

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
- Mid Sussex 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 area.

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

	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

4.6 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.

4.7 These meetings have been well attended by senior officers from all authorities that are considered to be Z L W K L Q % U L J K W R Q + R Y broader Housing Market Area, and took place with the intention of reaching agreement. Further meetings have also taken place, at both officer and member level, with individual L PAs adjoining Brighton & Hove to discuss more specific issues⁷. The following member level meetings have taken place:

Date	Attendees
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4.10 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 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 Board⁸, 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 indicates that the Coastal Housing Market Area is unlikely to be able to deliver the full level of required housing development. This is in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the Coastal Housing Market Area are still those which were identified and tested through the development of the South East Plan² 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 Coastal West Sussex authorities that the analysis shows that, collectively, the 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 evidence⁹.

⁸ Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council and the South Downs National Park Authority.

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 authorities in the Sussex Coastal Housing Market Area in the South East Plan were at least 27-30% below demographic projections¹⁰.

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

5.7 In August 2013 a meeting took place between the West Sussex Councils, Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority. The purpose of the meeting was to discuss a way forward regards housing needs and the provision in the emerging Local Plans under the Duty to Co-operate requirement. It was acknowledged that most LPAs are unable to meet their objectively assessed housing needs in their current local plans because of capacity constraints and for those that can meet their own needs, the constraints of their areas (including infrastructure) as well as economic objectives mean that they are unlikely to meet potential shortfalls from other districts.

5.8 The meeting agreed that authorities would work together to identify, if possible, longer term strategic solutions to the identified shortfall of housing across the Local Planning Authority boundaries, including necessary strategic infrastructure and appropriate delivery mechanisms. This work would be undertaken on the understanding that the

Local Authority:

Signed:

Print Name:

Date: