

Comparison of Duty to Co-operate Statements of Common Ground

APPENDIX 1

	A	B	C	D	E	F	G
HMA/ district area	SDLP Housing provision total	SDLP housing provision (A divided by 19 yrs)	OAN inside SDNP	Unmet need inside SDNP (C minus B)	Local authority plan provision (outside SDND)	Local authority OAN per annum (whole area)	Total annual unmet need by LA/HMA (B + E - F)
Adur 1	12	1	8	7	177	325	147
Worthing 1	1	0	3	3	200	636	436
Arun 2	118	6	15	9	1,000	919	(+87)
Brighton & Hove 3	0	0	9	9	660	1506	846
Chichester 4	1,534	81	125	44	435	575	59
East Hampshire 5	1,678	99 (17 yrs)	178 (17 yrs)	79	502	592	(+9)
Horsham 6	85	4	9	5	800	659	(+145)
Lewes 7	1,307	69	114	45	276	520	175
Mid Sussex 8	35	2	5	3	876 (2014 - 24) 1,090 (2024 - 31)	876 (2014 - 24) 1,090 (2024 - 31)	2 (2014 - 24) 2 (2024 - 31)
Wealden 9	48	3	10	7	450	950	500
Winchester 10	283	15	31	16	625	625	(+15)
Eastbourne	No Statement of Common Ground						
Totals	5,101	280	507	226	6,001 (2014 - 24) 6,215 (2024 - 31)	8,183 (2014 - 24) 8,397 (2024 - 31)	1,906 (2014 - 31)

General note: the data in the table is taken from table 1 of the individual Duty to Cooperate Statements of Common Ground with the one exception being East Hampshire. This exception is simply because the table doesn't follow the same format as others and as a result the Housing trajectory attached to the East Hampshire Joint Core Strategy has been used to fill in the gaps. The other point to note is that the process of rounding numbers means that the total line of data does not always add up eg Column D is the sum of the numbers in column G not the totals for columns C + B - F.

Notes over the page

Notes to table

1. Adur & Worthing No expectation that all needs can be met and as a consequence there is expected to be a very significant housing shortfall for Worthing. Adur has a shortfall of approx. 3,100 dwellings.
2. Emerging Arun Local Plan meets the whole of the OAN for housing including that part within the SDNP
3. The SDNPA and BHCC agree that the objectively assessed housing needs for that part of Brighton & Hove that lies within the National Park cannot be met without unacceptable environmental consequences and that there continues to be an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework is engaged.
4. Both parties acknowledge that there is an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework are engaged. The SDNPA confirms a housing provision figure of at least 70 dpa for that part of the district which falls within the NP.
5. It is agreed that the commitments made relating to housing need and supply are being met up to 2028 and the parties will work to address future needs beyond 2028.
6. Both parties agree that the figure for objectively assessed housing need for Horsham includes the communities within the NP.
7. Lewes DC is currently investigating further how to meet the unmet need across the whole district.
8. The effective unmet need in the NP part of Mid Sussex is 3 dpa which will be met elsewhere in Mid Sussex District
9. The unmet housing need within the NP in Wealden is very low, and is considered negligible when compared with the wider district and HMA, but may need to be addressed together with the wider unmet need through the local plan process.
10. The Winchester Joint Core Strategy meets the whole of the objectively assessed housing need for the City's administrative area, including that part in the NP

2.4 Adur & Worthing Districts fall partly within the South Downs National Park. This means that statutory planning responsibilities within the districts are geographically split along the National Park boundary. The South Downs Local Plan (SDLP) will supersede the Adur District Local Plan 1996, the Worthing Local Plan (2003) and the Worthing Core Strategy (2011) when adopted.

2.5 There are significant constraints to development within Worthing and Adur. The presence of the sea to the south and the SDNP directly abutting the urban areas to the north, along with narrow and sensitive gaps between settlements, means that opportunities for growth are extremely limited. All 3 authorities fall partly or wholly in the Coastal West Sussex Housing Market Area.

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 three authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed housing need, 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 and in the jointly prepared documents referred to below.

4. Addressing housing need within Worthing and Adur

4.1 It is agreed between the parties that the housing supply and objectively assessed need for the districts both within and outside of the South Downs National Park, is as set out in the Table 1 below:

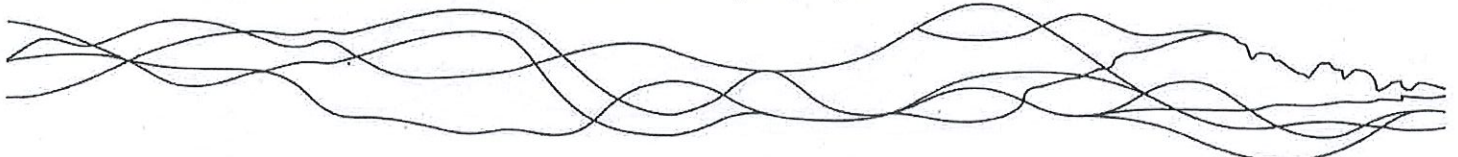
Table 1 Housing supply and need in the Adur and Worthing parts of the South Downs National Park

	A	B	C	D	E	F	G
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Adur	12	1	8	7	177	325	147
Worthing	1	0	3	3	200	636	436
Sussex Coast HMA	2971	156	274	112	2748	4481	1577

¹ As there are no housing allocations in SDLP Policy SD26 or any Neighbourhood Plan allocations, these totals consist of commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)



⁴ Housing provision figures are from Adur Local Plan 2017 and Worthing Core Strategy 2011 respectively

⁵ Objectively assessed housing need (OAN) taken from Adur Local Plan 2017 and Worthing Housing Study June 2015 respectively.

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

4.2 The South Downs Housing and Economic Development Needs Assessment (HEDNA) (September 2017) estimates the unmet housing need within the National Park, broken down by district and by HMA (Table 5). The annual unmet need in the **Adur** part of the National Park is **7 dwellings per annum** (a total of 133 dwellings over the Plan period), and in the **Worthing** part of the National Park is **3 dwellings per annum** (a total of 19 dwellings over the Plan period).

4.3 The three parties confirm that the figure for the objectively assessed housing need for Adur and Worthing includes the communities within the National Park which fall within those Districts. The level of unmet need in Worthing will be determined through the progression of the emerging Worthing Local Plan. Whilst a positive approach is being taken to bring forward sites to meet development needs there is no expectation that all needs can be met and, as a consequence, there is expected to be a very significant housing shortfall for Worthing. Adur has a shortfall of approximately 3,100 dwellings.¹

5. Addressing wider housing need

5.1 Adur and Worthing fall within the coastal West Sussex area and all parties acknowledge that there is a significant shortfall of housing throughout this area caused by the inability of all Authorities bar Arun to meet their own needs. The scale of the issue requires a sub-regional response and therefore on-going engagement across the sub-region through the West Sussex and Greater Brighton Strategic Planning Board will consider and test whether there are any opportunities for other local authority areas to meet some of the unmet housing need. Although all options will be explored, all parties agree that the South Downs National Park is not in a position to meet its own need let alone accommodate any of the shortfall arising from neighbouring areas.

6. Shoreham Cement Works

6.1 Adur & Worthing and the SDNPA are in agreement over the need to bring forward the sympathetic redevelopment and restoration of this site and are keen to work together on the preparation of an Area Action Plan for the site (as set out in Strategic Site Policy SD56). This work will need to include consideration of the impact on the local economies of Adur and Worthing along with traffic impacts.

6.2 SDNPA has started work on the AAP, commissioning consultants to provide baseline reports / surveys. This evidence base and early drafts of the AAP will be shared with both Districts at the appropriate time.

¹ Adur District Council & Worthing Borough Council representations to Pre-submission South Downs Local Plan

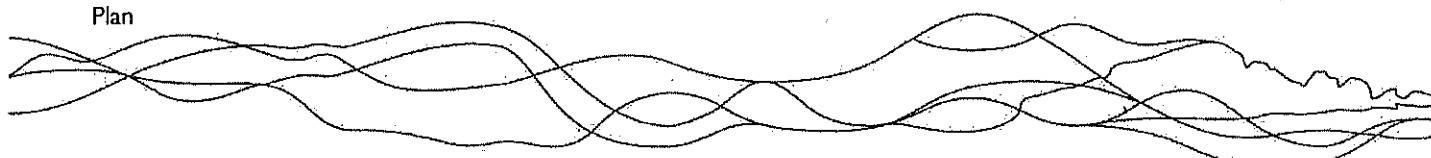


Table 1 Housing supply and need in the Arun part of the South Downs National Park

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

¹ 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)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

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

⁵ 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)

⁶ 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 2016.² 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.³ The Board has now started work to address the challenge for the future of creating an approach

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

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

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 goods and services we get from the natural environment) 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 both authorities, have been and will continue to 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 Statement¹, and in the jointly prepared documents referred to below.

4. Addressing unmet housing need

4.1 It is agreed between the parties that the housing supply and objectively assessed need both within and outside of the South Downs National Park, is as set out in the Table 1 below:

Table 1: Housing supply and need in the Brighton & Hove part of the South Downs National Park

	A	B	C	D	E	F	G
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Brighton & Hove	0	0	9	9	660	1506	846
Sussex Coast HMA ⁷	2971	156	274	112	2748	4481	1577

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Brighton & Hove figure derived from the City Plan Part One

⁵ Taken from Brighton & Hove City Plan Part One (para 2.20) which states an OAN of 30,120 new homes over the Plan period.

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

⁷ Sussex Coast HMA consists of the following lower tier/unitary authorities: Adur, Arun, Brighton & Hove, Chichester, Lewes, and Worthing.

4.2 The SDNPA and BHCC agree that the objectively assessed housing needs for that part of Brighton & Hove that lies within the National Park cannot be met without unacceptable environmental consequences and that there continues to be an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework is engaged. The

¹ South Downs National Park Duty to Cooperate Statement, 2017

small part of the western part of the district at Southbourne is within the Portsmouth HMA. 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 goods and services people get from the natural environment) 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 housing need, 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 Statement¹, and in the jointly prepared documents referred to below.

4. Addressing unmet housing need

- 4.1 It is agreed between the parties that the housing supply and objectively assessed need for the district both within and outside of the South Downs National Park, is as set out in the Table 1 below:

Table 1 Housing supply and need in the Chichester part of the South Downs National Park²

	<i>Part A - Proposed Housing Provision in South Downs Local Plan: Pre-submission</i>					
	A⁽ⁱ⁾	B	C	D	E	F
District	Provision made in the SDLP (Policy SD26)	Completions (2014/15 to 2016/17)	Unimplemented Planning Permissions	Windfall Allowance	Total Provision (A+B+C+D) (plan period 2014-2033)	Average Per Annum (E/19 years)
Chichester	677	290	404	163	1,534	81

<i>Part B - Target in Chichester Local Plan</i>	<i>Part C - Deficit of housing supply compared with housing need in whole district</i>			
G	H⁽ⁱⁱ⁾	I	J⁽ⁱⁱⁱ⁾	K
Annualised housing target for part of district outside SDNP	Total housing need per annum in SDNP part of district	Per annum difference between supply and need in SDNP (F-H)	Total housing need per annum in whole district/HMA	Annual surplus/deficit of supply vs need (negative value indicates a deficit) (F+G-J)
435	125	-44	575	-59

¹ South Downs National Park Duty to Cooperate Statement, 2018

² These figures are produced by the SDNPA and are considered to be the most accurate available as of April 2018. The housing supply trajectory for the South Downs National Park is updated annually in the Authority Monitoring Report, to reflect yearly completions and planning permissions updates.

Notes on Table 1:

⁽ⁱ⁾ Column A includes site allocations in the draft South Downs Local Plan, 'made' neighbourhood plans (Fernhurst & Lavant) and neighbourhood plans currently in preparation (Bury, Fittleworth, Petworth & Rogate).

⁽ⁱⁱ⁾ The South Downs National Park HEDNA (GL Hearne, 2017) (Table 5, p120) states an objectively assessed housing need of 125 dwellings per annum in the National Park within Chichester district, based on a 10-year trend (demographic-led projection) utilising the 2014-based Sub-National Population Projections and the 2014-based CLG Household Projections.

⁽ⁱⁱⁱ⁾ The Review of Objectively Assessed Housing Need in light of 2012-based Subnational Population Projections (GL Hearne, 2014) states an objectively assessed housing need of 560-575 dwellings per annum for the whole of Chichester district. The Chichester Local Plan Inspector's Report (May 2015) (paragraph 41) acknowledges that the top of this range is the District's OAN.

4.2 As a result, both/all parties acknowledge that there is an unmet housing need whereby paragraphs 179-181 of the National Planning Policy Framework are engaged. The parties to this agreement are addressing this as far as is consistent with the policies set out in the Framework, in the following ways:

- i) The study 'Defining the HMA and FEMA' (GL Hearne, 2017) prepared on behalf of the West Sussex and Greater Brighton Strategic Planning Board identifies that Chichester District falls primarily within the Chichester and Bognor Regis Housing Market Area. It is acknowledged that the South Downs National Park HEDNA nevertheless uses the previous, larger Coastal Sussex HMA which includes Chichester district.
- ii) In May 2013, the authorities falling within the Coastal West Sussex (CWS) area published a report 'Housing Study (Duty to Cooperate) Executive Summary'. This set out an objectively assessed housing need of 2,905-3,415 dwellings per annum for the entire HMA. The study also concluded that a level of development required to meet the development needs of the area cannot be achieved in light of the significant environmental, landscape and infrastructure constraints to development which exists. This is a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel.
- iii) A Coastal West Sussex and Greater Brighton Local Strategic Statement (LSS) was published in October 2013 and updated in January 2016.³ 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.⁴

4.3 The SDNPA confirms a housing provision figure of at least 70 dwellings per annum for that part of Chichester District which falls within the National Park; as evidenced in the table above, the figure is expected to average 81 dwellings per annum. Both parties confirm that the SDNPA has formally requested that CDC considers how it is able to accommodate some or all of the unmet housing need arising within the South Downs National Park.⁵ CDC has resolved that, subject to the completion of the ongoing evidence-based work and the assessment of sites to meet the identified housing needs associated with the Local Plan Review, Chichester District Council will assess its ability to meet some or all of the unmet housing needs arising from the part of the South Downs National Park within Chichester

³ <https://coastalwestsussex.org.uk/wp-content/uploads/2016/05/FINAL-LSS-Refresh-Final-version-Jan-16-180416.pdf>

⁴ <https://coastalwestsussex.org.uk/wp-content/uploads/2014/02/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

⁵ Letter from SDNPA (Tim Slaney) to CDC (Andrew Frost) sent 5 February 2018

Table 1 Housing Supply in the South Downs part of East Hampshire District Council

	A ¹	B	C	D ²	E	F
District	Provision made in the SDLP (Policy SD26)	Completions in first 6 years of JCS period (2011-12 to 2016/17)	Unimplemented Planning Permissions	Windfall Allowance	Total Provision (A+B+C+D) (JCS period 2011-2028)	Average Per Annum (E/17 years)
East Hampshire	932	396	188	162	1,678	99

¹ Column A includes site allocations in the draft South Downs Local Plan, and the made Petersfield, Liss and East Meon Neighbourhood Plans. This figure excludes 97 of the homes to be delivered in Petersfield, Liss and East Meon which are assumed to come forward in the period 2028-2033 and therefore do not fall within the totals above relating to the JCS period. It also excludes 81 net dwelling completions on sites allocated in Petersfield which are instead included in Column B.

² Windfall is based on average annual figure over a 10 year period (Apr 2006 to Mar 2016) which calculates as 24 dpa – a figure for windfall is not applied for the first 2 years going forward (i.e. 100% discount for 2017-18 and 2018-19) and a figure of 18 dpa applied thereafter (i.e. 24 discounted by 25%).

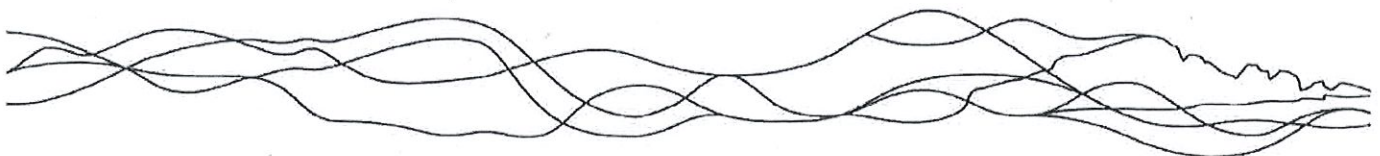
4.5 Key points to note are:

- Over the period 2011-28, it is expected that 1,678 homes will have been delivered in the National Park within East Hampshire, equivalent to 99 dwellings per year on average. This is just 16 dwellings short of the MoU commitment, equating to just 1 dwelling per year.
- The supply of homes through as-yet unimplemented site allocations in the East Hampshire within the SDNP area during the JCS period totals 932. This consists of 707 homes allocated through the made Petersfield Neighbourhood Plan and not yet completed, 90 provided for in the Liss and East Meon Neighbourhood Plans, and 135 proposed to be allocated in the SDLP, or identified in the SDLP for inclusion in emerging neighbourhood plans.

4.6 It is agreed that the JCS commitments and the commitments made in the MoU relating to housing need and supply are being met up to 2028. Therefore the objections made by EHDC to the Pre-Submission SDLP in relation to deficient housing supply in the National Park in the period 2011-2028 are duly withdrawn.

5. Addressing unmet housing need beyond 2028

5.1 It is agreed between the parties that it is not appropriate to seek to meet the full OAN in the South Downs National Park, given Government policy and the background of a landscape – led plan as described above. It is agreed that the two authorities will continue to work closely together to address future housing needs beyond 2028. This work will commence as part of the EHDC Local Plan Review and going forward will inform any future review of the SDNPA Local Plan.



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 housing need, 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, and in the jointly prepared documents referred to below.

4. Addressing housing need within Horsham District

4.1 It is agreed between the parties that the housing supply and objectively assessed need for the district both within and outside of the South Downs National Park, is as set out in Table 1 below:

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

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./ HMA ⁶ (B+E-F)	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Horsham	85	4	9	5	800	659	145	-
Northern WSx HMA	120	6	14	8	2104	2210	-	100

¹ SDLP & NDP housing allocations (discounted by 10%) plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

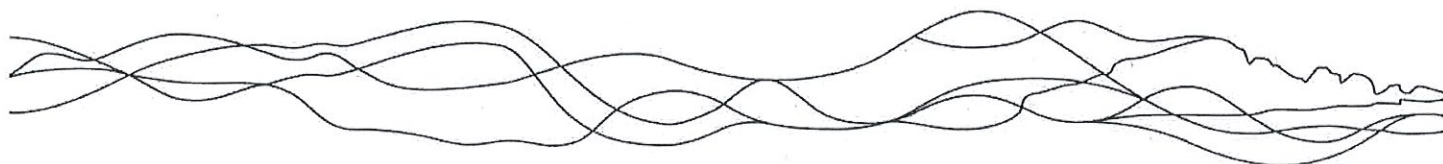
² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Housing provision targets based on Horsham District Planning Framework (adopted November 2015) and Mid-Sussex (Main Mods stage) and Crawley local plans

⁵ Taken from the most recent SHMA or HEDNA. As the Horsham OAN (650dpa) does not include the area within SDNP, the OAN inside SDNP as stated in the South Downs HEDNA 2017 (9dpa) has been added.

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



4.2 The South Downs Housing and Economic Development Needs Assessment (HEDNA) (September 2017) estimates the unmet housing need within the National Park, broken down by district and by HMA (Table 5). The annual unmet need in the Horsham part of the National Park is **5 dwellings per annum** (a total of 95 dwellings over the Plan period).

4.3 Based on the above evidence, both parties confirm that the figure for the objectively assessed housing need for Horsham includes the communities within the National Park which fall within the District, and therefore these communities' housing needs will be met through the provision of housing through both the Horsham District Local Plan and South Downs Local Plan. At a District level there is no unmet need.

5. Addressing wider housing need

5.1 Whilst Horsham District relates primarily to the Northern West Sussex HMA, both parties acknowledge that there is also a shortfall of housing in the neighbouring coastal West Sussex area, caused in particular by the current inability of Brighton & Hove, and some of the other coastal authorities, to meet their own needs. The level of unmet need is high and both authorities are taking steps, with neighbouring authorities and those in the sub-region, to address the issue. The scale of the issue requires a sub-regional response.

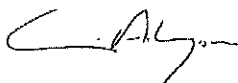
5.2 Both parties are participants in the West Sussex and Greater Brighton Strategic Planning Board which is addressing the issue of unmet housing needs in the coastal area through the Local Strategic Statement 3 (LSS3).

6. Shoreham Cement Works

6.1 HDC and the SDNPA are in agreement over the need to bring forward the restoration of this site and are keen to work together on the preparation of an Area Action Plan for the site (as set out in Strategic Site Policy SD56). This work will need to include consideration of the potential impact of proposals at Shoreham Cement Works on the neighbouring settlements, such as Steyning and Upper Beeding.

6.2 SDNPA has started work on the AAP, commissioning consultants to provide baseline reports / surveys. This evidence base and early drafts of the AAP will be shared with HDC at the appropriate time.

Signed on behalf of Horsham District Council

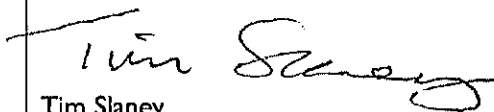


Chris Lyons

Date 10 April 2018

Position: Director of Planning, Economic Development and Property

Signed on behalf of the South Downs National Park Authority Planning Authority



Tim Slaney

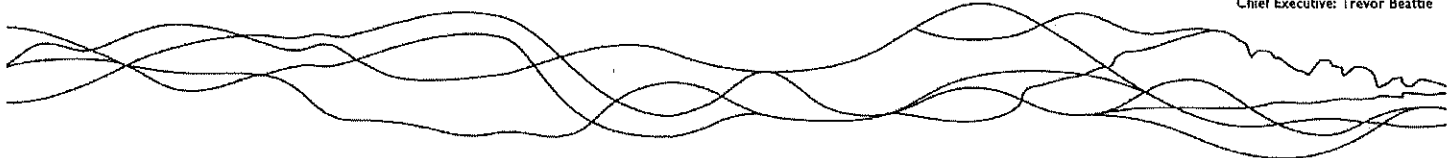
Date 24/4/2018.

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Chief Executive: Trevor Beattie



the natural environment) 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 both authorities, have been and will continue to 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 Statement¹, and in the jointly prepared documents referred to below.

4. Addressing unmet housing need

- 4.1 It is agreed between the parties that the housing supply and objectively assessed need both within and outside of the South Downs National Park, is as set out in Table 1 below:

Table 1: Housing supply and need in the Lewes part of the South Downs National Park

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./ HMA ⁶ (B+E-F)	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Lewes	1307	69	114	45	276	520	-	175
Sussex Coast HMA ⁷	2971	156	274	112	2748	4481	-	1577

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Lewes figure derived from total Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030 annualised target (345) less annualised housing provision being delivered by SDLP (69).

⁵ The Lewes OAN reflects the Lewes Local Plan Part 1 Inspectors Report (para 22) and Inspectors Preliminary Findings (letter dated 10 February 2015) and is the upper end of the range identified in the Coastal West Sussex Duty to Cooperate Housing Study.

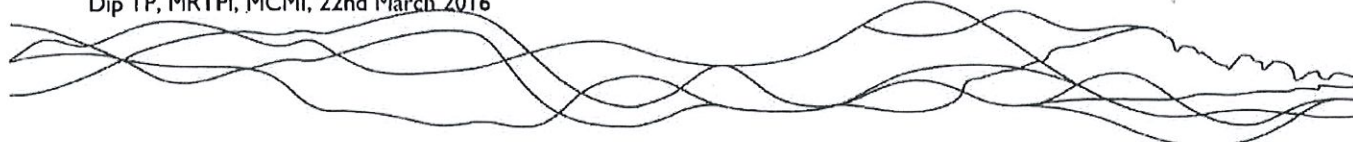
⁶ This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

⁷ Sussex Coast HMA consists of the following lower tier/unitary authorities: Adur, Arun, Brighton & Hove, Chichester, Lewes, Worthing.

- 4.2 The housing figures in the South Downs Local Plan relating to that part of Lewes District within the National Park carry forward the scale of housing agreed in the Lewes Joint Core Strategy (JCS). The Inspector's report² on the JCS states that:

¹ South Downs National Park Duty to Cooperate Statement, 2017

² Report to Lewes District Council and the South Downs National Park Authority, by Nigel Payne BSc (Hons), Dip TP, MRTPI, MCMI, 22nd March 2016



National Park of approximately 7 dwellings per year (around 1% of the total OAN for the whole district).

- 4.3 Taking into account the above, it is agreed between the parties that the housing supply and objectively assessed need for the district area, as applies with regards to the district both within and outside of the South Downs National Park, is as set out in the table below:

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./ HMA ⁶ (B+E-F)	Total annual unmet need by L.A./ HMA ⁶
Mid Sussex	35	2	5	3	876 (2014/15 to 2023/24) 1090 (2024/25 to 2030/31)	876	0 (2014/15 to 2023/24) 214 (2024/25 to 2030/31)	-
Northern WSx HMA	120	6	14	8	2104	2187	-	77

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ The latest outcome from the Mid Sussex Examination is a stepped annual provision of 876 dpa for the first 10 years of the 17-year Plan period, and 1,090 dpa thereafter. This calculates as an annualised oversupply of 88 dpa, however no oversupply is expected until at least 2024/25.

⁵ As Mid Sussex Local Plan Main Modifications September 2017

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

- 4.4 As an average of around 2 dpa will be delivered in the National Park over the Plan period, the effective unmet need in the National Park part of Mid-Sussex is 3 dpa, which will be met elsewhere in Mid-Sussex District. Based on the above evidence, both parties confirm that the figure for the objectively assessed housing need for Mid Sussex includes the communities within the National Park which fall within the District, and therefore these communities' housing needs will be met through the provision of housing through the Mid Sussex District Plan.

5. Addressing wider housing need

- 5.1 Whilst Mid Sussex District relates primarily to the Northern West Sussex HMA, both parties acknowledge that there is also a shortfall of housing in the wider West Sussex and Greater Brighton area, caused by the inability of the coastal authorities (except Arun) to meet their own needs. The scale of the issue requires a sub-regional response and therefore on-going engagement across the sub-region through the West Sussex and Greater Brighton Strategic Planning Board, which both parties are members of, will consider and test whether there are any opportunities for other local authority areas to

Table 1: Housing supply and need in the Wealden part of the South Downs National Park

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision for whole area ⁴	Local Authority Actual Net Housing Provision since adoption of Core Strategy ⁵	Local Authority OAN per annum (whole area) ⁶	Total annual unmet need against current Joint Core Strategy target ⁷ (E-G)
Wealden	48	3	10	7	450	579	950	500

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Wealden figure derived from Wealden Joint Core Strategy

⁵ This is the average number of net dwellings completed between 2012/13 and 2016/17 within the Wealden District.

⁶ Taken from the Wealden OAN Update Draft Paper: 2013-2028 (Regeneris Consulting, March 2017) and as advised by WDC. The OAN methodology includes the part of the SDNP in the District.

⁷ This is the difference between the total plan provision and the total OAN, for the whole area (both within and outside SDNP). This assumes annualised average delivery of 450 dpa over the JCS period, whereas for the first five years of the Plan period there has been a much higher rate of completions (column F) and therefore a lower annual unmet need

4.2 The unmet housing need arising within the National Park in Wealden is very low, and is considered negligible when compared with the wider district and HMA, but may need to be addressed together with the wider unmet need through the local plan process. WDC is currently reviewing its Local Plan and will be consulting on its Pre-submission Local Plan in the near future. However a key issue is the impact of development on the Ashdown Forest Special Area of Conservation (SAC), which WDC considers is a significant constraint in accordance with national policy and of European environmental protection legislation. In addition to this, constraints also potentially include the need and delivery of an off line A27 and waste water treatment in relation to the Pevensey Levels.

4.3 Both the SDNPA and WDC are members of the East Sussex Local Plan Managers Group and the East Sussex Strategic Planning Members Group (ESSPMG), which was set up in 2013 to enhance and endorse cooperation at the political level. All ESSPMG member authorities are signatories to a memorandum of understanding, which was drawn up to formalise and give direction to ensure active, constructive and ongoing joint working arrangements. The memorandum of understanding sets out the group's key purposes as raising awareness of cross boundary issues; and to explore any matters of concern to understand how they are affecting development and/or delivery of plans.

5.0 Ashdown Forest

The South Downs National Park is located at its closest point 13km from the Ashdown Forest Special Protection Area (SPA). Work is underway by a number of local planning authorities including WDC on producing a Statement of Common Ground on recreational disturbance to the Ashdown Forest SPA. It is advised by Natural England and agreed between the two authorities that the SDNPA do not need to be a signatory to this

- 2.4 Winchester is a city council area within the county of Hampshire of which approximately 40% falls within the South Downs National Park. This means that statutory planning responsibilities within the city administrative area are geographically split along the National Park boundary.
- 2.5 Both local authorities fall partly in the Central Hampshire Housing Market Area as defined in the South Downs Housing and Economic Development Needs Assessment (HEDNA) published in 2017.
- 2.6 The two authorities have worked in partnership to ensure that strategic planning issues are properly and holistically addressed, initially through the production of a Joint Core Strategy (Winchester District Local Plan Part 1) and subsequently through their respective Local Plans.

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, 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. In relation to Winchester City Council these issues focus on addressing objectively assessed development needs, particularly housing needs. Further detail is given in the South Downs National Park Duty to Cooperate Statement¹.

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 Winchester city district (both within and outside of the South Downs National Park) is as set out in Table 1 below (figures are annual averages unless otherwise stated):

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

	A	B	C	D	E	F	G	H
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual over-supply by L.A./ HMA ⁶ (B+E-F)	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Winchester	283	15	31	16	625	625	15	-

¹ South Downs National Park Duty to Cooperate Statement, 2017

Notes:

¹ SDLP & NDP housing allocations plus commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)

⁴ Housing provision targets based on Winchester District Local Plan Part I- Joint Core Strategy adopted March 2013.

⁵ Objectively Assessed Housing Need as set out in the Joint Core Strategy

⁶ 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 Winchester Joint Core Strategy meets the whole of the objectively assessed housing need for the City's administrative area, including the part that lies within the South Downs National Park and the communities that live in it. As such, both parties confirm that these communities' housing needs will be met through the provision of housing through the Winchester Joint Core Strategy, with the provision proposed in the SDLP being over and above the Winchester City area OAN to 2031.

4.3 This situation reflects the requirements of the current (2012) NPPF and relates to the period up to 2031. An alternative method of assessing housing needs is expected to be introduced through revisions to the NPPF. Both parties acknowledge that, following adoption of the SDLP, future reviews of both the SDLP and the Winchester Local Plan will need to take account of a recalculated level of housing need, and potentially review how it is apportioned between the authorities, once the new methodology comes into effect.

5. Addressing unmet Gypsy and Traveller and Travelling Showpeople need

5.1 It is agreed between the parties that the identified need for Gypsy and Traveller pitches in the National Park part of Winchester (as established through the 2016 Winchester GTAA²) is zero. With respect to Travelling Showpeople, there is no identified need for plots within the National Park part of Winchester. The current position is summarised in Table 2.

Table 2 Winchester part of the SDNP Gypsy & Traveller Need 2016 – 2036 as at 1st March 2018

	Gypsy & Traveller pitches	Travelling Showpeople plots
Total existing authorised pitches/plots	1	3
Total current need	0	0
Total Future Need 2021 - 2036	0	0

5.2 However, the Winchester Traveller DPD has been unable to identify sufficient travelling showpersons' sites to meet the identified need and has requested neighbouring authorities (including the SDNP Authority) to assist under the Duty to Cooperate. Despite carrying out a joint site assessment study with WCC and East Hampshire District Council³, the SDNP Authority has also not been able to identify any suitable or available sites which could assist in providing for travelling showpersons and therefore the authorities agree that any applications in the future will be considered on their merits as necessary.

² Winchester Gypsy and Traveller Accommodation Assessment (ORS, 2016)

³ Site Assessment Study (on behalf of East Hampshire District Council, SDNPA, Winchester City Council), July 2016