



WORTHING BOROUGH COUNCIL

WORKING DRAFT

HOUSING IMPLEMENTATION STRATEGY

Regulation 18

October 2018



Draft Housing Implementation Strategy - Draft Worthing Local Plan 2016 -2033

1.0 Introduction

- 1.1 This Draft Housing Implementation Strategy has been prepared to support the Draft Worthing Local Plan 2016-2033. It sets out the Council's proposed approach to managing the delivery of housing over the Local Plan period in order to support the housing delivery target set out in the Draft Worthing Local Plan for a minimum of 4,182 (246 per annum) dwellings over the plan period.
- 1.2 The revised NPPF July 2018 sets out what the Government expect local planning authorities to do in order to support the Government's objective of significantly boosting the supply of homes. It states at Para 59 that *'it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.'*
- 1.3 In determining the minimum numbers of homes needed, Para 60 states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'*
- 1.4 It goes on to state that *'In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- 1.5 In terms of housing delivery, work has been undertaken to assess the number of new homes that can realistically be delivered, taking account of the characteristics and constraints of Worthing. This early stage in the local plan process sets out a proposed housing delivery target based on what is considered the most realistic housing capacity figure for the borough between 2016 -2033. This capacity figure (see Section 5.0 below) is based on the most up to date information and evidence at the time of publishing this stage of the plan. Additional evidence derived from this draft consultation stage will help refine the proposed capacity figures and delivery rates and will be used to inform subsequent stages of the Local Plan which will be tested at a public examination.
- 1.6 This document includes a housing trajectory, identifies the sources of housing supply for the Plan period and the five-year housing land supply position as at 1st April 2017.
- 1.7 It also assesses the risk to housing delivery and how any risk can be managed and mitigated as well as setting out the framework for monitoring and reviewing delivery of housing.

2.0 Current Housing Position at 1 April 2017

- 2.1 The most recent Annual Monitoring Report (AMR) 2016 - 2017 (currently being updated for publication in December 2018 to cover period 2017-2018) reported housing delivery against the target as set out in the Core Strategy which was adopted on 12 April 2011. The Core Strategy housing target is 200 dwellings per annum (dpa).
- 2.2 Since the adoption of the Core Strategy and in accordance with changes in government policy which required local authorities to meet their 'Objectively Assessed Need', the Council

commissioned a new housing study to determine the up to date level of housing need within the borough. The Worthing Housing Study (June 2015) indicated that Worthing would need to build 636 dpa to meet its Objectively Assessed Need (OAN). This was a significantly higher delivery target than the adopted 200 dpa target in the Worthing Core Strategy. These changes to national policy, particularly the changes to local requirements for housing, resulted in the need to undertake a review of the Core Strategy and produce a new Local Plan. Work on this commenced in 2016 and we have now reached this Regulation 18 Draft Local Plan stage.

- 2.3 In preparing the AMR (2016/17) it was considered appropriate to continue to measure Worthing's housing delivery against the 200 dpa target adopted in the Core Strategy. However, it was acknowledged that, in line with the requirements of the NPPF (2012) at that time, the OAN figure (being then the most up to date assessment of housing need) was also reported. As such, the five year housing land supply position had been calculated using the outcomes of the Worthing Housing Study (2015).
- 2.4 Since the completion of the Worthing Housing Study (2015) and the publication of the AMR 2016-2017, the government published a revised NPPF (July 2018) and accompanying Planning Practice Guidance. This has introduced a new Standard Methodology for calculating Local Housing Need (LHN).
- 2.5 However, the revised NPPF sets out transitional arrangements for the implementation of the new Standard Methodology calculation. It requires local plans that were adopted more than 5 years ago, (which includes the Worthing Core Strategy) and that have not reached Publication stage, to use the new standard methodology to assess Local Housing Need and to form the basis of the 5-year Housing Land Supply calculation. This Housing Implementation Strategy therefore sets out the five Year Housing Land Supply position against both the Draft Local Plan proposed housing delivery target and against the new Standard Methodology calculation (set out below).
- 2.6 Since the publication of the Worthing Housing Study in June 2015 it was clear that the Council faced a significant challenge to meet the identified needs and this has been further exacerbated with the introduction of the Standard Methodological approach which has, in effect, increased the level of housing need. It became abundantly clear that despite taking a positive approach to development, the likely delivery rate for housing was going to fall significantly below the identified needs.
- 2.7 Against the backdrop of significant and growing housing need the Council has taken, where possible, positive steps to bring forward sustainable opportunities to deliver new development. Whilst the progression of the Local Plan provides the main mechanism through which sites will be allocated the Council has also considered ways in which housing delivery can be increased in advance of plan adoption. In response to this two edge of town opportunities (Fulbeck Avenue and Land North of West Durrington) have been given support for development in advance of the adoption of the new Local plan. These sites which sit within the existing built up area boundary, were included in the earlier Local Plan consultation 'Issues and Options' which raised the question of bringing these two sites forward in advance of the new Local Plan. In general the proposed approach was positively received. Since that time an application has been approved on the Land at west Durrington site pending the signing of a legal agreement and discussions are ongoing regarding the delivery of the Fulbeck Avenue site.

3.0 Standard Methodology Calculation

- 3.1 The revised NPPF 2018 now requires local planning authorities to meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. The government proposes that projections of household growth should be the demographic baseline for every local authority area. The most recent official projections should be used, with the household growth calculated for the period over which the Plan is being made. It is suggested that the demographic baseline should be the annual average household growth over a 10 year period. The government considers that given the expectation that plans are reviewed every five years, using average household growth over this period will ensure effective planning over the preparation period and duration of the plan. Household projection should therefore be regarded as the minimum local housing need figure.
- 3.2 Guidance states that household growth on its own is insufficient as an indicator of demand and an adjustment factor is required. The use of median affordability ratios published by Office of National Statistics (ONS) at a local level is considered to provide the best basis for adjusting household projections. The affordability ratios compare the median house prices (based on all houses sold on the open market in a given year in a local authority) to median earnings (based on full-time earnings for those working in that local authority area). The most recent data available needs to be used to achieve the Local Authority Ratio (LAR).
- 3.3 The data used is based on the most up to date information available at the time of writing this document and is likely to change between now and when the Local Plan is submitted for examination.
- 3.4 Calculation for Draft Worthing Local Plan 2016 -2033:

Step 1 - setting the baseline - using the most up to date household growth projections ONS (2016 based on figures published September 2018)

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

- 3.5 Calculating for the 10 year period from now i.e. 2018 - 2028 the expected household growth projections are as follows:

2018 - 50,103 households

2028 - 55,479 households

= projected growth of 5,376 over the 10 year period which equates to an annual rate of 538 households.

Step 2 - An adjustment to take account of affordability - using the most up to date affordability data (based on 2017 data published in April 2018)

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhouseprice-to-workplacebasedearningslowerquartileandmedian> (Table 5c) the adjustment factor for

Worthing is as follows:

Adjustment factor = $(\frac{\text{Local affordability ratio} - 4}{4}) \times 0.25$

4

Worthing's Affordability Ratio = 11.35 and therefore the Adjustment Factor:

$$\frac{(11.35 - 4)}{4} \times 0.25 = 0.46$$

Overall housing need is therefore:

Local Housing Need = (1+adjustment factor) x projected household growth.

For Worthing this is:

$$\text{Local Housing Need} = (1 + 0.46) \times 538 = 785 \text{ dpa}$$

Step 3 - Capping the level of any increase - planning policy guidance allows local planning authorities to apply a 'cap' to any increase. Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10 year period identified in step 1;
- b. or the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).

For Worthing (a) is applicable and therefore the calculation is as follows:

$$\text{Cap} = 538 \text{ (as derived at Step 1)} + (40\% \times 538) = 538 + 215 = 753 \text{ dpa}$$

- 3.6 This capped local housing need annual delivery figure must then be applied to the 'whole plan period' which results in a requirement for 12,801 dwellings over the 17 years of the Plan from 2016 - 2033.
- 3.7 This calculation does not factor in any shortfall/delivery from the start of the plan period 2016 - 2017. Taking into account the level of delivery between 2016-2017 which was 347 (net), the requirement for remaining 16 years of the plan:

$$12,801 - 347 \text{ (completions between 2016 - 2017)} = 12,454 \text{ dwellings which gives an annual delivery rate for the remainder of the plan period of 778 dpa.}$$
- 3.8 However, this level of housing requirement is significantly higher than has ever been planned for or delivered in the borough. The proposed 'capacity' based target set out in the Draft Local Plan (and justified below) is considered to be the most realistic level of housing that can be delivered having regard to the identified constraints and potential development capacity.

4.0 Local Plan Strategy for Housing Delivery 2016 -2033

- 4.1 The base date for the emerging Worthing Local Plan is 1st April 2016. A housing trajectory, setting out the projected annual housing delivery over the Local Plan period 2016 - 2033 is included in this Draft Housing Implementation Strategy.
- 4.2 The Local Plan aims to deliver a minimum of 4,182 dwellings over the Plan period 2016 - 2033, equating to an average of 246 dwellings per year. Whilst this planned housing target does not

meet the Local Housing Need requirement of 12,801 homes (753 dpa 'capped'), it is considered to be a realistic and deliverable figure given the genuine constraints of the area.

5.0 Sources of Housing Supply

- 5.1 This Local Plan target has been informed by a number of studies, evidence documents and monitoring reports. It should be noted that many of the elements that make up the Housing Supply for the Draft Plan are based on data derived from the Annual Monitoring Report 2016 - 2017 (which includes sites assessments from the Strategic Housing Land Availability Assessment Update 2016). West Sussex County Council (WSCC) provide annual monitoring information on much of the data relating to housing supply and this has not yet been finalised for the monitoring year 2017/2018 and therefore not included in this draft HIS. However, the information on a number of sites has been updated in relation to capacity and delivery rates due to reassessment and additional evidence.

Strategic Housing Land Availability Assessment

- 5.2 The Council's Strategic Housing Land Availability Assessment (SHLAA) has provided the mechanism through which the quantity and suitability of land potentially available for housing development has been determined. Following a comprehensive review of all development opportunities, the first SHLAA for Worthing was published in 2009 to help inform the Core Strategy. The SHLAA was subsequently reviewed and updated through the Annual Monitoring Report. However, to inform the preparation of this Local Plan and ensure that the methodology conformed to prevailing guidance a more thorough review of the SHLAA was undertaken in 2014. Updates have since been published annually within the AMR and during this period, there have been several 'calls for sites' exercises where landowners and developers were invited to put forward sites for consideration.
- 5.3 The SHLAA provides an assessment of risk associated with each site in terms of potential delivery constraints. All sites have been evaluated in terms of suitability, availability and achievability in accordance with the SHLAA practice guidance. Sites that do not have reasonable development potential have been excluded from the housing land supply. For those sites which are assessed as having reasonable development potential, any identified risk, in terms of policy constraints, infrastructure requirements, ownership constraints etc. are reflected in potential delivery rates. The SHLAA methodology can be viewed on the Council's website at [SHLAA](#).
- 5.4 The most recent SHLAA Update covers the period from 1st April 2016 to 31st March 2017. It indicates that 1019 dwellings can be delivered on 13 sites. The SHLAA Update 2016 - 2017 can be viewed at [SHLAA](#). In order to maximise the use of previously developed land the Government also requires all local authorities to publish a Brownfield Register annually. Informed by the findings of the SHLAA and a further 'call for sites' the first Brownfield Register for Worthing was published in December 2017. The Brownfield Register can be viewed here:
- 5.5 The housing supply calculations for the draft Local Plan uses data set out in the most recent published Annual Monitoring Report 2016-2017. However, further evidence and reassessment has allowed the conclusions on some sites included in the SHLAA Update 2016-2017 to be updated. The updated position is that 6 sites (assessed in the SHLAA Update 2016 - 2017) are expected to deliver 342 dwellings and another 4 sites (identified as Areas of Change within the Draft Plan and reassessed) are expected to deliver 495 dwellings, a total of 837 over the Plan period to 2033.

5.6 The SHLAA Update 2017-2018 is currently being undertaken and will be published in December 2018 as part of the AMR. It will reassess all potential site opportunities (and any new sites) to consider their development potential. Whilst the focus in previous SHLAA's has been on previously developed sites in the built up area, a rigorous assessment of edge of town opportunities (including greenfield sites) has also been undertaken. This work is continuing and this new consultation stage provides an opportunity for another 'call for sites' and to ensure that the capacity figures and projected delivery rates are robust. This will help refine the next version of the Local Plan.

Housing Completions (2016/2017)

5.7 Monitoring indicates that, for the one year period since the base date of the Local Plan, 347 net dwellings have been completed.

Commitments

5.8 These are large sites of 6 or more dwellings and small sites of 5 or fewer dwellings that have extant planning permission and which are either under construction or have not yet started. For small sites a discount of 55% has been applied (in accordance with the West Sussex County Council standard based on historic completion data). The large identified sites are listed in Appendix 1. In total the number existing commitments as of 1 April 2017 is 1,196 dwellings.

Small sites windfall calculation

5.9 Windfall sites are defined by the revised NPPF as:

"Sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously developed sites that have unexpectedly become available."

5.10 Historically, given the built up nature of Worthing, a significant proportion of housing development has come forward on small sites which generally comprise of infill sites, conversions and changes of use. These sites fall below the size threshold for sites to be included in the SHLAA.

5.11 Appendix 2 sets out in more detail how the projected windfall allowance has been calculated based on historic trends for small site completions from 2006-2017 it shows an average of 73 dwellings being completed on small sites per annum. Whilst the figure fluctuates from year to year, there is no clear trend that would suggest there might be an overall decline in completions and, as such, it is considered that there is compelling evidence to extrapolate these forward based on past evidence of delivery.

Strategic Development Sites

5.12 The Draft Local Plan proposes the allocation of 7 sites to deliver housing or mixed uses including housing. These sites are considered to be 'deliverable' meaning they are viable, available and offer a suitable location for development. Importantly, the Council considers that are achievable with a realistic prospect that housing (and other uses) will be delivered within five years. The following sites therefore form a key component of the Council's 5 year housing land supply:

- A1 - Caravan Club, Titnore Way (75 dwellings)
- A2 - Land West of Fulbeck Avenue (50 dwellings)
- A3 - Land at Upper Brighton Road (123 dwellings)

- A5 - Teville Gate (300 dwellings as part of a mixed use development)
- A6 - Union Place South (128 dwellings as part of a mixed use development)
- A7 - Grafton Site, Marine Parade (113 dwellings as part of a mixed use development)
- A8 - Civic Centre Car Park (64 dwellings)

5.13 Together, these sites are expected to deliver a minimum of 853 dwellings.

Areas of Change

5.14 In addition to the sites allocated for development, there are a number of other large previously developed sites within Worthing where change is expected and encouraged, over the plan period. However, at this stage in the plan process there is insufficient certainty over the timescales for delivery to specifically allocate these sites. As such, these sites are not currently included within the Councils five year housing land supply but do represent a delivery opportunity over the whole plan period. Given the lack of development opportunities in the borough and the important role these sites can play in meeting wider objectives, in this draft version of the Local Plan they are identified as 'Areas of Change' (AOC):

- AOC1 - Centenary House has an indicative delivery of 100 dwellings as part of a mixed use development.
- AOC2 - British Gas Site, Lyndhurst Road has an indicative delivery of 85 dwellings as part of a mixed use development.
- AOC3 -Stagecoach Bus Depot has an indicative delivery of 60 dwellings as part of a mixed use development.
- AOC5 - HMRC Offices, Barrington Road has an indicative delivery of 250 dwellings as part of a mixed use development.

5.15 As further progress is made, some of these Areas Of Change may become site allocations in later versions of this Plan.

5.16 The following emerging policies in this Worthing Local Plan Regulation 18 document relate specifically to housing delivery:

Policy SP3: Development Sites - this policy sets out the overall target for delivery of a minimum of 4,183 homes over the period 2016-2033. It identifies the different sources of housing provision, including seven site allocations and four Areas of Change where residential development is expected to come forward.

5.17 The proposed breakdown of housing provision from the different sources of housing supply is set out in Table 1 below:

Table 1 - Housing supply over the Local Plan Period 2016-2033

Sources of Housing Supply	
Dwellings completed (net) 2016-2017	347
Existing commitments (2016-2017) (sites where planning permission has been granted)	1,196
Windfall allowance (2021 - 2033)(13 years x 73)	949
Sites identified in SHLAA (net) as at 1 April 2017 (other than those now allocated and Areas of Change)	342
Areas of Change set out in Draft Worthing Local Plan	495
Sites allocated in the Draft Worthing Local Plan	853
Total Housing Supply (2016- 2033)	4,182
Annual Delivery Target (2016-2033)	246

6.0 Housing Trajectory for the Draft Local Plan period 2016 – 2033

- 6.1 The National Planning Policy Framework requires local authorities to prepare a housing trajectory to illustrate the expected rate of delivery for the Plan period.
- 6.2 This Draft Housing Implementation Strategy accompanies the Draft Worthing Local Plan 2016 and includes the housing trajectory for the Local Plan period 2016-2033. This trajectory has a base date of 1st April 2016. The housing trajectory once adopted will be monitored and updated on an annual basis through the Council's Annual Monitoring Report (AMR). The annual update of the Worthing Strategic Housing Land Availability Assessment (SHLAA) will also be reported through the AMR.
- 6.3 The trajectory included in this Draft Housing Implementation Strategy is based on the housing monitoring position at 1st April 2016 and the SHLAA Update 2016/17, published in December 2017 and sets out the expected rate of delivery over the Plan period. It indicates the amount of housing already delivered since 2016 and the anticipated delivery of housing from 2017 to the end of the Plan period. It is based on actual completions for the first year of the Plan period, current commitments on both large and small sites (as at 1 April 2017), potential strategic allocations, potential Areas of Change as set out in the Plan and an allowance for small windfall sites.

- 6.4 The proposed housing target is for a minimum of 4,182 dwellings to be delivered between 2016 and 2033 as set out in Policy SP3 of the Draft Worthing Local Plan (2016) and which results in an annual average of 246 dwellings per annum.
- 6.5 The trajectory indicates that the Council can meet the overall housing target with a continuous supply of land coming forward for development. There is a peak in delivery in the first five years of the plan and in particular in year 5. This is because the information available on the sites allocated within the Plan at this point in time indicates delivery (fully delivered) within the first five years of the Plan for those sites that are being proposed for allocation. Further evidence and the responses received during this current consultation will help to finalise the expected delivery rates.
- 6.6 Delivery rates will reduce considerably during the latter part of the Plan period. This is in part due to the reduced certainty of identifying sites that far into the future and there may be an issue in maintaining a continuous supply of available land for housing towards the latter part of the Plan period. Annual monitoring will highlight any such issue and appropriate intervention measures may be required as set out in the Overall Risk to Housing Delivery and Contingencies sections below. Furthermore, a review of the Local Plan(to be undertaken within five years of adoption) will allow any 'new' opportunities to be considered and potentially allocated.

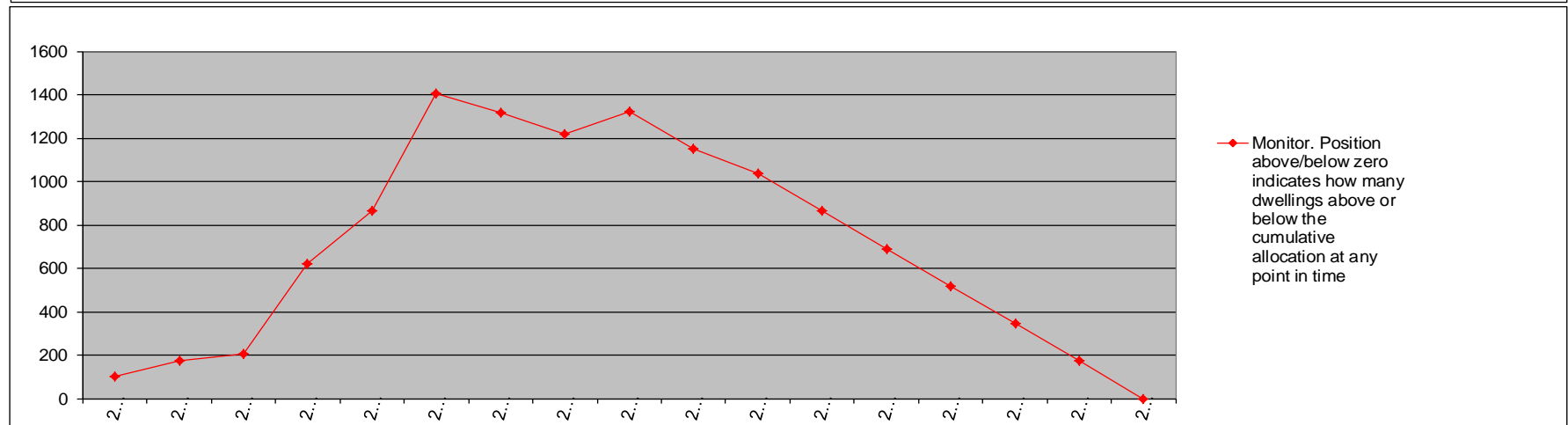
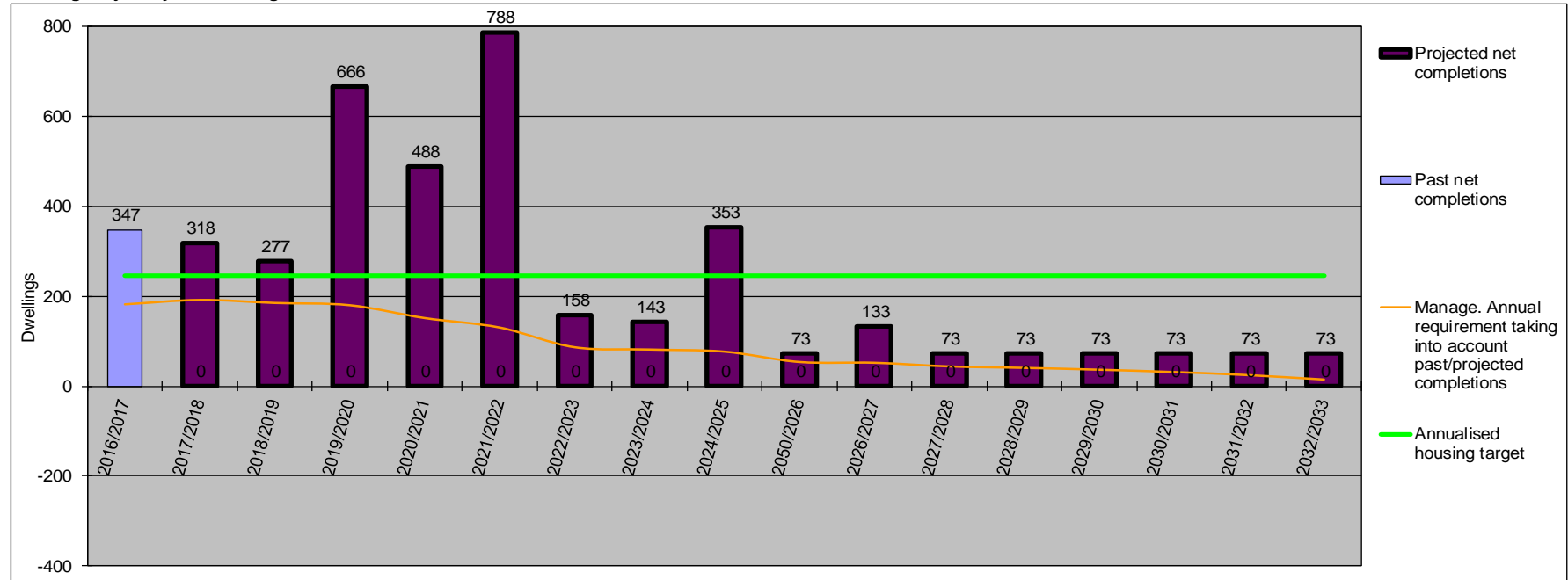
Worthing Trajectory

	2016/2017	Projected Completions															Totals	
		2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	2031/2032		2032/2033
Gross Completions at 1 April 2017 (large and small sites)	359	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	359
Commitments at 1 April 2017 (large and small sites with planning permission)(net)	0	288	92	337	5	0	0	0	0	0	0	0	0	0	0	0	0	722
Allowance for small windfall sites	0	0	0	0	73	73	73	73	73	73	73	73	73	73	73	73	73	949
West Durrington	0	30	156	206	82	0	0	0	0	0	0	0	0	0	0	0	0	474
SHLAA sites at 1st April 2017 (net)	0	0	29	123	86	104	0	0	0	0	0	0	0	0	0	0	0	342
Local Plan Allocations 2017	0	0	0	0	242	611	0	0	0	0	0	0	0	0	0	0	0	853
Areas of Change 2017	0	0	0	0	0	0	85	70	280	0	60	0	0	0	0	0	0	495
Total Projected Completions/Commitments	359	318	277	666	488	788	158	143	353	73	133	73	73	73	73	73	73	4194
Losses	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	12
Past net completions	347	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	347
Projected net completions		318	277	666	488	788	158	143	353	73	133	73	73	73	73	73	73	3835
Cumulative net completions	347	665	942	1608	2096	2884	3042	3185	3538	3611	3744	3817	3890	3963	4036	4109	4182	4182
Annualised housing target	246	246	246	246	246	246	246	246	246	246	246	246	246	246	246	246	246	4182
Monitor. Position above/below zero indicates how many dwellings above or below the cumulative allocation at any point in time	101	173	204	624	866	1408	1320	1217	1324	1151	1038	865	692	519	346	173	0	
Manage. Annual requirement taking into account past/projected completions	182	192	185	180	151	130	87	81	77	54	52	44	41	37	31	24	15	

Notes

Source: 2017 Residential Land Availability Survey, WSCC. To view source data search West Sussex County Council Planning Data for Housing and Residential Land in West Sussex. Large Sites: 6 units or more. Small sites: under 6 units.

Housing Trajectory for Worthing



7.0 Housing Delivery - 5 year housing land

- 7.1 The NPPF requires Local Planning Authorities to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with a buffer of 5% to ensure choice and competition or a 20% buffer where there is a record of persistent under delivery. Worthing has consistently delivered sufficient new homes to meet the adopted Core Strategy housing targets (200 dwellings / annum) and, for this reason, it is considered that the 5% buffer is currently the most appropriate figure to use. The Council is aware that should it so wish there is the option to request to fix the housing land supply position for 1 year at the submission stage of the Plan. The Council will consider whether this is an appropriate route.
- 7.2 The key purpose of the housing trajectory is to assess whether the Council's housing delivery strategy is delivering the required number of homes within appropriate timescales and to maintain a rolling five-year housing land supply.
- 7.3 This Draft Housing Implementation Strategy identifies a supply of sites, which are considered deliverable and developable within the five-year timeframe 2017-2022.
- 7.4 Monitoring of housing delivery will be reported through the Council's Annual Monitoring Report to be published in December each year(to cover the previous financial year).
- 7.5 Tables 2 and 3 set out the five year housing land supply position for Worthing as at 1 April 2017. Table 2 is based on the proposed Local Plan housing target of 246 dwelling per annum and with a 5% buffer to ensure choice and competition. Table 3 is based on the government standard methodology for assessing local housing need which requires delivery of 753 dwellings (capped) also applying a 5 % buffer.

Table 2 Five year Housing Land Supply measured against Draft Worthing Local Plan target of 246 dwellings per annum (with 5% buffer).

		Dwellings (net)	Annual Average
a	Draft Local Plan Housing target 2016-2033	4,182	246
b	Completed 2016-2017	347	
c	Number of years left in plan period = 16 year		
d	Remaining requirement 2017-2033 (a - b))	3,835	240
e	Five year target with no adjustment (246x 5)	1,230	

f	5% Buffer (1230/100 x 5)	62	
g	Requirement for five years 2017-2022 with 5% buffer (e+f)	1,292	258
h	Five year target with adjustment (240x5)	1,200	
i	5% Buffer (1,200/100X5)	60	
j	Requirement for five years 2017-2022(adjusted) with 5% buffer (h+i)	1,260	252
	Supply:		
k	Commitments at 1 April 2017 (net) (including West Durrington)	1196	
l	SHLAA sites	342	
m	Windfall allowance (73x2 years)	146	
n	Draft Local Plan Allocations	853	
o	Total Commitments (k+l+m +n)	2,537	
p	Surplus (o-j) (2537 - 1260)	1,277	

7.6 This table demonstrates a 10 year supply of deliverable sites (2,537/252).

7.7 This Draft Housing Implementation Strategy demonstrates that a five year supply of deliverable land is achievable against the proposed housing target in this Draft Local Plan.

Table 3 Five year Housing Land Supply measured against 753 dwellings per annum (Standard Methodology Capped figure) (with 5% buffer)

		Dwellings (net)	Annual Average
A	Objectively Assessed Need figure 2016-2033	12,801	753
B	Completed 2016-2017 (net)	347	
C	Number of years left in plan period = 16		
D	Remaining requirement 2017-2033 (a-b)	12,454	778
E	Five year target with no adjustment (753x5)	3,765	
F	Shortfall of housing provision from 2016 (753x1 years =753) minus completions (b) (347)	406	
G	Five year target including shortfall (e+f)	4,171	
H	5% Buffer (4,171/100x5)	209	
I	Requirement for five years 2017-2022 with 5% buffer (g+h)	4,380	876
	Supply:		
J	Commitments at 1 April 2017 (including West Durrington)	1196	
K	SHLAA sites (sites identified in SHLAA (net) as at 1 April 2017 (other than those allocated above)	342	
L	Windfall allowance (73 x 2 years)	146	
M	Draft Local Plan Allocations	853	
N	Total Commitments	2,537	
O	Shortfall (n-i) (2,537-4,380)	Minus 1,843	

7.8 This table demonstrates a 2.9-year supply of deliverable sites (2,537 / 876)

7.9 It can be seen that, when measured against the Standard Methodology figure (using the 2016 household projections published in September 2018 and capped) Worthing cannot demonstrate a five-year supply of available land for development.

7.10 This Draft Housing Implementation Strategy demonstrates that there are no fundamental obstacles to delivering a five-year supply of housing land in the early part of the Plan period as assessed against the proposed target for the Draft Local Plan, as being the most realistic capacity based figure. It should be acknowledged however, that build rates may be affected by wider housing market conditions over which the Council has no control.

8.0 Overall Risks to Delivery

8.1 Throughout the production of this Local Plan there has been ongoing engagement with key stakeholders and local communities. The process of this engagement is in line with the Adur and Worthing Statement of Community Involvement.

8.2 A consultation database specifically for the Local Plan has been maintained and used to engage with all parties with an interest throughout the whole Local Plan production process. A Statement of Consultation will be published to set out details of the engagement undertaken and how it has been used to inform the Local Plan policies.

8.3 Overall, risks to delivery are considered low. A raft of background evidence, together with continuous engagement, the encouragement for pre-application discussions with developers and landowners gives the Council confidence that the Draft Local Plan strategy is able to deliver sufficient housing to meet the target of a minimum of 4,182 dwellings in the Worthing Local Plan to 2033 and ensure a continuous supply of housing throughout the Plan period.

8.4 However, it is necessary to identify potential risks to delivery, firstly to increase the robustness of this Draft Housing Implementation Strategy and also to ensure that, where possible, potential mitigation measures are identified to address these risks.

8.5 The main identified risk to overall housing delivery is the health of the economy, which will be a major factor in the supply of housing throughout the Local Plan period. The ability of developers to access finance and the availability of mortgage products to prospective purchasers have also had an impact. If there is another downturn, and the effects of Brexit on the housebuilding industry are as yet unknown, this will have a detrimental effect on delivery rates, over which the Local Authority will have little control. There is a risk therefore that the Local Plan housing target will not be delivered. Furthermore, the Council has established a major projects and investment team to help support the delivery of key regeneration sites, many of which are also supported within the sub-regional strategies and funding programmes.

8.6 However, the Council is confident that the comprehensive evidence base indicates that sufficient housing will be delivered from the sources identified. The Council has sought to minimise the risk of unforeseen development constraints by undertaking detailed assessments of potential constraints during the Plan preparation process. This has included commissioning a number of background evidence studies and continuous liaison with key statutory agencies and site promoters throughout the Local Plan process. The risk of additional infrastructure requirements, particularly in respect of the larger sites, has been minimised through working

closely with key infrastructure and service providers throughout the Plan preparation process. Overall, the risk of non-delivery of sites is low although unforeseen barriers to development may occur. The Council will work with developers to help overcome this. Working with the relevant infrastructure/service providers and site promoters, an Infrastructure Delivery Plan has been prepared alongside this Local Plan. This sets out what infrastructure is required to support specific developments and the costs and sources of funding proposed to deliver this infrastructure.

- 8.7 The level of development proposed to be delivered in this Plan (246 dpa) is approximately 25% higher than the levels of growth planned for within the Worthing Core Strategy.
- 8.8 Viability of individual sites is a key risk. There is a theoretical risk that the policies in this Plan will have an adverse impact on the viability of development, thus inhibiting completion rates. A Whole Plan Viability Assessment will be undertaken to assess whether the policies of the Plan, taken together, do not adversely impact the viability of development.

Contingencies

- 8.9 The Local Plan includes a Monitoring and Delivery Framework which will assess the overall impact of the strategy and whether or not the vision and strategic objectives are being delivered. Housing delivery will continue to be measured as part of this.
- 8.10 The Council has been unable to identify contingency sites and build in flexibility to help address the shortfall in meeting its objectively assessed need for housing. The lack of land available and the sensitive character of Worthing, means that there simply are no reasonable and sustainable alternatives for development. In effect, if a site was to be suitable and potentially deliverable there is no reason why it couldn't be allocated/identified now within the Plan to meet the significant levels of need. Therefore, every effort will be made to facilitate and support the strategy for delivery set out in the Local Plan. In addition to the housing identified, there is likely to be scope for additional housing, as yet unidentified, from other sources over the Plan period:
- Additional housing opportunities from future "windfall" large sites of 6+ homes which are not currently identified in the SHLAA.
 - Sites identified in the SHLAA that are suitable for development but are not currently available
 - Additional housing from current planning applications which were either granted consent after 1 April 2017 or are yet to be determined.
- 8.11 The Local Plan does not rely on contributions from these additional sources to help meet the housing target as there is uncertainty about how much and when any new homes may be delivered. It does however provide a degree of flexibility in the event of any shortfall arising in identified sites over the Plan period.

- 8.12 The Council has identified potential measures to encourage the delivery of sites:

- Consideration will be given to the redevelopment for housing of any Council owned land identified through a review of assets currently being undertaken.
- Developers/landowners will be contacted to identify and understand reasons for delay or non-delivery of sites and find ways to help.
- Developers/landowners will be encouraged to hold pre-application discussions.
- A flexible policy approach will be taken where it can be demonstrated that viability is an issue.

- Alternative/additional funding streams e.g. Local Growth Fund, to help with bids as appropriate.

The Council Major projects team have been and will continue to be proactive in the delivery of key regeneration sites. Where appropriate key sites will be brought under Council ownership in order to increase the certainty of delivery.

Monitoring and review of Performance

- 8.13 The Council comprehensively monitors housing delivery. The monitoring of planning permissions on all sites involving residential dwellings is undertaken by West Sussex County Council on behalf of the West Sussex Authorities on an annual basis. This has been undertaken since the late 1990s and thus good historical evidence of delivery exists. All sites of 6 or more dwellings are visited and together with information from a variety of other sources, the progress of each site is tracked. This information is checked by the local authority and additional information on site specific delivery rates and phasing is provided. Any lapsed permissions are removed from the database. Together this provides comprehensive information on housing commitments, completions and other identified sites.
- 8.14 This information is included in the Council's Annual Monitoring Report (AMR) which will be the main document for monitoring housing delivery. The AMR also shows the 5 year housing land supply position against the housing target set in the Local Plan. The housing trajectory will be updated annually and provides for projected housing supply over the plan period to 2033.
- 8.15 The SHLAA will be monitored on an annual basis to ensure that the most up to date site information is incorporated and reflected in an updated housing trajectory. This will be reported through the AMR.
- 8.16 If monitoring of the five year housing land supply indicates that targets are not being met in the short term or that strategic sites are not being delivered in the longer term, the Council will seek to address the issues within the framework of this Plan. The Council will continue to work with landowners, developers, and other relevant bodies to identify and resolve obstacles to delivery.
- 8.17 If however, the issues surrounding delivery are unable to be resolved then the Council may need to review the Local Plan. This may be the case if:
- New evidence indicates that an unforeseen issue prevents development of a proposed allocation/Area of Change.
 - New evidence results in a significant reduction in the amount of housing able to be delivered on a proposed allocation/Area of Change and the shortfall is unable to be addressed elsewhere in the Plan.
- 8.18 Under delivery in any one particular year may not require immediate intervention but prolonged under delivery may have implications for the 5 year supply.
- 8.19 Where necessary the Council may produce development briefs/planning briefs/planning statements to increase certainty of sites progressing through planning process.
- 8.20 The Annual Monitoring Report will be published in December each year and made available on the Council's website.

9.0 Meeting the shortfall outside the Borough

- 9.1 The fact that not all of Worthing's identified development needs will be met within the borough places great importance on Duty to Co-operate considerations. For this reason, the Council has been working with other local authorities across the sub-region to address key strategic matters. Whilst positive progress has been made, it is evident that currently only a very small proportion of the borough's shortfall might be met elsewhere in the sub-region.
- 9.2 A Memorandum of Understanding (MoU) / Statement of Common Ground (SOCG) has been signed by all the authorities represented within the Sussex Coast Housing Market Area (as well as the West Sussex authorities of Crawley, Horsham and Mid Sussex). This commits the authorities to continue to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues and to work together to explore longer-term solutions for housing delivery. More information can be found in the Interim Duty to Co-operate Statement which is published alongside the Draft Plan.

10.0 Conclusion

- 10.1 A significant increase in the housing delivery rate has been planned for in this Local Plan. Despite taking a positive approach to delivery within the context of key constraints faced by the borough, the most significant of which is being land availability, the Council acknowledges the significant level of shortfall against the Standard Methodology target and is continuing to look robustly at all sources of potential supply. Worthing Borough Council is confident that the housing delivery target, set out in Policy SP3 of the Draft Worthing Local Plan, which is considered to be the most realistic and deliverable figure given the identified constraints, can be delivered within the Plan period. This Draft Housing Implementation Strategy demonstrates that the local planning authority does have a five-year housing land supply and that there is a sufficient supply of land for the delivery of the proposed housing target as shown in the housing trajectory.
- 10.2 The 7 proposed site allocations and the 4 Areas of Change are essential to the delivery of the overall strategy. However, the delivery of small and unidentified sites will continue to make a significant contribution to the housing supply.
- 10.3 Extensive and continuous stakeholder engagement has taken place throughout the process of developing policies in this Draft Local Plan and this stage provides another opportunity to modify the policy approach as appropriate. The risks to the delivery of the components of the draft housing delivery strategy, together with the mitigation required have been identified and the overall risk to the housing delivery strategy is low.

Appendix 1 - Table 4 (source 2016/17 AMR)- Sites with Extant Planning Permission (6+ units) considered deliverable

Planning Ref	SHLAA Ref	Address	Site Total (Gross) To be delivered	Time Frame (Years)			Losses	Site Total (net) (remaining to be delivered)	Achievability
				0-5*	6-10*	11-15*			
		<u>Broadwater Ward</u>							
AWDM/0301/16		<u>The Elms 66 Broadwater Street</u>	9	9	0	0	0	9	Under Construction
		<u>Castle Ward</u>							
AWDM/0844/15	WB08174	Land South of 1-8 Field Place Parade	74	74	0	0	0	74	Under Construction
WB/0363/11	WB08055	Worthing Sixth Form College, Bolsover Road	51 (211 completed = Site Total = 265 +4)	51	0	0	0	51	Under Construction
		<u>Central Ward</u>							
WB/0447/09	WB13041	37-39 Chesswood Road	9	9	0	0	2	7	Under Construction
NOTICE/0025/15	WB16009	Shelley House, 23 Warwick Street	7	7	0	0	0	7	Prior Notification Approved
AWDM/1861/15		Providence Works 27-33 Lyndhurst Road)	9	9	0	0	0	9	
AWDM/1633/16		The Aquarena Brighton Road	141	141	0	0	0	141	Under Construction
Notice/0015/1		12 Chapel Road	8	8	0	0	0	8	
		<u>Durrington Ward</u>							
AWDM/0521/12	WB08056	Northbrook College, Littlehampton Road,(Phase 1)	5 (112 completed = Site Total 117)	5	0	0	0	5	Under Construction
Notice/0018/16	WB08111	Columbia House Columbia Drive	102	102	0	0	0	102	Prior Notification Approved
AWDM/0184/14	WB13018	Land North of Northbrook College, Littlehampton Road (Phase 3)	32 19	32	0	0	0	32	Under Construction

WB/0275/11	WB08037	West Durrington Strategic (CS1)	474 (226 completed = Site Total = 700)	474	0	0	0	474	Under Construction
AWDM/1522/16		Land North Of Highdown Court, Durrington Lane	10	10	0	0	0	10	Planning Application Approved
		<u>Heene Ward</u>							
AWDM/0769/15	WB16005	49-56 New Broadway	5	5	0	0	0	5	Under Construction
AWDM/0681/16	WB16001	The Cavendish Hotel, 115-116 Marine Parade	10	10	0	0	0	10	Under Construction – new application approved for 10 units.
AWDM/0250/14		6 Southey Road	6	6	0	0	0	6	Under Construction
AWDM/0124/15	WB08181	MGM House, Heene road	43	43	0	0	0	43	New application approved for 43 units.
AWDM/1583/15		The Kingsway Hotel 117-119 Marine Parade	14	14	0	0	0	14	Planning Application Approved
		<u>Offington Ward</u>							
AWDM/1575/14	WB08068	185-187 Findon road	9	9	0	0	2	7	Under Construction
AWDM/1492/14	WB15010	66 Rectory Gardens	8	8	0	0	0	8	Planning Application Approved
		<u>Selden Ward</u>							
AWDM/1609/15 & NOTICE/0012/15	WB08169	39 Selden Road	19	19	0	0	0	0	Under Construction
		Total	1045	1045	0	0	4	1041	

*Years 0-5 = 1/4/17-31/03/2022, Years 6-10 = 1/4/2022-31/03/2027, Years 11-15 = 1/04/2027-31/03/2032

APPENDIX 2
Worthing Windfall Calculations

Year	Number of Net Dwellings
2006	83
2007	119
2008	45
2009	161
2010	102
2011	87
2012	19
2013	30
2014	51
2015	43
2016	81
2017	60

Worthing's data is based on the annual monitoring returns from WSCC between 2006 and 2017. The total number of units delivered within a given monitoring year (excluding greenfield/garden land) on sites of 5 and under is calculated. The annual windfall allowance calculation is therefore the total number of units divided by a specific period to arrive at an annual windfall allowance. The last calculation was undertaken in 2013 covering a 9 year period from 2005-2013 at that time the annual windfall allowance was 81 dwelling per annum. Adding the 4 additional years since the last calculation (total dwellings /specified time period = 965 units/13 years) results an annual windfall allowance of 74. However, it is considered appropriate to use the base date of the Core Strategy (2006) to 2017(the most recent data), which results in an 73 additional units per annum.