



FAO Cllr Pat Beresford

C.C. Moira Hayes – Planning Policy

Date: 26/11/14

Dear Cllr Beresford,

Adur District Local Plan: Duty to Co-operate

Thank you for inviting Worthing Borough Council to comment on the Proposed Submission Adur Local Plan 2014.

Background and Partnership Working

The Duty to Co-operate now places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. Every effort should be made to secure the necessary cooperation on strategic cross boundary matters before a Plan is submitted for examination.

With the 'Duty' in mind, you will be very aware that there are perhaps not many better examples of partnership working than Adur District Council and Worthing Borough Council. In 2007 the two authorities took the decision to work in partnership. In 2008 a single senior officer team was created and since that time all services have become joint teams. The provision of joint services has led to significant savings and efficiencies.

Planning Policy has been no exception to this change and a single team of officers, under one Planning Policy Manager, work on Development Plan documents for both Worthing and Adur. There are many benefits for this arrangement in terms of resources, procurement and the sharing of evidence. Furthermore, joint documents such as the Statement of Community Involvement have been published and this is a trend that is likely to continue in the future.

This joint working has resulted in a detailed and thorough understanding of key planning issues for officers, and indeed Members, across both authority areas. Despite this awareness, it is considered important that, for two reasons, Worthing Borough Council should make comment on the Adur Local Plan. Firstly, and in line with the requirements of the 'Duty', the letter helps to highlight the close working relationship that is in place between the authorities and an awareness of the limited development opportunities across both areas. Secondly, it allows for Worthing BC to summarise the very significant housing and economic needs in the Borough. Given the very limited opportunities for future

development in and around Worthing, this information helps to demonstrate the strong likelihood that Worthing will not be able to meet its own needs let alone consider the potential for meeting any additional needs arising from Adur or other neighbouring authorities.

Housing Provision needs

It is understood that the Assessment of Housing Development Needs Study of April 2014 (undertaken for the Sussex Coast Housing Market Area) indicated that the objectively assessed housing need for Adur between 2011 and 2031 is 180-240 homes pa. This represents the upper figure in the range of 180 and 240. In terms of delivery, the Proposed Submission Adur Local Plan 2014 indicates between 174 and 182 homes per annum over this period. Whilst the upper figure potentially meets the lower end of the needs range, there is a shortfall of 1162-1312 dwellings (58-65 dwellings per annum) when measured against the upper end of the needs range.

The work that Adur has undertaken to assess the potential of the district to accommodate new housing (including the Strategic Housing Land Availability Assessment, the Sustainability Appraisal of the Adur Local Plan, the Adur & Worthing Strategic Flood Risk Assessment and the Adur Landscape and Ecology Study) appears comprehensive and is appreciated. It is also understood that there is very limited land within the district to accommodate further development, in part due to environmental constraints, as well as the location of the South Downs National Park to the north and the sea to the south. The capacity constraints to providing new housing development in Adur are highlighted in the Coastal West Sussex Housing study – Duty to Co-operate study of 2013. The wider constraints of the coast are also highlighted in the CWS Local Strategic Statement. Worthing Borough Council is satisfied that, as set out in your evidence, Adur District Council has positively tested options for growth and that the development strategy set out in your Plan represents the most realistic, sustainable and deliverable option for growth in your District.

Worthing

With regard to Worthing, the adopted Core Strategy (2011) seeks to deliver a total of 4,000 dwellings to 2026 (200 dwellings/year) which was the requirement set for the Borough within the South East Plan. This is a figure that takes into account the lack of opportunities for any more significant growth in and around Worthing and as such, the key focus of the local strategy is regeneration. There was never any suggestion that this level of development would meet all of Worthing's housing needs. Through the Annual Monitoring Report the Council has been able to demonstrate that against the requirements of the Core Strategy the Borough has met (and often surpassed) the 200 dwelling a year delivery requirement.

It is recognised that the significant changes made to the planning system, in particular, how each authority must now assess its housing needs, means that a full review of the local policy position in Worthing is now required. The Assessment of Housing Development Needs Study of April 2014 indicates that objectively assessed needs for Worthing is between 500 and 600 dwellings per year and further work to provide more information on this will be published in early 2015. The outcomes of this work will help to inform the timetable for the full Plan review to be set out within a revised Local Development Scheme. This will be prepared for consideration by Members in early 2015.

A full and positive review of the Worthing SHLAA is currently being undertaken and careful consideration has been given, in the first instance, to opportunities on previously developed sites within the built up area boundary. Work will then continue to assess the

potential of the small number of greenfield opportunities around the borough. Although the complete SHLAA review has yet to be finalised, it is clearly apparent that opportunities to deliver new housing are extremely limited.

Even though the development potential of every opportunity in and around Worthing will be positively tested, there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet Worthing's objectively assessed housing need. Even if every realistic opportunity were to be developed, the lack of available land and other constraints will mean that there would still be a significant shortfall.

To highlight this, the Coastal West Sussex Housing study – Duty to Co-operate study of 2013 notes that Worthing is a relatively small local authority and that the urban area is sandwiched between the sea to the south and the South Downs National Park to the north. Most of the land outside of the built-up area to the north of the town falls within the South Downs National Park. Development potential is also affected by two river flood zones, and significant congestion on the A259 and the A27 which runs as a single carriageway road through much the Borough. The study concludes that whilst further work is needed, 'it is unlikely that delivery of more than 250 homes per annum over a sustained period can realistically be achieved in the Borough.'

Given that it is highly likely that Worthing will be unable to meet its own objectively assessed needs, it is also highly probable that it will be unable to assist Adur in meeting its housing provision needs.

Given this position, and in line with the requirements of the Duty to Co-operate Worthing Council is currently working closely with Adur District Council and other local authorities within West Sussex which are within or abut the housing market area to address housing needs under the duty to co-operate. Strategic issues including housing needs will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board (and its Local Strategic Statement 2013); the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.

Economic

It is understood that the 2014 Employment Land Review for Adur indicates that the Adur Local Plan should make provision for between 15,000 and 20,000 sqm net floorspace for offices and research and development and between 35,000 and 40,000 for warehousing over the 2011 and 2031 period in addition to 18,750 sq m of employment floorspace to be relocated from Shoreham Harbour and provided elsewhere within Adur. However, due to capacity constraints (as referred to above in relation to housing - i.e. Adur's size and location, flood risk and landscape quality), the Local Plan can only allocate 41,000 sqm of floorspace for employment generating uses (not specifically B class uses). As above for housing, Adur is unlikely to be able to meet its own employment floorspace needs.

As such, it is appreciated that Adur is unlikely to be able to assist Worthing in meeting its economic floorspace needs. However, both our authorities should benefit from the wider regeneration and growth aspirations within the LEP area and we are working together to ensure that mutual sustainable advantages are gained to benefit our communities. This would encompass jobs, skills and training. As with housing, active and ongoing evidence gathering and strategy development on the wider economic needs - will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.

Worthing

The Worthing Core Strategy indicates a need to provide 780,000 sq ft of industrial and warehousing floorspace and 240,000 sq ft of office space up to 2026. Monitoring reveals that this amount is unlikely to be provided if current completion rates continue. Furthermore, changes made to planning policy at the national level have increased pressures on employment land in the borough from residential uses. In response to this, a recent Worthing Employment Land Review Update (Dec 2013) concluded that the Council's protectionist policy towards the retention of employment land is still valid and that there will continue to be a need to deliver additional employment land to help achieve economic growth.

As part of the full review of the Council's Core Strategy, a new Employment Land Review will be commissioned. This will provide more robust and up-to-date information on the type, scale and tenure of employment needs. This in turn will help to inform consideration of the location of this employment land within Worthing and within the context of the duty to co-operate. As above in relation to housing, there are significant constraints to meeting new development needs including the size and location of the Borough and a large part of the area falling within the South Downs National Park. Due to the scarcity of available sites to deliver new employment needs, co-operation with neighbouring local planning authorities will be required.

Because it is highly likely that Worthing will be unable to meet its own employment floorspace needs, it is also highly probable that it will be unable to assist Adur in meeting its economic needs. However, as referred to above, both our authorities should benefit from the wider regeneration and growth aspirations within the LEP area and work together to secure this. Worthing is currently working with other local authorities within West Sussex to address employment and economic floorspace needs under the duty to co-operate. Strategic issues including employment and economic needs will continue to be considered through the framework of the Coastal West Sussex and Greater Brighton Strategic Planning Board; the Greater Brighton City Deal as well as through the Coast to Capital Local Economic Partnership.

Summary

The above concludes that Worthing Borough Council is unable to assist Adur in meeting any of its unmet housing and economic needs given our own shortfalls although we wish you every success with your Local Plan. It is also apparent from the evidence, that Adur cannot meet any of Worthing's likely shortfalls. In line with our partnership working arrangements we have been engaging and co-operating with Adur DC throughout all stages of our respective plans and we look forward to continuing this positive relationship.

If you need any more information or have any queries, please do not hesitate to contact Ian Moody (01273 263009, e-mail ian.moody@adur-worthing.gov.uk).

Yours sincerely



(Cabinet Member for Regeneration – Worthing Borough Council)