

Worthing Borough Council / Horsham District Council

Statement of Common Ground



Signatories:

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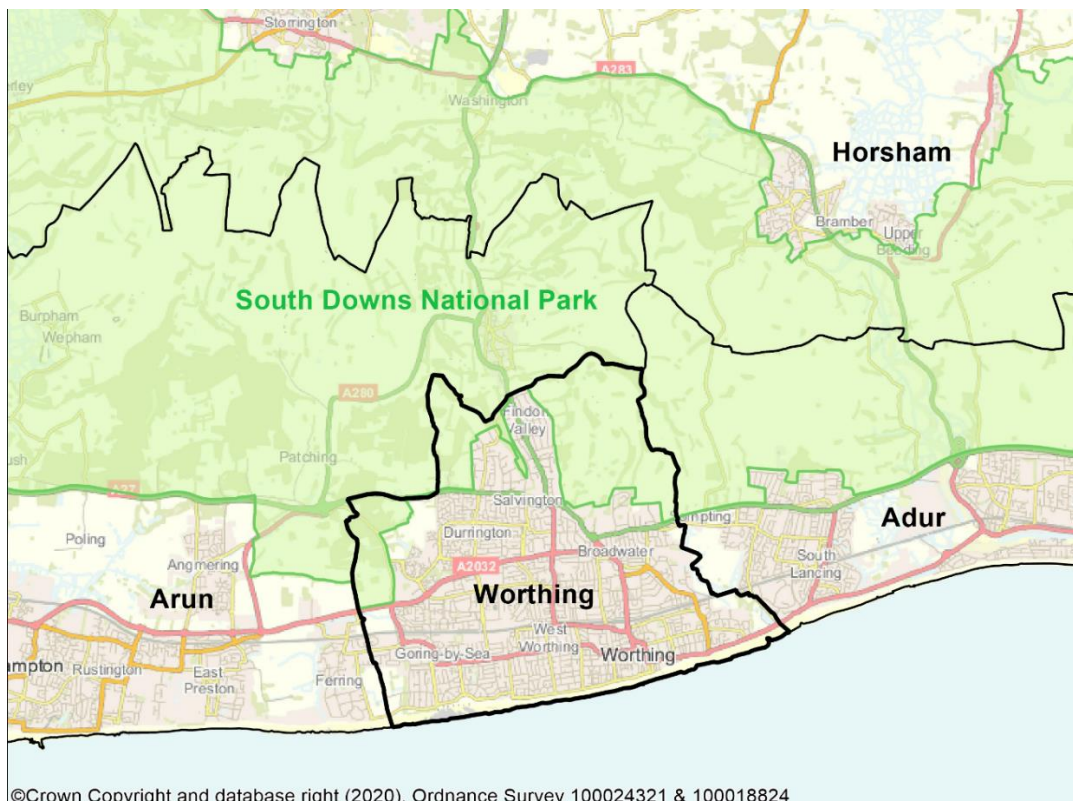
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1. Introduction and Scope

- 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)