



WORTHING LOCAL PLAN 2020- 2036

DUTY TO CO-OPERATE STATEMENT

January 2021



**WORTHING BOROUGH
COUNCIL**

WORTHING LOCAL PLAN
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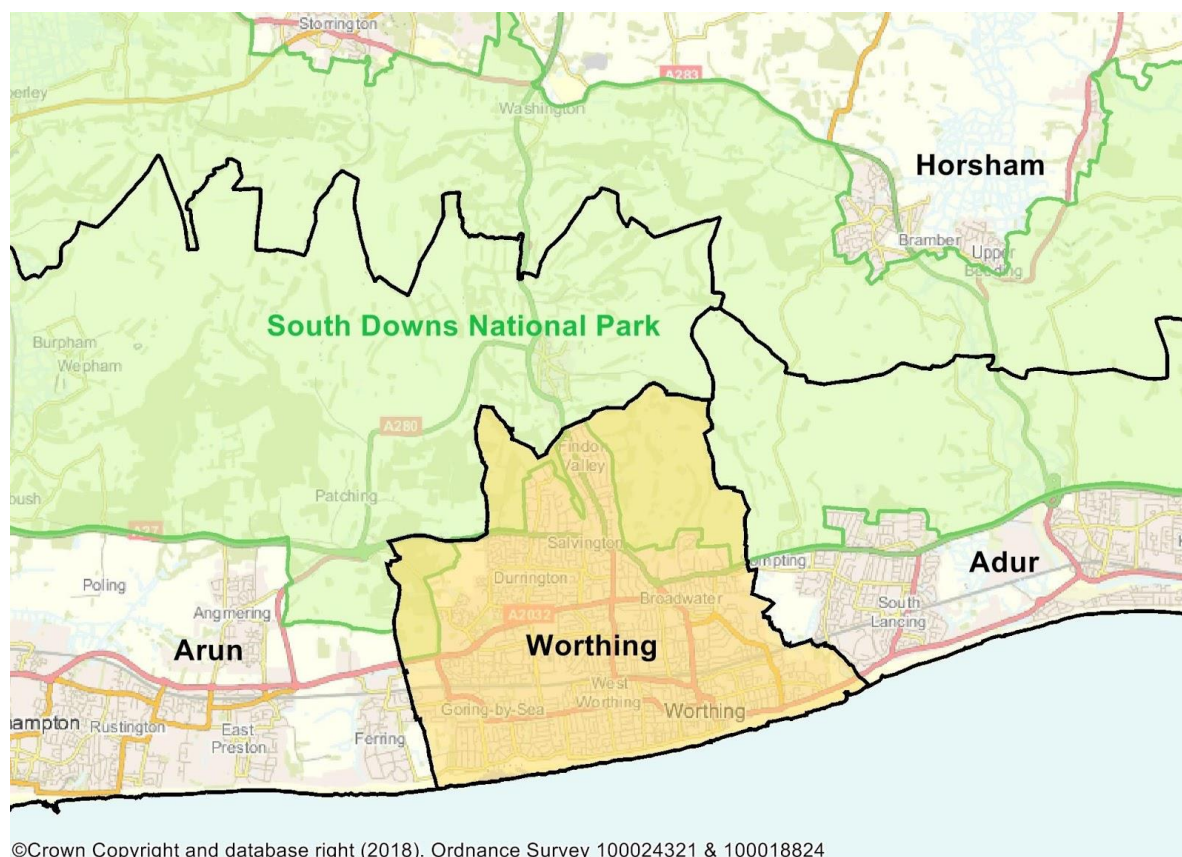
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I Introduction

- I.1 The Duty to Co-operate was created in the Localism Act 2011. It places a legal duty on local planning authorities to ‘*engage constructively, actively and on an ongoing basis*’ with relevant local authorities and specified bodies on strategic matters through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. Local Planning authorities must demonstrate how they have complied with the Duty at the independent examination of their Local Plans. The most up-to-date statement can be found in the National Planning Policy Framework 2019.
- I.2 This document is a statement of the work that Worthing Borough Council has undertaken so far in respect of the Duty to Co-operate, in developing the emerging Local Plan. The Council continues to work with other local authorities and organisations in the sub-region on an ongoing basis.

2 Worthing, its neighbours, and liaison further afield



Map: Worthing and neighbouring planning authorities

- 2.1 The local authority neighbours who share a boundary with Worthing are, as shown on the above map, Adur District Council to the east (with whom Worthing has been delivering joint services since 2008) and Arun District Council to the west and north. That part of Worthing Borough which lies within the South Downs National Park is being addressed through the South Downs Local Plan, produced by the South Downs National Park Authority. The South Downs National Park Authority is a consultee on the preparation of the Worthing Local Plan and has been involved in duty to co-operate discussions.
- 2.2 Other local authorities which are not immediate neighbours but share a number of strategic issues and are part of existing partnerships to address these are: Chichester District Council, Mid Sussex District Council, Crawley Borough Council, Horsham District Council (West Sussex), Brighton and Hove City Council, and Lewes District Council (East Sussex). (See also Part 5: Working Together - Local Strategic Statements).

3 Defining the Duty to Co-operate

- 3.1 The Duty to Co-operate was introduced by the Localism Act 2011. It requires local planning authorities to engage with relevant local authorities and specified bodies on strategic matters that cross administrative boundaries, through the preparation of development plan documents (DPDs) and other activities in connection with strategic matters which affect more than one area. Engagement on strategic matters should be *active, constructive and ongoing*. As part of the Local Plan examination process, Inspectors will consider whether Plans have been prepared in accordance with the Duty.

The National Planning Policy Framework 2019 states:

Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

In order to demonstrate effective and on-going joint working, strategic policymaking authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency. (Paragraphs 25-27).

- 3.2 Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements; as such, if an Inspector considers that the Duty to Co-operate has not been met, a plan cannot be found sound.

The Tests of Soundness (which must also be met if a plan is to be found sound) are as follows:

a) *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

b) *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

c) *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Who Should We Liaise with?

- 3.3 As well as other local planning authorities, other public bodies are subject to the Duty to Co-operate, as set out in the Planning and Compulsory Purchase Act 2004 (s33A).
- 3.4 Although Local Enterprise Partnerships (LEPs) and Local Nature Partnerships are not subject to the requirements of the Duty to Co-operate, they are important bodies that have an important role in strategic planning (paragraph 26 of the National Planning Practice Guidance). The Sussex Local Nature Partnership and Coast to Capital LEP are being consulted during the plan-making process, alongside a wide range of other organisations and groups. (In addition to the Duty to Co-operate, the Local Plan is subject to consultation as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012)).

4 What Are the Key Strategic Matters for Worthing?

- 4.1 The Worthing Core Strategy was adopted in 2011; the intention was that this document would help guide development in the borough until 2026. The Council is now progressing a new development plan – the Worthing Local Plan, which will guide development in the Borough until 2036. However, even prior to this, Worthing Borough Council has been liaising with other local authorities on various matters, including a potential housing shortfall.
- 4.2 Whilst there is an aspiration to accommodate and deliver growth in Worthing Borough this must be achieved within a very constrained area. Limited land availability, infrastructure constraints, areas of flood risk, heritage assets and high quality landscapes around the borough means that there is little room for expansion. Put simply, it is the same features which are worth protecting, which, in part, constrain the Borough's ability to grow and develop. The overarching challenge is therefore to balance development and regeneration against the limited physical capacity of Worthing to accommodate it and the need to maintain a good quality of life for new and existing residents.
- 4.3 The Council must plan for housing in the variety of forms needed to meet current and future needs and take into account how the population is changing. In particular, the Council will need to increase the amount and availability of affordable housing (of various tenures) to take account of relatively high house prices and below average wages. Housing delivery will also need to respond to the needs of different groups, particularly the needs of an aging population. In summary, when responding to housing needs the Council must ensure that the right types of housing are built in the right locations.

- 4.4 Whilst the need to deliver housing will be a priority, to ensure that we deliver balanced and sustainable communities the provision of other uses such as employment, leisure and community facilities will also need to be carefully considered.
- 4.5 From an economic perspective, Worthing is performing adequately and the town has a strong base to build upon. However, evidence relating to the local economy identifies a number of improvements that would allow the town to significantly enhance its attraction and competitiveness. Redevelopment provides a unique opportunity to improve the town's identity, enhance the public realm, add vibrancy and improve connectivity.
- 4.6 The Covid-19 pandemic has had a significant impact on all sections of society. Whilst it is too early to say how pronounced and long term these impacts might be it is widely accepted that there will be many implications for the local economy, for transport and for social structures. Like all local authorities the Council will have to respond positively to support post-Covid recovery. Planning will play an important role in this process and, if anything, the pandemic has emphasised the importance of the Local Plan's role in planning for sustainable, resilient and inclusive outcomes ('Build Back Better').
- 4.7 Taking proposed new development and demographic projections into account, it is clear that the town is going to experience an increase in population over the plan period. A clear challenge is therefore to ensure that all essential infrastructure is delivered to support the levels of growth forecast. For example, road congestion and related pollution (air and noise) is already a significant problem in the borough so it is vital that sustainable transport measures are promoted and the potential impacts of new development are mitigated. The lack of available land for growth is likely to result in great pressure being placed on many existing land uses.
- 4.8 Although the Council is working positively to deliver growth, there is no expectation that all needs (particularly housing) can be met within the Borough. Therefore, it will be imperative that the Council continues to work with neighbouring authorities and partners through the Duty to Co-operate to explore all options on whether there is any ability for other areas to deliver some of Worthing development needs, and how this might be achieved.

Key strategic issues for Worthing are therefore:

- Housing Needs and Provision
- Employment Needs and Provision
- Transport
- Flood risk and defences
- Green infrastructure

- 4.9 Worthing also works with other authorities on the following matters:

- Gypsy, Traveller, and Showpeople's accommodation: Joint working with the other West Sussex coastal authorities has been undertaken (Chichester District Council, Arun District Council and Adur District Council). The Final Report of the Coastal

West Sussex Authorities Gypsy and Traveller Accommodation Assessment (GTAA) Final Report April 2019 can be found on the Council's website. No need has been identified for permanent accommodation in Worthing Borough. A transit site was provided in Chichester District in 2015 to accommodate transit movements along the coast. (See Section 6 for more information).

- **Waste and Minerals:** West Sussex County Council is responsible for preparing statutory land use plans for minerals and waste. The Waste Local Plan was adopted in 2014 (jointly with the South Downs National Park Authority) and safeguards allocated waste sites and permitted capacity for waste management. A recent review concluded that the plan remains relevant and effective. West Sussex County Council and the South Downs National Park Authority jointly adopted a Minerals Local Plan for West Sussex in 2018 (A review specifically relating to soft sand is under way).

5 Working Together: The Local Strategic Statements

Background

- 5.1 Working across boundaries on strategic planning matters is not new territory for the local authorities in the West Sussex area. There is a long history of joint working through the South East Plan's Sussex Coast Sub-Regional Strategy and Regional Planning Guidance before that. Following the introduction of the Duty to Co-operate, and the revocation of the South East Plan in 2013, and, the LPAs recognised at an early stage that there was a need for a new common approach to strategic planning (and investment) issues, which resulted in the preparation of a Local Strategic Statement (LSS), as set out below.
- 5.2 To address governance, the LPAs agreed to establish a new Strategic Planning Board with its inaugural meeting held in October 2012. The Board is governed by Terms of Reference and a Memorandum of Understanding both updated in 2015 and agreed in January 2016. The updated versions have been agreed by all the relevant authorities. The Board comprises lead councillors from each of the local authorities and the South Downs National Park Authority, usually those with a planning portfolio. The Board's remit is to:
- identify and manage spatial planning issues that impact on more than one local planning area within CWS&GB¹; and
 - support better integration and alignment of strategic spatial and investment priorities in CWS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.
- 5.3 The Board is advisory only as decision-making remains with the individual legally responsible bodies.

¹ Now known as the West Sussex and greater Brighton partnership to better reflect the member authorities.

The First Local Strategic Statement

- 5.4 In January 2013 the Board agreed that in order to fulfil its role, a new framework was needed to replace the Sussex Coast Sub-Regional Strategy and guide strategic planning decisions, and that this was to be in the form of a Local Strategic Statement (LSS). There was a clear commitment from all authorities to develop an LSS that had a direct influence on individual local plans but also highlighted the strategic challenges along the coast, with possible ways of addressing these. It was also agreed that the LSS should be ‘evidence-based’ and deliverable, with significant importance attached to the need for a delivery plan.
- 5.5 The LSS was developed between January and October 2013, building on key evidence such as the Duty to Co-operate Housing Study (GL Hearn 2013) and through stakeholder engagement. The final version (which won the Royal Town Planning Excellence Award 2014 for Innovative Planning Practice in Plan Making) set out a shared vision, four overarching Strategic Objectives and five Spatial Priorities, based on the ‘place-based’ approach recommended by Parsons Brinckerhoff.
- 5.6 Subsequently, as part of the refresh of the LSS in 2015/16 (see below), a Monitoring and Delivery Framework was produced and the first monitoring report (which forms an annex to the LSS) was considered and approved by the CWS and GB Strategic Planning Board in January 2016.

The First Review of the Local Strategic Statement – “LSS2”.

- 5.7 The Coastal West Sussex and Greater Brighton Strategic Planning Board undertook a ‘refresh’ of the LSS in 2015, in order to reflect the progression of local plans in the area, the Greater Brighton City Deal, and the fact that the strategic geography covered by the LSS now includes the districts of Mid-Sussex and Horsham (which joined the CWSGB Strategic Planning Board in 2014 and 2015 respectively), then followed by Crawley. (See map, Appendix 2). Evidence to inform the review was commissioned and completed by consultants Nathaniel Lichfield and Partners.
- 5.8 The review was managed as a focussed ‘refresh’ rather than a full review since the original LSS (2013) was still considered to provide a reasonable approach to the significant challenges the area faces. A Monitoring and Delivery Framework was also added.
- 5.9 The refreshed LSS (LSS2) covers the Local Planning Authorities of Arun DC, Adur DC, Brighton and Hove CC, Chichester DC, Horsham DC, Lewes DC, Mid-Sussex DC, the South Downs National Park Authority, West Sussex CC and Worthing BC. LSS2 sets out the long-term, integrated strategic planning and investment priorities for the CWS&GB area, and supports the monitoring requirement of the Growth Deal. The refreshed LSS was approved by the CWS&GB Strategic Planning Board supported by the CWS partnership and Greater Brighton Economic Board in January 2016. Individual local authorities approved LSS2 in the first part of 2016.

Progressing Towards LSS3:

- 5.10 At this point there was a recognition that that a full review would be required in the near future to address the longer term issues - potentially requiring a different spatial strategy.
- 5.11 As a result, the Board commissioned further work to consider the geography of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) affecting the Coastal West Sussex and Greater Brighton area. The study, 'Defining the HMA and FEMA' (GL Hearn Feb 2017) identified three main housing market areas:
- A Chichester and Bognor Regis HMA, extending north to Midhurst;
 - A Coastal Urban HMA, extending from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks;
 - A Horsham and Crawley HMA which includes East Grinstead, Haywards Heath, Burgess Hill, Billingshurst, Pulborough and Storrington.
 - 'Overlap' areas were also been identified.
- 5.12 Three core Functional Economic Areas were identified, as follows:
- Coastal Urban FEMA – extending from Worthing to Newhaven and inland to Burgess Hill and Lewes;
 - Crawley and Horsham FEMA – extending over a similar area to the HMA;
 - Chichester and Bognor Regis FEMA – extending from Littlehampton to Nutbourne and north to Midhurst.
- 5.13 The report also identified that Worthing sits in an area of 'overlap' with economic influences and relationships in two directions.
- 5.14 This analysis of the functional geography of the area enables a clearer definition of the boundaries of the area to be covered by future LSS work. The study also provides a sound basis for undertaking future housing and economic need assessments.

LSS3

- 5.15 At its meeting in May 2017, the Board agreed to explore options for meeting the unmet needs across its area, and to commit to preparing an updated strategy (known as LSS3). This will robustly and creatively explore options for meeting the sub-region's unmet needs for housing, employment and infrastructure. The new LSS will cover an extended geography including the three HMAs referred to above, covering West Sussex, plus Brighton and Hove and Lewes District in East Sussex. LSS3 will develop a longer term strategy for the sub-region for the period 2030-50 to consider all sustainable options and maximise the area's potential for housing and economic growth. The LSS will provide an agreed non- statutory strategic planning framework to guide the future location and delivery of development, and will inform future Local Plans as partner authorities review them.

- 5.16 A range of evidence will be required to inform the identification of strategic growth options to accommodate identified needs for development within the defined housing and functional economic market areas (see above). These are likely to include: a demographic trends analysis; an assessment of landscape sensitivity and constraints; an economic growth capacity study; an assessment of the potential transport impacts created by different development options and the identification of infrastructure required to address these impacts; an assessment of strategic social and community infrastructure; and work in relation to sustainability appraisal and Habitats Regulations Assessment. This may include strategic green infrastructure delivering valuable ecosystem services.
- 5.17 The review will have to address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around supporting sustainable economic growth and infrastructure investment.
- 5.18 However it should be noted that following this strategic work, further work will be required (potentially on a more local basis) to address these and other matters in more detail. An updated Statement of Common Ground between the partner authorities is being prepared.

Other Liaison

- 5.19 In addition to the West Sussex and Greater Brighton Partnership referred to above, Worthing Borough Council is included in other formal groupings of partner authorities and organisations working together to address strategic issues as set out below (See also Appendix I, Summary of Groups/ Organisations).

Coast to Capital LEP

- 5.20 The Coast to Capital Local Economic Partnership (LEP) extends as far north as Croydon and includes Chichester at its western end and Brighton & Hove and Lewes at its eastern end. Most recently, it has produced the Strategic Economic Plan (revised 2018). The Strategic Economic Plan 2018-2030 (SEP) for the Coast to Capital LEP sets out the scope for sustainable economic growth; investments and proposals for realising these ambitions.

Greater Brighton Economic Board

- 5.21 This was established in May 2014 as a joint committee which brings together the City Region's 5 local authorities, 2 universities, 4 FE colleges, 3 business partnerships, the LEP and the South Downs National Park Authority. The Board works on economic issues that affect the area and has responsibility for overseeing the Greater Brighton City Deal. Together with the CWS&GB Strategic Planning Board, it commissioned the three background papers in 2015 on the economy, housing and transport to develop a greater understanding of the economic geography of the area and to form part of

the common evidence base to inform the refresh of the Local Strategic Statement (LSS2).

Greater Brighton City Deal

- 5.22 The Greater Brighton City Deal, awarded in 2014, is formed by the local authorities of Brighton and Hove City Council, Adur District Council, Lewes District Council, Mid-Sussex District Council, Worthing Borough Council and East and West Sussex County Councils, working together. The Deal transfers specific powers, funding and responsibilities to the local authorities in return for a commitment to support growth. The Deal aims to enable the area to fulfil its economic potential and to become a high performing urban economy. The Deal focusses on a number of key areas to build on Greater Brighton's economic assets – its skilled workforce, its innovative businesses and its universities – and help the area move on from decades of economic underperformance. It recognizes that Worthing has a strong engineering, manufacturing and pharmaceutical base, with businesses that export high tech products to an international market. There are opportunities for creating an enterprise hub for a developing technology cluster and there is potential to expand the creative and cultural industries in both Adur and Worthing.

Coastal West Sussex Partnership

- 5.23 The Coastal West Sussex Partnership (CWSP) is a group of businesses and public sector organisations which aims to strengthen the economy – this includes addressing issues of infrastructure and growth. The CWSP was the foundation for duty to co-operate relationships in the area, and the Coastal West Sussex and Greater Brighton Strategic Planning Board (CWS&GB SPB) was established in 2012 (now renamed the West Sussex and Greater Brighton Strategic Planning Board) to facilitate joint working on strategic planning priorities.

6 Strategic Issues

Housing Needs and Provision - Introduction

- 6.1 Both the CWS&GB Local Strategic Statement (2013) and the LSS refresh of 2016 (LSS2 – see previous section) make clear that due to the significant environmental, landscape and infrastructure constraints to development which exist in the West Sussex area, that it is highly unlikely to meet its objectively assessed needs for housing. This is a result 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 which restricts the ability to meet objectively assessed needs for housing.
- 6.2 However, to address longer term needs beyond 2025, LSS 2 recognizes that a new, robust approach to planning across the area will be needed and are committed to working together to develop a joint understanding of the issues and potential responses to these, including long term spatial options (para 2.20). However, the LSS

states that given the advanced stage of many of the local plans (at the time of writing) as well as the need for robust shared evidence, this work will inform the next full review of the LSS ('LSS3') to provide a framework for the next round of local plan reviews. In summary, joint measures are being progressed by the Strategic Planning Board and the Economic Board for the sub region to address short and medium term housing delivery whilst the LSS full review and local plan reviews will address longer term delivery in order to meet assessed needs (see previous section).

- 6.3 The emerging Worthing Local Plan makes clear that despite maximising the opportunities for development within the Borough (that part addressed by the Worthing Local Plan) it is unlikely that Worthing can accommodate its full housing needs.
- 6.4 For some time, consultation and engagement has taken place with those LPAs within the functional housing market and also with those in northern West Sussex (Crawley, Horsham and Mid Sussex). A number of LPAs within Hampshire and Surrey were contacted in 2012 informing them of the CWS Duty to Co-operate housing study being progressed at the time and the likelihood that the coastal authorities would not be able to meet their housing needs. Consultants NLP in the Housing Background paper (paragraph 6.2 of the paper) to LSS2 highlighted that housing provision opportunities should be explored with neighbouring authorities outside of the West Sussex and Greater Brighton area to meet longer term housing needs. This will be an issue for the full review of the LSS (LSS3) and will need to be supported by further robust evidence

Housing Needs and Provision – other Authorities

Adur District Council

(Adur DC is represented on the WS&GB Strategic Planning Board)

- 6.5 Since 2008 Adur District Council and Worthing Borough Council have shared an officer structure, delivering joint services. However as Adur is severely physically constrained, it is not able to address Worthing's housing shortfall.
- 6.6 The Adur District Local Plan was adopted in December 2017, and delivers 3,718 dwellings between 2011-2032 (compared against an OAN of 6,825 dwellings – therefore a shortfall of 3,107 dwellings. This is a capacity-based delivery figure due to the physical constraints of Adur (shared by Worthing). A joint MOU was signed by Adur District and Worthing Borough in 2016 (See appendix 4).

Arun District Council

(Arun DC is represented on the WS&GB Strategic Planning Board).

- 6.7 Arun DC submitted its Local Plan in January 2015 which included a housing provision figure of 580 dwellings pa up to 2031 which the Council considered went some way to meeting the OAN. Following additional work, the adopted Arun Local Plan

(adopted 18th July 2018) now addresses an updated, higher OAN of 919 dwellings per annum.

- 6.8 The adopted Arun Local Plan states: “Under the Duty to Co-operate Arun District Council has sought to plan for ... additional housing to meet the needs of neighbouring authorities who cannot meet their needs, mainly Chichester and Worthing who share a local Housing Market Area. The planned housing for the District is 20,000 units up to 2031 which is equivalent to a delivery of 1,000 homes per annum. This surplus is an additional 81 homes per annum or 1,620 up to 2031, which will contribute to the overall supply to meet the needs of the local HMA around Arun, Chichester and Worthing as well as the greater Coastal West Sussex HMA.”(paragraph 12.1.9).
- 6.9 Arun has reviewed its housing requirement policy within the Arun Local Plan and agreed that it should be updated (Full Council decision 15th January 2020) due to under-delivery in two successive years against the housing trajectory, which is a trigger in the plan for a review. A revised LDS was agreed in July 2020.
- 6.10 Various meetings with Arun District Council have taken place over the last few years and letters sent as part of consultation on the Arun Local Plan to highlight Worthing’s housing needs (see activities log, Appendix 3). A Memorandum of Understanding between Arun, Worthing and Adur was agreed in March 2017 agreed (See Appendix 4).
- 6.11 Arun District raised some concerns regarding the Worthing Local Plan in their response to the WLP Regulation 18 consultation –particularly with regards to evidence on density and capacity matters, and the potential need for an audit of employment land. These matters were discussed at an officer meeting in March 2019. It was agreed that these matters were capable of resolution; a response was made to Arun DC in August 2019, setting out the forthcoming evidence base work for the Worthing Local Plan, and indicating that work to progress sites would be available in the forthcoming Housing Delivery Test Action Plan (subsequently published August 2019).
- 6.12 More recently, officers of Arun and Worthing met on 16th October 2020; Arun officers acknowledged the work undertaken by Worthing and how it was likely to meet their concerns, subject to consideration of the Plan (and evidence base) at regulation 19 stage.

Brighton and Hove City Council

(Brighton and Hove City Council is represented on the WS&GB Strategic Planning Board).

- 6.13 In 2013, Brighton and Hove CC, in support of the then draft City Plan, produced a Statement of Common Ground on the provision of housing as part of the Duty to Co-operate Compliance Statement (June 2013 – see Appendix 4). This agreement was between all the coastal West Sussex authorities together with Crawley Borough Council, Eastbourne Borough Council, Horsham District Council, Lewes District Council, the South Downs National Park Authority and Wealden District Council. The Statement of Common Ground set out what steps were taken to comply with

the Duty with regard to housing provision, and areas of agreement regarding this key strategic cross-boundary issue affecting the Brighton & Hove sub-region and provided a basis for further co-operation on strategic issues in the future.

- 6.14 Within Brighton & Hove, the Council acknowledges that there is a significant housing shortfall (the adopted Plan provides for a total of 16,920 units up to 2030 against the objectively assessed housing requirement of 30,120 dwellings to 2030). The adopted City Plan Part One (adopted 24th March 2016) states that the Council will continue to engage constructively, actively and on an ongoing basis with neighbouring authorities and public bodies with regard to strategic planning matters including the provision for housing over sub-regional areas. Paragraph 4.5 of that document states: 'This will include seeking commitment from neighbouring authorities to participate in further sub-regional work such as building upon the Local Strategic Statement for the Coastal West Sussex and Greater Brighton Area and the sub-regional work of the Greater Brighton Economic Board. This will allow long-term opportunities to be explored for meeting unmet housing needs and the identification of delivery mechanisms including local plan reviews.'
- 6.15 BHCC are intending to review the City Plan part One, and have updated the Local Development Scheme accordingly (approved 19 November 2020). Whereas the adopted City Plan part One sets a delivery figure of 660dpa against an OAN of 1,506 dpa (44% of total requirement) the Standard methodology figure is 924 dpa; the proposed revised Standard Methodology would give a higher figure of 1,520 dpa.
- 6.16 City Plan Part Two was published for Regulation 19 in 2020; submission to Government is anticipated March 2021. However this document does not address the amount of housing to be delivered.

Chichester District Council

(Chichester DC is represented on the WS&GB Strategic Planning Board).

- 6.17 In July 2015 the Council adopted the Chichester Local Plan: Key Policies 2014-2029, which sets out an overall development strategy and implementation policies for Chichester District (excluding the area within the South Downs National Park).
- 6.18 The adopted Local Plan makes provision for delivery of 7,388 homes over the period 2012-2029 (an average delivery rate of around 435 homes/year) and 25 hectares of new employment land. The planned housing includes four strategic development locations (SDLs) allocated in the Key Policies document, together with provision for smaller housing sites which have mainly been allocated through neighbourhood plans prepared by parish councils. The Council also adopted a Site Allocations DPD (in January 2019) to allocate remaining sites to meet the Plan provision targets.
- 6.19 The housing provision in the current adopted Local Plan falls short of meeting the full objectively assessed housing need (OAN) for the Chichester Plan area, which was assessed in August 2014 at 505 homes/year. To address this shortfall, the Plan

included an explicit commitment that the Council will undertake a full Plan review within five years to aim to ensure that OAN is met.

- 6.20 The Local Plan Review extends the Plan period to 2035. A Preferred Approach consultation was held in December 2018, which stated that the plan could address the objectively assessed needs of the plan area, plus an allowance for accommodating unmet need arising from the Chichester District part of the South Downs National Park.
- 6.21 With the current standard methodology, Chichester's target is 628 dwellings per annum whilst the proposed revised standard methodology would raise this target further to 995 dwellings per annum.
- 6.22 A Regulation 19 version of the Plan is likely to be published in Spring 2021. Land availability is sufficient for growth, but there are significant infrastructure issues particularly with regards to transport and wastewater.

Horsham District Council

(Horsham DC is represented on the WS&GB Strategic Planning Board).

- 6.23 A MoU with Horsham DC was signed in October 2014 (see Appendix 4). This stated that the two LPAs have shared evidence and have sought to understand the housing needs of their areas. At that time, Horsham DC informed the Coastal Authorities that Horsham was able to meet its own need (through the Horsham District Planning Framework Submission Draft) and offered additional sustainable capacity that may be available subject to more details on needs being provided. Further details to quantify this need were provided to Horsham (as well as to all the local planning authorities in the CWS&GB area as well as Crawley, Horsham and Mid Sussex) in the autumn of 2014. It was acknowledged that the southern part of Horsham District would be the most sustainable location that could achieve this due to recognised migration flows and travel to work patterns.
- 6.24 The MoU states that both Councils are satisfied that they have co-operated to meet the legal duty and it is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
- 6.25 Following the agreement of the MoU, the Horsham District Planning Framework was submitted in August 2014, an Examination held and the Inspector's report published in October 2015. During this period, consultation on Main Modifications, including an increased housing target, (from 650 to 750dpa) was undertaken. The delivery figure was further increased to 800dpa (following the Inspector's recommendation) for the period of 2014 to 2031 to address approximately half of Crawley's shortfall. In his report, the Inspector states "I remain unconvinced of any considerable degree of overlap between the North West Sussex HMA and that of the coastal authorities to the south." (Paras 40 and 41).

- 6.26 The Inspector recommended an early review of the Framework to identify housing for the latter part of the Plan period.
- 6.27 Subsequently Horsham D published a Regulation 18 Local Plan in February-March 2020; this proposed three different levels of housing delivery; the higher two (1,200 dpa to meet the unmet needs of Crawley and a small element for Coastal West Sussex/ 1,400 dpa to meet the unmet needs of Crawley and the Coastal West Sussex area). Worthing Borough Council submitted a representation to this consultation, welcoming this positive approach and supporting the implementation of a higher level of housing growth to meet unmet needs from Coastal West Sussex.
- 6.28 A regulation 19 Local Plan is anticipated February /March 2021, aiming for examination in Autumn 2021.

Lewes District Council

(Lewes DC is represented on the WS&GB Strategic Planning Board).

- 6.29 A Statement of Common Ground (Duty to Co-operate: Statement of Common Ground - Cross boundary working and meeting housing needs - see Appendix 4) was produced and signed in October 2014 by the CWS&GB authorities together with Crawley Borough Council, Eastbourne Borough Council, Hastings Borough Council, Horsham District Council, Mid Sussex District Council, Rother District Council and Wealden District Council.
- 6.30 The Statement sets out how Lewes District Council and the South Downs National Park Authority have sought to comply with the duty to co-operate in the preparation of the Joint Core Strategy on strategic planning matters (with housing being the main issue). The statement also describes the mechanisms for ongoing co-operation on strategic matters. Dialogue and partnership will continue in order to address cross-boundary strategic matters. It states that the Coastal West Sussex and Greater Brighton authorities are committed to cross-authority working in the pursuit of sub-regional and longer term solutions to meeting the housing needs of the Sussex Coast HMA.
- 6.31 Lewes District Council and the South Downs National Park Authority jointly adopted the Lewes Core Strategy: Local Plan Part One in May 2016 and June 2016 respectively. The Plan is not able to deliver housing to meet the District's full OAN, due to the fact that 56% of the district lies in the National Park, flood risk issues, and infrastructure constraints. The adopted Plan states that 'if a longer-term potential solution which affects the Plan area is agreed, the DC and the SDNPA are committed to a review of the Core Strategy if this is necessary to deliver it.' (Paragraph 6.22).
- 6.32 The Local Plan Part 2 allocates land for housing and was adopted in February 2020

Mid Sussex District Council:

(Mid Sussex DC is represented on the WS&GB Strategic Planning Board).

- 6.33 A MoU was originally agreed with Mid Sussex DC in October 2014. This was up-dated and agreed by Mid Sussex, Adur and Worthing in January 2016 (see Appendix 4). Its overall aim is to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the three authorities. (This has since been updated – see below).
- 6.34 The MoU states that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.
- 6.35 MSDC undertook an assessment of neighbouring authorities' unmet housing needs and commissioned consultants to carry out a sustainability appraisal to assess the impacts of meeting those needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. The results were shared with the neighbouring authorities in 2014. Mid Sussex has also shared with neighbouring authorities, including Worthing, the results of its up-dated work on housing need and supply. The evidence was revised in November 2015 (following the publication of the Mid Sussex Pre-submission Local Plan in the summer of 2015).
- 6.36 The Plan was submitted to the Secretary of State on 17th August 2016, and following examination, adopted on 28th March 2018. The Objectively Assessed Need (OAN) for housing was established as 14,892 (an average of 876 dwellings per annum). The District Plan set a minimum housing provision figure of 16,390 homes in the 17-year period 2014 – 2031 to meet the OAN as well as contributing towards the unmet need of neighbouring authorities, primarily the unmet need arising in the Northern West Sussex Housing Market Area. (1,498 dwellings). The Plan states that the increase in housing provision will enable the Council to make a contribution to meeting housing needs of neighbouring authorities but these would principally be directed to Crawley, which is within the same housing market area, and therefore has stronger economic and functional links with Mid-Sussex than the Coastal West Sussex authorities.
- 6.37 Policy DP5 of the adopted Local Plan commits Mid-Sussex District Council to working with other local authorities (via the Greater Brighton Strategic Planning Board, and Gatwick Diamond) to address future housing needs.
- 6.38 Subsequent to this, Mid-Sussex DC and Worthing BC signed a Statement of Common Ground in November 2019 (an update to this Memorandum of Understanding of January 2016) the overall aim being to demonstrate that ongoing and appropriate engagement and co-ordination is taking place between the parties, including addressing cross-boundary strategic issues arising from Mid-Sussex District Council's Site Allocations Development Plan Document (Preferred Options consultation October –November 2019). This allocated a residual amount of dwellings which had not been allocated in the District Plan (plus an additional amount to ensure flexibility). It was agreed that this approach did not raise any cross-boundary issues of concern, and made a positive contribution to delivering sustainable residential development.

South Downs National Park Authority

(The South Downs National Park Authority is represented on the WS&GB Strategic Planning Board)

- 6.39 A Statement of Common Ground was agreed between Worthing Borough Council, Adur District Council and the South Downs National Park in March 2018 (see Appendix 4). Work undertaken by the SDNPA indicates that demographically driven need for homes far outstrips historic housing supply, and anticipated future supply, when considered against the landscape and environmental constraints of the National Park. Due to the statutory purposes and duties of National Parks, government policy does not provide general targets for them. However in order to meet the socio-economic duties of the Park, a housing figure is included in the South Downs Local Plan (adopted July 2019) 250 dwellings per annum - 4,750 over the plan period.
- 6.40 Officers of Worthing Borough Council met with those of the South Downs National Park in October 2020; Worthing's housing shortfall was discussed. However, given the role and functions of the National Park, it is not in a position to meet unmet housing needs of other local authorities.

Housing Liaison – A Summary

- 6.41 In summary, in order to help address Worthing's housing shortfall, the following measures/agreements have been put in place with some proposed for the future:
- The updated and agreed CWS&GB MoU establishes a framework for co-operation between the LPAs with respect to strategic planning and development issues. Its objectives include:
 - To help to secure a broad but consistent approach to strategic planning and development issues across the Coastal West Sussex and Greater Brighton area.
 - To identify and manage spatial planning issues that impact on more than one local planning area within Coastal West Sussex and the Greater Brighton area.
 - The CWS&GB Local Strategic Statement and its refresh LSS2 guide strategic planning decisions for the area.
 - All the local planning authorities in the CWS & GB area are aware of Worthing's housing shortfall
 - Continuous consultation and engagement has taken place with those Local Authorities within the functional housing market area and with those in North West Sussex (Crawley, Horsham and Mid Sussex all now part of the CWS&GB Strategic Planning Board).
 - (Communication also took place with a number of Local Authorities in Hampshire and Surrey as well as with the GLA regards the London Plan, some time ago. However in recent years efforts have been concentrated on working with those local authorities within the West Sussex and Greater Brighton area).
 - Memoranda of Understanding and Statements of Common Ground have been agreed with other local authorities in the sub-region (jointly with Adur District Council).
 - The overall level of unmet need across the coast as well as that in Crawley, as well as the environmental and infrastructure constraints in the northern authorities, means

that the contribution to provision through any available headroom is limited. Whilst a number of joint measures to help housing delivery in the short to medium term are being explored via the CWS&GB Strategic Planning Board and the Economic Board, longer term housing needs can only be addressed via a full review of the LSS (LSS3) and local plan reviews. Preparatory work on the LSS is currently being undertaken, and a Statement of Common Ground will be produced in early 2021.

Employment

- 6.42 The Worthing Local Plan is seeking to deliver a minimum of 28,000 sqm employment floorspace (industrial and warehousing) and 10,000 sqm retail and leisure through allocations. Other mixed use sites are also likely to bring forward floor space of this type. The Worthing Employment Land Review recommended 32,000 sqm employment land be provided (see Chapter 3 of the Worthing Local Plan). As such, the emerging Plan broadly meets predicted needs. However, the impact of the recently –introduced Use Class E must be borne in mind; the implications of this are not yet clear.
- 6.43 Opportunities for further employment growth are being promoted through the LEP and the Greater Brighton City Deal. This includes proposals for enhanced sustainable transport infrastructure to help improve access to these opportunities. This will help provide sustainable employment opportunities for Worthing.
- 6.44 Longer term employment needs will be addressed via the review of the LSS informed by evidence work across the wider area.

Gypsy and Traveller Accommodation

- 6.45 A Gypsy and Traveller Accommodation Needs Assessment (GTAA) was undertaken on behalf of the CWS LPAs together with the South Downs National Park Authority in 2013. No need for permanent accommodation was identified for Worthing Borough.
- 6.46 To meet the need for a transit site in the Coastal West Sussex area (as identified in the above coastal needs study), a site was opened at Westhampnett in Chichester District, in March 2015.
- 6.47 An updated GTAA was published in 2019, partly in response to the new planning definition of Travellers in Planning Policy for Gypsies and Travellers published in 2015, and addresses the period 2018-2036. There have been no Gypsy or Traveller sites identified within Worthing and there is no current or future need for pitches or plots identified in Worthing.

Transport

- 6.48 The Highways Agency and West Sussex County Council (WSCC) are statutory consultees on the Local Plan. The Highways England Delivery Plan 2020-25 identifies

the A27 between Worthing and Lancing for a package of enhancements to improve capacity and flow of traffic, as well as to reduce congestion, improve safety and enhance community cohesion.

- 6.49 Close working with WSCC has taken place throughout the production of the Local Plan to address transport issues and impacts arising from its policies including the undertaking of a transport study. The West Sussex Transport Plan (2011-2026) provides strategic direction for transport planning within Worthing, focusing on the objectives of promoting economic growth; tackling climate change; providing access to services, employment and housing; and improving safety, security and health. WSCC are working with Worthing Borough Council to progress significant improvements to the public realm in Worthing town centre
- 6.50 Meetings have taken place and will continue to take place with the developers/land owners of the proposed strategic allocations in the Worthing Local Plan in order to address the transport issues and to agree appropriate transport mitigation measures to be put in place, as required.

Countryside, Green Spaces and Green Infrastructure

- 6.51 Part of Worthing Borough lies within the South Downs National Park and this is addressed within the South Downs Local Plan. The SDNPA is a consultee and officers have met regarding the duty to co-operate (see above and Appendix 3).
- 6.52 Adur District Council and Worthing Borough Council are in the early stages of preparing a joint Green Infrastructure Strategy for the areas. It is anticipated that the AW Green Network will consist of a green infrastructure framework, major and local green infrastructure projects, and advice regarding new developments and green infrastructure.

Flood Risk and Defences

- 6.53 Coastal flood risk and climate change have to be addressed jointly with other local authorities; liaison is also undertaken with the Environment Agency and West Sussex County Council in its role as Lead Local Flood Authority.
- 6.54 A Strategic Flood Risk Assessment (SFRA) was commissioned jointly between Adur and Worthing Councils in 2011 and an update completed in 2020.

7 Conclusion and Next Steps

- 7.1 In line with the requirements of the Localism Act and the NPPF, this Statement has aimed to demonstrate the extent of positive and diligent on-going co-operation and engagement that has taken place and continues to take place with relevant authorities on those spatial issues which impact on areas outside of Worthing and/or involve joint working and support.
- 7.2 This Statement has also indicated where future work is required to address unmet needs. Whilst a number of joint measures to help housing and employment delivery are on-going via the WS&GB Strategic Planning Board and the Economic Board, longer term housing and employment needs can only be addressed via a full review of the LSS (LSS3) and through local plan reviews.
- 7.3 A revised Statement of Common Ground will be prepared and signed by the constituent authorities within the West Sussex and Greater Brighton Strategic Planning Board in early 2021.
- 7.4 In addition to the regular engagement with neighbouring authorities, officers from Worthing BC have liaised closely with officers from authorities across the sub-region in the lead-up to the publication of the Regulation 19 version of the Worthing Local Plan. Updated Statements of Common Ground will be signed between Worthing and other individual local authorities following the publication of the Regulation 19 Worthing Local Plan (January 2021). This will allow other authorities to consider the updated Worthing Local Plan evidence base and its implications for strategic matters.

APPENDICES

1 Summary of Groups/ Organisations

2 Map of West Sussex and Greater Brighton Strategic Planning Board Area

3 Worthing Duty to Co-operate meetings and Activity Log

4 Memorandum of Understanding/ Statements of Common Ground signed by Worthing Borough Council and other local authorities.

APPENDIX I

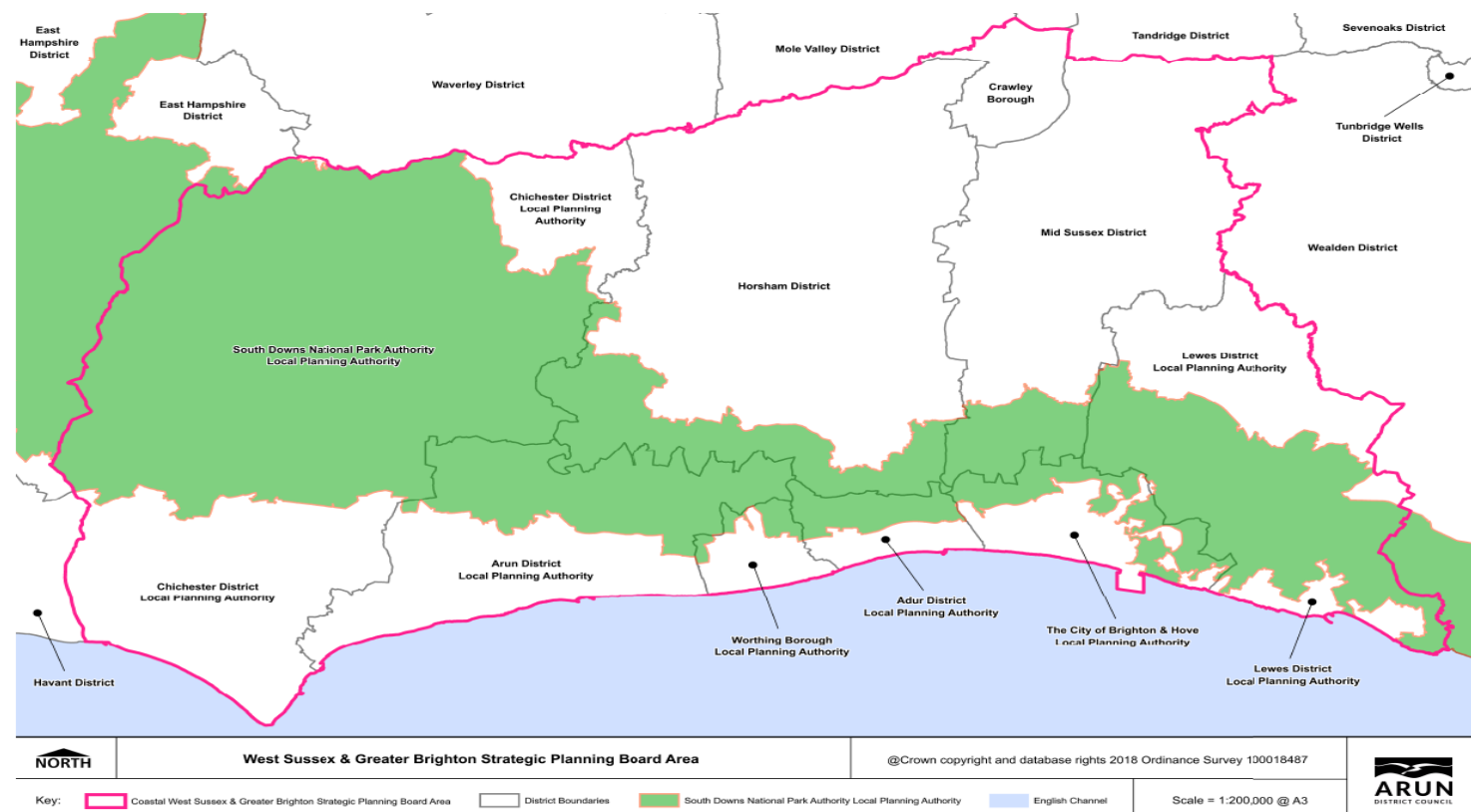
SUMMARY OF GROUPS/ ORGANISATIONS

These organisations/ groups are involved in the progression of strategic issues.

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| Coast to Capital Local Economic Partnership (LEP) | Includes the local authorities in the area , spanning from Chichester in the west, Brighton and Hove CC and Lewes DC in the east, and north to Crawley. |
| Greater Brighton Economic Board | Joint committee which brings together the City Region's 5 local authorities, 2 universities, 4 FE colleges, 3 business partnerships, the LEP and the South Downs National Park Authority. The Board works on economic issues that affect the area and has responsibility for overseeing the Greater Brighton City Deal. (See 'Working Together' section). |
| Coastal West Sussex Partnership | The Coastal West Sussex Partnership (CWSP) is a group of businesses and public sector organisations which aims to strengthen the economy – this includes addressing issues of infrastructure and growth. The CWSP is being used as a basis to address Duty to Co-operate issues - see below. |
| Coastal / West Sussex and Greater Brighton Strategic Planning Board | The Coastal West Sussex and Greater Brighton Strategic Planning Board (CWS&GB SPB) was established in 2012 and emerged from work undertaken by the Coastal West Sussex Partnership). It is now known as the West Sussex and Greater Brighton Strategic Planning Board to reflect the expanded membership. |
| West Sussex and Greater Brighton Strategic Planning Board Officers Group | This group supports the work of the West Sussex and Greater Brighton Strategic Planning Board referred to above. |

Appendix 2:

Map of West Sussex and Greater Brighton Strategic Planning Board Area



APPENDIX 3

WORTHING DUTY TO CO-OPERATE MEETINGS AND ACTIVITY LOG

| Date/venue | Title/ attendees | Purpose of meeting | Outcome(s) |
|--|--|--|--|
| 12/9/2011 Meeting at Field Place Worthing | Coastal West Sussex Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present. | | Report by Parsons Brinkerhoff submitted in Feb 2012 'CWS Developing and Employment and Infrastructure Study' Looked at main employment development opportunity sites and the infrastructure to deliver these as well as new housing. |
| 13/9/2011 Meeting at Hove town hall | Informal meeting on Duty to Co-operate between Brighton & Hove, Lewes, Adur and Worthing. | Duty to Co-operate general discussion | |

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| 21/2/2012 Meeting at Arun Civic Centre | Coastal West Sussex LDF Officer leads - Chichester, Arun, Worthing, Adur, SDNPA, WSCC, Lewes and Brighton and Hove City. | To consider the Duty to Co- operate requirements and particularly in relation to housing (the social and economic impacts of not meeting housing needs). | Discussed scope for radical solutions for meeting housing needs after 2028 such as new settlements. The need to link to the rest of West Sussex raised and the need for a MoU and position statement and strategy. Idea of a consultant to do the housing work explored a bit (notes made at meeting). |
| 26/4/2012 Meeting at Arun Civic Centre | Coastal West Sussex - Development and Infrastructure Group Brighton and Hove, Chichester, Arun, Adur and Worthing. Other stakeholders present. | | Discussed development sites and infrastructure needs. |
| 23/5/2012 Meeting at Adur Civic Centre | Coastal West Sussex LDF Officer leads Chichester, Arun, Worthing, Adur, SDNPA, WSCC, Lewes and Brighton and Hove City. | To discuss Duty to Co- operate issues and identify strategic issues. | Strategic issues identified at this meeting and the need to co-operate on housing provision. Recommended that a consultant is appointed to do a housing study on behalf of the four coastal Local Planning Authorities in West Sussex as well as Brighton and Hove City Council, Lewes District Council and the South Downs National Park Authority. Such a study to identify theoretical housing needs and to compare this to actual capacity. |
| 18/6/2012 Meeting at Hove Town Hall | Authorities within the Brighton & Hove Strategic Housing Market Areas - Adur, | Officer meeting to scope out issues and agree the next steps. | Agreed to carry on meetings. |

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| | Brighton & Hove, Crawley, East Sussex, Eastbourne, Horsham, Lewes, Mid Sussex, SDNPA Authority Worthing West Sussex. | | |
| 27/6/2012 Meeting at Worthing town hall | Coastal West Sussex - Strategic Planning Board inception meeting. Chichester, Arun, Worthing, Adur, SDNPA, WSCC and Brighton and Hove City. | The need to establish the SPB and presentation by consultant Catriona Riddell on appropriate governance arrangements and also on Duty to Co-operate. | Agreed to draft terms of reference for the group and for LPAs to consider formal reps on the Board |
| 6/9/2012 Meeting at Hove Town Hall | Authorities within the Brighton & Hove Strategic Housing Market Area. Attended by Adur Brighton & Hove; Horsham; Lewes; Mid Sussex; South Downs National Park Authority and Worthing. | Officer meeting to discuss duty to co-operate progress and Brighton's proposed Statement of Common Ground | Brighton and Hove will make a formal request to other LPAs to assist in meeting housing requirements. Brighton to produced a Statement of Common Ground for comments. |
| 8/10/2012 | Coastal West Sussex LDF lead | Inception meeting with consultant G L Hearn re | Questions asked and comments made on methodology etc. |

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| Meeting at Adur Civic Centre | officers meeting Adur, Worthing, Lewes, Brighton & Hove, Arun, Chichester, SDNPA | Duty to Co-operate Housing study | |
| 9/10/2012 Meeting at Worthing town hall | CWS&GB Strategic Planning Board Chichester, Arun, Worthing, Adur, Brighton & Hove, SDNPA. | | Board is informed of the D to C housing work and further amendments suggested to the brief |
| 13/11/2012 Meeting at Adur Civic Centre | Coastal West Sussex Officer Meeting Adur, Worthing, Arun, Chichester, SDNPA plus GL Hearn (consultants) | To discuss D to C housing study with consultants | |
| 6/12/2012 Meeting at Hove Town Hall | Authorities within the potential Brighton & Hove Strategic Housing Market Areas. Attended by Brighton & Hove; Adur; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs National Park | Progress meeting and to discuss Brighton's DTC housing request letter and Statement of Common Ground. | Mid-Sussex unable to agree to the Statement of Common Ground due to its suggestion that Mid Sussex, Crawley and Horsham are part of the Brighton & Hove Strategic Housing Market Area (SHMA). Agreement made to hold a further meeting to explain how Brighton & Hove SHMA impacts on Mid Sussex, Crawley and Horsham. |

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| | Authority and Worthing. | | |
| 24/1/2013 Meeting at Worthing Town Hall | CS&GB Strategic Planning Board Coastal West Sussex authorities. | | Draft MoU considered. Also agreed consultant to begin development of the LSS. |
| 1/2/2013 Meeting at Adur Civic Centre | Coastal West Sussex Officer Meeting Coastal West Sussex authorities. | For G L Hearn consultants to present draft Duty to Co-operate housing study. | |
| 5/3/2013 Meeting at Adur Civic Centre | Coastal West Sussex Officer Meeting. Coastal West Sussex authorities. | Group to make final comments on the Duty to Co-operate housing study. | |
| 19/3/2013 Meeting at Worthing Town Hall | CWS&GB Strategic Planning Board. | Presentation to Board by consultants of Duty to Co-operate housing study. | |
| 27/3/2013 Meeting at Arun Civic Centre | Coastal West Sussex Officer Meeting Coastal West Sussex authorities. | To discuss possible contents of the Local Strategic Statement with consultant. | |

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| 18/4/2013 Meeting at Adur Civic Centre | Meeting requested by Brighton and Hove Council. Present were planning officers and Cllr P McAfferty (B and H), Pat Beresford (Adur) and Bryan Turner (Worthing). | To discuss Brighton and Hove City Plan and Adur and Worthing positions in relation to Duty to Co-operate. | An overview of capacity issues and constraints in both areas to aid mutual understanding of LPA positions. |
| 23/5/2013 Meeting at Adur Civic Centre | Coastal West Sussex workshop – officers and members Coastal West Sussex authorities. | To discuss the emerging Local Strategic Statement – contents and implementation. | Views of Officers and Members taken forward by consultant |
| 13/6/2013 Meeting at Kings House, Hove Brighton & Hove, Adur, Worthing | Meeting of Adur, Brighton and Hove and Worthing Council planning officers. | Mid Sussex District Plan submission draft and possible joint response. | |
| 18/7/2013 | CWS&GB SPB meeting. | | Agreed final Memorandum of Understanding. |
| 9/8/2013 Meeting at Crawley BC | Meeting of CWS&GB LPAs LDF Officer leads and Executive Heads. | To discuss a way forward regards housing needs and provision in Local Plans under Duty to Co-operate requirements. | The meeting agreed to a commitment to look at longer term solutions which would need to be addressed through reviews of Local Plans (a strategic overview of long term options possibly a strategy). Agreed useful to produce a MoU between the LPAs which demonstrates commitment |

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| | | | between them to producing a strategy which covers both sub regions – Coastal West Sussex (including SDNPA, Brighton and Hove and Lewes) and the Gatwick Diamond. This MoU would state that each sub region would look within their own areas first for meeting future housing needs before looking beyond their housing market areas. |
| 7/10/2013 Meeting at Arun District Council | Arun SHMA Stakeholder event. Attended by officers from: Adur, Arun, Worthing, Chichester, SDNP, Lewes, Brighton and Hove. | To inform LPA stakeholders of progress of Arun's 'check' of Coastal West Sussex SHMA 2012. | Projections will be circulated in due course. Arun SHMA sent to other LPAs. |
| 17/10/2013 Meeting at Worthing town hall | CWS&GB Strategic Planning Board meeting. | To agree the Local Strategic Statement. | Agreed the LSS. Lewes DC invited to be a formal member of the Board. |
| 4/11/2013 | Email received from Arun DC. | | Email stating that Members concerns re: Coastal West Sussex SHMA have been dropped (at their Local Plan sub-committee 31 st October 2013). |
| 11/11/2013 Meeting in Portland House Worthing | Meeting of Cabinet Members for Regeneration - Cllr Beresford for Adur and Cllr Turner for Worthing. | To discuss duty to co-operate issues. Capacity constraints discussed. | Agreed the strategic issues and how these were being addressed via the Adur Local Plan and joint work. Agreed that evidence indicated that both LPAs could not meet housing needs and this would entail discussions with neighbouring and other LPAs in West Sussex. |

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| 21/11/2013 Meeting in Mid Sussex Council offices in Haywards Heath | Meeting of Adur and Worthing Cabinet Members for Regeneration (Cllr Beresford and Cllr Turner) with Mid Sussex Cabinet Member for Regeneration. | To discuss duty to co-operate issues. Capacity constraints discussed. | Agreed the strategic issues and how these were being addressed. All three Councils concluded that it was difficult to meet housing needs because of constraints but that solutions should be explored going forward. Some good measures are now in place for progressing the Duty to Co-operate. . |
| 2/12/2013 Meeting at Arun DC | Meeting at Arun Local Plan stakeholder group. | To help progress draft Arun Local Plan. Arun presented the pre submission draft of Arun Local Plan and opportunity for comments. | Agreed that comments on Plan to be submitted by Xmas 2013. |
| 3/12/2013 Meeting at Adur Civic Centre | Joint Strategic Committee for Adur and Worthing. | Committee meeting. Agenda includes CWS LSS. | Local Strategic Statement agreed. |
| 03/12/2013 Portland House Worthing | Meeting with the Marine Management Organisation (Pete Cosgrove) attended by officers from Adur and Brighton and Hove. | Discuss timeframe and policies of MMO South Plan, Adur Local Plan, Worthing Core Strategy Revision, and BHCC City Plan / Minerals Waste Plan. To identify any policy conflicts. | PC to send through some information regarding the overlap between the high / low water mark. |
| 9/1/2014 | Horsham PAS event attended by reps of West Sussex LPAs | Workshop entitled 'Incorporating Strategic Issues into Local Plans'. To consider joint working | |

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| | and B&HCC. (MH attended). | arrangements and prepare an action plan. | |
| 22/1/2014 Meeting at Horsham DC | Officer meeting between CBC/HDC/Adur DC and WBC. | To discuss emerging local plans, strategic issues (especially housing) and duty to co-operate. | Meeting clarified issues and discussed what was needed to take forward options for meeting future housing. |
| 24/1/2014 | CWS&GB SPB meeting. | | <p>Duty to Co-operate Statement agreed – to be used as template by each LPA. This sets out how strategic issues as identified in the Local Strategic Statement (housing, regeneration, infrastructure and environmental resources) are being addressed by CWS.</p> <p>Phase 2 of the Gypsy and Traveller and Travelling Showpeople Accommodation Assessment for CWS authorities presented and discussed.</p> |
| 29/1/2014 | Officer meeting between ADC/WBC and Arun DC. | To discuss timetables, evidence, development opportunities and work programme. | Further sharing of evidence agreed. Discussions relating to development proposals on Arun and Worthing boundary. Timetable 'risks' for Arun as the housing evidence emerges in Worthing. |
| 4/3/2014 | Horsham PAS event attended by officer and Member reps of West Sussex LPAs and B&HCC. LEP and some Surrey LPAs represented. | <p>On Duty to Co-operate. Objectives were:</p> <ul style="list-style-type: none"> To update participants on key strategic issues and recent examination cases. | Action Plan produced with recommended actions needed relating to communication, evidence gathering and working together on duty to co-operate issues. |

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| | | <ul style="list-style-type: none"> • To consider adequacy of existing joint working arrangements and agree the principles of future joint working arrangements particularly in relation to economy and housing. • To prepare an action plan. | |
| 8/4/2014 Meeting at Portland House – Worthing | Planning officers from SDNPA, Adur and Worthing. | Meeting with SDNPA regards duty to co-operate strategic issues for both Adur and Worthing. | Discussed difficulties of meeting objectively assessed needs in the local plans given constraints. Also discussed sites in the National Park which could contribute to meeting the needs of Adur and Worthing rather than the needs of the Park as a whole. |
| 10/4/2014 | Letter sent to Boris Johnson Mayor of London from the Gatwick Diamond, Coastal West Sussex and Greater Brighton Strategic Planning Board and the East Sussex Planning Authorities re the London Plan. | Letter comprises the official response from the Sussex authorities to the Draft Further Alterations to the London Plan. | <p>The letter addresses three areas of concern with the London Plan;</p> <ul style="list-style-type: none"> • The need for a more robust mechanism through which London co-operates with local authorities across the South East. • The need for London to do more to meet the projected shortfall in housing supply. • Infrastructure Investment. <p>The Inspector's report concludes: 'The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to</p> |

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| | | | <p>meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015. In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city.' The Mayor proposes to adopt the London Plan in 2015 and is committed to its early review in the same year.</p> |
| <p>23/4/2014 Meeting at Portland House - Worthing</p> | <p>Meeting of officers from SDNPA, Adur and Worthing together with Cllr Turner (Worthing BC), Cllr Beresford (Adur DC).</p> | <p>Workshop to discuss SDNPA emerging Local Plan - Issues Document.</p> | <p>Opportunity for Councillors to comment on the document - comments made at meeting have fed into official response made by the Councils to the document.</p> |
| <p>27/5/2014 Meeting at Lewes DC</p> | <p>Meeting with Lewes planning officers (together with other adjacent LPA planning officers).</p> | <p>To discuss progress of the Lewes Local Plan and associated issues.</p> | <p>Briefing paper produced which summarises the main changes to be made to the Proposed Submission Draft of the Lewes Local Plan to help avoid any significant problems with soundness at Examination. Some amendments have been made to address the requirements of the Duty to Co-operate and the need to plan to meet the level of Objectively Assessed Need for housing. More housing provided but unable to meet OA needs.</p> |

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| 27/6/2014 | Letter sent to Horsham District Council (with approval of AD and WBC Cabinet Members for regeneration). | On the contents of the proposed submission draft. | Welcomes the Plan and the implied statement that provision in Horsham could help address housing needs from London and the coast. Letter sought further clarification as to this intention. |
| 1/7/2014 Meeting at Mid Sussex DC | Planning Officer meeting attended by Mid Sussex DC, Adur DC and Worthing BC. | Meeting to informally discuss draft Mid Sussex Local Plan, the progress of the Adur Local Plan and the review work of Worthing and duty to co-operate issues including a draft MoU. Mid Sussex asked how it could help address our housing needs in terms of housing types etc. | Identified housing need, gypsy and traveller accommodation and employment as the main strategic issues impacting across our LA boundaries. Housing capacity work is ongoing for Mid Sussex and will be shared with Adur and Worthing when completed this Summer 2014. A draft MoU circulated and comments made on this – awaiting revised draft for discussion. |
| 3/7/2014 | CWS and GB Strategic Planning Board meeting | | <p>Presentation of the updated housing OAN work for the sub-region (took account of 2011 Census and new ONS projections).</p> <p>Discussion on the PAS duty to co-operate work.</p> <p>Agreed that some form of representation should be made to the London Plan with respect to housing shortfalls and impact for areas beyond.</p> |

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| 31/7/2014 at Arun District Council offices | Officer meeting requested by Horsham District Council. Attended by Adur, Brighton and Hove, Worthing, Arun and Chichester. | To discuss the details of how the Horsham Local Plan can address coastal housing needs. | Horsham to produce a MoU and a Statement of Common Ground. LPAs agreed to forward details on objectively assessed needs - why cannot meet these, the type of housing needed, where need arising from and what the impact would be if needs not met. 1/8/14 Horsham DC sent draft MoU to coastal LPAs and being finalised in October 2014 for final signing by Members. |
| 5/8/2014 | Letter from Mid Sussex sent to Adur and Worthing Councils with attached table to be filled in by 20/8/14. | Formal letter requesting details of any unmet needs (for housing, employment and gypsy accommodation) Adur and Worthing may be seeking assistance with. | The information provided to be fed into the SA process on the Mid Sussex Local Plan to assess impact of meeting needs in the district. However, letter sent by Mid Sussex also refers to the recently published Mid Sussex Capacity Study which demonstrates that 96% of the District is covered by primary or secondary constraints, or is already built upon. |
| 20/08/2014 | Letter from Crawley Borough Council sent to LPAs in the sub region. | Letter requests assistance in meeting Crawley's unmet housing and employment needs. | Adur and Worthing replied by letter (signed by Cabinet Members for Regeneration) on 5/9/14 stating that cannot meet own needs, outlining the levels of unmet need and capacity constraints. However, letter concludes that Adur and Worthing have been engaging and co-operating with Crawley throughout all stages of respective plans and look forward to continuing this positive relationship. |
| 27/8/2014 | Meeting at Portland House (Worthing) of Adur and Worthing and Mid Sussex planning officers and Cabinet Members with responsibility for planning for Mid | To further discussions on duty to co-operate based on information in needs template (see above). Discussed needs and capacity constraints with respect to housing, employment and gypsies | Work on housing needs and provision is on-going for Mid Sussex and when complete, a MoU will be drawn up and signed between LPAs. |

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| | Sussex and Worthing (apologies from Adur Member). | and travellers. To provide Mid Sussex with more details as to type of unmet needs in Adur and Worthing. | |
| 11/9/2014 | Draft Statement of Common Ground and Duty to Co-operate Statement sent by Lewes DC. | | Statement of Common Grounds signed by Adur and Worthing Members for Regeneration in November 2014. Sets out how Lewes Council and the South Downs National Park Authority have sought to comply with the duty to co-operate in the preparation of the Joint Core Strategy on strategic planning matters (with housing being the main issue). The statement also describes the mechanisms for ongoing co-operation on strategic matters. Dialogue and partnership will continue in order to address cross-boundary strategic matters. The statement is intended to be an agreement between the CWS&GB authorities together with Crawley Borough Council, Eastbourne Borough Council, Hastings Borough Council, Horsham District Council, Mid Sussex District Council, Rother District Council and Wealden District Council. |
| 3/10/2014 | MoU signed by Mid Sussex DC and Adur DC. | | To agree the details of the strategic planning issues for Mid Sussex, Adur and Worthing. To agree liaison and working arrangements. Agree that the LPAS will continue to co-operate actively and diligently on all cross boundary planning matters to achieve the proper planning of the wider area. |
| 9/10/2014 | CWS&GB SPB meeting. | | Mid Sussex DC invited to be a formal member of the Board. |

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| 10/10/2014 | Draft MoU signed by Horsham DC and Adur DC. | | Outlines the strategic planning issues for Horsham and Adur with the main focus on housing. States that the LPAs have shared evidence. HDC offers additional sustainable capacity that may be available to help address coastal housing needs. Agree that the LPAS will continue to co-operate actively and diligently on all cross boundary planning matters to achieve the proper planning of the wider area. |
| 11/11/ 2014 | Statement of Common Ground from Lewes DC signed by Cabinet Members for Regeneration for Adur and Worthing. | | Statement of Common Ground (as above) signed by Adur and Worthing Members for Regeneration. |
| 1/12/2014 | Representation sent on the Proposed Submission Adur Local Plan by Brighton and Hove City Council. | | Due to the City not being able to meet its own objectively assessed housing needs and recognising that housing provision is a key cross boundary issue within the sub region, on-going co-operation with Adur District and other authorities within West Sussex and elsewhere is welcomed to address housing and other strategic planning issues. Brighton and Hove City Council confirms that constructive discussions and joint work have taken place between both authorities in particular through the sub-regional groupings of Coastal West Sussex Planning Board, the Greater Brighton Economic Board and Local Economic Partnership. The Council states that this work is positive and ongoing. |
| 2/12/2014 | Meeting of Adur and Worthing planning | To discuss the work MSDC commissioned on the | Comments on methodology and results. |

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| | officers with Mid Sussex planning officers at Portland House. | Sustainability Appraisal of Cross Boundary Options to inform the emerging Mid Sussex District Plan. | |
| 11/12/2014 | Letter sent to Simon Meecham at Arun District Council in response to proposed publication draft of the Arun Local Plan. | | Letter supports the Plan but outlines Adur and Worthing's housing and employment shortfalls and refers to the importance of an early review of the Arun Plan and asks if scope to bring forward an earlier consideration of the allocations at Ford, Fontwell and Littlehampton growth area. |
| 10/12/2014 | Comments sent from, Adur and Worthing officers to Claire Tester and John Cheston at Mid Sussex District Council on the work they commissioned by consultants on the Sustainability Appraisal of Cross Boundary Options (to inform the emerging Mid Sussex District Plan). | | Useful comments sent to Mid Sussex DC on the methodology and results. Email to Mid Sussex hoped that they would find these comments to be constructive and looked forward to working with Mid Sussex as our respective Plans are progressed. |
| 13/1/2015 | Letter sent to Claire Tester and John Cheston at Mid Sussex District | | The letter states that Adur and Worthing Councils have no substantive comments to make on the Plan noting that the Plan does not include proposed housing provision figures at this stage which will be set out in Policy DP5 in the pre- |

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| | Council in response to the Mid Sussex District Plan Consultation Draft. | | submission of the Plan once ongoing work on the housing land supply and an assessment of the unmet development needs of neighbouring authorities has been completed. The letter welcomes the joint working that there has been with Mid Sussex on this assessment and requests that these discussions be on-going and include informal consultation about the proposed housing numbers for Mid Sussex prior to the Council agreeing its pre-submission District Plan. |
| 3/2/2015 | Greater Brighton Economic Board and Coastal West Sussex and the Greater Brighton Strategic Planning Board – stakeholder event. Attended by a planning officer each from Adur and Worthing. | | <p>Workshop to consider findings of consultants NLP – the papers focussed on: City Region Economy / Housing Market / Transport and will be used to create a ‘story of place’. This will inform the refresh of the Local Strategic Statement and be used by the Greater Brighton Economic Board.</p> <p>Discussion focussed on DTC and strategic issues. Feedback during workshop will help to inform changes made to papers and recommended outcomes. Slides to be circulated.</p> |
| 2/3/2015 | Horsham District Council workshop – Incorporating Strategic Issues into Local Plans. | Meeting followed series of earlier PAS workshops designed to facilitate Horsham’s DTC engagement with other authorities. This event followed interim findings from the Inspector examining the Horsham District Planning | <p>Gave update on key strategic issues and recent examination into the Horsham Planning Framework.</p> <p>Discussions around: How authorities can support economic growth and housing provision in the context of DTC; and what mechanisms are required to take things forward? Discussions included the value of joint evidence. Suggestion that exiting statements of common ground, etc could be updated, particularly given updated evidence base.</p> |

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| | | Framework. Both the Adur and Worthing Cabinet Members attended, plus one officer representing both Adur and Worthing. | |
| 24/03/2015 | Meeting with Arun District Council officers (Neil Crowther & Karl Roberts) | Meeting called for by WBC/ADC to provide general update and consider 'gaps'. JA & IM attended. | <p>Arun provided brief update on their position. A set of testing issues / questions had just been received from their LP Inspector and they will be considering this before deciding on their next course of action. Apart from a OAN housing work update (which GLH are currently working on) Arun are not actively progressing or assessing other options or strategies at this time as this would jeopardise their submitted LP.</p> <p>IM / JA provided an overview of the current position for WBC/ADC and explained the context of 'needs' and significant shortfall. IM shared an Adur briefing note. IM set out position relating to WBC commitment to progress a new LP. In the context of need / shortfall IM, using a map, illustrated the lack of opportunities / sites around Worthing and therefore the need to test positively all options. This will include the last two green field areas of any note – the Goring gaps.</p> <ul style="list-style-type: none"> • Overview provided on interest in the gaps and work being undertaken to assess them • IM explained that a brief was being prepared to consider landscape / biodiversity etc. Arun understood the need for this work to consider land within Arun and would welcome the opportunity to view the brief etc. However, this should be a WBC study as there is no appetite in Arun at this time to |

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| | | | <p>consider the land as potentially meeting Arun's needs (there are sites elsewhere that would be preferable to this if additional land is required).</p> <p>The outcome of the Arun LP Examination (and others) will influence the timetable / strategic planning across the sub-region. Agreed to keep each other informed of progress – particularly in relation to the gaps.</p> |
| 4/6/2015 | <p>Workshop hosted by Horsham DTC and Coast to Capital LEP.</p> <p>Range of attendees including LPA officers.</p> | <p>Main aims; to consider emerging findings of Coast to Capital Infrastructure Study, (work undertaken to present growth agenda to Government). as well as updates on emerging WSCC and other studies.</p> | <p>Dissemination of information regarding early findings of C2C Infrastructure Study; role of WSCC Place Plans and Growth Plans; discussions around how LEP can compete with others to achieve growth.</p> |
| 5/6/2015 | <p>Meeting between Mid Sussex DC, Adur DC and Worthing BC (officers).</p> | <p>To update on progress with plan progression and DTC issues.</p> | <p>Mid Sussex updated that consultation will take place 12th June- 24th July 2015 (intending to submit in Autumn and undertake examination in winter). Using recent CLG projection figures (no market adjustments). Recent Inspector's advisory visit seemed positive. Worthing updated regarding new LDS, progression of CIL and emerging evidence base (inc OAN update). Adur updated regarding progression of Local Plan, addressing G&T needs, and OAN update).</p> |
| 29/6/2015 | <p>CWS and Greater Brighton Planning officers Group Meeting.</p> | <p>Discuss NLP reports.</p> | <p>Catrionna Riddell presents overview of work to progress LSS2.</p> |

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| 13/7/2015 | CWS and Greater Brighton Strategic Planning Board Meeting | | Horsham DC invited to be a formal member of the Board. Catriona Riddell presents overview of work to progress LSS2 with nod towards LSS3. |
| July 2015 | WBC/ADC & MSDC. | Revised MOU agreed and submitted prior to close of MSDC consultation period. | Signed copy received 23/07/15 |
| July 2015 | WBC/ADC & Mid Sussex DC. | MoU Drafting | Work being progressed on the drafting of MoU |
| Aug 2015 | WBC/ADC & Horsham DC. | Update. | General update relating to current position and identified needs was sent in response to a request for projects to add to the HDC Infrastructure Schedule (to inform their IDP). |
| Sep 2015 | CWS&GB Planning and Economic Development officer workshop. | Refresh of LSS | Presentation of LSS refresh by Catriona Riddell. Discussion around amended and new spatial priorities. |
| Sep 2015 | CWS and Greater Brighton Planning officers Group Meeting. | Discuss Terms of Reference / MOU and LSS Refresh report | Revisions to be made to be various documents to then be considered by SPB. Key discussion was around the 'hooks' in LSS which will help to act as a stepping stone to LSS3. |
| Oct 2015 | DTC Meeting with Arun DC (WBC & ADC.) | Update meeting. | Update provided by all parties on current position. Shortfall explained for Worthing and Adur. Arun examination currently on hold and further evidence being collected – |

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| | IM / MH / NC / KB | | including on 'Ferring East'. Arun officers were invited to the Worthing landscape presentation by H&D on 20 th Oct. |
| Oct 2015 | CWS & GB Strategic Planning Board Meeting. | | Consideration of LSS2 (election of new Chair - Cllr B Turner). |
| Oct 2015 | | | Officer response to Arun OAN consultation sent. OAN not challenged but the opportunity was taken to flag up expected levels of housing shortfall. |
| 28/10/2015 | Representation made to SDNP Local Plan Reg 18 Consultation. | | Officer level response (joint Adur and Worthing Councils) made. Indicated housing shortfalls experienced by A&W Councils, suggested that sites allocated on edge of National Park, abutting boundary may relate better to A&W HMA and should perhaps be considered as contributing to A&W housing figures; also made some site-specific comments. |
| 12/11/2015 and 15/12/2015 | Coastal West Sussex and Greater Brighton LSS workshop: Refresh of Strategic Objectives and Spatial Priorities. | To consider proposed changes to LSS refresh. | Range of Stakeholders from updated LAA area, (plus wider), including officers and members, wider agencies such as JCA, also Surrey CC and East Sussex representatives. Discussion around proposed amendments; further revisions suggested. Made clear that LSS2 is a 'refresh'. |
| 14/1/2016 | Representation made to Mid Sussex DC | MOU updated | Representation (and MOU) made to MSDC focussed amendment consultation. |
| 18/1/2016 | CWS&GB Strategic Planning Board meeting. | To agree changes made to LSS refresh. | Board agreed to return refreshed LSS to respective LPAs for formal adoption. Next meeting to consider scope of LSS3. |

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| 21/1/2016 | Meeting with Arun officers. | Update meeting | IM met with Arun officers to provide summary of key issues and emerging landscape study findings for Worthing. See note of meeting. |
| 25/1/2016 | MoU with Mid Sussex DC. | | Signed version of Jan 2016 MoU update exchanged. |
| March 2016 | MoU between Adur DC and Worthing signed | <p>This MoU aims to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the two authorities. The MOU aims to set out the context and basis for co-operation and the principles of agreement in progressing the Adur and Worthing Local Development Plans. Although the two authorities have a long history of joint working and partnership (with merged services) and have common spatial issues and constraints, the Councils remain separate political administrations and it is therefore necessary to</p> | <p>Both authorities have communicated their unmet needs to each other and also to other local authorities within the Housing Market Area and beyond. The main strategic issues (where there are unmet needs) are housing, employment and jobs, and (with respect to Adur) gypsy and traveller needs. However, many of the Local Plans in the area are at advanced stages with some recently adopted and others are post examination and approaching adoption. In the meantime, liaison continues with Arun, Mid Sussex and the South Downs National Park Authority. Also, a number of joint measures to help housing and employment delivery are on-going via the CWS&GB Strategic Planning Board and the Greater Brighton Economic Board with discussions taking place on the need to progress a full review of the Local Strategic Statement and other measures to address unmet needs.</p> <p>The MOU states an agreement that the two authorities will continue to cooperate actively and diligently on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.</p> |

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| | | have an approved MOU in place between the two authorities. | |
| 4 th April 2016 | Coastal West Sussex and Greater Brighton Officers Group Meeting | Discussion of paper relating to options for LSS3; also of expanding membership of group | Paper to go to Strategic Planning Board in April for initial discussion, and to return in July for decision-making |
| 18 th April 2016 | CWS&GB Strategic Planning Board meeting. | Discussion of paper regarding proposed way forward for LSS3; also potential expansion of membership of group. | Paper will be debated again at July meeting (See above). East Sussex County Council are to be invited to join the group; Crawley may be invited to join as part of a consultee group. A workshop for Leaders and Chief Execs will be held after the July meeting. |
| 9 th May 2016 | Meeting with Officers of the South Downs National Park | Update meeting, with regards to progress on respective Local Plans and Shoreham Cement Works site | ADC to provide comments on Shoreham Cement Works – list of prospective evidence |
| 15 th June 2016 | Meeting between officers of Adur, Worthing and Arun District Council. | Update meeting; discussed timetables and emerging evidence base. | Authorities to liaise with regards towards agreement of positions (see below). |
| 12 th July 2016 | Officers at Worthing BC have shared a report summarising the responses to their recent 'issues and options' consultation. | | |

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| 13 th July 2016 | Letter received from Cabinet member for Planning, Arun District Council. (Following officer meeting 15 th June 2016). | Sets out process moving towards submission of Proposed Modifications to Arun Local Plan. This includes work on cross-boundary issues and capacity/ constraints. | Arun propose a DTC meeting in September 2016 when results of work will be presented to authorities within the HMA. Arun will at that point be in a position to agree and confirm a future approach to the issue of unmet needs, which can then be progressed via MOUs by the end of 2016. |
| 18 th July 2016 | Coastal West Sussex and Greater Brighton Strategic Planning Board. | Discussion regarding challenges/ options regarding progression of LSS3, and commissioning of work to support it. | Resolved that Board supports principle of preparing a Local Strategic Statement 3 but decision is postponed until early 2017 to allow more time to consider form/ content/ coverage... and subject to outcomes of work to be commissioned by SPB, to review the boundaries of the SHMA/s in the sub-region. Budget provision also recommended. |
| 12 th September 2016 | Arun, Adur and Worthing Officer Meeting (Minutes from meeting saved to file) | Update meeting; Updates regarding latest Adur OAN work and forthcoming submission date; Worthing progress on Local Plan, potential shortfall and timetable; Arun discussed development of latest evidence (including landscape study) and housing supply situation. Development of MOU discussed. | MOU to be developed; initial draft points to be circulated. Arun holding two DTC meetings in October (one with other HMA authorities, one between Members of Arun, Adur, Worthing and Chichester). |
| 12 th October 2016 | Arun Local Plan – Duty to Co-operate Workshop | To discuss and consider key issues arising from Arun Local Plan examination process and agree any further actions/ | Arun presentation outlined work undertaken to increase housing delivery from 580 dpa to meet their current OAN (919 dw/yr). Sites being promoted through the Plan would deliver approximately 1,000 dpa which would allow for 81 dpa to help the delivery shortfall from sub-region. |

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| | | measures required with relevant neighbouring authorities prior to completion of Main Modifications to the Adur Local Plan. | <p>Arun likely to have surplus employment land. Further discussions (Chi / WBC / ADC) needed to establish how this could be used to best meet the needs of the sub-region.</p> <p>Largely due to infrastructure constraints Arun is having to take Liverpool approach – as a consequence, a formal request will be made to neighbouring LPAs to ask whether there is any ability to help meet needs for Arun in the first 5 years of their Plan.</p> <p>Agreed to update MOUs / SOCG with all key partners.</p> |
| 24 th October 2016 | Arun Local Plan – Duty to Co-operate Meeting | Officers and Members from Arun, Adur, Worthing and Chichester attended. (presentation on file) | <p>Arun outlined work undertaken to date (see entry above). Opportunity for Members to question approaches and outcomes (eg increased OAN, infrastructure, etc).</p> <p>MOUs to be developed between Arun and the attending authorities.</p> |
| Dec 2016 – Feb 2017 | Defining the HMA and FEMA | GB & CWS SPB commissioned GL Hearn to undertake study | <p>Draft study received in Dec 2016 and presentation provided to key stakeholders 06/01/17. Revised report received and follow up presentation provided to Project Group 27/01/17. Document and recommendations then considered by SPB on 6th Feb. A report endorsing / proposing recommendations will be taken to SPB in May. As discussed at officer group meeting (23/01/17) this is likely to include a formal invitation to Crawley to join the group and the change of name to 'West Sussex and Greater Brighton'.</p> |
| 21 st Feb 2017 | Arun Local Plan – Duty to Co-operate Meeting | Officers from Arun, Adur, Worthing invited to attend | <p>Updates provided on latest LP position with each respective LPA. Evidence base discussed, particularly transport, landscape, Green Park / Chatsmore. Draft MOU discussed and then circulated for further amendment / consideration.</p> |

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| 4 th April 2017 | 3SC Devolution Bid | Workshop | <p>Provided:</p> <ul style="list-style-type: none"> • an update on the 3SC devolution bid • an update on the development of a Sub National Transport Body for the South East • an explanation of the process for updating housing and employment forecasts • an overview of the steps for developing a 3SC Spatial Statement and Infrastructure Strategy |
| 16 th April 2017 | Arun DC – DTC | Meeting | Provided update on Arun LP and Main Modifications – including: approach to meeting unmet need from within HMA; Transport improvements; employment needs; MoU. |
| 30 th May 2017 | Arun DC | Response to consultation | Joint ADC & WBC response submitted in response to Arun DC Main Modifications consultation. |
| 1 st Sept and 4 th Sept 2017 | Coastal West Sussex and Greater Brighton | Officer Group – 1 st Sep Board Meeting – 4 th Sept | Meetings and report to clarify the role and function of the Board in the delivery of strategic planning in the board area – includes scoping of evidence required to inform LLS3. |
| Sept 2017 | Arun DC | MOU | MOU agreed in advance of Arun DC's Examination sessions. |
| Sept 2017 | 3SC | Infrastructure Investment Needs | Detailed schedule of housing / employment delivery and infrastructure needs submitted to WSCC to inform infrastructure strategy to support 3SC devolution deal. |
| Nov 2017 | SDNP | DTC Meeting | Meeting with Sarah Nelson & Kelly Porter to discuss progress on Local Plans / key sites (including Cement Works) and principle of an MOU. |
| Nov 2017 | Coastal West Sussex and Greater Brighton | Officer Group – 20 th Nov | Discuss – work programme for LSS3 and appointment of Strategic Planning Advisor |
| Jan 2018 | Coastal West Sussex and Greater Brighton | Officer Group – 15 th Jan | Agreement on Joint Funding Bid for Joint Working Funding. Work programme including the splitting of work programme |

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| | | | / topics between different LPAs. Agreement to advertise the Strategic Planning Advisor post. |
| Jan 2018 | Bid to Joint Working Fund | | Seeks funding to secure additional resources required to accelerate delivery of an updated LSS (LSS3) to set out long-term planning framework for growth in West Sussex and Greater Brighton area. Funding to support dedicated personnel and preparation of a suite of evidence studies to underpin and shape the future LSS3 strategy. (Update note: funding not secured). |
| Feb 2018 | SDNPA | SCG | SCG requested by SDNPA |
| March 2018 | SDNPA, Adur and Worthing | | Finalised and signed by all 3 parties. |
| 25 th January 2019 | Chichester, ADC and WBC | | Update regarding Chichester Local Plan (published for consultation), recent WLP consultation, and ADC situation. Chichester clarified issues around infrastructure funding and constraints. WBC and ADC explained shortfalls and future work planned to address capacity, density, form of housing need etc. |
| 29 th January 2019 | Horsham DC, WBC and ADC | | Update regarding forthcoming Horsham review, recent WLP consultation, and ADC situation. Chichester clarified issues around infrastructure funding and constraints. WBC and ADC explained shortfalls and future work planned to address capacity, density, form of housing need etc. Need to express explicit request to Horsham if considered they can realistically address some of WBC needs. If so where, what form would that take etc. |
| 18 th February 2019 | Strategic Planning Board | | Agreed to prepare SCG setting out work of the Board on LSS3. Microsite to be set up to highlight work of the Board, and its key objectives. Governance paper to be taken to West Sussex Chief Execs meeting 28 th April. |

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| 27 th March 2019 | Arun DC / Worthing BC and Adur DC | DTC meeting on the back of the objection submitted by Arun on the WDLP. | Arun District raised some concerns regarding the Worthing Local Plan in their response to the WLP Regulation 18 consultation –particularly with regards to evidence on density and capacity matters, and the potential need for an audit of employment land. See ‘Housing Needs and Priorities – Other Authorities’ section above. |
| 1 st August 2019 | Arun DC | Letter sent to Arun DC to respond to their concerns and provide update | This referred to the emerging evidence base to support the Worthing Local Plan, the forthcoming publication of the Worthing Housing Delivery Test Action Plan, and took the opportunity to highlight the need for assistance in addressing Worthing’s housing shortfall. |
| September 2019 | Strategic Planning Board | | |
| November 2019 | Mid-Sussex District Council | Statement of Common Ground | SCG signed to confirm ongoing engagement and co-ordination; this updates Memorandum of Understanding of January 2016. |
| 30 th March 2020 | Horsham DC | Letter to Horsham DC in response to Reg 18 Consultation on Horsham LP | AWC supported the ‘higher’ options of housing, although requested clarity as to whether any greater options were tested, and if so, what and why rejected. Also offered to work further with Horsham DC to explore implementation of higher rates (eg locations of development to potentially serve A&W need). |
| | | | Along with other West Sussex authorities, signed Statement of Common Ground with WSCC. This relates to role of WSCC in planning matters, infrastructure etc. |
| 11 Aug 2020 | Horsham DC | Zoom Meeting | Zoom meeting with Matt Bates & Catherine Howe (HDC) and IM, MH, JA (ADC & WBC). Discussed – strategic issues, recent changes at national level, timeline for LPs and the working up of a SoCG. Note of meeting to follow. |
| 9 th October 2020 | Strategic Planning Board Meeting | | |

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| 12 th October 2020 | ADC, WBC and Brighton and Hove City Council. | Via Zoom | Each authority gave an update regarding current status of plan, delivery, standard methodology figures and likely timetable for review. Agreed that an updated Statement of Common ground will be circulated in December, with an updated version to follow post-WLP's reg 19 publication period (which will allow an opportunity to consider the WLP evidence base). |
| 16 th October 2020 | WBC (also representing Adur DC) and Arun DC | Via zoom | Each authority gave an update regarding current status of plan, delivery, standard methodology figures and likely timetable for review. Agreed that an updated Statement of Common ground will be circulated in December with an updated version to follow post-WLP's reg 19 publication period (which will allow an opportunity to consider the WLP evidence base). |
| 21 st October 2020 | WBC (also representing Adur DC) and South Downs National Park Authority | Via Zoom | Some key sites in Worthing (emerging WLP) were discussed with the SDNPA. Following this, each authority gave an update regarding current status of plan, delivery, standard methodology figures and likely timetable for review. Agreed that an updated Statement of Common ground will be circulated in December with an updated version to follow post-WLP's reg 19 publication period (which will allow an opportunity to consider the WLP evidence base). |
| 22 nd October 2020 | WBC , ADC and Chichester District Council | Via Zoom | Each authority gave an update regarding current status of plan, delivery, standard methodology figures and likely timetable for review. Agreed that an updated Statement of Common ground will be circulated in December with an updated version to follow post-WLP's reg 19 publication period (which will allow an opportunity to consider the WLP evidence base). |
| 9 th November 2020 | WBC, ADC, Crawley BC and Horsham DC | Via Zoom | Informal meeting to discuss Local Plan progress, etc |

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| Update | | | <p>Please note that during the Autumn 2020 meetings with officers of Arun, Brighton & Hove, South Downs National park Authority, Horsham, Crawley and Chichester, officers of Worthing BC had proposed sending a draft Statement of Common Ground (SCG) for officer level sign off prior to the during Regulation 19 consultation in early 2021, in addition to a subsequent version (for Member sign-off) during the Regulation 19 period itself, in order that the evidence base could be considered. However on reflection it has been decided that it would be more beneficial for a single SCG only (between the relevant authority and Worthing Borough Council), which will be circulated subsequent to the commencement of the Regulation 19 Local Plan publication period.</p> |
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APPENDIX 4

Duty to Co Operate

Memorandum of Understanding

Parties to the Agreement

The Agreement involves the following Local Planning Authorities:

- Worthing
- Horsham District Council

Introduction

Local Planning Authorities are required by the Localism Act 2011 to meet the 'Duty to Cooperate', that is to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area. Section 33A(6) of the 2004 Act also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. Local planning authorities are also required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF details how it is expected that the Duty to Cooperate will function, and in particular states that

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position”.

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Co-operate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The NPPG states that:

“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty”.

Objectives

This Memorandum of Understanding relates to the preparation of local development plans in the two local planning authority areas set out above. Its overall aim is to ensure appropriate planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the Councils.

Current Position

The current position is as follows:

In Horsham District there is currently a full suite of adopted LDF documents which form the Development Plan and provide the planning policies for the District up to 2018. The Horsham District Planning Framework (HDPF) is a new Local Plan up to 2031 but was started in 2009 as an update of the adopted LDF documents in an NPPF compliant form. As part of the preparation of the HDPF we have reviewed the evidence that supported the LDF documents and where necessary, undertaken further evidence gathering work. This evidence gathering has often, when appropriate, been undertaken jointly. The Horsham Core Strategy includes a locally set housing target as it was adopted before the publication of the South East Plan, however further work has been undertaken to assess Horsham's objectively assessed housing needs in accordance with the new requirement in the NPPF. As part of Horsham District lies within the South Downs National Park (which is a separate planning authority that are producing their own plan for this area) this portion of the District is excluded from Horsham District Council's plan making. The HDPF refers to the planning area as the HDPF area.

Horsham District Council wishes to continue to be a Plan led authority, working for Horsham District and collectively with neighbouring authorities, planning positively for growth. The District have had a history of delivering large scale strategic developments such as; the previous expansion of Horsham town to the north (now North Horsham Parish) and surrounding settlements. The smaller villages, and in particular those along the foot of the South Downs such as Pulborough, Storrington and Henfield have experienced considerable housing growth in recent years. Through the Core Strategy (2007) 2000 homes were allocated West of Horsham and it identified 2500 homes West of Crawley. The Joint Area Action Plan for the West of Bewbush planned for and is delivering the new neighbourhood, adjacent to Crawley within the boundary of Horsham District.

Worthing Borough Council adopted its Core Strategy in April 2011 with the intention that this would help guide planning and development in the Borough up to 2026. With regards to housing, the Core Strategy sought 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 was a figure that took 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 was regeneration. There was never any suggestion that this was a level of development would meet all of Worthing's housing needs.

Through the Annual Monitoring Report (AMR) 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 requirement. Furthermore, in line with this local policy position the Council is able to demonstrate a very strong housing land supply position over the next ten years. Therefore, under the previous planning system there would be no current need to review the Council's adopted Core Strategy or review the housing delivery strategy as a result of under delivery. However, 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 is now required.

The Planning Advisory Service (PAS) recommends that a local planning authority should start to review its Core Strategy if, as a result of an updated SHMA, there is an increase in the housing number. This will be particularly the case for authorities such as Worthing where the Core Strategy was adopted pre-NPPF and where emerging evidence is showing that the Council's objectively assessed housing needs are much greater than that being planned for in the Core Strategy.

Initial housing need assessment work has indicated that the OAN figure for Worthing will be significantly higher than the 200 dwelling per year currently planned for. Further work to review the housing needs for Worthing has recently been commissioned. The outcomes of this work

will help to inform a revised LDS. This will be prepared for Members consideration in late 2014 and will include a timetable for the progression and adoption of a new Local Plan for the Borough.

A new Local Plan for Worthing must seek to meet objectively assessed housing needs unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits or policies within the Framework indicate that development should be restricted. A full and positive review of the SHLAA is currently being undertaken and careful consideration will be given to the potential allocation of additional sites (including greenfield opportunities) to help meet development needs

Although the 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 tested there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet 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. As a consequence, and in line with Government requirements, neighbouring authorities and sub-regions will need to determine whether some housing within constrained areas where they cannot meet their OAN can be located in less constrained areas

Strategic Planning Issues

An action plan setting out all strategic issues was developed as a result of Duty to Cooperate workshops (organised by the Planning Advisory Service) held from July 2013 to March 2014. The full set of objectives which cover a wide range of topics involving all or some specific neighbouring authorities has been developed and set out in the Duty to Cooperate Statement¹. In this instance the following specific issues have been identified as strategic planning Issues between the two Councils subject to this agreement:

| Ref | HDPF Issue | Resolution needed from DtC |
|-----|--|---|
| | Housing | |
| H1 | We need to bring together all evidence and to set a housing target in our policy that, if possible, meets the objectively assessed needs of the District | We need to share evidence with our neighbours and communicate how we got to our chosen figure. |
| H2 | If we are able to meet our objectively assessed needs (which we already know that we can) we need to identify whether there is any headroom in capacity that we ought to offer as a means to meet our requirement to meet the needs of others. | As above and as a next stage we need to identify the headroom and in negotiation with our neighbours identify whether it is spatially and sustainably possible to meet the unmet needs of our neighbours. |
| H3 | We need to understand the housing market in Horsham District and beyond to identify demand and preferences for housing which may be satisfied through housing delivery policies in the HDPF. Is it possible to deliver housing in Horsham that meets the needs of constrained areas beyond the District? | Need to agree the geographical area of the housing market. How can Horsham help our neighbour's needs to be asked and answered? If we build homes in Horsham will people move to these homes from areas where they cannot meet their need? Our "constrained" neighbours have and should in Duty to Cooperate conversations, let us know what the housing preferences and needs are in their area. |

¹ http://www.horsham.gov.uk/_data/assets/pdf_file/0004/9292/CD_LP_12_Duty-to-Cooperate-Statement-and-Action-Plan.pdf

Outcomes

Housing

The Objectively Assessed Housing Need for the HDPF plan area up to 2031 is assessed as falling between 11,000-11,900 homes (550 – 595 homes per annum). The proposed housing target in the HDPF 650 homes per annum. This target is based on sustainable development supporting the existing development hierarchy. Within this target therefore there is some “headroom” to meet the needs of neighbouring authorities. The quantum of housing proposed in the HDPF is considered to be sufficient to meet the full objectively assessed need for housing without there being any dependency on other authorities.

The West of Crawley strategic location, which is developed through a joint area action plan with Crawley Borough Council, has been developed within Horsham District as an extension to Crawley as they cannot physically meet their housing needs within their administrative boundary. This includes 2500 homes, associated infrastructure and a neighbourhood centre. The Gatwick Diamond authorities, including Mole Valley District Council, acknowledge that this strategic allocation, in accordance with the Local Strategic Statement for the Gatwick Diamond meets the wider Gatwick Diamond needs.

The HDPF strategy is based on a hierarchy of settlements with Horsham town as the primary centre. The medium settlements at Broadbridge Heath, Southwater and Billingshurst play a role in supporting Horsham town whilst the rural villages fulfil a local need. There are large strategic sites being developed in the plan period North of Horsham town (2500 homes and a 500,000ft² new business park), Broadbridge Heath (2000 homes), Southwater (500 homes).

Horsham District experiences in-migration from neighbouring authorities, particularly those with unmet housing need, combined with other factors such as high

affordability rates for housing. In the northern part of Horsham District there is a net flow of households from the constrained Green Belt authorities in Surrey and specifically a net flow for the immediate neighbour to the north, Mole Valley. It is likely and acknowledged that Horsham town as well as the strategic sites at north Horsham and Broadbridge Heath will attract people from neighbouring authorities to the north and may contribute to meeting their housing need. Unlike the West of Crawley site this relationship is more difficult to assess and quantify in absolute figures under the duty to cooperate.

In the southern part of the district there is a relationship between the coastal authorities which is indicated by travel to work patterns. The HDPF plans for more organic growth in this area as well as development as a result of Neighbourhood Planning. There is a significant amount of housing due to be delivered in the short term as a result of outstanding planning permissions as indicated in policy 14 a and b. The AMR housing trajectory attached shows past and future housing delivery. This may contribute to helping to meet the housing needs of the coast

Outcome – Through the development of the HDPF, HDC and Worthing have shared evidence and have sought to understand the housing needs of their areas. The northern part of Horsham district where a number of strategic sites are being developed is acknowledged as meeting a wider need for the Gatwick Diamond. HDC have informed the Coastal Authorities that Horsham District is able to meet its own need and has offered additional sustainable capacity that may be available. The Coastal area collectively cannot meet their objectively assessed need and have requested that they wish to explore whether some unmet capacity can be found in Horsham District. The Coastal authorities are currently quantifying what this need is and how much they would like HDC to try to accommodate

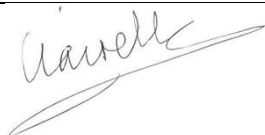

However, it is acknowledged that the southern part of Horsham District would be the most sustainable location that could achieve this due to recognised migration flows and travel to work patterns.

Agreement

The issues above have been agreed by the Coastal Authorities and Horsham District Council as the specific issues and objectives that need to be resolved between the two Councils for them to fulfil the Duty to Cooperate. Both councils are satisfied that they have co-operated to meet the legal duty and as far as possible Horsham district council have progressed to a stage that would enable them to put submit the HDPF for examination.

Ongoing Cooperation

It is agreed that the two authorities will continue to actively and diligently cooperate on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

| | | | |
|---|---|-----------------|---------------------------|
| Signed: Cllr Claire Vickers – Cabinet Member for Living and Working Communities |  | Dated: 19.9.14 | Horsham District Council |
| Signed: Cllr Bryan Turner – Worthing Cabinet Member for Regeneration |  | Dated: 10/10/14 | Worthing District council |

Duty to Cooperate

Memorandum of Understanding – January 2016

Parties to the Agreement

The Agreement involves the following local planning authorities:

- ☐ Adur District Council
- ☐ Worthing Borough Council ☐
- Mid Sussex District Council

Introduction

Local planning authorities are required by the Localism Act 2011 to meet the ‘Duty to Cooperate’, that is to engage constructively and actively on an ongoing basis on planning matters that impact on more than one local planning area. Section 33A(6) of the Planning and Compulsory Purchase Act 2004 also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. In addition, local planning authorities are required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF detail how it is expected that the Duty to Cooperate will function, and in particular state that:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.”

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Cooperate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross-boundary matters. The NPPG states that:

“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty.”

Objectives

This Memorandum of Understanding relates to the preparation of local development plans in the three local planning authorities – Adur, Worthing and Mid Sussex. Its overall aim is to ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the three authorities.

Current Position

The current position is as follows:

Mid Sussex District Council

Mid Sussex District Council is preparing a revised version of its District Plan for the period 2014 – 2031. There was public consultation on this draft Plan from November 2014 until January 2015. It was published in June 2015 and will be submitted to the Secretary of State in early 2016 following public consultation on a schedule of 'focused amendments' to the Plan from November 2015 until January 2016.

Mid Sussex District Council is also preparing a Traveller Sites Document for the period to 2031. There was a public consultation on this draft document in August/September 2014 and it is anticipated that it will be published in 2016 following further appraisal of potential suitable sites.

Adur District Council

Adur District Council published the Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014. Due to issues raised in relation to certain strategic sites, a brief regulation 18 exercise is being carried out from 9th December 2015 - 4th January 2016. This will be followed by proposed Amendments to the Proposed Submission Adur Local Plan 2014, which are likely to be published in early spring 2016 (Regulation 19) and submitted summer 2016.

That part of the district which is within the National Park (about half the district) is covered by the emerging local plan for the South Downs National Park and not by the Adur Local Plan. The new Adur Local Plan covers the period up to 2031.

The Council is also working with Brighton and Hove City Council, West Sussex County Council with the support of Shoreham Port Authority and other partners, on a joint Area Action Plan for Shoreham Harbour. This is a large strategic regeneration site identified in the Coast to Capital Local Enterprise Partnership's (LEP) Strategic Economic Plan as well as the Greater Brighton City Deal.

Worthing Borough Council

Worthing has an adopted Core Strategy to cover the period up to 2026. Significant changes to the planning system means that a review of the Core Strategy is now required. The Council has adopted a revised Local Development Scheme (April 2015) which sets out a timetable for the progression of a new Local Plan to be

adopted in 2018. The Council's evidence base is currently being updated to inform the new Local Plan.

Strategic Planning Issues

The following have been identified as current cross-boundary strategic planning issues relevant to Adur, Worthing and Mid Sussex Councils:

- Housing provision
- Gypsy and Traveller accommodation
- Employment and jobs
- Transport

Whilst transport is identified as a strategic issue, this is being addressed as part of meeting the above housing, employment and Gypsy and Traveller development needs. The main issue is the capacity of the A27 and links across the South Downs National Park.

Liaison and working arrangements

Adur District Council, Worthing Borough Council and Mid Sussex District Council have been working together through the following mechanisms:

- all three authorities are partners in the Coastal West Sussex and Greater Brighton Strategic Planning Board and are members of the Greater Brighton Economic Board and parties to the City Deal
- formal consultation as the respective local plans have progressed
- all three authorities are partners in the Coast to Capital LEP, and their Leaders are members of the Joint Committee set up to agree and implement the Strategic Economic Plan for the LEP

The following meetings were held just between the three authorities to discuss their emerging plans and agree this Memorandum of Understanding:

- Regeneration/Planning Portfolio Holders' meeting (21/11/13). At this meeting the strategic issues for our LPAs were agreed as was the need to explore solutions to housing needs as the respective local plans are progressed.
- Duty to Cooperate officers' meetings (1st July 2014, 4th December 2014, 2nd February 2015, 5th June 2015)
- Regeneration/Planning Portfolio Holders' meeting (27th August 2014)

Outcomes

Mid Sussex

Housing

Consultants commissioned by MSDC have undertaken a sustainability assessment of cross boundary options for the Mid Sussex District Plan and, as part of this process, MSDC wrote on the 5th August 2014 to neighbouring local planning authorities, including Adur & Worthing Councils, to establish whether they have unmet needs that they are seeking assistance with, and the detailed nature of any such needs. Adur & Worthing Councils responded on 20th August 2014 to say that

both Councils had housing needs which were not capable of being met internally within each District/Borough.

The results of the sustainability assessment were shared with the neighbouring authorities including Adur & Worthing Councils. MSDC has also shared the results of its updated work on housing need and supply. This evidence was revised in November 2015 and indicated an objectively assessed housing need of 695 homes per annum 2014-2031 and a potential supply of 800 homes per annum over the same period. The sustainability assessment advises that any supply in excess of local need (currently 105 homes per year) is most likely to be absorbed by Crawley and Brighton & Hove, which have the strongest economic and functional links with Mid Sussex.

Gypsy and Traveller Accommodation

The need for permanent Gypsy and Traveller accommodation in Mid Sussex is assessed to be 34 pitches (2011-2031). No need exists for Travelling Show People accommodation. The quantum of sites proposed in the Traveller Sites Document is considered sufficient to meet this need without there being any dependency on other authorities.

Employment

The Mid Sussex District Plan includes provision for a 30 hectare business park and additionally supports in principle a science park. There may be scope for these proposals to serve wider than local needs.

Adur

Housing

The Objectively Assessed Housing Need for Adur Study was updated in 2015. This assessed Adur's need for housing as 291 dwellings per annum, which equates to 5820 dwellings over the plan period (2011-2031). (Previous work had indicated a requirement of 180-240 dwellings per annum, or 3,600-4,800 over the plan period.) In setting a delivery figure for the emerging Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and total 2531 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 1080 dwellings. In total 3611 dwellings can be delivered over the Plan period which equates to an annual average of 181 dwellings. Consequently, a shortfall of approximately 2200 dwellings remains against the full objectively assessed need figure over the Plan period. (These figures will form part of the proposed Amendments to the Proposed Submission Adur Local Plan 2014 which will be taken to Council in March 2016, and subsequently tested at Examination later that same year.) The details of this shortfall have been provided to Mid Sussex District Council.

Gypsy and Traveller Accommodation

The need in Adur is for 4 public pitches for Gypsy and Traveller accommodation (1 during the period 2012-17; 1 between 2018-22; and 2 between 2023-27). The Council is investigating the potential to address these needs but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation, as well as land raising to bring it out of flood zone 3. Until further work is undertaken to assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is

difficult to quantify. A separate Development Plan Document is timetabled after the adoption of the Adur Local Plan in early 2017 to progress this site.

In addition, one Travelling Showperson's plot is required in the period up to 2027.

Employment

The 2014 Adur Employment Land Review indicates that the Adur Local Plan should make provision for between 15,000 to 20,000 sq m net for offices and R&D, and between 35,000 and 40,000 sq. m for warehousing over the 2011 and 2031 period. This includes 18,750 sq m to be relocated from Shoreham Harbour and expected to be provided within Adur. However, due to capacity constraints, the Local Plan can only provide for 41,000 sq m for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required.

Worthing

Housing

The Core Strategy 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. However, 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 is required.

The Worthing Housing Study (June 2015) indicates that the Objectively Assessed Housing Need for Worthing (2013-2033) is 636 dwellings per annum. This is significantly higher than the level of housing currently planned for. As such, the Council now needs to assess all options to meet that need as part of the review of the Core Strategy. A timetable for the preparation of a new Local Plan for the Borough has been set within a revised Local Development Scheme (April 2015).

A full and positive review of the SHLAA has been undertaken and careful consideration will be given to the potential allocation of additional sites (including greenfield opportunities) to help meet development needs.

Although the 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 tested, there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet 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. Details of this shortfall have been provided to Mid Sussex District Council.

Gypsy and Traveller Accommodation

Evidence indicates that there is no need in Worthing for Gypsy and Traveller accommodation.

Employment

With regard to employment, the Worthing Core Strategy indicated a need to provide 780,000 sq ft of industrial and warehousing floorspace and 240,000 sq ft of office space up to 2026.

The Worthing Employment Land Review Update (December 2013) concluded that the Council's protectionist policy towards the retention of employment land is still valid and that there will be a need to deliver additional employment land to help achieve economic growth. Due to the scarcity of available sites to deliver new employment needs, co-operation with neighbouring local planning authorities will be required.

As part of the full review of the Council's Core Strategy, a new Employment Land Review has been commissioned in July 2015. 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.

Ongoing Cooperation

It is agreed that the three authorities will continue to cooperate actively and diligently on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

| | | |
|---|--|--|
| Signed: | Signed: | Signed: |
| Pat Beresford Cabinet Member for Regeneration, Adur DC Dated: January 2016 | Bryan Turner Cabinet Member for Regeneration, Worthing BC Dated: January 2016 | Andrew MacNaughton Cabinet Member for Planning Mid Sussex DC Dated: 19 th January 2016 |

Mid Sussex District Council: Site Allocations Development Plan Document October 2019

Statement of Common Ground

(Update to Memorandum of Understanding Jan 2016)

Parties to the Agreement

The Agreement involves the following local planning authorities:

- Mid Sussex District Council
- Adur District Council
- Worthing Borough Council

Introduction

This Statement of Common Ground is an update to the Memorandum of Understanding signed in January 2016 between the Parties to the Agreement. More specifically its overall aim is to demonstrate that ongoing and appropriate engagement and co-ordination is taking place between the parties that includes planning for the identified cross-boundary strategic planning issues that exist and/or likely to arise resulting from the MSDC emerging Site Allocations Development Plan Document that has been published for 'Preferred Options' Consultation 9th October to 20th November 2019.

Current Position

Mid Sussex District Council adopted the District Plan (2014 – 2031) in March 2018. The District Plan identified a housing requirement for the district of 16,390 dwellings up to 2031. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings. The emerging Mid Sussex Sites DPD has four main aims, which are:

- i. To allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- ii. To allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- iii. To allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- iv. To set out additional Strategic Policies necessary to deliver sustainable development.

The Site Allocations DPD policies are strategic and, once adopted, will form part of the Development Plan for the district,

The Site Allocations DPD proposes 22 housing site allocations and 7 employment site allocations to ensure that the housing and employment requirements as identified by the District Plan are met in full.

The Sites DPD has been informed by a comprehensive suite of technical evidence, including Sustainability Appraisal and Habitats Regulations Assessment.

Strategic Planning Issues

The following strategic/ cross-boundary planning issues have been identified that relate to the Mid Sussex Site Allocations DPD and the parties:

1. Housing Provision

Mid Sussex District Council adopted the District Plan (2014 – 2031) in March 2018. The District Plan identified a housing requirement for the district of 16,390 dwellings up to 2031. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.

One of the aims of the Sites SPD is to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan. District Plan policy DP4: Housing indicates that, as at 1st April 2017, there was a residual amount of 2,439 dwellings to be allocated through future Neighbourhood Plans and the Site Allocations DPD. This residual amount has been updated as at 1st April 2019, and is now 1,507 dwellings.

Policy SA11: Additional Housing Allocations of the Site Allocations DPD proposes to allocate 22 housing sites, that will deliver around 1,962 dwellings. This amount ensures the residual is fully met and provides a reasonable over-allocation to provide flexibility.

The parties agree that the Site Allocations DPD is seeking to allocate sufficient sites to ensure the housing requirement for Mid Sussex is met in full. The Parties agree these allocations do not raise any cross-boundary issues and offer an opportunity to make a positive contribution to delivering sustainable residential development.

2. Employment Provision

Updated employment evidence, commissioned by Mid Sussex District Council to take account of the recent employment forecast statistics, identified that a total requirement of around 35 to 40 hectares is needed up to 2031. As 25 hectares employment land had already been allocated at Burgess Hill, within District Plan Policy DP1, this leaves a residual requirement of 10 -15 hectares to be allocated within the Site Allocations DPD.

The Sites DPD Policy SA1: Sustainable Economic Development – Additional Site Allocations allocates six new sites for employment use, plus an expansion one site, totalling approximately 17ha.

District Plan policy DP1: Sustainable Economic Development identifies a broad location for a Science and Technology Park to the west of Burgess Hill. A site for to the north of the A2300 has been identified as the preferred option. Policy SA9: Science and Technology Park allocates the site.

The Parties agree these allocations do not raise any cross-boundary issues and offer an opportunity to make a positive contribution to delivering sustainable economic development.

3. Transport

The main issue for transport identified in the 2016 Statement of Common Ground, is the capacity of the A27 and links across the South Downs National Park. The Sites DPD work is informed by a suite of technical evidence including the Mid Sussex Transport Study 2019 that comprehensively tests the emerging Sites DPD options to ensure there is an appropriate understanding of the impact of the proposals on the highway network. This work has been undertaken in partnership with West Sussex County Council and is iterative with a recognition that further work is needed up to submission of the Publication version of the plan.

The Parties agree that the evidence is fit-for-purpose for the purpose of preparing a Site Allocations DPD, and along with future iterations of work up to completion of the Publication version of the plan, for submission to the Secretary of State.

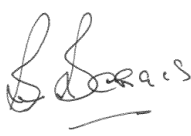


Liaison

The parties have engaged on an ongoing basis throughout the preparation of the Site Allocations DPD. Specific engagement has taken place at key stages during plan preparation including revision of the methodology for identifying sites for potential allocation, including for the Strategic Housing and Employment Land Availability Assessment (SHELAA) and for site selection, and during preparation of the Draft Plan at 'Preferred Options' (Regulation 18) stage.

Conclusion

Adur District & Worthing Borough Councils and Mid Sussex District Council agree that they have engaged on an ongoing basis throughout preparation of the Site Allocation DPD and on this basis that the Duty-to-Cooperate has been met.

Adur District & Worthing Borough Councils and Mid Sussex District Council agree that there are no areas of disagreement between the parties relating to the emerging Site Allocations DPD and to continue to work together on the areas of ongoing work discussed in this Statement of Common Ground.

| | | |
|--|--|--|
| Signed:  | Signed:  | Signed:  |
| Dated: 24 th October 2019 | Dated: 23 rd October 2019 | Dated: 4 th November 2019 |
| Cllr Brian Boggis Exec. Member for Regeneration Adur District Council | Cllr Kevin Jenkins Exec. Member for Regeneration Worthing Borough Council | Cllr Andrew MacNaughton Cabinet Member for Housing and Planning Mid Sussex District Council |

Duty to Cooperate

Memorandum of Understanding – March 2016

Parties to the Agreement

The Agreement involves the following local planning authorities:

- ☐ Adur District Council

- ☐ Worthing Borough Council

Introduction

Local planning authorities are required by the Localism Act 2011 to meet the ‘Duty to Cooperate’, that is to engage constructively and actively on an ongoing basis on planning matters that impact on more than one local planning area. Section 33A(6) of the Planning and Compulsory Purchase Act 2004 also requires local planning authorities and other public bodies to consider entering into agreements on joint approaches. In addition, local planning authorities are required to consider whether to prepare local planning policies jointly under powers provided by section 28 of the 2004 Act.

The Duty to Cooperate is amplified in the National Planning Policy Framework (NPPF) which sets out the key strategic priorities that should be addressed jointly (paragraph 156). Paragraphs 178-181 of the NPPF detail how it is expected that the Duty to Cooperate will function, and in particular state that:

“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position.”

The National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Cooperate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross-boundary matters. The NPPG states that:

“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and

it will

be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty.”

Objectives

This Memorandum of Understanding relates to the preparation of local development plans in the two local planning authorities – Adur and Worthing. Its overall aim is to: ***ensure appropriate co-ordination and planning for the cross-boundary strategic planning issues that exist and/or are likely to arise in the foreseeable future between the two authorities.***

The two authorities have a long history of joint working and partnership and particularly over the last 10 years where this has become formalised:

- All services of the two Councils are merged, with officer teams working jointly to cover both Adur and Worthing. Since 2010, the Planning Policy team (managed by one Executive Head) has worked jointly on Adur and Worthing planning issues, projects, studies and policy/advice documents. Staff within the team work across Adur and Worthing projects depending on service priorities and staff availability / skills.
- A number of policy documents are jointly produced with shared methodology (albeit covering separately Adur and Worthing). Examples include Strategic Housing Land Availability Assessments, Open Space Studies and the Annual Monitoring Reports. There is also an approved joint Statement of Community Involvement - a single document covering both Adur and Worthing.
- Joint responses (although covering two separate areas) have been made and will continue to be made into a number of strategic documents including the Local Strategic Statement (and joint evidence studies to support this), the Strategic Economic Plan for the Coast to Capital LEP, the Greater Brighton City Deal and Devolution proposals. Joint responses are also submitted on Government consultations.
- The team works jointly on the separate development plans - progressing evidence studies (albeit these usually cover Adur and Worthing separately) for housing, open space and gypsy and traveller accommodation needs, sustainability appraisals, policy writing and progressing the Duty to Co-operate. The latter work is supported by joint attendance by officers in the team representing both Adur and Worthing at meetings with other local authorities and workshops. Representations to neighbouring authority plans are made jointly as is the progression of MoUs and Statements of Common Ground.

- There is a Joint Strategic Committee of Adur and Worthing Members which makes decisions on key policy documents, including Local Development Plans. This has enabled not only a greater understanding and appreciation of the spatial and planning issues across both authorities, but has also built up a good foundation for joint working and decision making. Whilst there are two separate Executive Members with responsibility for planning in their areas, they have a good working relationship, attending together meetings, workshops and conferences. They also sit together on various boards and committees (see below). They also jointly sign MoUs and Statements of Common Ground which have been used to demonstrate effective cross boundary working arrangements with other local planning authorities.

As such, the knowledge and understanding (built up over the years) within the planning team and at Member level of issues impacting on both authorities is significant and unique within the sub regional area. However, because the Councils remain separate political administrations with a Portfolio Member for each authority responsible separately for Adur and Worthing, it is necessary to have an approved MoU in place between the two authorities. This MoU aims to set out the context and basis for co-operation and the principles of agreement in progressing the Adur and Worthing Local Development Plans, in line with Government policy and advice on the duty to co-operate.

Working Arrangements

Whilst the Councils are separate political administrations, they are jointly involved in a variety of bodies set up to address strategic issues for the Coastal West Sussex and Greater Brighton area with the aims of securing economic growth, more housing as well as improved and new infrastructure provision. Both authorities share common planning issues and problems including the difficulty of providing new homes to meet future needs within a highly constrained environment and with infrastructure problems, particularly in relation to transport. ***The recognition of this as well as the need to find solutions has fostered a culture of partnership and a willingness to work together and ‘make things work’.*** The authorities are represented and participate together on the following strategic bodies and projects:

- The Coast to Capital LEP (Adur and Worthing Council Leaders are members of the Greater Brighton Economic Board set up to agree and implement the Strategic Economic Plan for the LEP)
- The Greater Brighton City Deal (together with Brighton and Hove, Lewes, Mid Sussex and East and West Sussex County Councils)
- The Greater Brighton Devolution Proposals
- Greater Brighton Economic Board (progressing City Deal, Devolution and the Strategic Economic Plan for the coastal area)

- The Coastal West Sussex Partnership (an economic partnership of business and public sector leaders and also including Members from Arun, Chichester and West Sussex County Councils)
- The Coastal West Sussex and Greater Brighton Strategic Planning Board (set up to address strategic planning issues and also including Members from Brighton and Hove, Chichester, Horsham, Lewes, Mid Sussex, West Sussex County Council and the South Downs National Park) with agreed MoU and Terms of Reference
- The Coastal West Sussex and Greater Brighton Local Strategic Statement 2013 and refreshed in 2016 (commissioned and approved by the above Strategic Planning Board) which sets out the long-term, integrated strategic planning and investment priorities for the area
- A number of officer working groups to inform the above bodies and their work

In addition to the above, both authorities (officers and Executive Members) have been and continue to be represented at duty to co-operate meetings with other local authorities in the CWS and GB area. As an example, they have participated jointly in the duty to co-operate workshops organised by Horsham District Council in July 2013, March 2014 and March 2015.

Adur and Worthing have jointly signed separate MoUs with Horsham District and Mid Sussex District Council. They have also jointly signed a Statement of Common Ground with Lewes District Council and the South Downs National Park Authority and similarly with Brighton and Hove City Council.

Formal consultation has taken place at appropriate stages as the respective local plans have progressed.

Both Adur and Worthing have jointly inputted into a number of evidence studies (and workshops) to support the Local Strategic Statement – in relation to housing, the economy and transport. Both authorities are working with WSCC and Highways England on proposals to improve the A27 and its junctions. This work has enabled a greater mutual understanding of the issues for both authority areas.

Current Local Plan Position

The current position with the Adur and Worthing Local Plans is as

follows: Adur District Council

Adur District Council published the Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014. Due to issues raised in relation to the strategic site allocation at New Monks Farms, a brief regulation 18 consultation exercise was carried out from 9th December 2015 - 4th January 2016. This will be followed by 'Amendments to the Proposed Submission Adur Local Plan (2016)',

which are likely to be published 31st March - 11th May 2016 (Regulation 19) and submitted July 2016.

That part of the district which is within the National Park (about half the district) is covered by the emerging local plan for the South Downs National Park and not by the Adur Local Plan. The new Adur Local Plan covers the period up to 2031.

The Council is also working with Brighton and Hove City Council, West Sussex County Council with the support of Shoreham Port Authority and other partners, on a joint Area Action Plan for Shoreham Harbour. This is a large strategic regeneration site identified in the Coast to Capital Local Enterprise Partnership's (LEP) Strategic Economic Plan as well as the Greater Brighton City Deal. A second Regulation 18 consultation exercise is proposed on the Area Action Plan in the summer of 2016.

Worthing Borough Council

Worthing has an adopted Core Strategy to cover the period up to 2026. However, significant changes to the planning system has meant that a review of the Core Strategy is required. The Council has adopted a revised Local Development Scheme (April 2015) which sets out a timetable for the progression of a new Local Plan to be adopted in 2018. The Council's evidence base is currently being updated to inform the new Local Plan and an Issues and Options consultation is expected to be published in May 2016.

Strategic Planning Issues

The following have been identified as current cross-boundary strategic planning issues relevant to Adur and Worthing Councils:

- ☐ Housing provision
- ☐ Gypsy and Traveller accommodation
- ☐ Employment and jobs
- ☐ Transport

Whilst transport is identified as a strategic issue, this is being addressed as part of meeting the above housing, employment and Gypsy and Traveller development needs. The main issue is the capacity of the A27 and consequent congestion problems.

Outcomes

Adur

Housing

The Objectively Assessed Housing Need Study for Adur was updated in 2015. This assessed Adur's need for housing as 291 dwellings per annum, which equates to

5,820 dwellings over the plan period (2011-2031). (Previous work had indicated a requirement of 180-240 dwellings per annum, or 3,600-4,800 over the plan period). In setting a delivery figure for the emerging Adur Local Plan, a number of housing sources have been carefully considered which maximise development on brownfield land and total 2,531 dwellings. In addition, two sustainable greenfield urban extensions have been identified which will deliver a further 1,080 dwellings. In total, 3,611 dwellings can be delivered over the Plan period which equates to an annual average of 181 dwellings. Consequently, a shortfall of approximately 2200 dwellings remains against the full objectively assessed need figure over the Plan period. (These figures will form part of the Amendments to the Proposed Submission Adur Local Plan 2016 which will be published in March 2016, and subsequently tested at Examination later the same year). The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

Gypsy and Traveller Accommodation

The need in Adur is for 4 public pitches for Gypsy and Traveller accommodation (1 during the period 2012-17; 1 between 2018-22; and 2 between 2023-27). The Council is investigating the potential to address these needs but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation, as well as land raising to bring it out of flood zone 3. Until further work is undertaken to assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is difficult to quantify. A separate Development Plan Document is timetabled after the adoption of the Adur Local Plan in early 2017 to progress this site.

In addition, one Travelling Showperson's plot is required in the period up to 2027. The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

Employment

The 2014 Adur Employment Land Review indicates that the Adur Local Plan should make provision for between 15,000 to 20,000m² net for offices and R&D, and between 35,000 and 40,000 m² for warehousing over the 2011 and 2031 period. This includes 18,750m² to be relocated from Shoreham Harbour and expected to be provided within Adur. However, due to capacity constraints, the Local Plan can only provide for 41,000m² for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is required. The details of this shortfall have been provided to Worthing Borough Council and discussed as the local development plans progress.

Worthing

Housing

The Core Strategy 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. However, 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 is required – work to address this is well under way.

The Worthing Housing Study (June 2015) indicates that the Objectively Assessed Housing Need for Worthing (2013-2033) is 636 dwellings per annum. This is significantly higher than the level of housing currently planned for. As such, the Council now needs to assess all options to meet that need as part of the review of the Core Strategy. A timetable for the preparation of a new Local Plan for the Borough has been set within a revised Local Development Scheme (April 2015).

A full and positive review of the SHLAA has been undertaken and careful consideration will be given to the potential allocation of additional sites (including greenfield opportunities) to help meet development needs.

Although the review of greenfield sites 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 tested, there is still no realistic or sustainable prospect of ever being able to identify sufficient housing sites to completely meet 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. The details of this shortfall have been provided to Adur District Council and discussed as the local development plans progress.

Gypsy and Traveller Accommodation

Evidence indicates that there is no need in Worthing for Gypsy and Traveller accommodation.

Employment

With regard to employment, the Worthing Core Strategy indicated a need to provide 780,000ft² of industrial and warehousing floorspace and 240,000ft² of office space up to 2026. The Worthing Employment Land Review Update (December 2013) concluded that the Council's protectionist policy towards the retention of employment land was still valid and that there will be a need to deliver additional employment land to help achieve economic growth. Due to the scarcity of available sites to deliver new employment needs, co-operation with neighbouring local planning authorities will be required. The details of this shortfall have been provided to Adur District Council and discussed as the local development plans progress.

As part of the full review of the Council's Core Strategy, a new Employment Land Review was commissioned in July 2015. When published in spring 2016, 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.

Summary of outcomes

Both authorities share common planning issues and problems including the difficulty of providing new homes and employment floorspace to meet future needs within a highly constrained environment and with infrastructure pressures. Both local authorities are constrained to meet their full objectively assessed housing and employment needs. Adur may also have a small Gypsy and Traveller



accommodation shortage subject to further work on the relocation of the Withy Patch site.

The knowledge and understanding between the two Councils of issues and constraints impacting on both authorities is significant and probably unique within the sub regional area. The recognition of the common constraints each authority faces and the inability to meet objectively assessed development needs places a great importance on finding solutions through partnership and joint working. This has meant that both Adur and Worthing Councils have placed emphasis on working with those authorities elsewhere which have a more realistic prospect of helping to meet those needs.

Both authorities have communicated these unmet needs to each other and also to other local authorities within the Housing Market Area and beyond. However, many of the Local Plans in the area are at advanced stages with some recently adopted (e.g. Crawley and Horsham) and others are post examination and approaching adoption (Lewes and Brighton and Hove City). In the meantime, liaison continues with Arun, Mid Sussex and the South Downs National Park authority. Also, a number of joint measures to help housing and employment delivery are on-going via the CWS&GB Strategic Planning Board and the Greater Brighton Economic Board with discussions taking place on the need to progress a full review of the Local Strategic Statement and other measures to address unmet needs.

Ongoing Cooperation

It is agreed that the two authorities will continue to cooperate actively and diligently on all cross-boundary planning matters with a view to achieving the proper planning of the wider area.

| | |
|--|--|
| Signed:  | Signed:  |
| Pat Beresford Cabinet Member for Regeneration, Adur DC | Bryan Turner Cabinet Member for Regeneration, Worthing DC |

Brighton and Hove City Council
Provision of Housing – A Statement of Common Ground

This agreement is between:

- Brighton & Hove City Council
- Adur District Council
- Arun District Council
- Chichester District Council
- Crawley Borough Council
- Eastbourne Borough Council
- Horsham District Council
- Lewes District Council
- South Downs National Park Authority
- Wealden District Council
- Worthing Borough Council

1. Context

- 1.1 The Localism Act 2011 and the National Planning Policy Framework 2012 (NPPF) place a Duty to Cooperate on local planning authorities (LPAs) and other prescribed bodies to address strategic planning issues relevant to their areas in the preparation of Development Plan Documents and other Local Development Documents.

2. Purpose of the Statement of Common Ground

- 2.1 The Statement of Common Ground is a factual statement setting out what steps have been taken to comply with the Duty with regard to housing provision, and areas of agreement regarding this key strategic cross-boundary issue affecting the Brighton & Hove sub-region. It provides a basis for further cooperation on strategic issues in the future.

3. Housing Market Area

- 3.1 Research has shown that housing market areas operate as a layered system of tiers and that it is not possible to precisely define the boundary of a specific housing market area due to the variety of methodologies that can be used⁸. Therefore a number of different permutations can potentially exist as Brighton & Hove's housing market area.
- 3.2 Brighton & Hove's local housing market area has been defined as encompassing the city together with the districts of Adur and Lewes⁹. The City Council considers that Brighton & Hove is unable to meet its objectively assessed housing need, and this will be tested at the City Plan Examination hearings. This local housing market area was the first considered by the City Council in seeking to locate the unmet need. As Adur and Lewes both face similar constraints and consider that they are also unable to meet their own objectively assessed needs, it was then necessary to consider broader strategic housing market areas.

⁸ Geography of Housing Market Areas Final Report, DCLG (2010)

⁹ Brighton & Hove Strategic Housing Market Assessment, DTZ (2008),

3.3 In the now revoked South East Plan a Sussex Coastal housing market area is illustrated as one area extending from Bognor Regis to Lewes/Seaford and centred on Brighton and Hove¹⁰. This is not to suggest that Bognor Regis is in the same housing market as Lewes, but that the housing markets in this coastal strip overlap to such a degree that one cannot draw sensible boundaries. Within this broad area a distinct Brighton Strategic Housing Market Area (SHMA) exists, potentially stretching from Newhaven in the east to Southwick in the west¹¹.

3.4 Broader SHMAs centred on Brighton & Hove have been identified more recently, as follows:

1. A Coastal Sussex SHMA stretching from Seaford in the east along the South Coast to East Wittering, and extending inland into the South Downs National Park to settlements such as Lewes and Midhurst¹². This SHMA covers the administrative areas of Chichester, Arun, Adur, Worthing, Brighton & Hove and Lewes.
2. An alternative approach is a potential SHMA based on Brighton & Hove, Adur, Worthing, Horsham, Mid Sussex, Crawley, Lewes, Wealden and Eastbourne¹³.

4. Compliance with the Duty to Cooperate

4.1 In the absence of government guidance and but taking account of evidence arising from inspectors reports into Local Plans, along with the timescale for producing the City Plan, the City Council took a pragmatic approach to addressing the Duty to Cooperate issue by considering all the possible housing market areas detailed above, which led to some duplication.

4.2 A Coastal West Sussex Partnership (CWSP) had previously been set up to strengthen the coastal economy. The CWSP brings together business and the public sector to work across traditional boundaries and form the foundations of future infrastructure and growth. This existing partnership has been used to address Duty to Cooperate issues (see section 5 below) and a member level Coastal West Sussex Strategic Planning Board has been set up. Lead planning members for all the constituent authorities sit on the board, however the Board has no powers and decisions made have to be ratified by the individual authorities.

4.3 Additionally, the City Council has instigated a series of meetings specifically to address the Duty to Cooperate, to which all Local Planning Authorities that comprise the alternative potential SHMA detailed above in paragraph 3.4 were invited. These meetings facilitated constructive cooperation with the other authorities, in addition to existing mechanisms of cooperation such as consultation responses. The meetings were held with the purpose of establishing an overall picture of housing need over the sub-region and whether any LPAs had capacity to accommodate unmet demand from areas that were unable to meet their own needs, in particular Brighton & Hove.

¹⁰ South East Plan (2009), diagram H1.

¹¹ Brighton & Hove Strategic Housing Market Assessment, DTZ (2008), paras 2.10 and 2.11.

¹² Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012), para 2.34

¹³ Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012), para 2.10

4.4 The authorities agree that a series of planning officer meetings took place specifically to discuss the Duty to Cooperate:

| Date | Attendees |
|------------------|---|
| June 18 2012 | Brighton & Hove; Adur; Crawley; East Sussex; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs; Worthing; West Sussex |
| September 6 2012 | Brighton & Hove; Adur; Horsham; Lewes; Mid Sussex; South Downs; Worthing |
| December 6 2012 | Brighton & Hove; Adur; Eastbourne; Horsham; Lewes; Mid Sussex; South Downs; Worthing |

4.5 All nine authorities were invited to all three meetings. Wealden indicated that they wished to attend but were not able to due to previous commitments, but did receive any papers. The two County Councils were invited only to the first meeting but were copied in on papers. Any authority who did not attend only did so as they had no availability rather than lack of interest.

4.6 These meetings have been well attended by senior officers from all authorities that are considered to be within Brighton & Hove's SHMA, and took place with the intention of reaching agreement. Further meetings have also taken place, at both officer and member level, with individual LPAs adjoining Brighton & Hove to discuss more specific issues¹⁴. The following member level meetings have taken place:

| Date | Attendees |
|-------------------------------|---------------------------------|
| 7 th December 2012 | Brighton & Hove, Mid Sussex |
| 21 st January 2013 | Brighton & Hove, Lewes |
| 18 th April 2013 | Brighton & Hove, Adur, Worthing |
| 17 th May 2013 | Brighton & Hove, Horsham |

4.7 A formal request was made by the City Council to all other LPAs within this SHMA that they consider the extent to which they are able to assist in accommodating the unmet demand from Brighton & Hove. This was approved at member level at the City Council's Economic Development Committee on 20 September 2012. Following this request, no LPAs indicated they were able to assist in meeting Brighton & Hove's unmet need at the present time.

4.8 The Duty to Cooperate Compliance Statement produced to demonstrate that the City Plan has been produced in accordance with the Duty to Cooperate has been circulated to the other local planning authorities and no concerns have been raised. This document details the numerous other cross boundary and joint partnership relationships existing in the Brighton & Hove sub-region which have informed the preparation of the City Plan.

4.9 The authorities agree that cooperation is an ongoing process and dialogue will therefore continue to address this issue. Where a LPA has an unmet objectively assessed housing need, the LPA should demonstrate why and to what degree it cannot

meet the need prior to approaching other appropriate authorities with regard to accommodating the unmet need.

5. Housing Requirements for the Coastal West Sussex Sub-Region

- 5.1 The Coastal West Sussex Strategic Planning Board was established with the intent of identifying the extent of housing need and looking at options to meet it. To facilitate cross-boundary cooperation in addressing the issue, a joint Housing Duty to Cooperate Study has been produced by the local authorities that comprise the Coastal West Sussex Strategic Planning Board¹⁵, as well as Lewes District Council.
- 5.2 The Study pulls together evidence from a range of individual studies produced by each authority to provide a consistent and objective assessment of housing requirements in each authority and across the Coastal Sussex Housing Market Area (see paragraph 3.4 above) addressing the need and demand for market and affordable housing.
- 5.3 The Study demonstrates that it is highly unlikely that the level of required housing development can be achieved across the sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the sub-region are still those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity.
- 5.4 There is agreement between the authorities that the analysis shows that, collectively, the Coastal West Sussex authorities are unable to meet their assessed housing requirements. The analysis suggests that it would be feasible to accommodate a maximum of 75% of assessed development needs in the sub-region based on current evidence¹⁶. A significant shortfall equivalent to at least around 485 dwellings per year arises¹⁷.
- 5.5 The most significant likely shortfall against assessed needs is expected to arise in the centre of the sub-region in the City of Brighton and Hove, Lewes District, Adur and Worthing. This is a function of geography with limited development potential in areas between the National Park and the sea, and in some cases very tightly drawn administrative boundaries around the existing urban areas.
- 5.6 This is a similar situation to that which existed during the preparation of the South East Plan. Levels of housing provision proposed for the sub-region in the South East Plan were at least 27-30% below demographic projections¹⁸.
- 5.7 The Study recommends that the Strategic Planning Board consults on the findings of the report with the relevant statutory bodies to which the Duty applies. Once this has

¹⁵ Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council and the South Downs National Park Authority.

¹⁶ Housing Duty to Cooperate Study, GL Hearn (2013), para. 6.13

¹⁷ If the median requirement figures are used this rises to 740 per year.

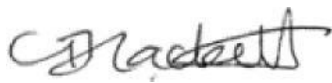
¹⁸ Housing Duty to Cooperate Study, GL Hearn (2013), paras. 3.36 to 3.38

been undertaken the Board will seek further engagement with other adjoining authorities in accordance with the Duty to Cooperate.

5.8 The Coastal West Sussex Partnership is also in the process of producing a Local Strategic Statement (LSS). The LSS will establish a strategic context and develop a clear set of ambitions for growth across the area to bring about a shared set of long term objectives that all partners are working towards. This will include the requirement to engage with areas north of the South Downs National Park about long term growth requirements. Following a period of consultation a revised draft of the LSS will be considered at a meeting of the Coastal West Sussex Strategic Planning Board on 17th October.

Local Authority: Adur and Worthing Councils

Signed:

A handwritten signature in dark ink, appearing to read 'C Blackett', with a stylized flourish at the end.

Print Name: Colette Blackett

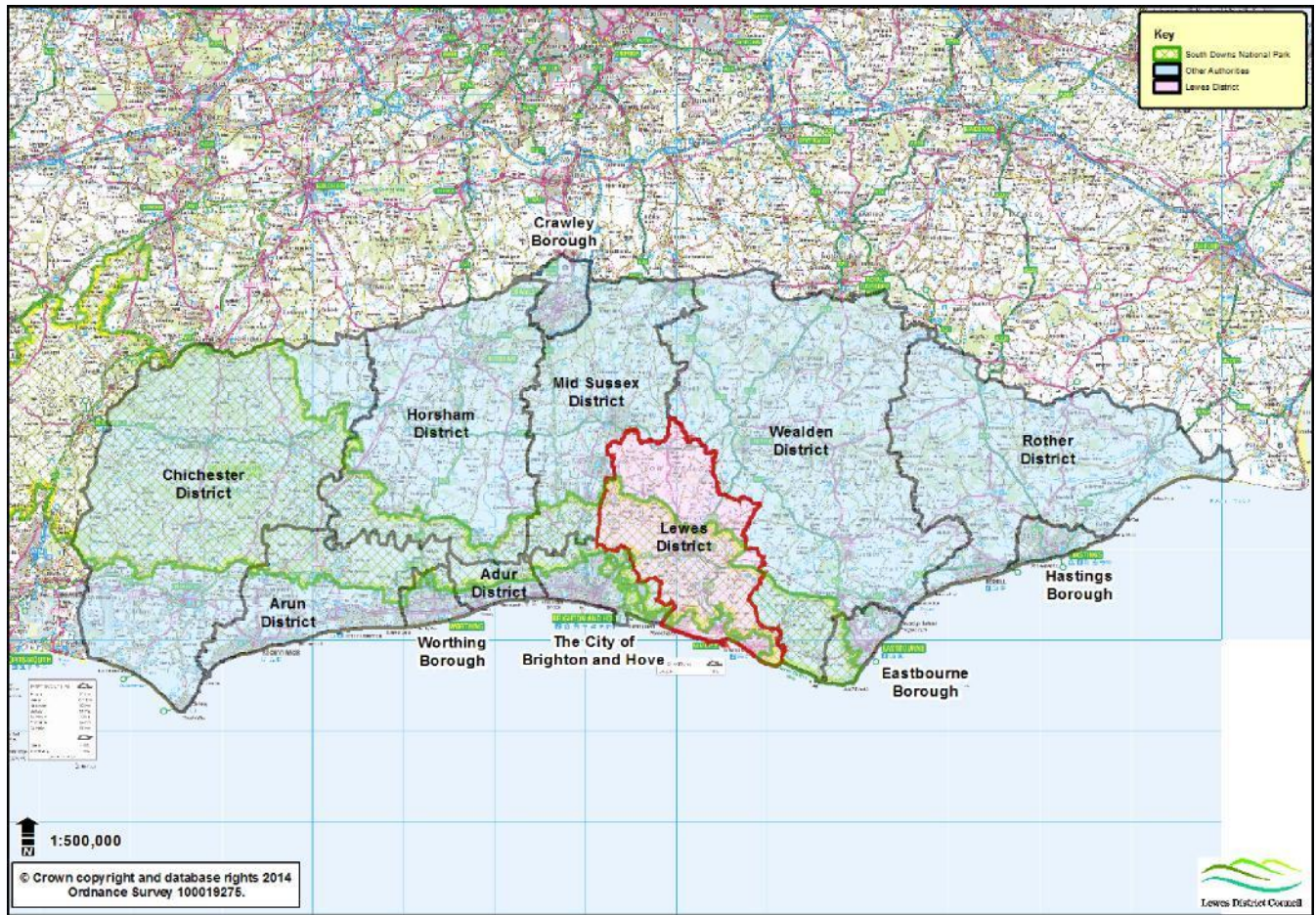
Date: 23/9/1

Duty to cooperate: Statement of common ground
Cross-boundary working and meeting housing needs

This agreement is between:

- Lewes District Council
- South Downs National Park Authority
- Adur District Council
- Arun District Council
- Brighton and Hove City Council
- Chichester District Council
- Crawley Borough Council
- Eastbourne Borough Council
- Hastings Borough Council
- Horsham District Council
- Mid Sussex District Council
- Rother District Council
- Wealden District Council
- Worthing Borough Council

Map 1: Lewes district in context



1. Background

- 1.1 Section 110 of the Localism Act 2011 places a legal duty on local planning authorities and other prescribed bodies to cooperate with each other on strategic planning matters insofar as they are relevant to their administrative areas throughout the preparation of their development plan documents. The National Planning Policy Framework (NPPF) 2012 reiterates this duty and requires an independent inspector to assess whether the development plan they are examining has been prepared in accordance with the duty to cooperate.
- 1.2 It is expected that engagement and cooperation will be constructive, active and ongoing in order to maximise effectiveness throughout plan preparation as well as implementation, delivery and subsequent review. The national Planning Practice Guidance confirms that this is not a duty to agree but that local planning authorities should make every effort to secure the necessary cooperation on cross-boundary strategic matters before submitting development plan documents for examination. The examination will test whether the duty has been complied with.

2. Purpose

- 2.1 This statement of common ground sets out how Lewes District Council and South Downs National Park Authority have actively and positively sought to comply with the duty to cooperate in the preparation of the Joint Core Strategy development plan document on strategic planning matters, with the main cross-boundary factor affecting Lewes district being housing provision.
- 2.2 A summary of the processes and meetings undertaken with all relevant organisations in undertaking the duty is set out in the associated submission document Joint Core Strategy: Duty to Cooperate Compliance Statement (August 2014). Other relevant information on seeking to meet housing need in Lewes district is explained in the Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
- 2.3 This statement also describes the established mechanisms for ongoing cooperation on strategic matters.

3. Housing Market Area (HMA)

- 3.1 Lewes district was identified in the South East Plan¹⁹ as forming part of the Sussex Coast HMA²⁰, which is focused on the city of Brighton and Hove and extends from Bognor Regis in the west to Seaford in the east. This is not to suggest that Bognor Regis is in the same housing market as Lewes, but that the housing markets in this coastal strip overlap to such a degree that distinct boundaries cannot be defined. The extent of this HMA was reconfirmed in the Strategic Housing Market Assessment²¹ undertaken for the coastal West Sussex authorities in November 2012.
- 3.2 Research by the Department for Communities and Local Government showed that HMAs operate as an overlapping system of tiers and that it is not possible to precisely define the boundary of a specific housing market area due to the variety of methodologies that can be used²². Therefore a number of different permutations can potentially exist as Lewes district's HMA.
- 3.3 Within the broad Sussex Coast area a distinct local HMA exists. This is focused on Brighton and Hove and exerts influence across most of Lewes district. Small parts of the district also have some overlap with the Eastbourne, High Weald and Crawley/Gatwick housing market areas, although for the vast majority of the district it is the Sussex Coast HMA that is of relevance²³.
- 3.4 Two broader strategic HMAs²⁴ have also been identified, again focused on Brighton and Hove.

¹⁹ South East Plan (2009) now revoked and archived

²⁰ South East Plan (2009), now revoked and archived, diagram H1

²¹ <http://www.arun.gov.uk/main.cfm?type=HOUSING#SHMA> 2012

²² Geography of Housing Market Areas Final Report, DCLG (2010)

²³ Housing Market Assessment of Lewes, DTZ (2008)

²⁴ Coastal West Sussex Strategic Housing Market Assessment Update, GL Hearn (2012)

1. The administrative areas of Brighton and Hove, Lewes, Adur, Worthing, Horsham, Mid Sussex, Crawley, Wealden and Eastbourne.
 2. A broader Coastal Sussex HMA centred on Brighton and Hove stretching from Seaford along the coast to West Wittering and inland into the South Downs National Park to settlements such as Lewes and Midhurst, covering the administrative areas of Lewes, Brighton and Hove, Adur, Worthing, Arun and Chichester.
- 3.5 The District Council and National Park Authority have sought to work with all authorities forming part of the main Sussex Coast HMA, as well as those authorities in HMA's where there is a degree of overlap.

4. Meeting objectively assessed housing needs

- 4.1 Despite extensive work, the Council and SDNPA consider that, due to extensive and well documented environmental and infrastructure constraints, objectively assessed housing needs in Lewes district cannot be met within the sustainable development requirements of the National Planning Policy Framework. This position will be tested at the examination of the Joint Core Strategy.
- 4.2 In seeking to locate the unmet need elsewhere the local level HMA, whereby most of Lewes district relates intimately with Brighton and Hove, was considered first. This was followed by the wider Coastal Sussex HMA, starting with the most directly related authority areas. Unfortunately the other authorities face similar constraints to Lewes district, leaving them unable to meet their objectively assessed housing needs. It is very likely, as documented in the Sussex Coast HMA Duty to Cooperate Housing Study, that the Sussex Coast authorities will be unable to meet the combined housing need of the Sussex Coast HMA.
- 4.3 A 'no stone unturned' programme of additional work, seeking to reduce the gap between the district's identified housing capacity and its housing needs for the plan period, was agreed by the council's Cabinet. This work led to some focussed amendments to the proposed submission version of the Joint Core Strategy, including an increase in the proposed housing target from 4,500 to 5,600. Relevant information on seeking to meet housing need in Lewes district is explained in the paper, Justification for the Housing Strategy²⁵.
- 4.4 As, to date, neighbouring authorities and those authorities making up the Sussex Coast HMA have been unable to identify any potential to help meet Lewes district's housing needs, broader strategic housing areas and routes to more innovative solutions for meeting the collective strategic housing need have been explored and implemented.

²⁵ Joint Core Strategy Background Paper: Justification for the Housing Strategy (May 2014).
<http://www.lewes.gov.uk/Files/plan HBP May 2014.pdf>

5. Compliance with the duty to cooperate

- 5.1 In the absence of government guidance (at the time) but taking account of evidence arising from Inspectors reports into Local Plans, together with the need to continue to progress the Joint Core Strategy, the council and SDNPA, together with partner authorities in the Sussex Coast HMA, took a pragmatic approach to addressing the Duty to Cooperate. This approach is considered to be consistent with the Planning Practice Guidance on the Duty to Cooperate, which was published in March 2014 after the cross-boundary cooperative working was already underway.
- 5.2 A Coastal West Sussex Partnership had previously been set up to strengthen the coastal economy, bringing together businesses and the public sector to work across administrative boundaries and form the foundations for future infrastructure delivery and growth. This existing partnership has been widened to include LDC and SDNPA as partners on the Coastal West Sussex and Greater Brighton Strategic Planning Board. Lead planning members for all the constituent authorities sit on the Board, which has an advisory remit and decisions made need to be ratified by the individual planning authorities.
- 5.3 The Strategic Planning Board is in place to:
- ☐ Identify and manage spatial planning issues that impact on more than one local planning areas across the Coastal West Sussex and Greater Brighton area; and
 - ☐ Support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area.
- 5.4 The Board has signed a memorandum of understanding²⁶ and agreed terms of reference²⁷ as a framework for cooperation. It has also a Local Strategic Statement²⁸ which sets out the long term strategic objectives for the period 2013-2031 and the spatial priorities for delivery in the medium term to support the delivery of regeneration, jobs and homes while protecting the high quality environment. It is proposed that the Local Strategic Statement will be reviewed and refreshed in October 2014.
- 5.5 Collaborative working among planning officers across East Sussex has been long-established through the channels of the Planning Liaison Group (chief planning officers), East Sussex Local Plan Managers Group and the East Sussex Development Management Forum. In addition, the East Sussex Strategic Planning Members Group (ESSPMG) was set up in 2013 to enhance and endorse cooperation at the political level. The group consists of the portfolio holders for planning assisted by officers from all local authorities in East Sussex, including SDNPA.

²⁶ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-CWS-SPB-MoU-Feb-2014-Final-Signed.pdf>

²⁷ <http://www.coastalwestsussex.org.uk/wp-content/uploads/CWS-Strategic-Planning-Board-TOR-Oct13-Final-Version.pdf>

²⁸ <http://www.coastalwestsussex.org.uk/wp-content/uploads/FINAL-LSS-for-CWS-Gtr-Brighton-30-Jan-14.pdf>

- 5.6 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. Although the ESSPMG is primarily for East Sussex authorities, it is recognised that strategic planning issues do not constrain themselves to county boundaries and therefore neighbouring authorities attend meetings of the group if an issue is being explored that is relevant to that authority area.
- 5.7 Additionally the council and SDNPA have instigated or attended many meetings and events specifically or indirectly to address matters relevant to the duty to cooperate. A schedule of key meetings and joint-working, and their key outcomes, with local planning authorities and other organisations subject to the duty to cooperate is set out in Appendix 1 of the Duty to Cooperate Compliance Statement. These have facilitated constructive and active cooperation with the other authorities, in addition to existing mechanisms of cooperation such as consultation responses. These meetings include those held with the purpose of establishing an overall picture of housing need across the sub-region and determining whether any local planning authorities had spare capacity to accommodate unmet needs from areas that were unable to meet their own needs such as Lewes district.
- 5.8 The Duty to Cooperate Compliance Statement has been circulated to all local planning authorities in East and West Sussex and no concerns have been raised.
- 5.9 The authorities agree that a series of officer and member level meetings and events have taken place, as set out in Appendix of the Duty to Cooperate Compliance Statement, during the production of the Joint Core Strategy, covering matters relevant to the duty to cooperate. To date, no local planning authorities have indicated that they have identified surplus housing capacity that could assist in meeting Lewes district's unmet housing needs.
- 5.10 The authorities agree that cooperation is an ongoing process and dialogue and partnership working will therefore continue in order to address cross-boundary strategic matters, including the issue of meeting development needs. Where a LPA has an unmet objectively assessed housing need, the LPA should demonstrate and justify why and to what degree it cannot meet the need prior to approaching other appropriate authorities with regard to accommodating the unmet need.
- 5.11 The Coastal West Sussex and Greater Brighton authorities are committed to cross-authority working in the pursuit of sub-regional and longer term solutions to meeting the housing needs of the Sussex Coast HMA. In this vein the Council and SDNPA are committed to a review of Spatial Policies 1 and 2 of the Joint Core Strategy if any options for this are demonstrated to be deliverable within Lewes District.

6. Housing Requirements for the Coastal West Sussex and Greater Brighton Sub-Region

- 6.1 The Coastal West Sussex and Greater Brighton Strategic Planning Board was established with the intent of identifying the extent of housing need and looking at options to meet it. To facilitate cross-boundary cooperation in addressing the issue, a joint Housing Study (Duty to Cooperate)²⁹ has been produced by the local authorities that comprise the Coastal West Sussex and Greater Brighton Strategic Planning Board³⁰.
- 6.2 The study pulls together evidence from a range of individual studies produced by each authority to provide a consistent and objective assessment of housing requirements in each authority and across the Sussex Coast HMA addressing the need and demand for market and affordable housing.
- 6.3 The study concludes that the Sussex Coast HMA is highly unlikely to be able to deliver the full level of required housing development in light of the significant environmental, landscape and infrastructure constraints to development which exist. Strategic infrastructure constraints in the Sussex Coast HMA are still those which were identified and tested through the development of the South East Plan – particularly capacity issues along the A27, around the Chichester Bypass, Arundel and Worthing, as well as the A259. Equally there are a number of more local routes which are at or near capacity.
- 6.4 There is agreement between the Coastal West Sussex and Greater Brighton authorities that the evidence shows that, collectively, they are unable to meet the full objectively assessed housing needs. Current evidence implies that it may be feasible to accommodate a maximum of around 75% of the assessed level of need across the sub-region³¹.
- 6.5 The most significant shortfall against objectively assessed needs is expected to arise in the area of the sub-region centred on the City of Brighton and Hove, including Lewes district, Adur and Worthing. This is primarily a function of geography with limited development potential in the areas between the national park and the sea.
- 6.6 This situation persists from that which existed during the preparation of the South East Plan (now revoked), which resulted in the South East Plan's housing requirements for the authorities in the Sussex Coast HMA being set at least 27-30% below demographic projections³².
- 6.7 In August 2013 a meeting took place between the Council, SDNPA, the West Sussex district/borough councils and Brighton and Hove City Council. The purpose of the meeting was to discuss a way forward, in accordance with the

²⁹ Housing Study (Duty to Cooperate), GL Hearn (2013)

³⁰ Arun District Council; Chichester District Council; Worthing Borough Council; Adur District Council; Brighton & Hove City Council, Lewes District Council and the South Downs National Park Authority.

³¹ Housing Study (Duty to Cooperate), GL Hearn (2013)

³² Housing Study (Duty to Cooperate), GL Hearn (2013)

duty to cooperate, regarding seeking to meet the sub-region's housing needs in the light of the levels of provision likely to be achieved through the recently adopted and emerging Local Plans. It was acknowledged that most LPAs are unable to meet their objectively assessed housing needs in their Local Plans because of recognised capacity constraints. Those authorities that anticipated being able to meet their own housing needs also experience capacity constraints such that they are unlikely to be in a position to accommodate the anticipated shortfalls arising in the other authority areas.

- 6.8 It was agreed that the authorities would continue to work together in order to identify, if possible, longer term strategic solutions to the identified shortfall of housing provision across the sub-region, including necessary strategic infrastructure and appropriate delivery mechanisms. This work would be undertaken on the understanding that each authority would look to meet future housing needs within their own local housing market area(s) first before looking at options beyond their market area(s) if necessary. Subsequently the Coastal West Sussex and Greater Brighton authorities signed a memorandum of understanding and produced its Local Strategic Statement, setting out the commitment and framework through which they will actively cooperate in seeking to address the sub-region's housing needs on an ongoing basis.
- 6.9 Wealden and Mid Sussex are neighbouring districts to Lewes but are not significant constituents of the Sussex Coast HMA. To date neither authority has identified that it may have capacity to help meet some of Lewes district's unmet housing needs. Mid Sussex is currently working on a revised District Plan. Before setting its proposed housing target, Mid Sussex is undertaking an assessment of neighbouring authorities' unmet housing needs and, as part of this process, Lewes District Council has provided details of its housing needs shortfall. This work will involve a sustainability appraisal, carried out by consultants, to assess the impacts of meeting unmet needs in Mid Sussex and the impacts on adjacent areas of those needs not being met. It is currently too soon for Mid Sussex to indicate whether it will be able to assist in meeting some of Lewes district's unmet need. However collaboration at officer and Lead Member level is ongoing in accordance with the Memorandum of Understanding between the two councils and SDNPA.
- 6.10 Wealden has a Core Strategy (adopted February 2013) with a housing target that does not meet its own objectively assessed need, leaving Wealden unable to meet assist with meeting any of Lewes district's unmet needs at the current time. Wealden's Core Strategy will be subject to review in 2015 which will consider the environmental impact of potential development on sites of international importance and other constraints of the area. Wealden is currently at the early stages of undertaking a new Strategic Housing Market Area Assessment. While it is too early to know whether Wealden will be in a position to assist in meeting any of Lewes district's unmet needs in the future, Lewes District Council and SDNPA are engaging with Wealden in this process and will also continue to work collaboratively through the East Sussex Strategic Planning Members Group.

7. East Sussex Strategic Planning Members Group

- 7.1 With regard to housing provision ESSMPG has agreed to consider the definition of HMAs affecting East Sussex and to establish a protocol for early liaison and consistency on this work, which is expected to draw on the 2011 Census migration patterns. It is recognised that HMAs are likely to extend beyond the county boundary and the protocol should include engagement with adjoining authorities, especially to the north and west (including the CWSGB Strategic Planning Board). The principle of linked assessments of housing and employment needs in future reviews and a 'robustness review' of housing market indicators in the existing countywide housing monitoring/reporting framework, in line with the National Planning Practice Guidance, have also been agreed.
- 7.2 Through the ESSPMG work is actively underway on establishing a common evidence base and planning policy direction for specific topics that require detailed policies and have commonality across East Sussex. The currently identified topic areas are Development in the High Weald AONB; Older Persons Housing; Equestrian Development; Biodiversity and Green Infrastructure; Tourism; Sustainable Transport; Energy Development; and Community Facilities.
- 7.3 The topic areas are being progressed by working groups comprised of all East Sussex local planning authorities and currently consists of the identification of inconsistencies, gaps or other weaknesses in the evidence base and policy coverage. This will be followed by any necessary additional evidence gathering, identification of common policy elements and ascertaining reasons for any local variations. As the majority of the issues being explored are detailed in nature, this work is of greater relevance to the Development Management policies each planning authority is preparing.

Lewes District Council:

Signed:



Print Name: Cllr Tom Jones - Strategy and Development Portfolio

Date: 17 October 2014

Adur District Council:

A handwritten signature in black ink that reads "Pat Beresford". The signature is written in a cursive style with a large, looping 'P' and 'B'.

Signed:

Print

Name: Cllr Pat Beresford

Date: 11/11/14

**Memorandum of Understanding
Arun Local Plan Proposed Modifications
September 2017**

Between:

- 1) Arun District Council (ADC) – local planning authority**
 - 2) Adur District Council (ADC) Consultee Reference: 1100650 – neighbouring local planning authority**
 - 3) Worthing Borough Council (WBC) Consultee Reference: 1100650 – neighbouring local planning authority**
-

1 Introduction

- 1.1 This Memorandum of Understanding has been prepared by the above parties to assist the resumption of the Examination-in-Public into the Arun Local Plan. The Memorandum of Understanding confirms that all parties are satisfied that Arun District Council has engaged constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters relevant to Adur District Council and Worthing Borough Council.
- 1.2 The Duty to Cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies 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.
- 1.3 Paragraphs 178 - 181 of the National Planning Policy Framework (2012) provide the national planning policy requirements for planning strategically across local boundaries. In addition, National Planning Practice Guidance (NPPG) offers further advice on the implementation of the Duty to Cooperate. This includes the advice that one way to demonstrate effective cooperation, particularly if Local Plans are not being brought forward at the same time, is the use of formal agreements (such as a Memorandum of Understanding) between local planning authorities, signed by elected members, demonstrating their long term commitment to a jointly agreed strategy on cross boundary matters. The NPPG states that:

“Such agreements should be as specific as possible, for example about the quantity, location and timing of unmet housing need that one authority is prepared to accept from another authority to help it deliver its planning strategy. This will be important to demonstrate the commitment between local planning authorities to produce effective strategic planning policies, and it will be helpful for Inspectors to see such agreements at the examination as part of the evidence to demonstrate compliance with the duty”.

- 1.4 The Duty to Cooperate Statement addendum (Main Mods) identifies that a Memorandum of Understanding (MOU) is being prepared jointly for Arun, Chichester, Adur and Worthing Councils. However, following representations received from Chichester District Council during the Main Modifications consultation, this MOU has been prepared between Arun District Council and Adur and Worthing. Adur and Worthing Councils are included in the same MOU due to the partnership working arrangements that they operate under. In addition, they face similar issues with respect to plan making.
- 1.5 A separate MOU is being prepared between Arun District Council and Chichester District Council.

2 Arun District Council Position

- 2.1 The Arun Local Plan (2011-2031) Publication Version (October 2014) (the 'ALP') was submitted on 30 January 2015 for independent examination. Some examination hearings were held in June 2015. A Procedural meeting was held in July 2015 and following this, the Inspector provided his conclusions and observations on the matters covered by the hearings. As new evidence relating to the Objectively Assessed Need (OAN) for housing had been produced in March 2015, it was determined that there should be a specific consultation on this followed by a hearing session. This resulted in a note from the Inspectors on what they considered the starting point for the OAN to be.
- 2.2 The Inspector agreed to formally suspend the Examination in February 2016 in order to enable the Council to undertake further work in response to the conclusions and observations raised. During the suspension period, an extensive part of the evidence to inform the content of the Plan has been updated, including the required Environmental Assessments. The Council undertook further active, constructive and continuing engagement with relevant local authorities and specified bodies on strategic planning matters through the preparation of the proposed main modifications to the ALP. Further details are set out within the Duty to Cooperate Statement Addendum (PELP27).
- 2.3 The updated evidence and ongoing discussions have informed a number of proposed Main Modifications to the plan that were consulted on between 10th April and the 30th May 2017. Further details of the work undertaken throughout the suspension period are set out within the summary note provided to the Inspector in July 2017 (ADCED46).
- 2.4 The Examination-in-Public of the Plan has now recommenced, and it is anticipated that further Hearing sessions will take place in September 2017.

3 Current Position of Other Relevant Parties With Regard to Plan Preparation:

Adur District Council

- 3.1 Adur District Council published the Proposed Submission Adur Local Plan 2014 under Regulation 19 in October 2014. Due to issues raised in relation to the strategic site allocation at New Monks Farms, a brief Regulation 18 consultation exercise was carried out from 9th December 2015 - 4th January 2016. This was followed by 'Amendments to the Proposed Submission Adur Local Plan (2016)', which was published 31st March — 11th May 2016 (a second Regulation 19 publication). The Submission Adur Local Plan 2016 was subsequently submitted on October 20th 2016. Hearings were held between 31st January and 8th February 2017. Subsequently, the Inspector's Main Modifications were made available for consultation between 15th June and 26th July 2017.
- 3.2 The Inspector's Final Report is yet to be published. However the Inspector's Main Modifications reflect the proposed plan period of 2011-2032 and the delivery of a minimum of 3,718 dwellings in the Adur Local Plan area during this period.. That part of the district which is within the National Park (approximately half) is covered by the emerging Local Plan for the South Downs National Park and not by the Adur Local Plan.
- 3.3 The Council is also working with Brighton & Hove City Council, West Sussex County Council with the support of Shoreham Port Authority and other partners, on a Joint Area Action Plan for Shoreham Harbour. This is a large strategic regeneration site identified in the Coast to Capital Local Enterprise Partnership's (LEP) Strategic Economic Plan as well as the Greater Brighton City Deal. (It is identified as a 'broad location' in the Adur Local Plan). A Proposed Submission version of the Area Action Plan will be published in November – December 2017.

Worthing Borough Council

- 3.4 Worthing has an adopted Core Strategy (2011) to cover the period up to 2026. However, significant changes to the planning system, particularly how local authorities need to plan for housing, have meant that a review of the Core Strategy is required. The Council has committed to the progression of a new Local Plan. The first key stage of consultation (the Issues and Options stage) was undertaken in summer 2016. Key parts of the Council's evidence base have been updated and this work, which is continuing, will inform the Draft Local Plan due to be published for consultation in early 2018.

4 Background

- 4.1 As set out above, Arun District Council has engaged with Adur District Council and Worthing Borough Council on an ongoing and constructive basis on strategic planning matters through the preparation of the proposed modifications to the Local Plan. The Memorandum of Understanding should

be read in conjunction with the Duty to Cooperate Statement Addendum (PELP27) and other Memoranda of Understanding produced to support the resumed Examination-in-Public.

- 4.2 All three local planning authorities have been working together through the following mechanisms:
- All are partners in the Coastal West Sussex and Greater Brighton Strategic Planning Board. As such, all have signed the updated Local Strategic Statement in 2016 (LSS2). Work has also commenced on the evidence base to support Local Strategic Statement 3 (see Section 5 below);
 - There is a history of joint working on strategic housing needs in this area: Coastal West Sussex SHMA 2009, Coastal West Sussex SHMA 2012, and the Sussex Coast HMA Duty to Co-operate Study (2013);
 - Formal consultation as the respective Local Plans have progressed; and
 - Ongoing Duty to Cooperate meetings held between the authorities as part of Local Plan preparation processes.
- 4.3 In the longer-term, the Local Strategic Statement 3 will provide an up to date strategic planning context for the Coastal West Sussex and Greater Brighton area through the Strategic Planning Board (<http://www.coastalwestsussex.org.uk/cws-in-partnership/cws-strategic-planning-board/>). The Board is an advisory body which has a remit to:
- identify and manage spatial planning issues that impact on more than one local planning area across the Coastal West Sussex and Greater Brighton area; and
 - support better integration and alignment of strategic spatial and investment priorities in the Coastal West Sussex and Greater Brighton area.
- 4.4 The Local Strategic Statement 3 will provide further clarity in due course in relation to the future strategic planning priorities for the Coastal West Sussex and Greater Brighton area, in accordance with relevant legislative provisions.
- 4.5 However, at the present time statutory plan making responsibilities lie at the individual LPA level, and it is necessary for local planning authorities within the Coastal West Sussex and Greater Brighton area to ensure that up to date Local Plans are put in place as soon as possible through effective and ongoing joint work and cooperation.

5 HMA/FEMA

- 5.1 Since the suspension of the examination into the Arun Local Plan, the Council has held numerous meetings with authorities within the Housing Market Area (HMA) / Functional Economic Market Area (FEMA).
- 5.2 The Arun Local Plan has been produced on the basis of the District forming part of the Sussex Coast Housing Market Area. This includes the local authorities of Adur, Arun, Brighton & Hove, Chichester, Lewes and Worthing, which, together with the South Downs National Park Authority, comprise the South Coast HMA. In April 2014 the authorities commissioned GL Hearn to

produce an Assessment of Housing Development Needs (PELVP02), following the production of the Housing Study (Duty to Cooperate) Report (PELVP03A) which drew together a series of existing evidence, including the Coastal West Sussex SHMA 2012, to identify objectively assessed housing need for the various partners.

- 5.3 Through ongoing Duty to Cooperate discussions, the Council has also engaged with Mid Sussex and Horsham District Councils, as these authorities also form part of the Great Brighton and West Sussex Strategic Planning Board. The Council recognises that the definition of the Housing Market Area is not an exact science, and in the future potential exists for alternative approaches to be taken, reflecting the recently produced study 'Defining the HMA and FEMA' which was published in February 2017, and commissioned by the Greater Brighton and West Sussex Strategic Planning Board. This does not invalidate the approach taken within the Arun Local Plan, which reflects years of ongoing joint work undertaken to produce Local Plans across the Sussex Coast Housing Market Area, but rather is intended to inform future Duty to Cooperate discussions with the objective of positively testing the ability of the market area to meet the identified housing needs through LSS3.
- 5.4 In terms of the Functional Economic Market Area, the Employment and Enterprise Local Plan Background Technical Paper (PEPP9a) sets out that Arun is located in the Coast to Capital LEP area however, the District has a more localised administrative relationship with Coastal West Sussex and Greater Brighton and the Strategic Planning Board which will influence future growth and investment. The Arun District Council Commercial Property Market Intelligence Report (PEPP9b) also includes commentary on Arun's FEMA from a commercial property market perspective. It outlines that Arun falls within a Coastal West Sussex property market with the strongest functional relationships with Chichester and Worthing. Arun is identified as similar in terms of its property market characteristics to both Chichester and Worthing and businesses from both districts seeking new accommodation for expansion or upgrading would be likely to consider Arun if there was a lack of suitable floorspace in their 'administrative areas'.
- 5.5 In terms of both the HMA and FEMA, analysis of key factors suggests that the western part of the District (Bognor Regis and the area west of Littlehampton and Arundel) has the strongest functional relationship with Chichester while the area to the east of the District including Littlehampton, Arundel and Angmering has a strong relationship with Worthing, and to a lesser extent, Adur.
- 5.6 **All parties agree that the approach taken within the Arun Local Plan with regards to the identification and consideration of the HMA and FEMA is appropriate, whilst recognising that further work is being undertaken strategically across the Coastal West Sussex and Greater Brighton area to inform Local Strategic Statement 3.**

6 Arun Local Plan Modifications

6.1 The proposed modifications to the Arun Local Plan propose a housing requirement of 20,000 net additional dwellings between 2011 and 2031. The housing supply comprises of:

- Completions (2011-2016) – 3,047* dwellings;
- Commitments (large sites) - 3,090* dwellings;
- Commitments (small sites) – 216* dwellings;
- Neighbourhood Plan Allocations - 491 dwellings;
- Deliverable HELAA sites - 408 dwellings;
- Non-Strategic Sites - 1,250 dwellings;
- Windfall - 922 dwellings; and
- Strategic Site Allocations - 10,650 dwellings.

*Exact figure to be confirmed at date of the Local Plan adoption.

6.2 Through the proposed modifications, Arun District Council is planning to meet a significantly increased housing requirement. The objectively assessed need for housing within the Publication Local Plan (PELP01) equated to 580 dwellings per annum. The proposed modifications to the Local Plan respond to the latest evidence, which indicates an objectively assessed need for housing equating to 919 dwellings per annum.

6.3 A Housing Implementation Strategy has been produced which provides explanation and justification in relation to the modified housing requirements and supply of the Local Plan. This includes the use of a phased trajectory to reflect future delivery rates, taking into account constraints and the nature of future housing supply and sites which are proposed for allocation in order to meet the significant uplift in objectively assessed housing needs.

6.4 In addition, the Inspector suggested that the Council should give further 'thorough, informed consideration' in relation to the contribution that the Arun Local Plan may or may not be able to make to unmet needs from elsewhere during the suspension period of the Examination.

7 Cross-boundary issues

7.1 Through ongoing discussions careful consideration has been given to a number of cross-boundary issues as follows:

Approach to meeting housing requirements, including consideration of unmet needs in the HMA, use of a phased housing trajectory and short term housing land supply

7.2 As at December 2016, all of Arun District's neighbouring authorities within the Sussex Coast Housing Market Area have identified housing shortfalls. Mid Sussex District Council and Horsham District Council (who are part of the wider Greater Brighton and West Sussex Strategic Planning Board) are likely to be able to meet their needs (see table 4.1 of the Sustainability Appraisal (PELP28a)). However the concept of "no stone unturned" in order to find as

much housing as possible, particularly for those authorities with a shortfall is long established since the Brighton and Hove City Plan Examination. Therefore, Arun District is the only local authority which has a surplus of housing that can contribute to meeting the unmet housing need in the Sussex Coast Housing Market Area, and one of only three local authorities within the wider Greater Brighton and West Sussex Strategic Planning Board area with a potential surplus.

- 7.3 The modifications to the Local Plan result in housing provision of 20,000 dwellings over the plan period. This follows extensive testing and assessment of options to significantly boost the housing land supply in the District, taking into account the latest evidence, and discussions with LPAs within the HMA and wider Strategic Planning Board area in relation to the consideration of unmet housing needs of the HMA within the Arun Local Plan. The approach taken by Arun District Council to significantly boost housing land supply through the proposed modifications to the Local Plan has been welcomed and agreed through ongoing discussions with relevant LPAs as being appropriate and proportional under the circumstances.
- 7.4 The Council proposes modifications to the Local Plan which will result in the provision of a minimum of 1,600 dwellings towards the unmet needs of the Housing Market Area (over and above the objectively assessed housing need requirement of 18,400 dwellings).
- 7.5 The Sustainability Appraisal (PELP28) has considered how surplus housing supply within the Arun Local Plan can contribute towards the unmet needs of neighbouring local planning authorities.
- 7.6 The evidence of exceptionally strong links between Arun, Chichester and Worthing has resulted in detailed discussions with these authorities about sites that could contribute toward their unmet needs. The next strongest links are with Horsham but they are able to accommodate all of their needs within their recently adopted Local Plan and do not therefore have any unmet needs.
- 7.7 Chichester has unmet needs of 70 dpa and have a recently adopted Local Plan. The Worthing Housing study concludes that Worthing has an OAN of 636 dpa. This is significantly higher than the level of development (200 dwellings per annum) currently planned for within the Core Strategy. The new Worthing Local Plan now being progressed is testing the ability to deliver higher levels of development but there is no expectation that the full OAN will be met. This is likely to result in a significant level of unmet need in Worthing. Whilst the level of unmet need will be determined through the progression of the emerging Worthing Local Plan it is estimated that the shortfall for Worthing will be approximately 6,500+ dwellings. Adur has a shortfall of approximately 3,100 dwellings. Because of the limited ability to provide for unmet needs and the very strong evidenced links and close proximity to Worthing, Adur and Chichester, discussions on unmet needs have principally involved those authorities.

- 7.8 Because of the high levels of out commuting to Chichester from the western areas of Arun District, locations such as Pagham (ref SD1 and SD2), Bersted (SD3), Fontwell (SD6) and BEW (SD5) are most likely to contribute to their needs. Conversely, due to the high levels of out commuting to Worthing from the eastern parts of Arun District, locations such as Angmering (SD9 and SD11) and Littlehampton - West Bank (SD4) are most likely to contribute towards their needs.
- 7.9 The Sustainability Appraisal also identifies linkages with other local planning authorities within the HMA, including Brighton & Hove (1,065 people commute from Arun to Brighton and Hove), Crawley (823 out-commuters), Lewes (unknown level of out commuting to Lewes from Arun). However, the contribution of the Arun Local Plan towards unmet needs in these areas is likely to be negligible.
- 7.10 Based on the capacity of the proposed housing sites within Arun and the anticipated phasing of these developments, it is assumed that some of Arun District Council's neighbours' unmet housing need could be provided for during years 6-10 of the plan period [2021-2026] (i.e. not within the first five years [2016-2021] or the last five years [2026-2031] of the plan as there is an anticipated shortfall of land supply within Arun during these times).
- 7.11 Through ongoing discussions, each of the neighbouring local planning authorities within the HMA has confirmed that they are unable to provide housing towards the shortfall that is projected to occur in Arun in the first five years [2016-2021] or the last five years [2026-2031] of the plan period.

Approach to meeting employment needs, including consideration of unmet needs in the FEMA

- 7.12 One of the key objectives of the Local Plan is to promote economic growth and regeneration in order to strengthen the economic base of the District, and provide local job opportunities in order to minimise out-commuting.
- 7.13 The plan includes seven Strategic Employment Land Allocations (Policy EMP SP3) which will provide a substantial amount of employment floorspace over the Plan period. This is supplemented by the promotion of local employment opportunities through the designation of Economic Growth Areas at Littlehampton and Bognor Regis (Policy EMP SP2) and the promotion of a Local Development Order at Bognor Regis (referred to as Enterprise Bognor Regis).
- 7.14 The Strategic Employment Land Allocations in the Local Plan focus on Enterprise Bognor Regis, along with land at Littlehampton and Angmering. Evidence prepared for the Local Plan (PEPP9a) states that according to the 'labour supply employment scenario forecast' which reflects the growth potential of the District's economy there is a gross floorspace requirement of 63,495m² (40,460m² for industrial and 23,035m² for offices) which results in a land requirement for 14ha (10.1ha for industrial and 3.9ha for office uses). Requirements based on past take-up are significantly higher at 123,360m²

and 28.6ha of employment land and represents a more aspirational trajectory of growth for the District reflecting the fact that Arun has performed strongly in terms of delivering new space over the past decade.

- 7.15 The seven Strategic Employment Land Allocations identified within the plan amount to some 79.8ha of employment land (gross site area), although clearly the capacity of the strategic employment land allocations will vary depending on the exact mix of uses and floorspace that are brought forward on each site. Site 4 (former LEC Airfield and adjoining land) is identified as having a gross site area of 29.3ha, but the net developable area of the site will be considerably less taking into account constraints on the site. As a result, the gross floorspace of the site is anticipated to be 9,000 to 9,500m².
- 7.16 Whilst the plan may identify an oversupply in quantitative terms, when qualitative factors of supply are considered, there is much less of an oversupply.
- 7.17 Future growth scenarios do not factor in the job growth implications associated with 'step change' developments that have been recently delivered or could to be delivered during the Local Plan period as a result of inward investment decisions of a strategic nature (e.g. Rolls Royce). This is particularly relevant given the objectives set out in the Coast to Capital LEP Strategic Economic Plan, the Council's Economic Development Strategy and the forthcoming adoption of a Local Development Order at Enterprise Bognor Regis which combined provide a strategic framework to support growth.
- 7.18 The Commercial Property Market Intelligence Report (PEPP9b) indicates that:
- "the Arun market has been provided with a major fillip by the recent development of a major Logistics and Technology Centre for Rolls Royce at Oldlands Farm and this is likely to act as a catalyst for future development, particularly in the industrial, logistics and warehouse sector. Occupier demand for such premises is increasing, and thus further development at Oldlands Farm is now firmly in the pipeline. The district is further set to benefit from increasing demand for large logistics premises for the south coast, helped by the lack of available land in Brighton & Hove"*
- 7.19 Indeed, previous work undertaken by NLP for the Coastal West Sussex and Greater Brighton Strategic Planning Board in 2015¹ suggests that there is potential for parts of the sub-region to develop a complementary offer for key locations on the basis that Brighton & Hove faces a range of constraints and this strategy would ensure that economic growth is retained in the area. Adopting a more polycentric growth strategy for Coastal West Sussex and Greater Brighton area means a strategy which is framed in terms of developing a complementary offer for the area in overall terms, not just individual locations. This is likely to mean a requirement to define a 'role' for

¹ Greater Brighton & Coastal West Sussex Background Papers: Background Paper 1 – Economy (NLP, 2015)

different parts of the area, and potentially accepting that some locations will be more significant drivers of the economy than others. The report states that:

"A specific recent example is the opening of the Rolls Royce facility in Bognor Regis where allocated land was made available through the Enterprise Bognor Regis initiative as an extension to the company's existing headquarter operations in Chichester – it demonstrates how the area can capture different parts of the value chain of a particular business to generate growth locally. It is these types of complementary opportunities that need to be explored further with businesses across the area, and particularly those that might otherwise seek to locate some operations elsewhere."

- 7.20 Through the duty to cooperate process, the Council is working on an on-going basis with the adjoining authorities to identify the scope to help accommodate unmet employment land needs from elsewhere. A number of the adjoining authorities have identified that they will not have a sufficient supply of land to meet their employment land requirements in full albeit the scale of these requirements have yet to be fully quantified.
- 7.21 The Adur Local Plan evidence base indicates that provision should be made for between 15,000 to 20,000m² net for offices and R&D, and between 35,000 and 40,000 m² for warehousing over the 2011 and 2031 period. However, due to capacity constraints, the Local Plan can only provide for 41,000m² for employment generating uses (not specifically B class uses). As such, co-operation with neighbouring local planning authorities is considered required.
- 7.22 With regard to employment, the Worthing Core Strategy indicated a need to provide 72,464m² of industrial and warehousing floorspace and 22,297m² of office space up to 2026. More recently, the Economic Research and Employment Land Review (April 2016) has been published. The study provides an up-to-date understanding of the existing economic situation in Worthing and explores the employment growth potential of the local economy. It considers the economic development requirements of the Borough objectively in line with the NPPF and Planning Practice Guidance, highlighting the balance of demand for and supply of B class employment land in Worthing, and the potential policy approaches in relation to B class employment space that could be brought forward as part of the new Local Plan. The Employment Land Review (2016) does acknowledge the need to look beyond the administrative boundary. In this respect, one of the key conclusions in the study is that it can be assumed that a level of employment needs will be displaced to adjoining local authorities that lie within the Borough's functional economic area.
- 7.23 Due to physical constraints, the availability of medium to large scale sites (>10ha) is particularly limited in neighbouring authorities, and further afield within the Coastal West Sussex and Greater Brighton area. At the same time, the shortfall and requirements are highest for industrial uses. Taking account of the typology of Arun's allocated sites (Enterprise Bognor Regis and

Angmering), there is considerable potential for the District to accommodate some medium to large scale, industrial requirements as has already occurred with Rolls Royce at Bognor Regis, taking into account the need to adopt a more polycentric growth strategy for Coastal West Sussex and Greater Brighton area

- 7.24 Strategic objectives and planned initiatives to kick start future economic growth and to attract inward investment into Arun over the Local Plan period means that the functional economic market area role of the District is anticipated to develop further. The Council will seek to continue to work on an on-going basis with adjoining authorities and those within the Coastal West Sussex and Greater Brighton area to identify the scope to help accommodate unmet employment land needs – particularly for industrial, logistics and warehouse (B8) uses. Nevertheless, the commitment to meet any of these needs from neighbouring authorities within Arun will be balanced with meeting the District's own employment land needs in the first instance.**
- 7.25 All parties strongly support the ambitions of the Local Plan to significantly grow the economic base of the District, reduce out-commuting and to play a key role in accommodating the future industrial, logistics and warehouse sectors (B8) of the Coastal West Sussex and Greater Brighton area.**

Approach to infrastructure planning, including proposed transport mitigation measures arising from the Transport Assessment and waste water treatment

Transport Assessment

- 7.26** A Transport Assessment was undertaken to inform the Local Plan was updated in 2016 to take account of the additional development proposed through the Main Modifications. The scope of the study was agreed between Arun District Council and the two highways authorities – West Sussex County Council and Highways England. Reflecting Duty to Cooperate discussions and advice from the highways authorities about the area of impact from the proposed housing in Arun along the A27, it was agreed that the survey area for the study would go beyond the boundaries of Arun District into Chichester and Worthing District. The study modelled development growth based on the Local Plan up to 2031. The study identified junctions where severe impacts would be experienced and tested mitigation to address this to meet the needs of planned development. An apportionment estimate was undertaken to determine the impact each strategic housing site would have on the junctions which required mitigation to establish the percentage proportional cost contribution that the strategic site would be required to make to a particular junction. Some of the junctions requiring improvements lie within Chichester District so mechanisms for the collection of infrastructure contributions are being considered through joint discussions.

Ecology and Pagham Harbour

- 7.33 Evidence has identified a need for Arun to provide a total of 14 permanent pitches for Gypsies and Travellers and 7 plots for Travelling Showpeople during the plan period
- 7.34 The need in Adur is for 4 public pitches for Gypsy and Traveller accommodation (1 during the period 2012-17; 1 between 2018-22; and 2 between 2023-27). The Council is investigating the potential to address these needs through extension and relocation of an existing site, but this is dependent on the delivery of a new roundabout to serve an adjacent strategic allocation, as well as land raising to bring it out of flood zone 3. Until further work is undertaken to assess the exact capacity of an expanded Withy Patch site, the unmet remaining need is difficult to quantify. A separate Development Plan Document is timetabled after the anticipated adoption of the Adur Local Plan in late 2017 to progress this site.
- 7.35 In addition, one Travelling Showperson's plot is required in Adur in the period up to 2027. The details of this shortfall have been provided to Arun District Council and Worthing Borough Council and discussed as the local development plans progress.
- 7.36 Current evidence indicates that there is no need in Worthing for Gypsy and Traveller accommodation.

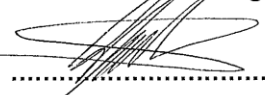
8 Conclusion

- 8.1 All parties support the approach proposed by Arun District Council in the Proposed Modifications to the Arun Local Plan.
- 8.2 All parties agree to continue working together in a constructive ongoing manner in respect of the cross-boundary issues identified in order to ensure that effective and timely delivery and implementation of the Arun Local Plan.

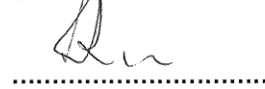
Signed

On behalf of Arun District Council

On behalf of Worthing Borough Council

 *K. Jenkins* (EXECUTIVE MEMBER FOR REGENERATION)

On behalf of Adur District Council

 *Debbie Rogers* (EXECUTIVE MEMBER FOR REGENERATION)



South Downs

National Park

WORTHING BOROUGH COUNCIL

ADUR DISTRICT COUNCIL

DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Adur District Council & Worthing Borough Council and the South Downs National Park Authority

DATE: March 2018

I. Introduction

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

2. Context

2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as Adur District & Worthing Borough Councils, to have regard to the purposes of national parks. These are:

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

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

2.3 Furthermore, paragraph 115 of, the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF at this point makes clear, that the Government recognizes that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.

2.4 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 I below:

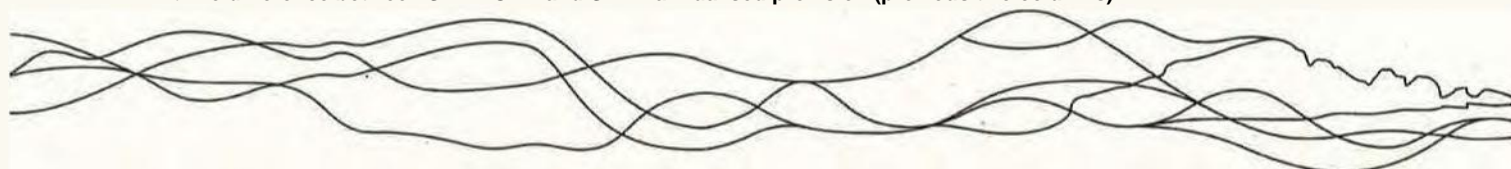
Table I Housing supply and need in the Adur and Worthing parts of the South Downs National Park

| HMA / District area | SDLP housing provision (total) ¹ | SDLP housing provision (A divided by 19 years) | OAN inside SDNP ^{2,3} | Unmet need inside SDNP (C minus B) | Local Authority Local Plan provision (area outside SDNP). ¹ | Local Authority OAN per annum (whole) | annual unmet need by L.A./ HMA ⁶ (B+E-F) |
|-------------------------|---|--|--------------------------------|------------------------------------|--|---------------------------------------|---|
| Adur | | | | | | | |
| Worthing | | | | | | | |
| Sussex Coast HMA | 2971 | 156 | 274 | 112 | 2748 | 4481 | 1577 |

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.'

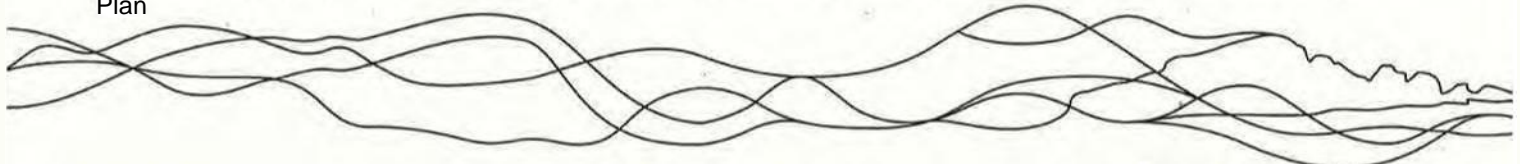
5. Addressing wider housing need

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.



Signed on behalf of Adur District Council

Brian Boggis

Date: 7 March 2018

Position: Executive Member for Regeneration

Signed on behalf of Worthing Borough Council

Kevin Jenkins

Date: 7 March 2018

Position: Executive Member for Regeneration

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

j(AA,U9

Neville Harrison

Date: _____

Position: Planning Committee Chair

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WORTHING BOROUGH
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