

Date:
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INSPECTOR:
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PROGRAMME OFFICER:
Mrs Claire Jones-Hughes

I have now had an opportunity to read through the City Plan Part 1 and wish to raise some initial questions. I must stress that these are queries that have arisen from my early reading of the document and the evidence base and not a substitute for the Matters and Issues that I will prepare before the PHM.

Housing need and supply

The SHMA identifies a need for 15,800 new homes over the plan period. Please indicate whether or not, with appropriate references whether this figure takes into account current needs including homelessness and overcrowded households as mentioned in paragraph 2.5 of the Plan. The City Plan sets a housing target of 11,300. I note that neighbouring authorities have indicated that they are unable or unwilling to assist in meeting the shortfall of 4,500 new homes. The City Plan, therefore, aims to meet less than two thirds of the objectively-assessed need for new housing. This is a substantial level of under provision. Paragraph 14 of the National planning Policy Framework (the Framework) requires local authorities to “positively seek opportunities to meet the development needs of their area. Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in the Framework indicate development should be restricted”.

The City Plan argues, for example paragraph 4.3, that the City is constrained by various environmental considerations, including the South Downs National Park. Paper TP/009 explains the process by which the Council has reviewed potential sources of housing land supply. I note that a significant number of potential sites in the Urban Fringe have been classified as not having any potential to meet housing needs. The Council’s assessment of these sites (Appendix 2 of TP/009) appears, on the face of it, to be a rather cursory examination of these sites which identifies perceived constraints, but includes no analysis of whether such constraints could be satisfactorily overcome, and what the residual adverse impacts of developing some of the less constrained sites would

be. Without such an analysis it is difficult to have confidence in the conclusions drawn in Appendix 3 of TP/009.

Bearing in mind the significant shortfall in meeting objectively assessed needs, my preliminary view is that the Council needs to reconsider whether such a restrictive approach to development within the Urban Fringe (Policy SA4) is fully justified in the context of paragraph 14 of the Framework.

National Park (Policy SA5)

Policy SA5 sets criteria which development within the setting of National Park should meet but also sets priorities for land within the National Park that falls within the City's administrative boundary. The Policy recognises that Brighton and Hove City Council is not the planning authority for this area and, in addition to potential legal implications relating to the approach taken in Policy SA5, it is my preliminary view that such a policy would not be effective and therefore unsound.

Implementation and Monitoring

Annexe 1 includes limited information on targets to be achieved, other than a restatement of the intentions over the whole plan period in relation to the Development Area policies. There are no trigger points or indications of what steps will be taken if expectations are not being achieved. Without this, the Plan may not be considered effective.

I look forward to your response,

Laura Graham

Inspector