

**WORTHING BOROUGH COUNCIL  
HOUSING DELIVERY TEST  
ACTION PLAN 2022**

**August 2022**



WORTHING BOROUGH  
COUNCIL

# WORTHING BOROUGH COUNCIL HOUSING DELIVERY TEST ACTION PLAN 2022

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# 1. Introduction

## Context

- 1.1 The Council recognises the Governments' commitment to boost the delivery of new homes and has responded to this challenge by undertaking a full review of the existing adopted Worthing Core Strategy 2011, which helps to set the strategy for development across the borough.
- 1.2 The existing Worthing Core Strategy was adopted at a time when there was not a strong relationship between the housing targets set for Worthing within Regional/Structure Plans and the need and demand for new homes within the borough. This is because the previous targets took account of the significant development constraints faced by Worthing and were therefore strongly influenced by the capacity of the borough to accommodate new homes in terms of its physical and environmental characteristics.
- 1.3 The National Planning Policy Framework (NPPF) now requires that local planning authorities meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. In response to this significant change, together with other changes at national level, the Council committed to review the existing Core Strategy and progress a new Local Plan.
- 1.4 In spring 2016 the first stage of Local Plan review (the Issues and Options stage) was published for consultation. At that stage the Council sought views and suggestions on how Worthing should grow and develop in the future. This consultation identified the challenges facing the borough and the options that could help address them.
- 1.5 All responses received at the Issues and Options stage informed the next stage of Plan preparation and the evidence that needed to be put in place to support it. In autumn 2018 the Council published its preferred options in its Draft Worthing Local Plan 2018. Building on the responses received at the two earlier stages and the emerging evidence a Regulation 19 consultation of the Local Plan took place between Tuesday 26th January and Tuesday 23rd March 2021. The Submission Draft Worthing Local Plan (SDWLP) was formally submitted to the Secretary of State on Friday 11th June 2021 for independent examination. Hearing sessions were conducted in November 2021.
- 1.6 Following the submission to the Secretary of State of the Submission Draft Worthing Local Plan (SDWLP) for examination, the appointed Inspector has considered all written representations received, and had regard to matters raised during a series of public hearings held during November 2021. The Inspector has concluded that Main Modifications are required to make the plan sound. The Inspector requested that the Council consulted on a schedule of proposed Main Modifications which he considers are necessary to ensure the soundness of the plan. These main modifications were consulted on for 6 weeks between Tuesday 5th April and Tuesday 17th May 2022.
- 1.7 In line with the NPPF, the Council is seeking to plan positively to establish whether housing delivery could be increased significantly to help close the gap between the level of identified need and recent levels of housing delivery.

- 1.8 At the time of the publication of the SDWLP (2020) the Objectively Assessed Need (OAN) (based on the 2014 household projections published in September 2016) was 14,160 dwellings over the Plan period (at that time the end of the plan period 2036). This equates to 885 dwellings per annum (capped).
- 1.9 The level of identified housing need for the plan period is a much higher level of housing delivery than the borough has previously planned for or delivered. To put this into context, the current adopted Core Strategy 2011 set a housing requirement of 200 dwellings per annum and the average annual delivery rate since 2006 has been 295 dwellings (which includes a significant level of housing delivered on a large greenfield site at West Durrington). It should be noted that there was no intention that the 200 dwelling / year target should be seen as a 'ceiling'.
- 1.10 In light of the changes made to national planning guidance and the need to meet, as much as possible, the housing need for Worthing the spatial strategy taken forward in the Submission Draft Worthing Local Plan is similar to that incorporated within the Worthing Core Strategy (i.e. placing a strong emphasis on regeneration and transforming key sites within the urban area). However, a key difference has been the need to now look more positively at potential development options, including greenfield sites located around the edge of the borough.
- 1.11 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 boundary without merging with the urban areas of Ferring (to the west) and Sompting/Lancing (to the east) and without damaging 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. Therefore, the reality is that when compared to many other local authority areas, there are relatively few options for growth.
- 1.12 The proposed spatial strategy 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. The core principles set out in the Plan take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest value / sensitivity.
- 1.13 The strategy as set out in the Submission Draft Worthing Local Plan (SDWLP) 2020 proposes the allocation of 15 sites (proposed main modifications following examination would reduce the number of allocations to 14) to deliver housing, or mixed uses including housing or employment uses. These comprise a mix of urban sites that provide the greatest opportunity to deliver residential and wider regeneration and edge of town sites that have been assessed as being suitable for allocation for housing development. At Draft plan stage, there were a number of sites that were less well advanced than the allocations proposed at that stage and as such there was less certainty about the likely mix of uses, site capacity and delivery timeframe. However, further evidence gathering and assessment took place and as a consequence the Council were able to allocate more sites in the SDWLP. A

key document that sets out the Councils approach to meeting housing delivery is the Housing Implementation Strategy that was published alongside the SDWLP. In summary, given the lack of available land in and around the borough the scale of the developments planned are relatively small and there is a key focus placed on regeneration. In addition to the more significant urban sites proposed for allocation it is expected that small sites will play a greater role in housing delivery.

## **Why an Action Plan has been prepared**

1.14 The 2018 revision to the National Planning Policy Framework (NPPF) introduced a Housing Delivery Test (HDT) as a mechanism to monitor housing delivery locally. The HDT measures additional net dwellings provided in a local authority area against the homes required. The consequences of failing the test are set out in the NPPF and these will apply until subsequent HDT results demonstrate that delivery in future years has improved:

- A local planning authority must produce an Action Plan within six months if the Housing Delivery Test result is less than 95%
- A local planning authority with a Housing Delivery Test result of less than 85% must provide a 20% buffer to the five year housing land supply
- The presumption in favour of sustainable development applies if the Housing Delivery Test result is less than:
  - i) 25% in November 2018
  - ii) 45% in November 2019
  - iii) 75% from November 2020 onwards

1.15 This update is the fourth Action Plan and its focus has been to consider whether there are any additional measures that can be included to help improve the delivery of new dwellings.

### *How is the Housing Delivery Test Measured?*

1.16 The methodology for calculating the HDT measurement is set out in the Housing Delivery Test Measurement Rulebook. It is based on the Department for Levelling Up, Housing & Communities (DLUHC) statistics for the total net housing completions (which includes student and other communal accommodation) in a local planning authority area over a three year rolling period using a ratio to adjust for occupancy. The result of the HDT for each local planning authority will be published annually by the DLUHC.

### *How did Worthing perform against the Housing Delivery Test?*

1.17 For Worthing, the fourth HDT (2021 measurement) covers the 3 monitoring periods 2018–2021. For test years 1 (2018/19) the Minimum Local Housing need figure has been used, for test year 2 (2019/2020) a figure of 806 - this is the annual requirement figure adjusted by the DLUHC to reflect circumstances resulting from the Covid-19 pandemic. The final year, test year 3 (2020/2021), a figure of 589 has been used, again adjusted as a result of the pandemic.

## Worthing Housing Delivery Test results

Year	Delivery Figure (net) <sup>1</sup>	Annual Housing Target
2018/2019	300	873
2019/2020	396	806
2020/2021	88*	589
<b>Total over 3 years</b>	<b>784</b>	<b>2268</b>
<b>The Housing Delivery Test measurement for Worthing is 784 / 2,268 = 35%.</b>		

\* Please note this figure which is reported in the Annual Monitoring Report, differs from the Government's Housing Delivery Test figure of 88 homes delivered; this is because the HDT includes a calculation for 'Communal Accommodation'. In this monitoring year an application at The Priory Rest Home South Street Worthing (AWDM/1114/17) for the 'Demolition of existing care home (use class C2) and erection of a 75 bed care home (use class C2)' had commenced but not completed. As such the net result on 'Communal Accommodation' Care Homes Bedrooms was an overall loss of 35. Applying the relevant calculation set out in the HDT Rule Book resulted in a loss of 19.4 dwellings so for HDT purposes this results in the 88 HDT figure.

Based on performance over the past three years (the fourth HDT) in Worthing the presumption in favour of sustainable development now applies. The Council is also updating the Action Plan to identify any new measures or updates to existing measures that will assist in the improvement of housing delivery.

### **Purpose and Objectives**

1.18 This Action Plan is the Council's response to the challenge set out in the NPPF to boost significantly the supply of homes. It sets out why the authority has not delivered against its housing requirements (as detailed above) and identifies a number of actions to increase and maintain housing delivery. However, it should be recognised that housing delivery is a complex matter, which includes the involvement of a number of different organisations in the delivery of new homes. Consequently, if this Action Plan is to succeed, then the cooperation of all partners will be essential, for example, landowners and developers.

1.19 This Action Plan covers the following issues:

- Relationships with other plans and strategies
- The historic performance on housing delivery
- Explains what the Council has been doing so far to boost housing delivery
- Analyses evidence on sites with planning permission (and sites allocated for housing development) to understand what barriers are preventing homes being built on these sites

<sup>1</sup> The completions figure(s) have been sourced from the Housing Delivery Test 2019 Measurement and been calculated in line with the Housing Delivery Test: 2019 measurement technical note.

- Sets out what actions the Council can take to increase the rate and number of homes built
- Monitoring

## Relationship with other plans and strategies for housing delivery

1.20 This Action Plan together with the following key Council plans, policies and strategies provides a mechanism for delivery of local housing targets:

### [Platforms for our Places – Going Further 2020-2022](#) (Corporate Strategy)

This is a plan that sets out Adur & Worthing Councils' ambition for our places' and our communities' prosperity and wellbeing. Platform 2 (Our Social Economies) encourages innovative actions around housing needs. This was agreed in December 2019, and sets out a direction of travel for the Council over the next three year period, and seeks to build on the success of the progress made in recent years. Platform 2 (Thriving People and Communities) encourages innovative actions around housing needs.

### [‘And then...Bouncing Back in post-pandemic Adur and Worthing’](#) (2020)

Adur & Worthing Councils recently published this document (agreed at Joint Strategic Committee on 7th July 2020) which sets out a series of place based activities and interventions AWC will take to enable our communities to thrive, prosper and be healthy and resilient following the pandemic of 2020.

This builds on the AWC strategy ‘Platforms for our Places’ and includes the following:

*Major new development across our places will deliver thousands of new homes and jobs. We will take every opportunity to accelerate the programme for delivery, including building out new projects ourselves and in partnership with others. The emphasis will be on sustainable growth; high levels of connectivity and skills and learning as an integral part of any major scheme. We will actively support those whose projects are already underway and use our regulatory powers wisely to create the right conditions for others to come forward. Where projects are stuck or can be catalysed we will consider what if any interventions we as Councils can make to unblock and speed delivery (See Platforms for Our Places 1.8)*

Recent examples of this proactive approach includes the acquisitions of the Teville Gate (an allocation in the SDWLP) site by Worthing Borough Council for the purpose of redevelopment to deliver new homes and employment opportunities. The site had received planning permission (subject to a legal agreement) for ‘Station Square’ (378 dwellings, hotel, supermarket, gym, retail and restaurants). However, market conditions meant that the ‘approved’ scheme was not likely to be implemented. As such, and to ensure that this key gateway area is developed, the Council took ownership of the site. Options for the site are being reconsidered. In the meantime, ‘meanwhile’ uses for the site are being invited.

Another example is the Union Place site (included as A14 in the SDWLP). This site was included in the Investment Prospectus and the Town Centre Investment Strategy. It has also been the subject of various funding and delivery initiatives, including the Coast to Capital Local Growth Fund. The Council has entered into a

land pooling agreement with partners London and Continental Railways. A development strategy was prepared and an Outline application for a mixed use (residential / leisure facility) was approved in 2020.

This approach has also highlighted the Council's commitment to investment in the public realm and infrastructure for the benefit of the local community and to improve the towns profile for investment. A further example of this is the work that has now been completed to improve public realm in the town centre – Portland Road scheme. In addition, further works are being proposed elsewhere in the town centre in Montague Place. Worthing Borough Council (WBC) will act as the lead design agency for West Sussex County Council (WSCC).

### [Housing Strategy 2020-2023: Enabling Communities to Thrive in their own Homes](#)

Priority 3 of this strategy refers to improving affordable housing supply, and states that the Councils are creating a Development Strategy detailing how it intends to increase the number of affordable homes across Adur and Worthing through self delivery and working closely with developers. This will address five key objectives, which are to:

- Deliver 1,000 affordable homes by 2025, of which 250 homes will be delivered directly by Adur & Worthing Councils
- Create sustainable homes for people to live and thrive in
- Utilise the Council's land and housing stock for self-delivery
- Purchase sites for development where appropriate
- Work with strategic partners to unlock and maximise affordable housing delivery across the Councils.

The strategy provides an overview of how the Councils will look to meet demand through self-delivery and partnership to progress the delivery of affordable housing. The Council will review ways in which different tenures could be offered to help complement affordable homes delivery and meet the needs of people throughout the housing market. These tenures could include discounted market sale, intermediate rent or shared ownership. As part of this review the Council will consider the need to set up a housing delivery company and/or joint ventures with development partners.

The Strategy also makes clear that the Councils will explore new and innovative partnerships and vehicles to create opportunity to increase the supply of affordable homes.

### *Economic Strategy 2018-2023*

This sets out ambitious plans for how the place will achieve “good growth” It seeks to ensure that this growth balances economic success with improvements to the quality of life for residents, including good quality housing.

### *Coast to Capital Local Economic Partnership*

This is a local business led partnership between local authorities and businesses and plays a central role in determining local economic priorities and undertaking activities



to drive economic growth and the creation of local jobs. It has a critical role in the delivery of local infrastructure to support growth in the local economy and helps unlock development. In turn, this helps to support the housing delivery priorities of the borough.

## **Approach and Methodology**

- 1.21 The Council already has in place a long standing monitoring arrangement with West Sussex County Council and also maintains its own comprehensive monitoring system. The Annual Monitoring Report provides updates regarding the housing land supply position. This monitoring has identified that there are significant challenges to the delivery of housing typical of an authority with limited land availability and recognised constraints to development.
- 1.22 A number of sources of information/evidence have been, and continue to be, used to identify and assess any opportunities for residential development and to understand any barriers to delivery that need to be addressed. These include the following documents that are reviewed on a regular basis:
- Strategic Housing Land Availability Assessment
  - Brownfield Register
  - Self-Build and Custom Housebuilding Register
  - West Sussex County Council Data
  - Empty Homes Strategy
  - Affordable Homes Delivery Group
  - Housing Implementation Strategy.

## 2. Housing Delivery Analysis

### Past Performance on Housing Delivery

- 2.1 Historically the housing targets for Worthing had been based on those set by Regional / Structure Plans and as previously explained, these did not have a strong relationship with the need and demand for new homes in the borough. Since the adoption of the Core Strategy, Worthing had been meeting its adopted target and in fact had been delivering a surplus. However, it is acknowledged that this wasn't the case when the newer requirements of the NPPF were in place which required local planning authorities to meet their housing needs in full.
- 2.2 The table below (also incorporated within the housing trajectory 2020 - 2021) indicates the recent levels of housing delivery. This is a net figure, which consists of new build dwellings minus demolitions plus conversions.

#### Historic Housing Delivery - Dwelling completions 2006/2007 - 2020/21

Year	Net Additional Dwellings
2006 – 2007	266
2007 – 2008	260
2008 – 2009	380
2009 – 2010	252
2010 – 2011	241
2011 – 2012	143
2012 – 2013	172
2013 – 2014	245
2014 – 2015	351
2015 – 2016	484
2016 – 2017	347
2017 - 2018	482
2018 - 2019	293
2019 - 2020	396

2020 – 2021*	107
<b>Total 2006 – 2021</b>	<b>4,419</b>

\*Please note this figure which is reported in the Annual Monitoring Report, differs from the Government's Housing Delivery Test figure of 88 homes delivered; this is because the HDT includes a calculation for 'Communal Accommodation'. In this monitoring year an application at The Priory Rest Home South Street Worthing (AWDM/1114/17) for the 'Demolition of existing care home (use class C2) and erection of a 75 bed care home (use class C2)' had commenced but not completed. As such the net result on 'Communal Accommodation' Care Homes Bedrooms was an overall loss of 35. Applying the relevant calculation set out in the HDT Rule Book resulted in a loss of 19.4 dwellings so for HDT purposes this results in the 88 HDT figure.

2.3 A total of 107 (net) new dwellings were completed in Worthing in the monitoring period 2020/2021. This represents a deficit of 93 dwellings against the annualised housing requirement (Core Strategy) of 200 dwellings per annum.

2.4 To better reflect delivery trends, last year's return must also be considered within the context of a longer term timeframe. It is clear that there has been a sustained period of 'over- delivery' in recent years (against the 200 dwellings / year requirement). In fact, the level of housing completions since 2006 is 4,419 dwellings which against the Core Strategy target, provides a 'surplus' of 1,419 over the last 15 years (although it should be noted that the Core Strategy has only been in place since 2011). However, it should be noted that there is no intention that the 200 dwelling / year target should be seen as a 'ceiling'. Furthermore, changes to the planning system have meant that the Council had to reconsider this existing target in light of more recent evidence. Work has been undertaken as part of the review the housing target for the Local Plan review and the Submission Draft Worthing Local Plan sets out what it considers to be a realistic target taking into account the evidence and local constraints.

Housing approvals and completions against housing targets 2006 - 2020

	2006/ 07	2007/ 08	2008/ 09	2009/ 10	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018 /19	2019 /20	2020 /21
Housing Supply Target	200	200	200	200	200	200	200	200	200	200	598	622	873	806	589
New Residential Approvals	382	407	460	240	193	149	1216 *	224	145	206	479	267	213	765 **	229
Net Residential completion	266	260	380	252	241	143	172	245	351	484	347	482	293	396	107 ***

\*This year includes 700 dwelling permission at West Durrington and 265 dwelling permission at Worthing College. West Durrington is still under construction but close to completion. \*\*This year includes HMRC site permitted development -254 dwellings, Land south of Coach and Horses – 240 dwellings and Colombia House permitted development -104 dwellings)

\*\*\*This year includes a calculation as set out in the HDT Rule Book which resulted in a loss of 19.4 dwellings for 'Communal Dwellings' so for HDT purposes this results in the 88 HDT figure (see explanation referred to in the Historic Housing Delivery - Dwelling completions 2006/2007 - 2020/21 table).

2.5 As can be seen from the table above, the number of homes delivered has, in general, kept pace with the number of homes permitted (all-be-it it can be expected that there are some permissions that are granted that are never 'built-out' despite proactive work by the Council to identify and where appropriate remove barriers to delivery however, there will still be cases where the Council has no control over this).

## Current Housing Supply

2.6 The requirement for local planning authorities to meet their full need for both market and affordable as far as is consistent with other policies in the Framework means that Worthing's new plan had to test whether a much higher level of housing delivery was achievable and deliverable than the borough has previously planned for or delivered.

2.7 The current adopted Core Strategy 2011 set a housing requirement of 200 dwellings per annum and the average annual delivery rate since 2006 has been 295 dwellings (2006 – 2021 which includes a significant level of housing delivered on a large greenfield site at West Durrington). The Submission Draft Worthing Local Plan (submitted 11th June 2021) identified a housing need for the plan period (to 2036) of 885 dwellings per annum (capped).

2.8 It is clear that the increase in need for new homes in Worthing required a step change in housing delivery compared with previous housing requirements. The Council is responding to this challenge and has the ambition, recognised across its key strategic documents and strategies, to increase and accelerate as much as possible the delivery of new housing across the borough.

2.9 The Submission Draft Worthing Local Plan (2020) proposes the allocation of suitable sites to accommodate the minimum of 3,672 new homes (230 per annum), including a number of greenfield and brownfield sites. Whilst this figure is still some way below the level of need it does represent a significant uplift on the housing requirements previously established for the borough within the County Structure Plan, the Regional Spatial Strategy and the Core Strategy

2.10 Current housing supply is made up of the following sources which, where appropriate, the assumptions behind them are being robustly reviewed as part of the current Local Plan review :

**Dwelling completions** - using local and West Sussex County Council (WSCC) data to determine the level of completions each year.

**Commitments** - Those sites identified as commitments at 1st April of the monitoring year in the Housing Land Supply Study produced annually by WSCC are those sites that can accommodate five or more units, which have planning permission but have not commenced or are under construction.

**Small sites of less than five dwellings (previous threshold was 6 across the County)** continue to come forward. It is not practical to identify and assess all of these sites in terms of their deliverability. Therefore, in forecasting house building on

these small sites, it is assumed that all dwellings under construction and 45% of those with planning permission but not yet started will be built. This is based on past evidence of completion rates.

**Strategic Housing Land Availability Assessment (SHLAA) sites** - The Council's SHLAA has provided the mechanism through which the quantity and suitability of land potentially available for housing development has been determined. Informed by a number of 'calls for sites' the SHLAA has been monitored and updated regularly to give the most up to date picture of housing delivery for Worthing. The methodology used to undertake this assessment was updated to reflect changes to the NPPF and revised SHLAA methodology. The threshold has been amended to include sites that are capable of accommodating five or more dwellings in order to ensure consistency with the threshold set by WSCC (commitments and small sites of less than five dwellings).

Whilst the focus in previous SHLAA's had been on previously developed sites in the built up area, a rigorous assessment of edge of town opportunities (including greenfield sites) was also undertaken as part of the local plan review. The SHLAA 2019 -2020 formed part of the evidence base for the Annual Monitoring Report for the monitoring period 2019/20 and the Submission Draft Worthing Local Plan. Further updates were undertaken in preparation for the examination to ensure that the capacity figures and projected delivery rates were robust and that the Council were able to demonstrate a very positive approach to Plan making.

**Strategic Allocation** - The adopted Core Strategy currently has only one Strategic Allocation which is West Durrington. Planning Permission has been granted for 700 new homes and works have commenced and very close to completion with the final 6 homes expected to be delivered over the next monitoring year.

**The current strategy in the SDWLP 2020** proposes the allocation of 15 sites to deliver housing, or mixed uses including housing or employment uses. However, following the examination and the receipt of the Inspectors Post Hearing Advice Letter one of the proposed Greenfield allocations 'Titnore Lane' (A13 SDWLP) was recommended for deletion. The Inspector considered that the risk of adverse impacts from developing the site would significantly and demonstrably outweigh the benefits. This, therefore, would reduce the number of allocations to 14 sites. The cumulative effect of a number of the proposed modifications to the plan means that whilst the number of allocated sites falls to 14 the overall number of dwellings expected to be delivered remains the same. The Inspectors Report is awaited.

**Windfall Allowance** - A windfall allowance takes account of housing development on sites which it is not possible to identify in advance (e.g. conversions, changes of use etc.). Historic small sites housing delivery data since the base date of the Core Strategy has been used to calculate a windfall allowance of 67 dwellings per year. So a total of 201 new dwellings are expected to be delivered by the end of the Core Strategy plan period (871 by 2036 proposed end date of SDWLP). To avoid double counting with the small sites commitments, the windfall allowance is not applied to the first three years of the projections.

## Housing delivery

- 2.11 The spatial strategy as set out in the Core Strategy was set by its context. There was one strategic allocation identified in the plan - West Durrington which was allocated for 700 new homes on a greenfield site situated on the north western edge of Worthing. This site has planning permission and construction is nearing completion.
- 2.12 Whilst there was only one allocation in the Core Strategy the Council identified 12 Areas of Change (AOC) which are areas where change was expected and were promoted over the Plan period. Eight of the AOC included residential development either solely or as part of a mixed-use development.
- 2.13 A number of the AOC identified in the Core Strategy have been, or are currently being delivered. These include the Aquarena, which has planning permission, and development is near completion to deliver a mixed-use development with 141 new homes. The Strand which has been subject to permitted development and new development and has delivered a significant number of dwellings. Northbrook College, which has also contributed to the borough's supply of homes. A planning application has been approved for 378 residential units on the Teville Gate site (subject to a legal agreement see para 1.20 above for further detail on this site). The remaining Areas of Change have been reassessed as part of the current Local Plan review and some of these are now proposed as allocations in the SDWLP. In addition to the sites set out in the Core Strategy a number of other sites have been, and are being, developed having secured planning permission.
- 2.14 Against the backdrop of significant and growing housing need the Council has taken, where possible, positive steps to bring forward sustainable opportunities to deliver new development. Whilst the progression of the Local Plan provides the main mechanism through which sites will be allocated the Council has also considered ways in which housing delivery could be increased in advance of Plan adoption. In response to this two edge of town opportunities (Fulbeck Avenue and Land North of West Durrington) have been given support for development in advance of the adoption of the new Local plan. These sites which sit within the existing built up area boundary (as defined on the Core Strategy Proposals Map), were included in the earlier Local Plan consultation 'Issues and Options' which raised the prospect of bringing these two sites forward in advance of the new Local Plan. In general this proposal was positively received and support was given to the Council taking this positive approach. Since that time an application for 240 new homes has been approved on the Land at West Durrington site and permission has also been granted for 152 modular dwellings on the Fulbeck Avenue site. Both sites are under construction.
- 2.15 The new Local Plan must be informed by a robust evidence base. A number of background studies have already been progressed to ensure that the Council's evidence base is up-to-date. This includes: a Landscape & Biodiversity Study transport studies; a Strategic Flood Risk Assessment (SFRA). The Council has recently updated the Strategic Housing Market Assessment (SHMA), the Retail and Other town Centre Uses Study and the Economic Research and Employment Land Review. These, and other studies, have helped to inform the assessment of sites for inclusion in the emerging Local Plan. In addition to the evidence base, the Council's proposal have already been subject to two rounds of consultation with key stakeholders and land owners to identify and address any issues and continues to

engage with them through the review process. In addition, landowners and developers have also been invited to promote potential development sites (a call for sites) on a number of occasions. In fact, given the severe shortage of developable land, the Council encourages interested parties to put forward potential development sites at **any** time.

- 2.16 The Council has taken a proactive and robust approach to identify suitable and sustainable sites for residential allocation in the emerging Local Plan. All sites that were previously identified in the Core Strategy have been reviewed and the latest position of this sites can be found in the most recently published Annual Monitoring Report.
- 2.17 The primary focus had been to identify additional opportunities within the built up area boundary (BUAB) and on previously developed land which resulted in a number of new sites identified at the DWLP stage. However, given the overwhelming housing need, sites outside of the BUAB have also been considered.
- 2.18 The Draft Worthing Local Plan 2018 identified 8 'Allocations', 7 of which were considered to be key to the delivery of future housing in the borough. It also identified six Areas of Change (AOCs) which were regeneration sites within the existing built up area boundary. These Areas of Change were defined as areas that were expected and encouraged to come forward over the Plan period. However, at the Draft Plan stage they were less well advanced than the other allocations and, as a consequence, there was less certainty about the likely mix of uses, site capacity and delivery timeframe. However, as the gathering of evidence continued as the Plan moved to submission all but one of these sites were taken forward into the Submission Draft version of the Plan as allocations. The Submission Draft Local Plan proposes the allocation of 15 (proposed modifications seek to reduce this to 14 as explained at paragraph 2.10 above) sites to deliver housing, or mixed uses including housing or employment uses. Of these, 12 are expected to deliver solely housing or housing as part of a mixed use development. These sites are considered to be 'deliverable' meaning they are viable, available and offer a suitable location for development.
- 2.19 Consideration has been given to all potential development sites in and around the borough including a number of greenfield sites on the urban fringe. A number of greenfield and/or edge of town sites had been proposed as allocations at the DWLP stage. These included:
- Caravan Club
  - Land west of Fulbeck Avenue
  - Upper Brighton Road
- 2.20 There were also, three other greenfield/ edge of town sites that were promoted for development at DWLP stage and, for which a robust and positive review (including consultation) of these was undertaken to assess whether they were potentially suitable for residential development. These were referred to as 'Omission sites' (DWLP 2018). These sites were:
- Land east of Titnore Lane (OS1)
  - Land north of Beeches Ave (OS2)
  - Worthing United Football Club (OS3)

2.23 Further evidence work had been considered and the Council took the view that two of these Omission Sites should become 'allocations' within the SDWLP. As a result, Land north of Beeches Ave is allocated as A1 and Land east of Titnore lane is allocated as A13 in the SDWLP (see paragraph 2.10 above for updated position). The Worthing United Football Club site (OS3) is referred to under the A1 Beeches Avenue allocation which acknowledges that the site could form part of a comprehensive redevelopment with the adjoining Football Club. However, that would be dependent on the relocation of the Football Club and, at this stage, the Council are not satisfied that the Club can be suitably relocated or that the resulting loss of playing fields could be justified. It is acknowledged that if these issues can be addressed the site may be considered appropriate for a residential use.

2.24 To summarise this process, the current evidence supports the allocation for residential use of the following sites in the Submission Draft Worthing Local Plan that, in most cases, will extend the existing BUAB:

**Caravan club** - a Council owned site that is currently leased to the Caravan Club. Discussions are ongoing to consider the potential of the site for residential development. The SDWLP proposes the allocation of this site (2.7 ha the southern portion of the site) residential development with an indicative capacity of 100 dwellings.

**Land west of Fulbeck Avenue** - a Council owned greenfield site. The site is a proposed allocation in the SDWLP. Planning permission has now been granted for the erection of 152 apartments and development has commenced.

**Upper Brighton Road** - a privately owned greenfield site has been proposed as an allocation for residential development for an indicative capacity of 123 dwellings.

**Land north of Beeches Ave** – a privately owned site which lies outside but adjacent to the BUAB and adjacent to the South Downs National Park. The 2.8 ha site offers the potential to deliver approximately 90 dwellings.

2.25 The approach to sites in the SDWLP is one that proposes the allocation of sites and then places them into two categories, those which are considered deliverable within the first five years and those that will be delivered over the remaining period of the plan. A number of these sites have the potential to make a significant additional contribution to the supply of housing in the borough.

2.26 Prior to submitting the Local Plan all sites were robustly reassessed to justify their continued inclusion in the delivery strategy and to provide greater certainty of their capacity and delivery timescales. It will be important to ensure that the capacity of the available sites to deliver residential dwellings is maximised.

### **Potential barriers to delivery**

2.27 The physical and environmental constraints of the borough strongly influence the capacity to accommodate new dwellings, with the sea to the south, the South Downs National Park to the north and sensitive gaps to the east and west forming an important component of the landscape setting of town. A key challenge is to balance the need for development against the need to minimise the impact on the countryside and landscape character. There are also flooding and key infrastructure constraints which impact on the availability of land for development.



- 2.28 Additionally, many parts of the borough are already intensely developed or the local characteristics are such that they make it very difficult to facilitate further significant development. For example, there is a predominance of suburban housing with relatively few open areas where larger scale growth and change cannot be easily accommodated.
- 2.29 There is also a significant reliance on a relatively small number of larger sites in and around the town centre to bring forward major development. An associated problem is that the housing market in the area is dominated by a relatively small number of key landowners and major developers, reducing possibilities for the smaller developers. Additionally, some sites are subject to complex planning histories or other complexities such as multiple ownerships. However, as set out above, where possible, the Council is working proactively to address these issues.
- 2.30 The provision of appropriate infrastructure is important to support new development, and this remains a key aspect of Local Plan preparation and progression. The Council has published an Infrastructure Delivery Plan (IDP) (January 2021) to ensure that the Submission Draft Worthing Local Plan can be supported by necessary infrastructure provision. The delivery of the right levels and type of infrastructure is essential to support new homes, economic growth and to protect the environment. It is important to note that the IDP is a mechanism for identifying the future infrastructure requirements of development proposed as a result of the Worthing Local Plan.

#### *Development costs and viability*

- 2.31 The Submission Local Plan is supported by a Whole Plan Viability Assessment (WPVA) (January 2021) to provide an appraisal of the Plan in terms of the impact of its policies on the viability of development expected to be delivered during the Plan period. It assessed whether the key sites (both greenfield and brownfield) which are key to the delivery of the housing strategy are viable. In summary, this assessment reviewed the overall viability of the proposed Worthing Local Plan and concludes that the residential sites and policies contained within the Plan (unless stated otherwise) have good prospects of delivery. This includes those policies that have potential direct cost impact on development.
- 2.32 The Community Infrastructure Levy (CIL) is now the main way in which the Council collects contributions from developers for infrastructure provision in Worthing. It partly replaces the use of S106 planning obligations with the exception of affordable housing provision and some site specific requirements. As charging authority, Worthing Borough Council has the responsibility for managing, monitoring and reporting on CIL.
- 2.33 Although the CIL 'pot' is growing, it is accepted that CIL will not generate enough funds to completely cover the cost of new infrastructure needed to fully support the planned growth. As a result, infrastructure providers will also have to apply for funding from other sources, with CIL used as match funding where appropriate. It is also clear that there will be many competing demands on CIL funds which means that it is important that a clear and justified process for the spend and prioritisation of CIL was established. The Infrastructure Investment Plan (IIP) has been adopted and focuses on which projects should be prioritised to receive funding from the Community Infrastructure Levy (CIL) over the next three year period (2020-23). This was updated in spring 2021 to allow for a revised allocation of projects.

2.34 The CIL Charging Schedule 2015 was reviewed by our consultants in 2019, with the findings and implications for proposed CIL rates considered and have resulted in a revised draft Charging Schedule. A consultation on the revised draft charging schedule was undertaken during July and August 2020 with a public Examination held 'virtually' in January 2021. The Inspectors report was received in May 2021 which recommended approval of the revised draft Charging Schedule. This revised Charging Schedule was ratified by Worthing Borough Council and implemented on 1st August 2021.

### **3 Key Actions & Responses**

3.1 The Council has already undertaken a significant amount of work to identify the barriers to bringing forward some of the key sites in the borough as discussed above. It will continue to be proactive in searching for additional opportunities to bring forward both existing and new sites. The Housing Implementation Strategy published alongside the SDWLP sets out key actions and interventions to help support the proposed housing delivery set out in the Plan and to proactively respond to any challenges to that delivery. The following are those identified areas where it is considered that regular reviews are undertaken to ensure that potential opportunities are identified, robustly assessed and delivered expediently:

#### **Ensure Housing Delivery Remains a Council Priority**

3.2 Given the very significant housing pressures within the town housing delivery is already a high level corporate and political priority for Worthing, as detailed in the Council's new Corporate Plan - Platforms For Our Places (most recent update 'Going Places' agreed in Dec 2019) and in Councils response to the Covid 19 pandemic ('And then...') Strong corporate leadership will be an ongoing requirement to ensure housing delivery remains a focus across the Council.

3.3 The Council will therefore undertake to:

- continue to provide a Council wide strategic approach to housing delivery, and ensure the delivery of new homes is a primary consideration in decision-making.
- ensure existing policies, strategies and other relevant documents and databases are updated and put in place to support housing delivery and are implemented to achieve specific goals.
- ensure that Councillors are fully aware of the importance of delivering new homes and supporting related policies and strategies.

#### **Review of Local Plan**

##### *Submission Draft Worthing Local Plan*

3.4 Worthing needed a new Local Plan to conform to the updated NPPF and to identify how the Council intends to meet housing, employment and infrastructure needs. The current Core Strategy does not address these changes and in particular new requirements and tests for meeting housing needs. Work commenced on the new Local Plan in 2015 and in spring 2016 the first stage of Local Plan review (the Issues and Options stage) was published for consultation. In autumn 2018 the Council published its preferred options (Regulation 18) in the Draft Worthing Local Plan. The consultation on the Submission Draft Worthing Local Plan ran for 8 weeks between Tuesday 26th January and Tuesday 23rd March 2021. This was the 'Regulation 19' stage and it was the formal stage of the consultation process, prior to submission to the Secretary of State for Examination. Within a specific remit, this 'Publication' stage provided all interested stakeholders with the opportunity to comment on the policy content of the Council's Plan. The Worthing Local Plan was formally submitted to the

Secretary of State on Friday 11th June 2021 for independent examination. The consultation on the Worthing Local Plan Main Modifications ran for 6 weeks between Tuesday 5th April and Tuesday 17th May 2022. The Inspectors Report is awaited.

- 3.5 An up to date policy framework will create greater certainty for those wanting to bring forward sites for housing delivery, supporting investment decisions and minimising areas of disagreement as to how policies are applied and the weight that needs to be attributed to different policies. Housing can also be facilitated through site allocations.

#### *Community Infrastructure Levy*

- 3.6 The CIL Charging Schedule 2015 was reviewed by our consultants in 2019, with the findings and implications for proposed CIL rates considered and have resulted in a revised draft Charging Schedule. A consultation on the revised draft charging schedule was undertaken during July and August 2020. A public Examination was held 'virtually' in January 2021, with the Inspectors report received in May 2021 which recommended approval of the revised draft Charging Schedule. This revised Charging Schedule was ratified by Worthing Borough Council and implemented on 1st August 2021. This review was a response to changes in legislation and the timeline for the emerging Worthing Local Plan. In particular, this has: responded to recent changes in guidance; 'tested' greenfield development; updated viability tests; and addressed some elements of the existing Charging Schedule. Importantly, the review will help to ensure that the infrastructure requirements and contributions placed on development are not impacting on development finances to such a degree as it might make schemes unviable.

#### **Planning Policy**

- 3.7 There are a number of policy approaches that can help with the delivery of new homes whilst balancing the wider sustainable, community and economic needs of the borough. In order to deliver sites and respond to changes in the economy the Council can, depending on circumstances, take a flexible approach to the application of its adopted policies. This includes residential tenure mix, loss of employment and other land use, where appropriate.

#### *More effective use of land*

- 3.8 A key policy in the Worthing Core Strategy encourages the most efficient use of land which will usually mean, where appropriate, developing at densities above those of the surrounding areas. The optimum density of a site should be achieved through a design led approach to determine the capacity of a site.
- 3.9 The expectation is that residential development of a family housing scheme should achieve minimum densities of 35dph whilst flats, mixed residential developments in or close to town centres or near public transport hubs should be achieving densities far in excess of this. Where developments do not demonstrably optimise the housing density of a site then permission is refused. Unlike some, more rural, authority areas this is not a common issue in Worthing as the nature and character of the borough means that the vast majority of proposals for development seek to maximise development. Further work undertaken to inform density policies in the SDWLP has confirmed that the approach set out in the policies i.e. to push densities higher more

particularly in the most appropriate locations, such as, town centres and transport hubs whilst at the same time ensuring that the characteristics valued in the surrounding area are maintained / enhanced and that a high standard of living accommodation is provided.

### *Specific Site Policies*

3.10 These policies identify the key development sites and set out the requirements for delivery. This provides developers and landowners with clear guidelines of the mix of uses, level of development, infrastructure requirements etc. with the aim of speeding up the decision making process.

### *Supplementary Planning Documents*

3.11 There are a number of Supplementary Planning Documents (SPD) relevant to the delivery of housing (where appropriate these will be update to reflect the most up to date policy position and to give clear guidance to developers and applicants):

*Tall Buildings Guidance SPD* - This document provides clear and consistent guidance on the design and location of tall buildings in Worthing.

*Guide to Residential Development SPD* - The purpose of this document is to provide general policy and design, guidance for all residential development. In particular, it gives more detail on how a number of Core Strategy policies will be applied.

*Space Standards SPD* - Since the introduction of national space standards relating to internal space this SPD is only used to inform applications for conversions and external space.

*Sustainable Economy SPD* - The primary purpose is to provide additional information to Core Strategy policy 4 (Protecting Employment Opportunities) and 5 (Visitor Economy). It sets out the detailed criteria that will be used to assess any loss of employment or tourism related uses. Where appropriate, residential uses will be encouraged.

*Developer Contributions SPD* - The purpose of the SPD is to summarise the different mechanisms which will be used and the relationship between them. This will help to provide clarity for developers when considering new development opportunities.

### *Development briefs*

3.12 Development briefs are prepared, where appropriate, to guide the future redevelopment of specific sites. By providing more detailed site analysis and development principles they provide landowners and developers with a clear indication as to what proposals are likely to be granted planning permission which, in turn, reduces uncertainty.

3.13 The purpose of development briefs is to:

- Improve the quality and consistency of advice provided to developers;
- Improve the efficiency of the planning and development process; and
- To improve the quality of the built environment.

3.14 The Council will keep its guidance under review to ensure there is adequate information for a developer to know what is expected from new development, including at the stage of the initial investment/land purchase, and to ensure the relationship between local and national policy guidance is clear. There will also need to be a full review of all guidance to ensure it 'dove-tails' with new Local Plan policies in due course.

### **Improving our Planning Application Processes**

3.15 Whilst the Council has not identified the Development Management planning process as a barrier to delivery it does recognise the importance of monitoring its performance and addressing any issues that may arise swiftly.

3.16 It can be seen from the data below on determining planning applications that the Council's performance and the speed of decision making is good and delays in the system are minimal. It can therefore be concluded that the authority has an efficient decision making process in place.

#### Percentage of applications determined within the prescribed timetable

<b>Year</b>	<b>Total Applications</b>	<b>Majors</b>	<b>Minors</b>	<b>Others</b>
2014/2015	1,102	79%	74%	80%
2015/2016	689	92%	77%	80%
2016/2017	716	94%	85%	89%
2017/2018	731	92%	83%	85%
2018/2019	749	71%	84%	90%
2019/2020	736	89%	84%	94%
2020/2021	747	73%	87%	91%

#### *Principal Planning Officer (Major Applications)*

3.17 There are a number of major development sites that are due to come forward over the Plan period. In order to ensure that are dealt with in the most efficient manner the Council has a dedicated Principal Planning Officer (Major Applications) with responsibility to provide detailed pre-application advice, enter into early stage negotiations in respect of S106 Agreements/CIL and liaise with other Council departments and other stakeholders. The aim is to ensure that the application process through to decision making is as smooth as possible by providing continuity and greater certainty for all parties involved.

### *Pre-Application Advice Service*

- 3.18 To save unnecessary delays in the planning application process the Council has successfully introduced a Pre-Application Advice Service. Since 2021 this has been refocussed to address major development proposals only, given the rise in applications experienced by the Council.

### *Planning Performance Agreements*

- 3.19 In the last few years the Council has entered into planning performance agreements with a number of applicants to provide a tailored project management framework for handling a development proposal from pre-application stage through to decision and any compliance with conditions. These have been used successfully on some of the major development schemes and will continue to be used where appropriate.

### *Major Projects & Investments Team*

- 3.20 An experienced cross-discipline Major Projects and Investments team has been set up to allow the Council to be more proactive in identifying issues and barriers to housing delivery on major sites. Part of their remit is to develop close working relationships with land owners/developers of the key sites across the borough together with infrastructure providers and other departments in the Council in order to unlock barriers to delivery. This includes a full review of the Council's own 'estate' and a more proactive land assembly and 'commercial' approach to site delivery if required. They have been successful in leveraging public funding where available and developing business cases to help unlock sites.

- 3.21 The Council has appointed a Development Manager to oversee both the delivery of council owned sites and to identify any opportunities to acquire land in the private sector which could be developed for new homes.

## **Other initiatives to support housing delivery**

### *Council Owned Land*

- 3.22 The Council as a landholder has identified a number of its own sites that may be surplus to requirements and is currently considering further sites to bring forward additional homes as part of an asset management review. This allows the Council to prioritise and use resources to unblock any barriers to delivery as well as providing more delivery certainty.

### *Land in Private Ownership*

- 3.23 A number of the major/strategic sites, which are critical to the delivery of the housing strategy, are controlled by the volume/national housebuilders who are also developing large sites in neighbouring local authorities. This could be a significant factor in slowing delivery rates as volume housebuilders are known to limit the release / commencement of development sites in order to maintain strong demand within the housing market area. The Council continues to work closely with these key developers/landowners and others to ensure the housing trajectory reflects the most realistic delivery timescales.

### *Affordable Homes Delivery Group*

3.24 The Council has recently set up a cross service group to address the significant shortfall of affordable housing provision across the borough. The primary focus of the affordable homes delivery group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment.

#### *Working Groups and Cross Boundary Working*

3.25 Planning Officers meet regularly with other districts and boroughs in West Sussex as part of Duty to Co-operate and to consider a range of cross boundary issues, including addressing the delivery of housing. This has allowed for best practice to be disseminated that when implemented could help to 'unblock delivery constraints. Work under the Duty to Co-operate has also included the consideration of development proposals within Worthing that could, in turn, help to deliver additional housing growth within neighbouring authority areas.

3.26 The Council is also a member of the West Sussex and Greater Brighton Strategic Planning Board, which seeks to jointly address strategic planning and development issues. It maintains a close working relationship with the Coast to Capital Local Economic Partnership. The constituent authorities have prepared a Local Strategic Statement (LSS) which sets out long term strategic objectives and spatial priorities for delivering these in the short to medium term. The Board is currently in the early stages of preparing the third revision to the LSS (LSS3) which will explore options for meeting the area's unmet needs for housing, employment and infrastructure. LSS3 will develop a longer-term strategy for the sub-region over the period 2030-2050. This will be a non-statutory strategic planning framework to help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans.

3.27 Housing delivery is a key consideration and the Borough Council has made it known to other local authorities within the Partnership that, despite taking a very positive approach to development, that Worthing will not be able to meet its housing needs. As a consequence, requests were made to neighbouring authorities as part of the 'Duty to Co-operate' (DTC) to ask whether they have any potential to help meet some of Worthing's housing shortfall. DTC Statements of common ground have been signed between Worthing and all respective LPA's in West Sussex as part of the submission of the Local Plan.

#### *Agents Forum*

3.28 The Councils Place and Investment Team set up an Agents Forum comprising key residential and commercial agents. The purpose is to create an open forum for dialogue about trends and issues impacting on development arising across the Borough.

#### *Corporate Marketing*

3.29 The Council has sought to raise the profile of the Borough and the key development opportunities it offers. Initiatives include a dedicated website. '



### *Supporting Investment in Worthing*

3.30 Worthing Borough Council, with the support of West Sussex County Council and other partners, has developed a vision for how the town will continue to be transformed in the future. The Council and other local partners are offering a 'ready to deliver' commitment. In practice, this means investors in Worthing can expect, direct contact with Council leaders and senior officers, a dedicated Economy Directorate with an experienced cross-disciplinary team. Where appropriate, the Council will be willing to consider flexible approaches to planning, development and tenure mix and a willingness to use public sector land assets directly and indirectly. Furthermore, the Council will provide a 'commercial' approach, encourage proactive land assembly and lever public funding where available for developing business cases.

### *Relationship with developers, landowners and agents*

3.31 The Council recognises the fundamental importance of building relationships with developers, landowners and agents within the borough.

3.32 Contact with these partners is an essential part of assessing whether sites are available for development as part of the Strategic Housing Land Availability Assessment. This is carried out on a regular basis to ensure that only those sites that are genuinely available can be considered as part of the potential housing land supply. As part of this, a 'Call for Sites' exercise is undertaken regularly.

## **4. Monitoring and Next Steps**

### **Monitoring**

- 4.1 Housing delivery is monitored jointly by West Sussex County Council and Worthing Borough Council and is reported through the Annual Monitoring Report published each December (to cover the preceding financial year). This includes an update on sites identified in the Strategic Housing Land Availability Assessment and Self Build and Custom Housebuilding Register. In addition, the Council maintains and updates annually the Brownfield Register.
- 4.2 The results of the Housing Delivery Test will be reported through the Worthing Members Working Group and, where necessary, the Action Plan will be reviewed and published in line with the requirements of the National Planning Policy Framework. Any changes in legislation, government policy or practice guidance will also be reflected in any update.

## 5 Conclusion

- 5.1 This is the fourth Action Plan produced by the Council and annual reviews are anticipated in future years. To help increase future housing delivery, the Council would welcome suggestions on any future actions from interested stakeholders.
- 5.2 This Housing Delivery Test Action Plan demonstrates the proactive approach being taken by the Council and its partners to increase the level of housing delivery in the borough. Significant steps have been taken within the Planning Service and beyond to help bring forward development sites and identify new ones. Some of the key steps identified in this Action Plan include:
- Commitment to produce a new Local Plan and allocate new development sites;
  - A focussed approach to bring forward existing development through land assembly, improved marketing and partnership working (often led by the Council);
  - A full and positive review of all potential development opportunities (including greenfield site) within a robust and comprehensive Strategic Housing Land Availability Assessment which includes a regular 'call for sites';
  - Improved Development Management processes;
  - Agreement to bring forward two greenfield, edge of town development sites in advance of the Local Plan;
  - Encouragement for all appropriate developments to deliver a residential density higher than the surrounding area;
  - A dedicated Principal Planning Officer (Major Applications) and a Major Projects & Investments Team;
  - Alignment of plans and strategies (internal and external) to deliver housing objectives;
  - A clear Corporate commitment to deliver development on its own sites and to work with partners and other landowners to facilitate delivery on theirs;
  - Continued cooperation with neighbouring local authorities.
- 5.2 It is clear that despite all these efforts being taken by the Council and its partners the level of housing delivery, whilst forecast to be higher than many previous years, will still fall significantly short of meeting the housing requirement established using the Housing Delivery Test Measurement Rulebook. As demonstrated, although actions and interventions have been put in place that will help to increase housing delivery in the borough, the Council has no way of addressing the main constraint, which is a tightly drawn borough boundary, environmental constraints and extremely limited land availability.

**Worthing Borough Council**  
**Planning Policy**  
**Worthing Town Hall**  
**Chapel Road**  
**Worthing**  
**West Sussex**  
**BN11 1HA**

