation in West Sussex and East Sussex; ALP007 – Response to Issue 1 – The Duty to Co-operate). In addition, work has recently been completed to confirm the extent of the relevant Housing Market Areas and Functional Economic Market Areas (FEMAs) as a precursor to LSS3 work, in order to clarify and confirm the relevant boundaries (Defining the HMA and FEMA, GL Hearn, February 2017 – as submitted).

At its meeting on the 6<sup>th</sup> February 2017 the Coastal West Sussex & Greater Brighton Strategic Planning Board met and considered the latest study on the Housing Market Areas and Functional Economic Market Areas and how this might affect future strategic planning to meet the challenges around meeting future housing and employment needs (Draft minutes of the Coastal West Sussex and Greater Brighton Strategic Planning Board – as submitted). The Board agreed with the report's findings that Crawley should be invited to join the Strategic Planning Board and it was agreed that the name of the Board should be

changed to the West Sussex and Greater Brighton Strategic Planning Board. As set out in ALP007 the proposed Local Strategic Statement 3 (LSS 3) will provide a sound mechanism to determine an appropriate spatial strategy for addressing housing distribution at the sub-regional level and the Board recognised the importance of defining the strategic planning area incorporating the 3 HMA areas. The Board was keen to assess what changes would be proposed by the forthcoming White Paper, in relation to Duty to Co-operate and strategic planning, but it also recognised that there needed to be a stronger and clearer vision as well as a delivery timeframe to seek to address unmet housing and employment needs across the expanded Board area. As the minutes indicate at the next Board in May issues of Governance for the expanded Board alongside any Housing White paper recommendations would need to be considered alongside any budgetary requirements for taking collaborative work forward. Since the publication of the White Paper the supporting Officer Group, now to be chaired by Adur's Head of Planning and Development James Appleton, has requested Authorities to consider ring fencing some of the 20% increase in planning fees towards appointing a Strategic Planning Advisor to assist joint working and the preparation of LSS 3.

Clearly it is not an option for a review of the Adur Local Plan to 'allocate' land within another authority/authorities to meet its shortfall. The most an early review of the Adur Local Plan could achieve is an updated reference to ongoing work through the newly formed WS and GBSPB (or any other alternative mechanism at that point in time) and any agreed outcomes of such work. The Council is aware that other Local Plan's which have demonstrated that there is insufficient land to meet their OAN requirements (or come close) have been adopted without the need for an early review (Brighton and Hove City Council being one such local example).

This raises the question as to whether a *full* review of the Adur Local Plan would be required to achieve this, or whether a *partial* review would be sufficient.

The Government's Housing White Paper was published on 7th February 2017. It states that Plans should be reviewed regularly, and are likely to require updating in whole or in part at least every five years (para 1.8).

As stated above the Council considers that the SALP as written is robust; however if the current lack of reference to early review in the SALP would result in an unsound plan, **the Council proposes that a modification is made to the effect that the plan be reviewed or partially reviewed within 5 years.**

This timescale would be consistent with the White Paper; would allow for the emerging work on LSS3 to come to fruition, and any implications arising from current devolution proposals would be known. In addition, should the references in the White Paper to wider-than-local strategic plans result in translation of current or future sub-regional work to such a format, this could be reflected in the ALP review/partial review process.

In addition, text referring to the following matters could also be added, if it is considered necessary:

- **That Adur District Council is fully committed to continuing to work positively and proactively with other local authorities (particularly those in the Coastal West Sussex and Greater Brighton Strategic Planning Board) and public bodies to develop a spatial strategy for the wider area in the longer term; specifically to address the opportunities to meet unmet housing needs.**
- **A reference to the proposed Local Strategic Statement 3.**

Although these matters are already addressed in Adur's Duty to Co-operate Statement (CD07/18) the Council is happy for them to be repeated in the Adur Local Plan itself if this is considered necessary to make the Plan sound.

In addition, given that work on the FEMA /SHMA has now been completed, the Council would also support the following addition, if considered necessary to ensure the soundness of the Adur Local Plan:

- **Reference to Adur's location and role within the Sussex Coast Urban Area Housing Market Area and Functional Economic Market Area as evidenced by the 2017 Study.**