



## DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Arun District Council and the South Downs National Park Authority

DATE: February 2018

### 1. Introduction

1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Arun District Council (ADC) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on either party, but sets out a clear and positive direction to inform ongoing strategy and plan-making.

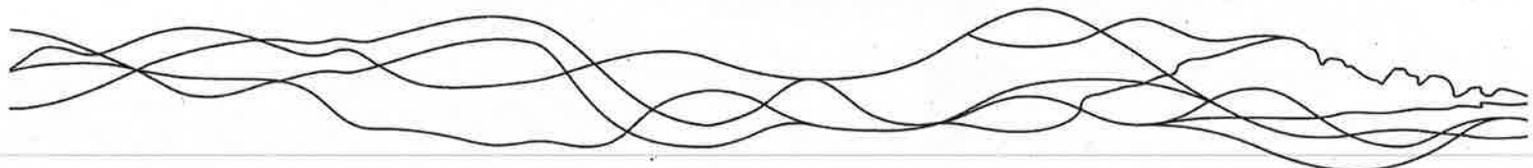
### 2. Context

2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as ADC, to have regard to the purposes of national parks. These are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

2.2 As a National Park and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park.

2.3 Furthermore, paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF at this point makes clear that the Government



recognizes that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.

2.4 Arun is a district area of which approximately 45% falls within the South Downs National Park. This means that statutory planning responsibilities within the district are geographically split along the National Park boundary.

2.5 Both local authorities fall partly or wholly in the Coastal West Sussex (CWS) Housing Market Area (HMA).

2.6 The two authorities work in partnership to ensure that strategic planning issues are properly and holistically addressed.

### 3. Purpose and objectives

3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the provision of goods and services arising from natural capital) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.

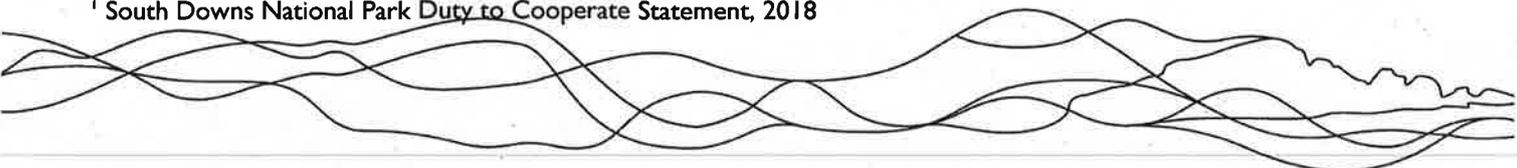
3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to the two authorities, have been and will continue be jointly addressed. These focus on the issue of addressing objectively assessed development needs, particularly housing needs, and on how points of disagreement between the parties are being positively resolved. Further detail is given in the South Downs National Park Duty to Cooperate Statement<sup>1</sup>.

### 4. Addressing unmet housing need

4.1 It is agreed between the parties that the housing supply and objectively assessed need in the whole of Arun district (both within and outside of the South Downs National Park) is as set out in Table I below:

---

<sup>1</sup> South Downs National Park Duty to Cooperate Statement, 2018



**Table 1 Housing supply and need in the Arun part of the South Downs National Park**

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) <sup>1</sup>	SDLP housing provision (total provision divided by 19 years)	OAN inside SDNP <sup>2</sup>	Unmet need inside SDNP <sup>3</sup> (C minus B)	Local Authority Local Plan provision (area outside SDNP) <sup>4</sup>	Local Authority OAN per annum (whole area) <sup>5</sup>	Total annual over-supply across whole district (B+E-F)	Total annual unmet need in HMA (B+E-F)
<u>Arun</u>	118	6	15	9	1000	919	87	-
Sussex Coast HMA	2971	156	274	112	2748	4481	-	1577

<sup>1</sup> SDLP & NDP housing allocations (discounted by 10% with exception of sites in not-yet-made NDPs which are assumed to deliver SD26 requirement) plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

<sup>2</sup> South Downs HEDNA 2017 (Table 4)

<sup>3</sup> The difference between SDNP OAN and SDNP annualised provision (previous two columns)

<sup>4</sup> Housing provision targets based on Arun District Local Plan 2011-2031 incorporating main modifications as per schedule published 12 Jan 2018.

<sup>5</sup> Objectively Assessed Housing Need is based on Arun District Local Plan 2011-2031 incorporating main modifications as per schedule published 12 Jan 2018 (covers whole district including the National Park part)

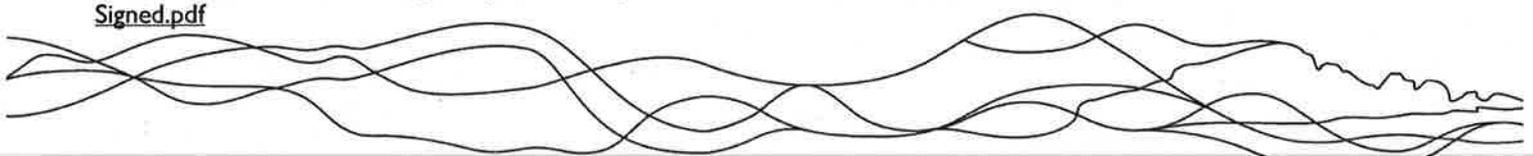
<sup>6</sup> This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

4.2 The table above reflects that the emerging Arun Local Plan meets the whole of the objectively assessed housing need for the District's administrative area, including the part that lies within the South Downs National Park and the communities that live in it. Furthermore, the Arun Local Plan will deliver housing that exceeds the objectively assessed housing need for the district, thereby contributing to the District's neighbours' unmet housing need in years 6-10 of the Arun Local Plan period. Both parties confirm that the unmet housing need arising in the South Downs National Park will be met in full through the provision of housing in the Arun District Local Plan 2011-2031.

4.3 Both parties are also members of, and fully committed to, the work of the West Sussex and Greater Brighton Strategic Planning Board. A Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) was published in October 2013 and updated in January 2016.<sup>2</sup> The Statement sets out a number of strategic priorities designed to maximize development potential, balanced against managing the many environmental assets and natural resources in the area. A Memorandum of Understanding has also been signed by all parties, which confirms an ongoing commitment to joint working across administrative boundaries.<sup>3</sup> The Board has now started work to address the challenge for the future of creating an approach

<sup>2</sup> <https://coastalwestsussex.org.uk/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf>

<sup>3</sup> <https://coastalwestsussex.org.uk/wp-content/uploads/2014/02/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>



which allows all the authorities in the Board to work collectively on developing a new high level strategic planning framework known as LSS3. This will seek to address the strategic cross boundary issues such as unmet housing needs. Each individual authority will be able to prepare their own plans within the context of LSS3. Further details are set out in the South Downs National Park Duty to Cooperate Statement.

5. Memorandum of Understanding – Arun Local Plan

5.1 Arun District Council and the South Downs National Park Authority have in September 2017 signed a separate Memorandum of Understanding in support of the Arun District Local Plan 2011-2031, confirming that the Duty to Cooperate has been effective. This is attached as Appendix 1.

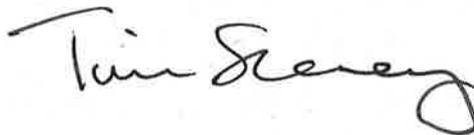
6. Conclusion

6.1 Both parties agree that the emerging South Downs Local Plan and emerging Arun District Local Plan have effectively addressed cross-boundary matters of strategic importance. Arun District Council confirms that it considers the Pre-submission South Downs Local Plan to be sound.

Signed on behalf of Arun District Council Council
Date: 09/03/18
Position: Karl Roberts, Director of Place



Signed on behalf of the South Downs National Park Authority
Date 15/03/18
Position Director of Planning



South Downs Centre, North Street,  
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: [info@southdowns.gov.uk](mailto:info@southdowns.gov.uk)

[www.southdowns.gov.uk](http://www.southdowns.gov.uk)

Chief Executive: Trevor Beattie

