



WORTHING LOCAL PLAN 2020- 2036

DUTY TO CO-OPERATE ADDENDUM – APPENDIX B

SUBMISSION

June 2021



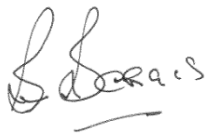

**WORTHING BOROUGH
COUNCIL**

Worthing Borough Council / Adur District Council

Statement of Common Ground



Signatories:

Cllr Brian Boggis Executive Member for Regeneration, Adur DC	Cllr Kevin Jenkins Executive Member for Regeneration, Worthing BC
	

Dated: 25th May 2021

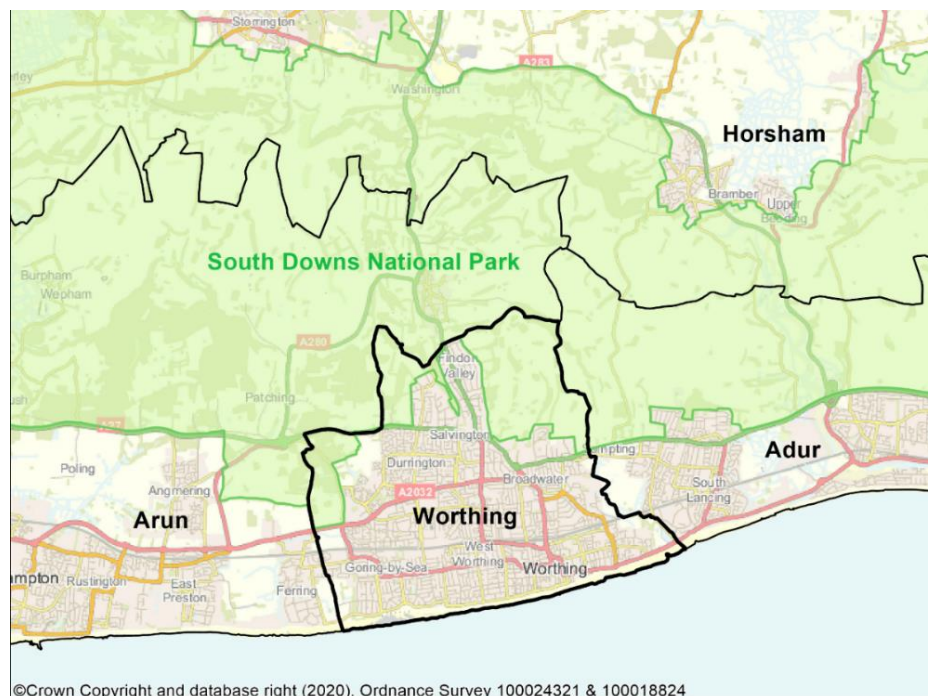
1. Introduction, Context and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan.

- 1.4 In 2008, Adur District Council and Worthing Borough Council formally approved a programme for undertaking services on a partnership basis; services merged in 2010. Within the Planning service, this has enabled opportunities for joint use of staff resources and work processes, and the development of joint evidence in certain areas (although it should be noted that each authority maintains a separate Local Plan).

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.4 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

- 3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:
- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
 - Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.
- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.
- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.

- 3.6 To inform the preparation of LSS3 a joint study has been completed called. 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
 - Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - a baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - a common methodology for determining the approach to identifying possible locations to meet any unmet need;
 - the capacity of the Board area to absorb further growth;
 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.
- 3.8 To help formalise this agreement, an updated Statement of Common Ground to be signed by all parties is currently being prepared.

Coastal West Sussex

- 3.9 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.10 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.

- 3.11 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 3.12 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment

floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Other Matters

- 5.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 5.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

6 Conclusion

- 6.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 In summary, the parties agree that:
 - a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan
 - b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme



- c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development
- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Arun District Council

Statement of Common Ground



Signatories:

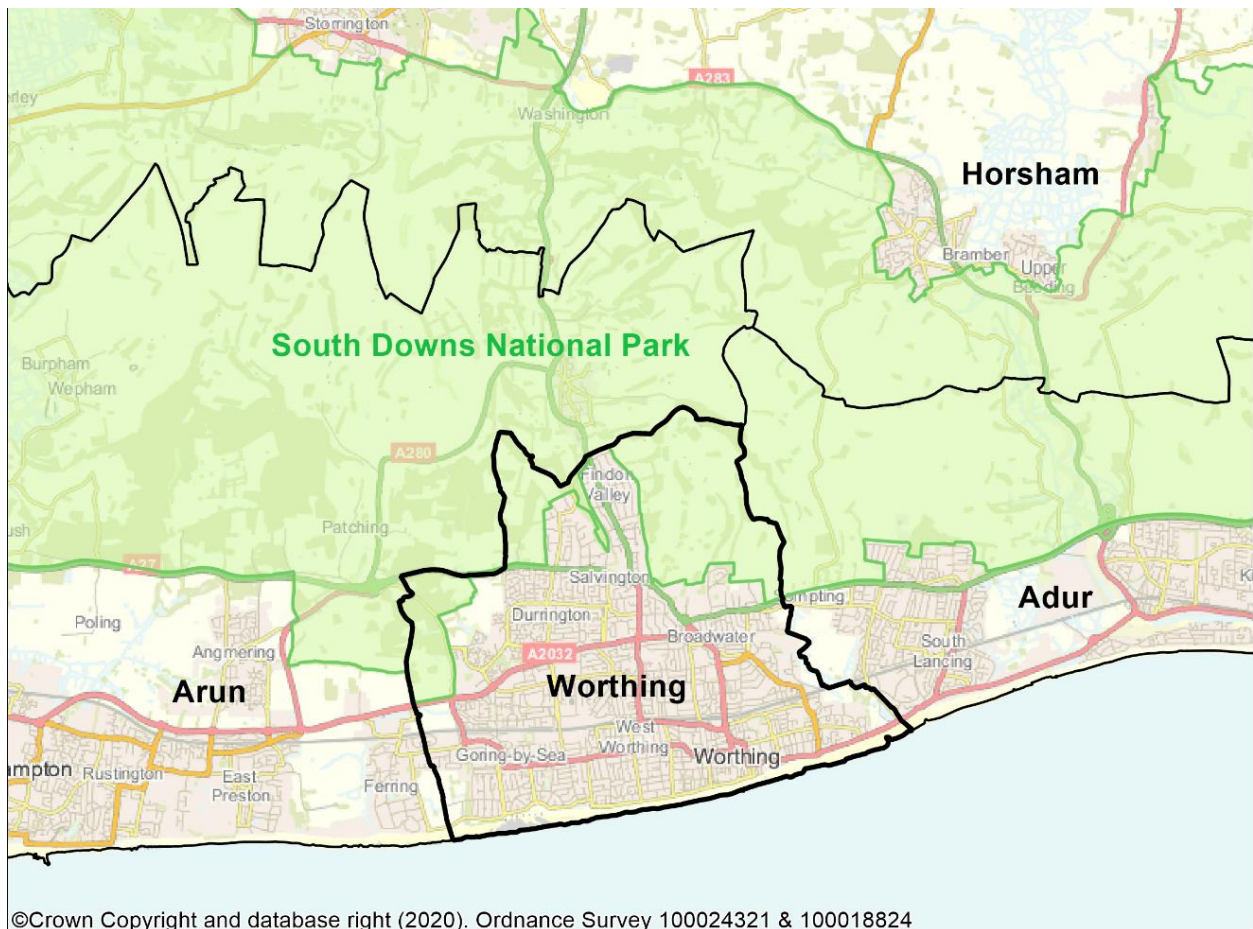
Neil Crowther Group Head of Planning, Arun DC	James Appleton, Head of Planning & Development, Worthing BC
	
Dated: 24/05/21	Dated: 25/05/21

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5. Arun local Plan

- 5.1 ADC reviewed its recently adopted Arun Local Plan (2018) housing policy (H SP1 The Housing Requirement) and it was agreed at Planning Policy Sub Committee (17 December 2019) that this policy and the Local Plan needs updating. This was approved at Full Council (15 January 2020).
- 5.2 The reasons for updating the plan housing policies stem from under-delivery over two successive years against the housing trajectory which is a trigger in the plan for a review. In addition, the authority is mindful of the outcomes of the Government Housing Delivery Test published for Arun in 2018 and 2019 which require an Action Plan (published in the autumn 2019) and application of a 20% buffer for the calculation of 5 year housing land supply. Housing delivery in Arun is a significant challenge because of the strategic infrastructure requirements required. Land supply is constrained in Arun (e.g. A27 and A259 capacity, flooding and landscape) and the authority has been unable to demonstrate a five-year housing land supply of 'deliverable sites' since spring 2020. The published AMR 2020 demonstrates 3.3 year land supply.
- 5.3 The Council's decision on 15 January 2020 to update the Arun local Plan included a declaration of a 'climate change emergency' and the need to urgently review appropriate Development Management policies.
- 5.4 The Local Development Scheme setting out the plan making timetable for Arun was updated and adopted at Full Council on 22 July 2020. A series of member workshops completed in December 2020/January 2021 progressed a draft a Vision and Objectives to steer the work – although these had yet to be agreed at Full Council – being deferred to the next Planning Policy Committee 1 June 2021 before anticipated subsequent adoption at Full Council.

6 Other Matters

- 6.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-

making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on working practices, the economy and the housing market.

- 6.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

7 Conclusion

- 7.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

- 7.2 In summary, the parties agree that:

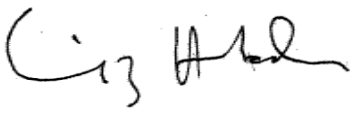

- a) there are no key areas of disagreement between the parties relating to the emerging Worthing Local Plan. It is acknowledged that progress on LSS3 has been delayed. This will consider the issue of unmet needs throughout the HMA and, whilst this issue will not be resolved through Worthing's Local Plan, there is a commitment from all authorities to make progress and establish a common understanding and position.
- b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme
- c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development
- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3 which will lead to a strategic understanding of capacity and supply within the Coastal West Sussex HMA. This would include details around how authorities that are unable to meet their own needs, including Worthing, would have their shortfalls accommodated if that was possible.

- f) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Brighton & Hove City Council
Statement of Common Ground



Signatories:

Liz Hobden, Head of Planning Services Brighton & Hove City Council	James Appleton Head of Planning & Development
	Insert signature 

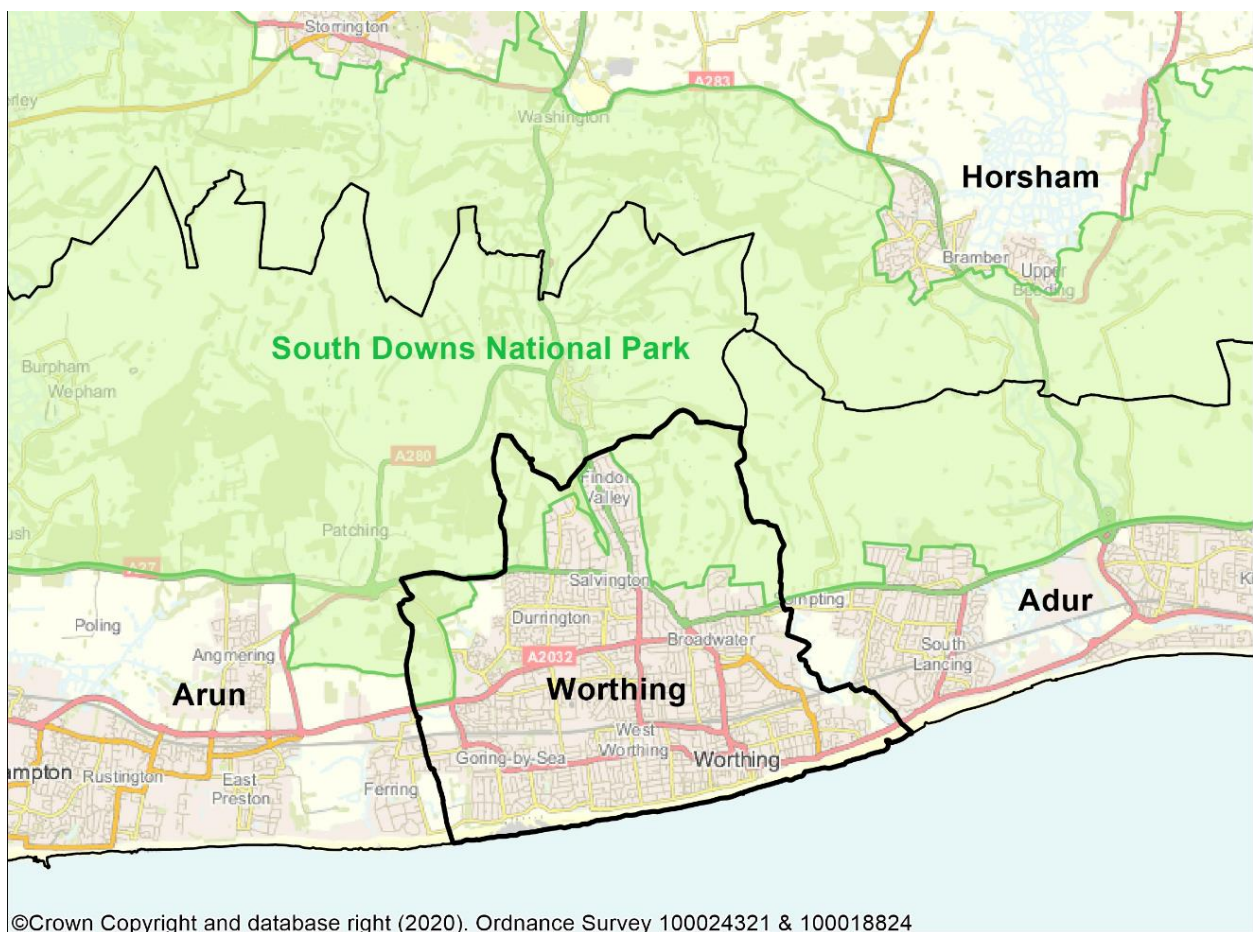
Dated: 7 May 2021

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- 3.8 To help formalise this agreement, an updated Statement of Common Ground to be signed by all parties is currently being prepared.

Coastal West Sussex

- 3.9 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.10 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.

- 3.11 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 3.12 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment

floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Other Matters

- 5.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 5.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

6 Conclusion

- 6.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 In summary, the parties agree that:
 - a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan
 - b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme

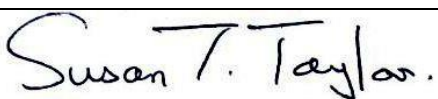

- c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development
- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Chichester District Council

Statement of Common Ground



Signatories:

Mrs Susan Taylor Deputy Leader and Cabinet Member for Planning	Cllr Kevin Jenkins Deputy Leader and Executive Member for Regeneration
	

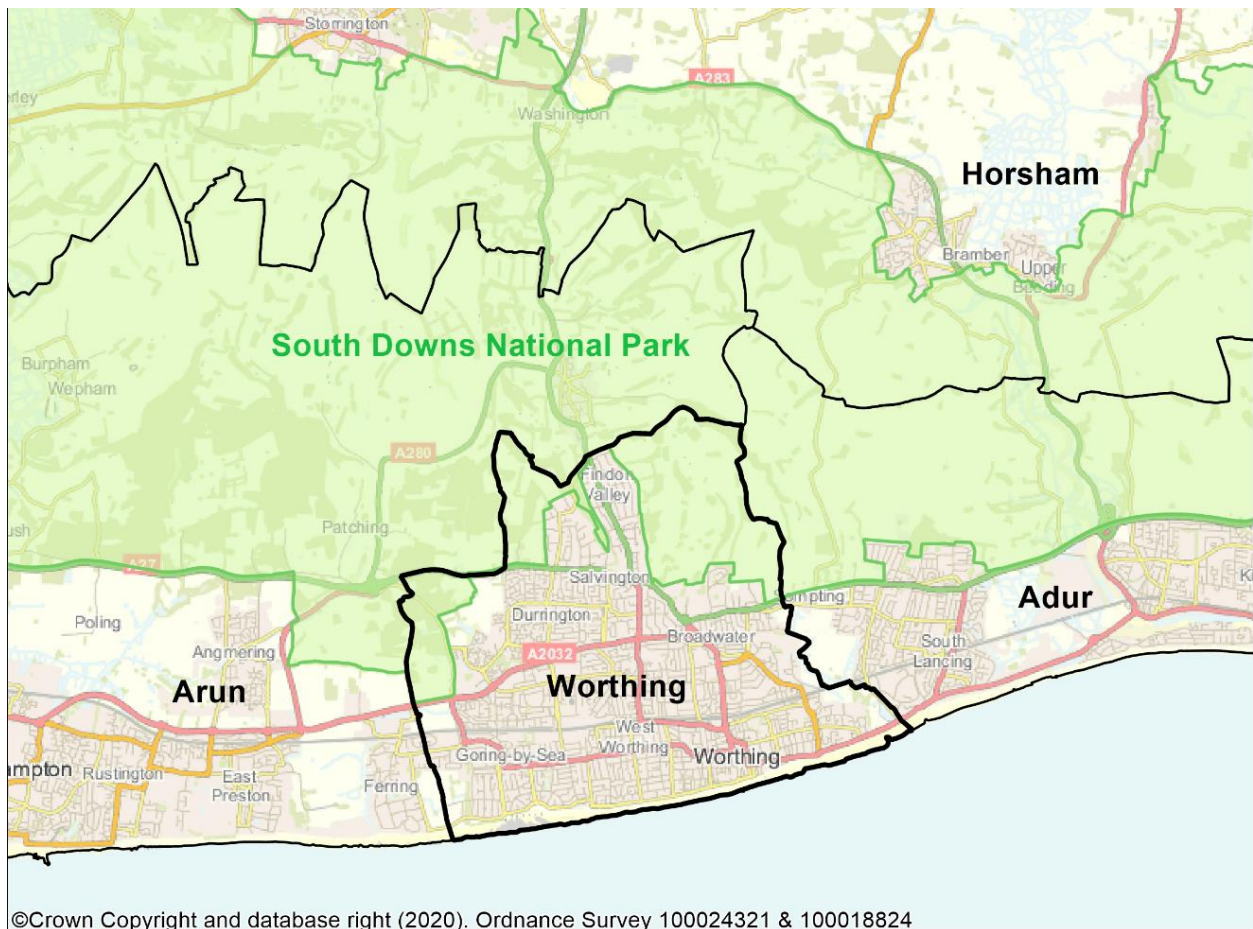
Dated: 24 May 2021

1. Introduction and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan.

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.4 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

- 3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:

- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
- Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.

- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.

- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.

- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.

- 3.6 To inform the preparation of LSS3 a joint study has been completed called 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
 - Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - a baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - a common methodology for determining the approach to identifying possible locations to meet any unmet need;
 - the capacity of the Board area to absorb further growth;
 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the

downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.

- 3.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Other Matters

- 5.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 5.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

6 Conclusion



- 6.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 In summary, the parties agree that:
- a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan
 - b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme
 - c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development

- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take emerging national planning policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Crawley Borough Council
Statement of Common Ground



Signatories:

Clem Smith Head of Economy & Planning Crawley Borough Council	James Appleton, Head of Planning & Development, Worthing Borough Council
	

Dated: 13th May 2021

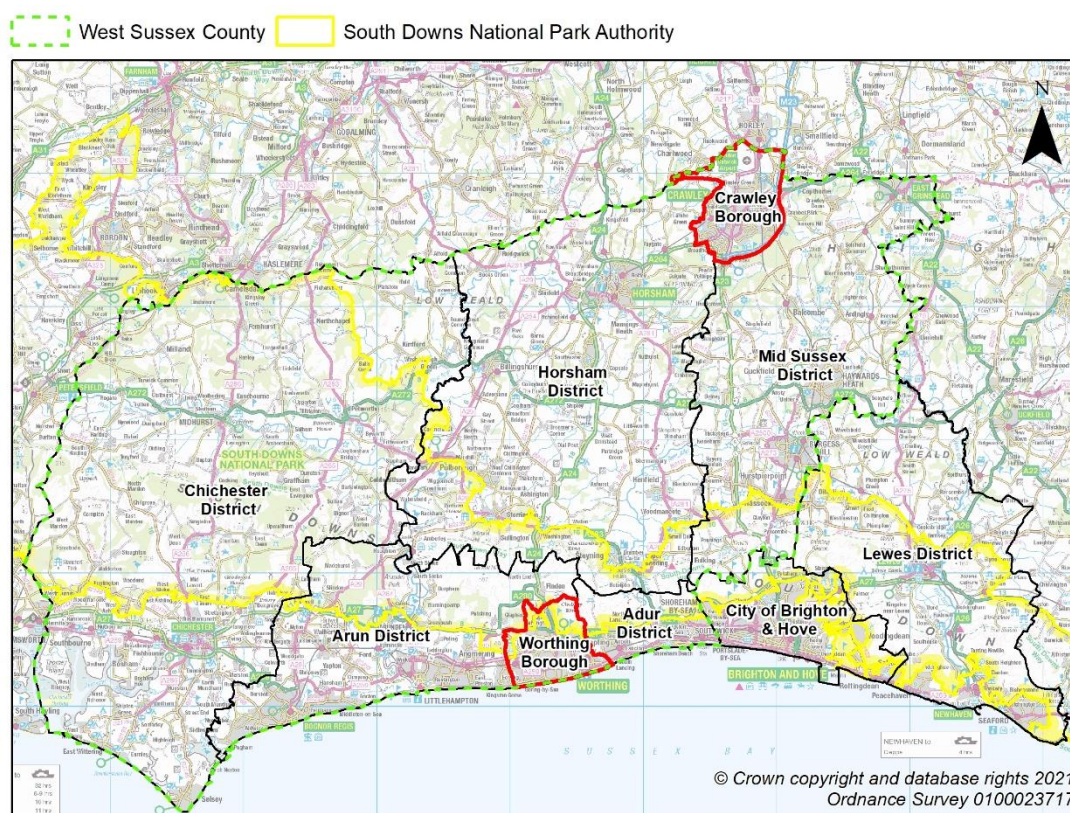
1. Introduction and Scope

- 1.1 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.
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alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan and Crawley Borough Council's Duty to Cooperate Statement which has been prepared to support the Crawley Borough Local Plan.

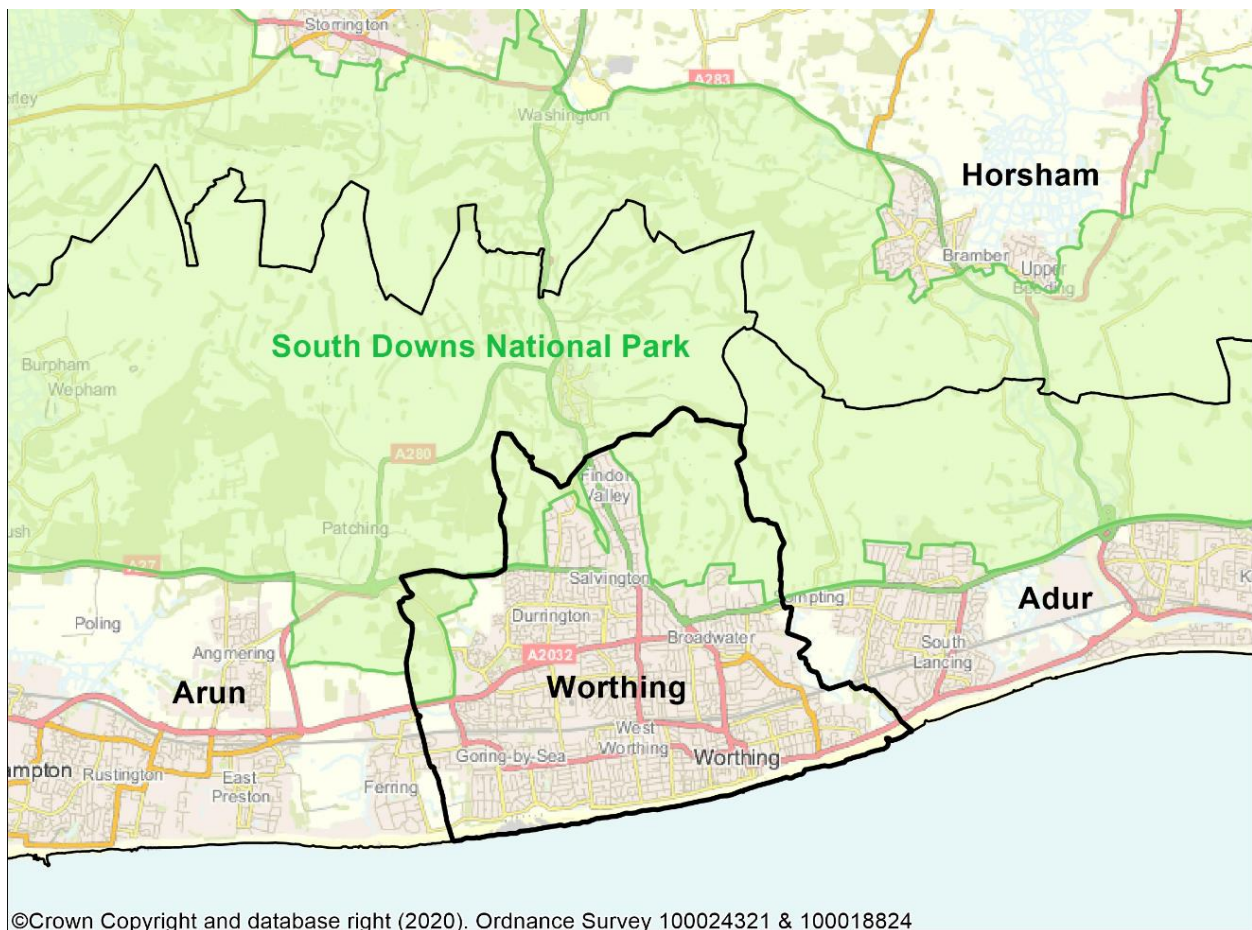
2 Geographic Context

- 2.1 Crawley and Worthing are located within the county of West Sussex. They do not share an administrative boundary, and are separated by the district of Horsham. The South Downs National Park crosses the northern part of Worthing and the southern part of Horsham.
- 2.2 Both authorities are located within the Coast to Capital Local Enterprise Partnership (LEP) Area. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area. Crawley and Worthing are the two largest towns by population in West Sussex. The two authorities are involved in positive and active engagement on strategic matters through the West Sussex and Greater Brighton Strategic Planning Board and, prior to this, the West Sussex Joint Planning Board.
- 2.3 The map below shows the authorities in relation to each other (i.e. indicated with the red administrative boundaries).



Worthing Context

- 2.4 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.5 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.6 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).



Crawley Context

- 2.7 Crawley is located to the north eastern part of West Sussex, halfway between London and the south coast. Horsham district abuts the town on the western side, Mid Sussex to the south and east, whilst the county of Surrey lies to the north of the borough.

- 2.8 Crawley borough covers 4,497 hectares. Its administrative boundaries are drawn tightly around the town itself, with very little land falling outside of the built up area. The M23 motorway forms the borough boundary to the east/south east. To the south, beyond the M23 and A264 dual carriageway, lies the High Weald Area of Outstanding Natural Beauty. Gatwick Airport is located within the borough to the north of the town – the land between the town and the airport is heavily constrained by aircraft noise and much of it is required to be safeguarded for a future southern runway.
- 2.9 Crawley forms part of the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts. It also lies within the Gatwick Diamond economic functional area, which includes the East Surrey authorities of Epsom and Ewell, Mole Valley, Reigate and Banstead, and Tandridge, in addition to the NWS authorities.

3.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

- 3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:
- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
 - Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.
- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014, this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015 (except Crawley Borough Council who were not yet a member of the Board), and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering

these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.

- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.
- 3.6 To inform the preparation of LSS3 a joint study has been completed called. 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
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 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton &

Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.

- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 3.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016) and Adur (2017) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up-to-date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.

- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target which is significantly higher than the levels of growth planned for within the Worthing Core Strategy.
- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue to work positively to review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Crawley Borough Local Plan (CBLP)

- 5.1 The draft Crawley Borough Local Plan has been published for Regulation 19 Consultation in January 2021. It is anticipated to be submitted for Examination in September 2021.
- 5.2 Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the plan period (2021-2037) of 11,488 dwellings (based on 718 dwellings per annum).
- 5.3 Crawley is a land-constrained borough, due to its tight administrative boundaries, the requirement to 'safeguard' land south of Gatwick Airport for a potential southern runway, and physical constraints such as aircraft noise, flooding, nature conservation and there being few infill opportunities due to planned nature of the New Town. Therefore, there is very limited land within the borough that is suitable, available and achievable for accommodating further development. The draft Crawley Borough Local Plan identifies that the borough's land supply allows for almost half of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,320 dwellings. This equates to an annualised average of 332.5dpa. This leaves a total unmet need figure of 6,168 dwellings (385.5dpa) to be accommodated within the

wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development. The draft Crawley Borough Local Plan allocates a site to meet Crawley's outstanding employment needs of approximately 24ha in a location unsuitable for housing due to its proximity to the airport.

- 5.4 Crawley lies within the Northern West Sussex (NWS) Housing Market Area (HMA), which also includes Horsham and Mid Sussex Districts, and across which there is already long-established, effective joint working. Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings above their objectively assessed housing needs, predominantly to meet Crawley's unmet needs, over the period from 2021 to 2031. However, it is acknowledged that through Local Plan Reviews this is likely to change, particularly as the Standard Method increases the housing needs within these districts above those established in the adopted Plans. The agreed NWS Statement of Common Ground¹ (May 2020) confirms that *"the authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development"* (agreement no. 3).

6. Other Matters

- 6.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 6.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging Local Plans should continue to be prepared in accordance with current legislation and guidance.

7 Conclusion

- 7.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

¹ <https://crawley.gov.uk/sites/default/files/2020-06/NWS%20SoCG%20May%202020%20final%20signed.pdf>

7.2 In summary, the parties agree that:

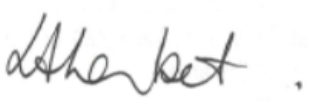

- a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan or Crawley Borough Local Plan;
- b) despite significant changes to the planning system being proposed the Worthing and Crawley Local Plans should continue to be prepared in accordance with current legislation and in line with their respective Local Development Schemes;
- c) when progressing the Worthing Local Plan and Crawley Borough Local Plan, the respective councils have taken a positive approach to development;
- d) given the highly constrained nature of each borough, neither area can accommodate the unmet housing needs of the other;
- e) given the levels of housing shortfall acknowledged in the Worthing Local Plan and Crawley Borough Local Plan, the councils should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period;
- f) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3;
- g) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Horsham District Council

Statement of Common Ground



Signatories:

Lynn Lambert Cabinet Member for Planning and Development	Kevin Jenkins Executive Member for Regeneration
	

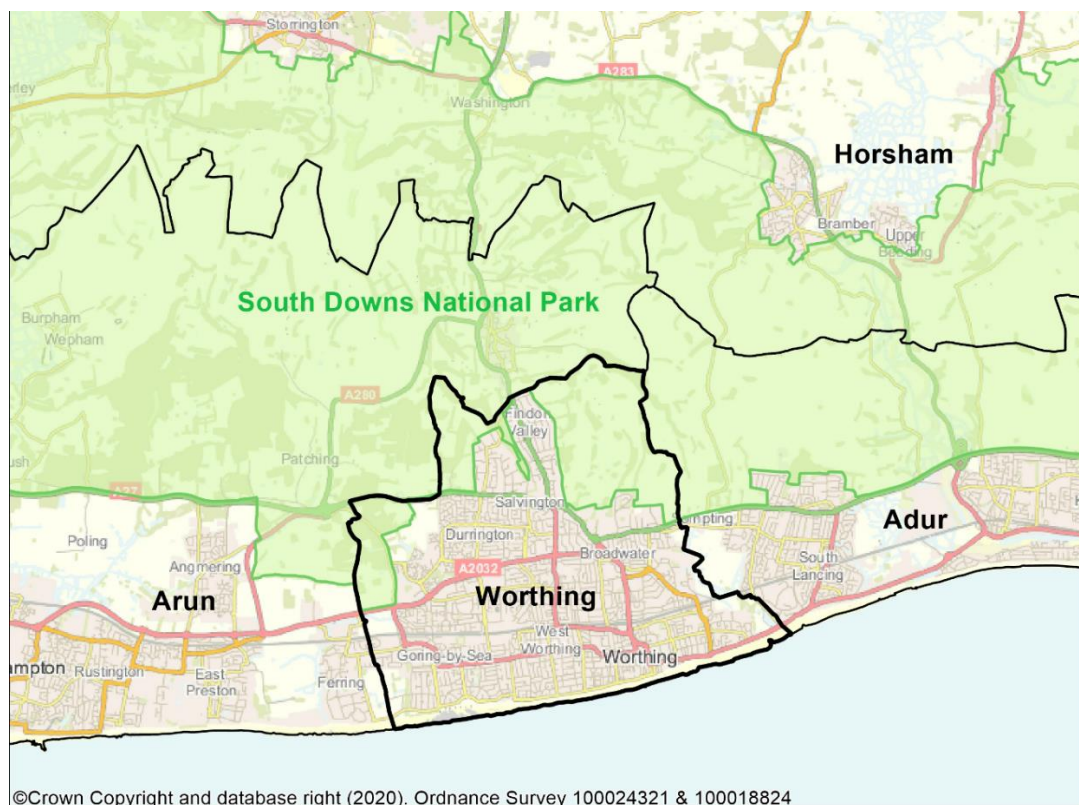
Dated: 2nd June 2021

1. Introduction and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside the respective parties' Duty to Co-operate Statements which have been prepared to support the Worthing Local Plan (WLP) and Horsham District Local Plan (HDLP) respectively.

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.4 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3 Horsham Context

- 3.1 Horsham District covers an area of 530km² (205 square miles) and is predominantly rural in character, containing a number of smaller villages and towns. The largest urban area is the market town of Horsham, situated in the north-east of the District. 95km² (36.49 square miles) of the District falls within the South Downs National Park (SDNP) which forms the boundary with Arun and Adur District. The boundaries of Horsham District and Worthing Borough are not contiguous, but are directly connected via the road network via the A24. Although Horsham District Council is not the planning authority for the SDNP this nationally important landscape provides an important landscape context for many areas in the district.
- 3.2 The District lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area. The majority of Horsham District is also located within the Gatwick Diamond economic area. This extends from Croydon in the north, around Gatwick Airport and down the A23 corridor to the south coast.
- 3.3 The whole of the District also falls within the North West Sussex Housing Market Area (NWS-HMA), together with Crawley Borough Council and Mid Sussex District Council. A modest portion of the District, concentrated in the South East of the District encompassing the settlements of Steyning, and Henfield also falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 3.4 In the context of both the North West Sussex and Coastal West Sussex and Greater Housing Market Areas, Horsham District is one of the least constrained authorities in terms of overarching constraints identified in paragraph 11 (footnote 6) of the NPPF. With the exception of the High Weald AONB which is located in the north east of the Horsham District, the majority of these constraints, which include the South Downs National Park, land at risk of flooding and Habitats of international importance are located in the southern portion of Horsham District.

4.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

- 4.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council

Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 4.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:
- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
 - Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.
- 4.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 4.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.
- 4.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.
- 4.6 To inform the preparation of LSS3 a joint study has been completed called 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 4.7 All WS&GB partners have committed to undertaking the following:

- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
- Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
- Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - a baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - a common methodology for determining the approach to identifying possible locations to meet any unmet need;
 - the capacity of the Board area to absorb further growth;
 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 4.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 4.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 4.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the South Downs National Park and the sea is largely already built-up. This is equally true of the part of Lewes District which lies outside of the National Park. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 4.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

5 Worthing Local Plan (WLP) (WBC position)

- 5.1 After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that in mid-June the Plan will be Submitted for Examination.
- 5.2 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 5.3 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.
- 5.4 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 5.5 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

6 Horsham District Local Plan (HDC position)

- 6.1 Horsham District Council is in the process of preparing a Regulation 19 Horsham District Local Plan. It is anticipated this will cover the period between 2021 and 2038. This document will replace the Horsham District Planning Framework which was adopted in 2015. Horsham District has a well-established geographical relationship with the town of Crawley which directly adjoins the north east boundary of Horsham District. The existing local plan is currently making a significant contribution to unmet housing needs within the coast to capital sub-region, providing 150 homes a year in the Northern West Sussex Housing Market Area, which is the dominant HMA in which the District lies.
- 6.2 In terms of meeting housing needs, the Horsham District Council Local Plan 2021-2028 is being prepared following the provisions of paragraph 11 of the

NPPF. The starting point for the authority will be to meet its own objectively assessed needs which based on the Standard Methodology is currently 897 homes a year.

- 6.3 Of the authorities who are members of the West Sussex and Greater Brighton planning board, both Worthing Borough Council and Crawley Borough Council have written to Horsham District Council in the context of their emerging local plans, and have asked whether Horsham District can contribute towards meeting their respective unmet housing needs. Horsham District Council has confirmed that as part of the preparation of its own local plan that it will seek to explore the extent to which this can be met whilst being consistent with achieving sustainable development.
- 6.4 In meeting housing requirements, HDC is seeking to balance the need for growth and development whilst respecting the rural and historic character of the district and maintaining the high quality of life for its residents. Horsham District has therefore prepared a range of evidence base documents to support the preparation of its own plan, to examine the extent to which it could meet additional housing needs for other areas.
- 6.5 This has included an assessment of environmental constraints including landscape and settlement character and setting, the level and type of infrastructure delivery required to support new development, and an assessment of the ability of the housing market within the District to accommodate growth. Cumulatively, this evidence indicates that there is a finite limit to the level of growth which can be accommodated within the District during the plan period. There are therefore limits as to the extent that the District can meet the overall level of unmet needs within the sub-region as a whole.
- 6.5 In addition to considering the overall extent to which unmet needs from surrounding District's and Boroughs can be met, a key consideration for the Horsham District Local Plan will be the locational strategy for any new development. In addition to environmental constraints, this will take account of a range of factors including the existing settlement pattern of the district, the geographical relationship with surrounding District's and boroughs and the extent to which development can be achieved through intensification and redevelopment, urban extensions or in new settlements. The options for growth are being fully tested through the Sustainability Appraisal process.

7 Unmet housing need

- 7.1 The parties agree that, as a positive first step towards addressing unmet housing need including from Worthing Borough, HDC will, through its emerging Local Plan, seek to explore the extent to which it can accommodate unmet needs in so far as this is consistent with achieving sustainable development. This will consider emerging requirements across the wider sub region including the Northern West Sussex HMA and coastal West Sussex.
- 7.2 The parties further agree that both WBC and HDC will, when implementing their respective plans, fully explore future opportunities within their respective areas

to make the fullest appropriate use of land that comes forward for development, and to maximise development on appropriate windfall sites provided these are aligned with respective local plan policies and the NPPF.

- 7.3 Both parties agree that there are significant challenges in meeting the level of unmet housing needs within the sub-region. In the longer term it is agreed that both authorities will work as part of the West Sussex and Greater Brighton Strategic Planning Board to consider at how these needs will be met in the longer term.

8 Other Matters

- 8.1 The parties agree there are robust mechanisms in place to address cumulative cross-boundary transport impacts. The two authority areas are connected by the A24 which forms part of the Major Road Network (MRN). Upgrades to this corridor are being considered jointly by the parties together with West Sussex County Council as part of an ongoing A24 Study, with implementation of identified mitigation measures to be led by WSCC and supported by WBC's and HDC's respective Local Plans. The two authority areas are not directly connected by rail.
- 8.2 WBC and HDC have engaged in discussion regarding other strategic cross-boundary matters, key amongst which are set out below. For each of these matters, the parties agree that development needs and supply are sufficiently addressed within the authorities' respective boundaries, and/or there are no significant cross-boundary impacts across specifically WBC and HDC boundaries.
- Gypsy and Traveller accommodation
 - Employment related development
 - Internationally designated wildlife sites
- 8.3 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 8.4 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

9 Conclusion

- 9.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters

relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

9.2 In summary, the parties agree that:

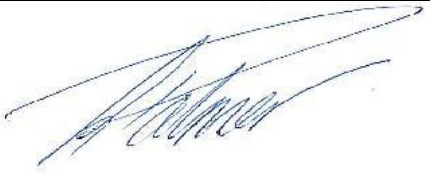

- a) there are no key areas of disagreement between the parties relating to the emerging Worthing Local Plan (subject to Worthing Borough Council responding sufficiently to the points raised by Horsham DC within their Regulation 19 representation)
- b) despite significant changes to the planning system being proposed, both the Worthing Local Plan and Horsham Local Plan should continue to be prepared in accordance with current legislation and as far as possible in line with the relevant Local Development Scheme. (**outcome:** Local Plans to be delivered in a timely manner such that development can swiftly come forward together with appropriate infrastructure)
- c) HDC will through its emerging Local Plan seek to meet an element of the unmet housing need arising from the Coastal West Sussex, to be confirmed through the local plan process. (**outcome:** a proportion of, but not the entire, unmet need from Worthing to be met in Horsham District)
- d) the parties will continue to work expediently and positively together on all other areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3. (**outcome:** wider sub-regional coordinated strategy to meeting development needs including those arising in the Coastal West Sussex area)

Worthing Borough Council / Lewes District Council

Statement of Common Ground



Signatories:

Leigh Palmer Head of Planning, Lewes DC	James Appleton, Head of Planning & Development, Worthing BC
	

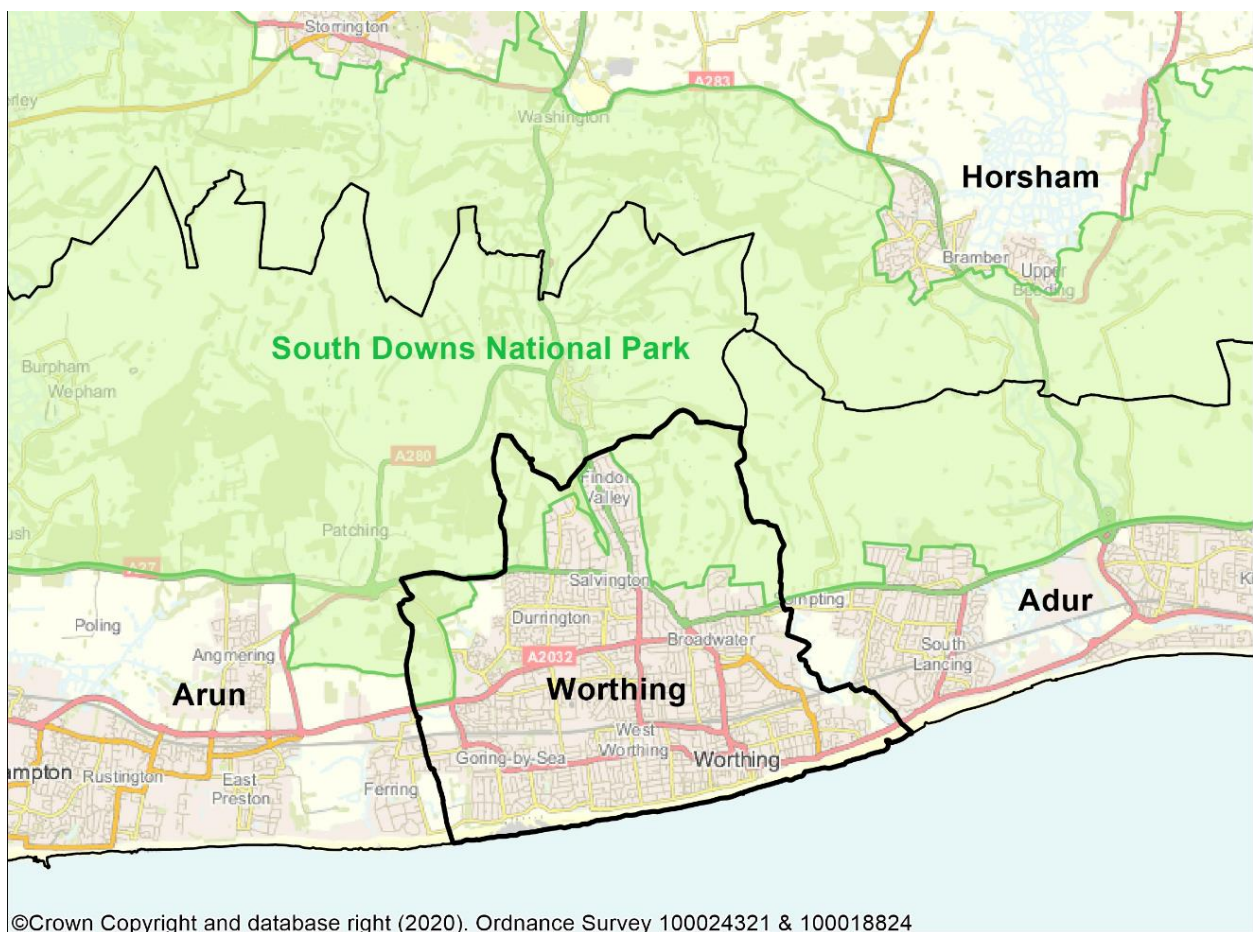
Dated: 17th May 2021

1. Introduction and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan.

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.4 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3.0 Regional Context

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- 3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
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Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:
- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
 - Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.
- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.
- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.

- 3.6 To inform the preparation of LSS3 a joint study has been completed called 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
 - Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
 - a baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;
 - a common methodology for determining the approach to identifying possible locations to meet any unmet need;
 - the capacity of the Board area to absorb further growth;
 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the

downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.

- 3.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Other Matters

- 5.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 5.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

6 Conclusion

- 6.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 In summary, the parties agree that:
- a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan
 - b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme
 - c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development

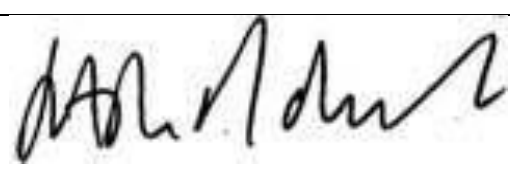

- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take emerging national policy the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / Mid Sussex District Council

Statement of Common Ground



Signatories:

Cllr Jonathan Ash-Edwards Leader of Mid Sussex District Council	Cllr Kevin Jenkins Executive Member for Regeneration, Worthing BC
	

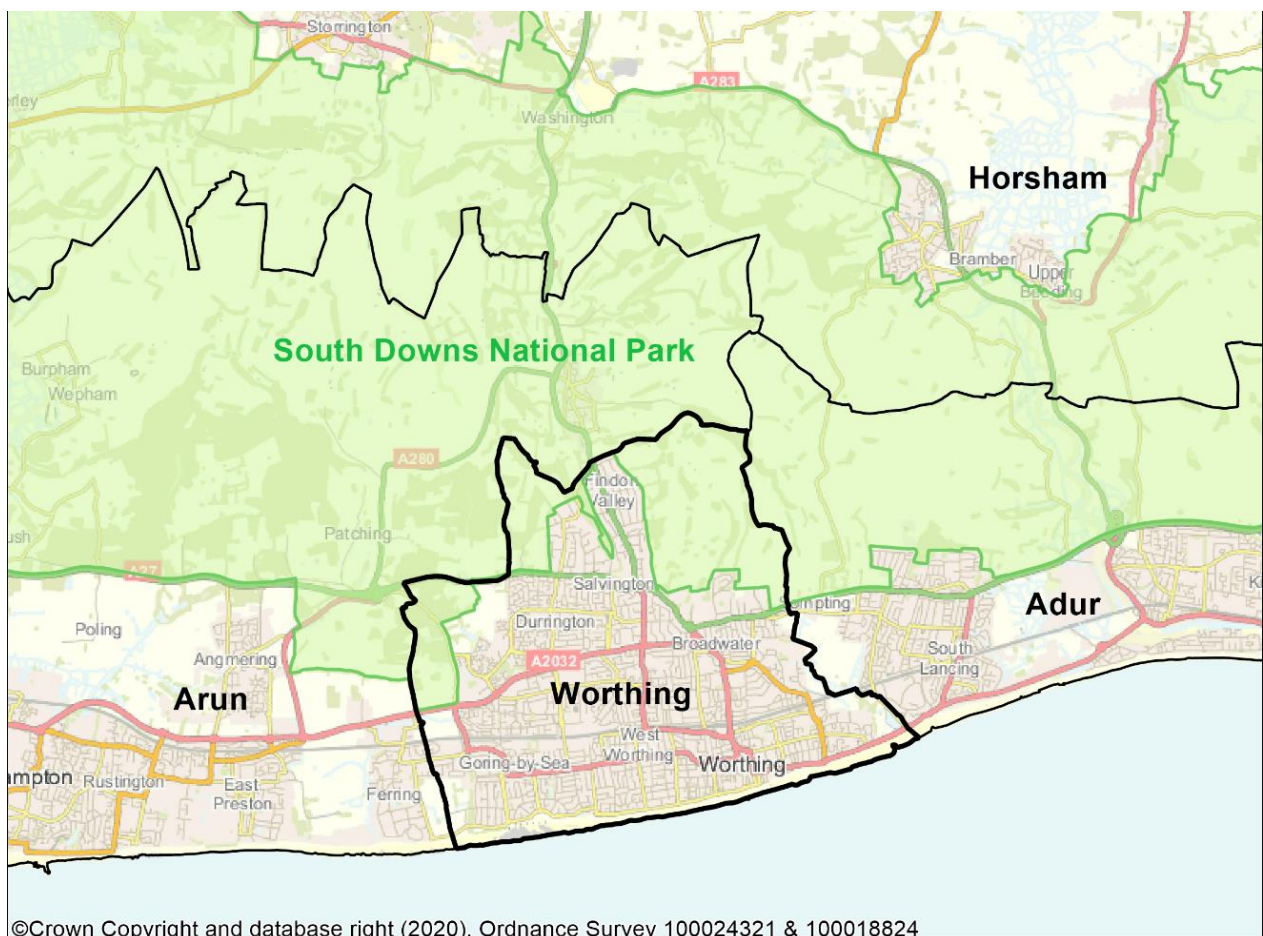
Dated: 21/05/21

1. Introduction and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan.

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.4 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

- 3.1 The West Sussex and Greater Brighton Strategic Planning Board (WS&GB) now consists of the following partners:

Adur District Council	Lewes District Council
Arun District Council	Mid Sussex District Council
Brighton & Hove City Council	Worthing Borough Council
Chichester District Council	South Downs National Park Authority
Crawley Borough Council	West Sussex County Council
Horsham District Council	

- 3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:
- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
 - Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.
- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.
- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.

- 3.6 To inform the preparation of LSS3 a joint study has been completed called 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
- 3.7 All WS&GB partners have committed to undertaking the following:
- Robustly and creatively explore options for meeting the unmet needs (leaving 'no stone unturned') across the Board area and for these options to inform Local Plan reviews;
 - Prepare a Local Strategic Statement 3 covering the period to 2050 with an appropriate level of stakeholder participation;
 - Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:
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 - the likely required level of growth;
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Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across the Coastal West Sussex HMA in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.10 These factors significantly limit the scope for development across the Coastal West Sussex HMA, but particularly within the central part of the Coastal West

Sussex HMA which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.

- 3.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment

floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Mid Sussex District Plan

- 5.1 The Mid Sussex District Plan (2014-2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings primarily to address Crawley's unmet need. Horsham District Council also commits in its adopted Local Plan towards making an annual contribution towards the current unmet need for Crawley. Therefore, in the current adopted plans there is a commitment to assisting with the delivery of the previously assessed unmet need for the North West Sussex area.
- 5.2 District Plan Policy DP5: Planning to Meet Future Housing Need commits the Council to working jointly and proactively with the Gatwick Diamond and the West Sussex and Greater Brighton Strategic Planning Board to address unmet housing need in the Sub Region. The policy goes on to state that the Council approach will be tested through a robust plan-making process as part of a review of the Plan starting in 2021.
- 5.3 Work on the District Plan review has commenced but is at an early stage. The review will establish the revised local housing need for Mid Sussex and include the preparation of a robust evidence base to ascertain if and how these needs can be met, including an HRA to test the impact on the Ashdown Forest. At this stage options and capacity for development beyond 2031 in Mid Sussex have not been tested and therefore it is not possible to confirm the role which Mid Sussex could play in assisting Worthing.

6 Other Matters

- 6.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example

due to likely (yet unknown) impacts on the working practices, the economy and the housing market.

- 6.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

7 Conclusion

- 7.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.

- 7.2 In summary, the parties agree that:

- a) there are no areas of disagreement between the parties relating to the emerging Worthing Local Plan
- b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme
- c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development
- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

Worthing Borough Council / South Downs National Park Authority

Statement of Common Ground



Signatories:

Tim Slaney Director of Planning	James Appleton Head of Planning & Development

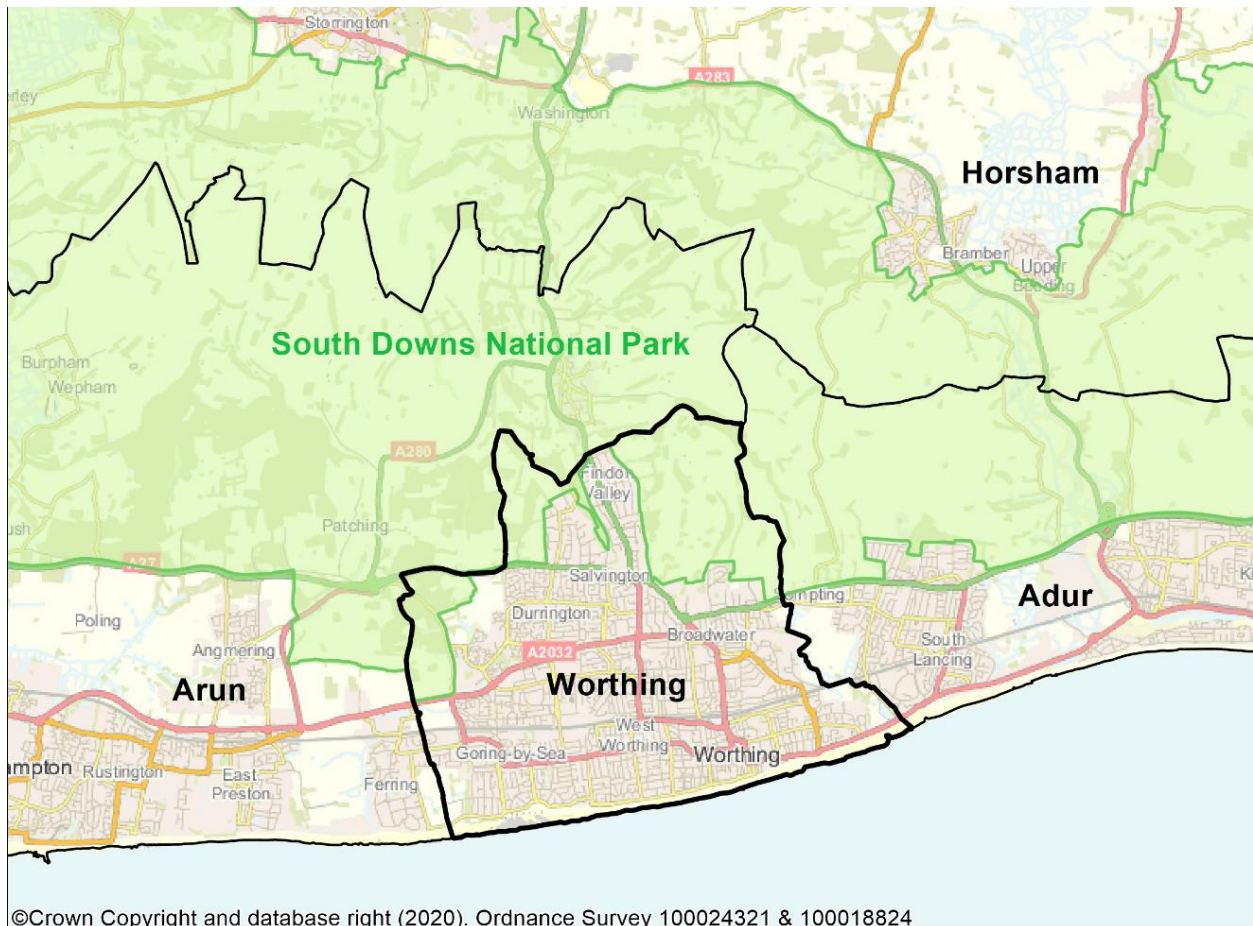
Dated: 07-05-21

1. Introduction and Scope

- 1.1 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.
- 1.2 The National Planning Policy Framework and National Planning Policy Guidance sets out the strategic issues where co-operation might be appropriate. In this regard, local planning authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.
- 1.3 The 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 Councils. This Statement of Common Ground (SoCG) helps to meet this requirement and it should be considered alongside Worthing Borough Council's Duty to Co-operate Statement which has been prepared to support the Worthing Local Plan.

2 Worthing Context

- 2.1 Worthing is located within West Sussex on the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.
- 2.2 The Borough measures 33.7 sq km in area. However, 8 sq km (24%) of this is taken up by part of the South Downs National Park. Worthing Borough Council is not the local planning authority for this nationally important landscape (the South Downs National Park Authority is the relevant authority).
- 2.3 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as WBC, 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.
- 2.4 The NPPF states that great weight should be given to conserving and enhancing landscape and scenic beauty in national parks. Both authorities note the Government's proposed changes (underlined below) to the NPPF paragraph 175 on National Parks, namely:
- "The scale and extent of development within these designated areas should be limited, while any development within their settings should be sensitively located and designed to avoid adverse impacts on the designated landscape."
- 2.5 The whole of the Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA).
- 2.6 Worthing lies within the area covered by the Coast to Capital Local Enterprise Partnership. This is a network of functional economic hubs, with Gatwick Airport (in the north of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity in the area.



3.0 Regional Context

West Sussex and Greater Brighton Strategic Planning Board

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3.2 The WS&GB consists of lead Council Members, supported by senior officers. Its remit is to:

- Identify and manage spatial planning issues that impact on more than one local planning area within WS&GB, and
- Support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process.

- 3.3 The partnership has been working effectively together for a number of years and the first Local Strategic Statement was endorsed by each of the constituent authorities in 2013 (note – at that time the Board did not include Mid Sussex DC, Horsham DC or Crawley BC). In 2014 this version was awarded the Royal Town Planning Excellence Award for Innovative Planning Practice in Plan making.
- 3.4 The updated Local Strategic Statement for Coastal West Sussex and Greater Brighton ('LSS2') was agreed by all partners in 2015, and is the main vehicle for taking forward the Board's work on behalf of the LPAs. This sets out the long term Strategic Objectives and the Spatial Priorities for delivering these in the short to medium term. These priorities reflect the local planning authorities' aspirations for long term sustainable growth to meet the existing and future needs of the residents and workforce in the area. It provides an overlay for Local Plans and business plans of various bodies; establishes a clear set of priorities for funding opportunities and will also be used for duty to co-operate purposes. The updated Strategic Objectives in LSS2 cover the period 2015 to 2031 and the Spatial Priorities cover the period 2015-2025.
- 3.5 Despite having LLS2 in place, all partners have recognised that a full review is required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly 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.
- 3.6 To inform the preparation of LSS3 a joint study has been completed called 'Defining the HMA and FEMA' (GL Hearne, 2017). This work provides a detailed review of the Housing Market Areas (HMAs) and Functional Economic Market Areas (FEMAs) operating within and across the Strategic Planning Board authorities. As a comprehensive analysis of the functional geography of the sub-region, it provides a sound basis for undertaking future housing and economic needs assessments within the area covered.
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- the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.
- 3.8 To help formalise this agreement, an updated Statement of Common Ground to be signed by all parties is currently being prepared.

Coastal West Sussex

- 3.9 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District and covers those parts of the National Park within these districts.
- 3.10 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.11 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.
- 3.12 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes (2016), Brighton & Hove (2016), Adur (2017) and the South Downs National Park (2019) were unable to deliver a level of development to meet their own housing needs.

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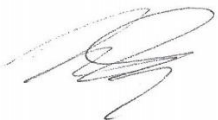

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- f) future work will need to take emerging national policy and the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region
- g) the South Downs National Park has the highest status of protection in relation to landscape and scenic beauty. Both the National Park Authority and the Borough Council will pay due regard to the purposes of the National Park in line with Section 62 of the Environment Act 1995.

Worthing Borough Council / West Sussex County Council

Statement of Common Ground



Signatories:

Michael Elkington, Head of Planning Services, West Sussex County Council	James Appleton, Head of Planning & Development, Worthing Borough Council
	

Dated: 13th May 2021

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 - the likely required level of growth;
 - the strategic options available to deliver additional growth;
 - the investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.

Coastal West Sussex

- 3.8 The whole of Worthing Borough falls within the Coastal West Sussex and Greater Brighton Housing Market Area (CWS-HMA). This area extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.9 Studies have demonstrated that it is highly unlikely that the required levels of development can be achieved across this sub-region in light of the significant environmental, landscape and infrastructure constraints to development which exist. This is largely a function of the geography of the sub-region, much of which forms a narrow intensively-developed coastal strip which falls between the South Downs National Park and the English Channel. Furthermore, some of the authority areas (including Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.10 These factors significantly limit the scope for development across the sub-region, but particularly within the central part of the sub-region which includes Worthing, Adur and Brighton and Hove where the coastal plain between the

downs and the sea is largely already built-up. This is equally true of the coastal and downland part of Lewes District. There are thus few further greenfield development options, coupled with limited brownfield capacity.

- 3.11 The constrained nature of much of the Sub-Region has been reflected within recently adopted Local Plans when Inspectors have accepted that Lewes, Brighton & Hove and Adur were unable to deliver a level of development to meet their own housing needs.

4 Worthing Local Plan (WLP)

- 4.1 Worthing Borough Council recognises the importance of having an up to date Local Plan in place that can enable 'local decision making' and guide development that is sustainable, inclusive and resilient. After a number of years of preparation (including regular liaison with local authorities within the sub-region) the Council published its Submission Draft version of the Worthing Local Plan (WLP) for comment in January 2021. It is expected that at the end of May the Plan will be Submitted for Examination.
- 4.2 The WLP builds on national guidance to provide for more specific local policies for Worthing to create a high quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 4.3 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built up area that could deliver significant levels of growth.
- 4.4 The spatial strategy established in the Plan seeks to achieve the right balance between planning positively to meet the town's development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.
- 4.5 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (9 previously developed sites and 6 edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target that is significantly higher than the levels of growth planned for within the Worthing Core Strategy.

- 4.6 Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings.
- 4.7 Whilst acknowledging that this is a very high level of unmet need, Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue work to positively review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

5 Other Matters

- 5.1 This Statement was prepared during the worldwide Corona virus pandemic. This is widely acknowledged to have yielded very significant uncertainties and risks in strategy-making for the medium and long term, including in plan-making. The parties agree that this will necessitate a flexible approach to addressing cross-boundary matters covered in this statement, for example due to likely (yet unknown) impacts on the working practices, the economy and the housing market.
- 5.2 Also at the time of preparation, the Government is consulting on radical changes to the planning system. However, transition arrangements are proposed which would allow Local Plans at an advanced state of preparation to continue being prepared in accordance with current legislation and guidance. The parties are therefore agreed that the emerging WLP should continue to be prepared in accordance with current legislation and guidance.

6 Conclusion

- 6.1 The parties to this statement have demonstrated that they have worked jointly constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process. The parties confirm that they will continue to do so, as outlined above and through sustained joint dialogue and the commissioning of joint studies as appropriate.
- 6.2 In summary, the parties agree that:
- a) there are no areas of disagreement between the parties relating to the soundness or legal compliance of the emerging Worthing Local Plan
 - b) despite significant changes to the planning system being proposed the Worthing Local Plan should continue to be prepared in accordance with current legislation and in line with the Worthing Local Development Scheme
 - c) when progressing the Worthing Local Plan, Worthing Borough Council has taken a positive approach to development

- d) given the levels of housing shortfall acknowledged in the Worthing Local Plan, Worthing BC should continue to pursue every opportunity to deliver sustainable development and, if possible where opportunities arise, increase the level of housing delivery over the Local Plan period.
- e) the parties will continue to work expediently and positively together on the areas of ongoing work discussed in this Statement, particularly the work required to progress and agree a robust Local Strategic Statement 3.
- f) future work will need to take the impacts of the Covid-19 pandemic (and recovery) into account when progressing plans and strategies across the sub-region.

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