



# WORTHING LOCAL PLAN 2020- 2036

## WBC-E-16

### Extending the time period of the Plan from Adoption – Note

November 2021

The Inspector at Q12 of the MIQs has asked:

**‘Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum period of 15 years from adoption. Is the WLP consistent with national policy in this regard?’**

Following discussions that took place during the first week of the Hearing Sessions the Inspector asked the Council to give further consideration to this issue and the implications for the WLP if an extension by one additional year was considered to be necessary. This short paper sets out the Council’s response.

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### **The Council’s Preferred Position**

The Council has previously responded to this question in WBC-E-04 Matter 2 - Broad Spatial Strategy and Strategic Policies. This response noted that when the original end date of the Plan was proposed it was expected that it would be adopted in 2021 (thereby providing a period of 15+ years). It goes on to explain that due to the Covid-19 pandemic the Plan was subject to significant delay as a number of the Planning Policy Team were redeployed to other departments to help in the Council’s response to the crisis. As a consequence of this delay and assuming a positive outcome at the examination it is now anticipated that the Plan will be adopted in 2022 (potentially Spring 2022).

The Council’s response also noted that there is no formal guidance as to what constitutes a ‘year’. If we use the monitoring year used in the Annual Monitoring Report then the ‘year’ is between ‘01/04 to 31/03’ so, in effect, this straddles a calendar year. Therefore, the Council accepts that, depending how it is calculated, the period of the WLP following anticipated adoption is likely to be between 14 or 15 years from the date of adoption.

The Council has reviewed examples of other Local Authorities recent Local Plan examinations and of particular relevance is the examination into the Hart Local Plan. The [Inspector’s report](#) which was published on 10th February 2020 makes specific reference to the issue of the end of Plan period. At paragraph 32 of the Inspector’s report it states:

***‘There has been some suggestion that the Plan period should be extended. The Plan looks forward 13 years after anticipated adoption, which is below the preferred 15 year time period set out in Paragraph 157 of the NPPF. However, the NPPF’s preference is not a set requirement and I consider 13 years to be an appropriate time scale in this instance, particularly as there is now a requirement to review plans every five years.’***

Although the NPPF has been revised since the report referred to above was issued, the Council is of the view that the wording relating to the 15 year time period remain largely unchanged.

The Council is of the view that given that the delay in Submission of the Local Plan was due to the issues around the Covid - 19 pandemic and that there are examples where a period below 15 years has been accepted in certain circumstances, the end of the Worthing Local Plan period should remain at 2036. In addition, given that there is now a requirement to review the Plan within 5 years of adoption at which point the end date of the Plan will be extended by at least 5 years.

### **Implications for Changing the End Date**

Despite setting out the preferred position above, the Council accepts that to fully respond to paragraph 22 (without any ambiguity) an end date of 2037 would be required. If this were to be the case there is some logic in using the 'financial year' for this purpose as this reflects the approach used for monitoring purposes and is also likely to correspond relatively well with the adoption date of the WLP.

If the Plan end date does change to 2037 the Council does not consider that this will have a significant impact on the WLP and would not in any way change the proposed development strategy outlined in the Plan. The key matters that would need to be taken into account are set out below:

#### Housing Evidence:

##### *Adur and Worthing Strategic Housing Market Area Assessment (SHMA)*

The SHMA covers the time period 2019 to 2039. In order to align with the end date of the emerging Worthing Local Plan the core reporting is based on the original Worthing Local Plan period 2019 to 2036 period. However, to also reflect the likely end date for the review of the Adur Local Plan, the end date for key analysis covers the 2019-39 period (this is included within Appendix A3 of the report). This means that the most robust data is not available if an additional year is required.

##### *Standard Methodology (SM)*

The SM has been assessed as set out in Appendix 1 of Topic Paper 2 - The Housing Implementation Strategy (HIS) June 2021. This takes the base date of the Plan as 2020 and calculates projected growth over 10 years to achieve the minimum annual growth figure (capped) for Worthing. To calculate the need over the Plan period this minimum annual figure is then multiplied by the years covered by the Plan.

The current calculation set out in the Plan at paragraph 3.13 states that there is a need for 14,160 dwellings over the plan period 2020 - 2036 (16 years). If the Plan period is extended to 2037 then there would be another 885 dwelling requirement (based on the 2020 SM calculation) bringing the total need over the Plan period to 15,045 dwellings. As all sustainable developable opportunities have been allocated, housing supply will be 3,672 dwellings (at 1 April 2020) plus one additional year of windfall (assuming the windfall allowance of 67 dwpa is accepted) over the plan period. The housing supply of a Plan period to 2037 would be 3,739 (3,674 + 67 ) which means that only approximately 25% (rather than 26%) of overall housing need will be met and the shortfall over the extended

plan period would increase from 10,488 to 11,306 dwellings. The change therefore, gives rise to an even higher housing shortfall than that set out in the published SDWLP. These changes would need to be incorporated within the Housing Trajectory and also within the figures referred to within the relevant supporting text of the WLP.

### Economic Evidence:

#### *Employment Land Review (ELR)*

The ELR was commissioned by the Council to provide a focused update to the 2016 Economic Research and Employment Land Review ('ERELR') to inform the evidence base for the Council's emerging Local Plan which will cover the period between 2020 and 2036. So the additional year of the Plan would not be accounted for in terms of employment evidence. This would potentially reduce the robustness of the conclusions when looking even further ahead. However, the Council does not consider this to be a significant issue particularly given the volatile economic landscape that we are currently in and that the full impacts of the Covid-19 pandemic and Brexit are yet to be fully realised.

#### *Retail and Town Centre Uses*

The study (2017 and update 2020) considers the requirements over the Plan period but focuses on the first 10 years of the Plan in accordance with the requirements set out in the NPPF. Guidance is clear that looking beyond 10 years is not worthwhile given the changing nature of retail and leisure trends which have been exacerbated during the Covid-19 pandemic. Therefore, a change in the end of the Plan period will not have any significant impact on the Retail and other town centre use elements of the Plan.

### Sustainability Appraisal

The implications of changing the end date will need to be considered in terms of the Sustainability Appraisal. Consideration will be had to the guidance in the Planning Practice Guidance which states:

*Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.*

The Sustainability Appraisal will need to reach a view as to whether the change is significant and if so it will need to be appraised. However, this could be undertaken at the same stage as all the proposed modifications.

### **Conclusion**

The Council's preferred position would be for the Plan to be adopted within the current Plan period (2036) with a review within 5 years of adoption. However, the Council would not be overly concerned with a change being made to the end date as it would not change the strategy established in the Plan. Although it would, in effect, slightly increase the shortfall in

meeting housing needs, the implications for the policies within the plan and the associated evidence are limited, and it is unlikely to be considered significant in terms of the need for Sustainability Appraisal.

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