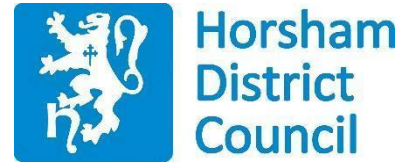


# Worthing Borough Council / Horsham District Council

## Statement of Common Ground



### Signatories:

Barbara Childs Director of Place, Horsham District Council	
James Appleton, Head of Planning Adur & Worthing Councils	

Dated: 3 July 2024



### 1. Introduction and Scope

1.1 The purpose of this statement is to document the strategic cross-boundary matters that have been or are being addressed jointly by the parties, as necessary to demonstrate effective joint working, or to draw out areas of common ground that are specific or unique to the signatories above.

1.2 The matters dealt with in this statement are:

- Section 2: Strategic context
- Section 3: West Sussex and Greater Brighton
- Section 4: Housing need
- Section 5: Gypsy and Traveller Accommodation
- Section 6: Other matters
- Section 7: Conclusion

### 2.0 Strategic Context

#### *Worthing context*

2.1 Worthing Borough is located within West Sussex on the coastal plain, immediately adjacent to Adur, 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 33.7sq. km in area. However, 8sq. 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). (See Appendix C Map of Worthing).
- 2.4 The Worthing Local Plan was adopted on 28th March 2023. The Plan builds on national guidance to provide for more specific local policies for Worthing to create a high-quality environment. Whilst it seeks to plan positively for growth and contribute to sustainable development it has been a very difficult task to balance all the identified needs of Worthing's communities with the scarcity of land within the borough.
- 2.5 As previously highlighted, the most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area without merging with the urban areas to the east and west and without damaging irrevocably the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing built-up area that could deliver significant levels of growth.
- 2.6 The spatial strategy established in the Local 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.
- 2.7 Following a robust and positive assessment of all opportunities the WLP allocates 15 sites for development (nine previously developed sites and six edge of town sites). These, and other sources of supply, will collectively deliver a minimum of 3,672 dwellings and a minimum of 28,000sqm of employment floorspace over the Plan period. This is a target which is significantly higher than the levels of growth planned for within the Worthing Core Strategy.
- 2.8 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.

- 2.9 Whilst acknowledging that this is a very high level of unmet need, Worthing Borough Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. It also highlights the need to continue to work positively to review whether there are options to contribute to meeting some of this unmet need within the wider sub-region.

### ***Adur context***

- 2.10 Adur District is located within West Sussex on the south coast of England, between Brighton & Hove City to the east, and Worthing Borough to the west. (See Appendix B: Map of Adur).
- 2.11 Adur is a relatively small district covering 41.5 square kilometres (sq. km) and has a population of approximately 64,500 (2021 Census), considerably smaller than its neighbouring urban areas.
- 2.12 It is bounded by the South Downs to the north, and the English Channel to the south, with the low-lying land of the Adur Valley between, separating Lancing and Sompting to the west and Shoreham-by-Sea, Southwick and Fishersgate to the east. Over half of Adur District (53%) lies within the South Downs National Park and this area is not covered by the adopted Adur Local Plan 2017 but by the South Downs Local Plan produced by the South Downs National Park Authority.
- 2.13 The whole of the district lies within the Coastal West Sussex and Greater Brighton Housing Market Area.
- 2.14 The Adur Local Plan was adopted in 2017; the plan seeks to deliver 3,718 dwellings and 41,000sqm floorspace in the Adur Local Plan area (that is, those parts of Adur outside of the South Downs National Park) up to 2032. The spatial strategy of the Plan maximises development on brownfield sites (including the identification of a broad location for regeneration at Shoreham Harbour) and greenfield site allocations at New Monks Farm and West Sompting.
- 2.15 The Plan is now being reviewed, and an update is being prepared which will cover the period up to 2042. The Council recognises the importance of having an up-to-date Local Plan in place that can enable local decision making and guide development that is sustainable, inclusive and resilient.
- 2.16 At the time of writing, the Standard Methodology figure for Adur indicates an annual requirement of 449 dwellings. However, given that the previous Adur Local Plan 2017 met just 53% of identified housing needs due to constraints (including land availability), it may not be possible for the emerging Adur Local Plan to meet its full requirement. The Council is leaving 'no stone unturned' and undertaking rigorous assessment of development opportunities and developing an extensive evidence base to support development of the Plan.

This evidence base includes updated work to assess the need for employment floorspace in the Adur Local Plan area up to 2042. It is not yet known whether it will be possible to meet all needs within Adur; however, at this point in time, this is not yet known.

### ***Horsham context***

- 2.17 Horsham District covers an area of 530km<sup>2</sup> (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. 95km<sup>2</sup> (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. There is however a common boundary with Adur District, albeit the planning authority areas are not contiguous due to the presence of the South Downs National Park in between. 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. Please refer to Appendix A.
- 2.18 The District lies within the area covered by the former 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.
- 2.19 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).
- 2.20 In respect to Horsham's housing needs, it is understood by both parties that the current objectively assessed need based on the Standard Housing Methodology is 917 homes per year. There is agreement between the Northern West Sussex authorities that the ability for each of the three authorities to meet current housing need (both individually and for the primary HMA as a whole) is becoming more challenging, given environmental and infrastructure constraints. Should early resolution of their respective constraints on housing growth occur, the Northern West Sussex authorities have agreed that the priority is to meet their own respective needs first, followed by wider housing needs from within the principle HMA, followed by housing needs from the Coastal West Sussex HMA as the third priority and then unmet needs from other adjacent and nearby HMAs as the final priority.

- 2.21 The Horsham District Local Plan 2024-40 is at the Regulation 19 stage, with submission anticipated in July 2024. The starting point has been as far as possible to meet its own needs based on the Standard Methodology. However, in September 2021, HDC received a Position Statement from Natural England. This explained that it could not be concluded that water abstraction at Pulborough was not having an impact on the Arun Valley SAC, SPA and Ramsar Site, and that development must not add to this impact. To therefore be compliant with Habitat Regulations, all new development in Horsham District must at the current time be water neutral. This requirement has resulted in a significant fall in planning permissions since late 2021, and an ongoing constraint on development coming forward in an HRA-compliant manner. Consequently, HDC's proposed Local Plan housing target of 777 homes per annum (annualised average) reflects that it is unable to meet its own full assessed housing need nor any additional housing needs from other areas including from within the Northern West Sussex HMA.
- 2.22 In addition the High Weald Area of Outstanding Natural Beauty (AONB) partly extends into north-east of Horsham District whilst other 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.

### **3.0 Coastal West Sussex and Greater Brighton**

- 3.1 The Coastal West Sussex Housing Market Area (CWS-HMA) extends from Littlehampton and Newhaven and across the Downs to Steyning and Hassocks. It comprises all of Worthing Borough, Adur District, Brighton & Hove and parts of Arun District, Horsham District, Lewes District and Mid Sussex District.
- 3.2 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 both Adur and Worthing) have very tightly drawn boundaries which further limits opportunity for outward expansion.
- 3.3 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.
- 3.4 The constrained nature of much of the Sub-Region has been reflected within 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. Over a number of years the West Sussex and Greater Brighton Strategic Planning Board have sought to address the issue on a sub-regional scale, and the member local authorities continue collectively and bilaterally to address the severe lack of housing land supply as evidenced in various Duty to Cooperate documentation including Local Strategic Statements 1 and 2.

#### **4 *Housing need***

- 4.1 The parties agree that all have engaged fully with one another in respect of exploring opportunities to meet unmet housing need and will continue to do so. Notwithstanding this, it is recognised that, currently, constraints on housing delivery in the area are severe, and the parties are respectively unable to meet their full objectively assessed need. It follows that they are respectively unable to help meet others' unmet housing needs.
- 4.2 The parties further agree that WBC, ADC 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.
- 4.3 All 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 group of local planning authorities to consider how these needs will be met in the longer term.

#### **5 *Gypsy and Traveller accommodation needs***

- 5.1 Adur & Worthing Councils have commenced work with the South Downs National Park and Brighton & Hove City Council to assess gypsy, traveller and travelling showpeople's accommodation needs up to 2042. This study will provide an up-to-date indication of current and future District and Borough requirements. Until this work is done, it is not possible to indicate whether Adur and Worthing Councils will be able to offer any assistance to other authorities to address their Gypsy and Traveller needs.
- 5.2 In respect to Horsham District, due mainly to the recent definition of Gypsy or Traveller in the Planning Policy for Traveller Sites (PPTS), the District will have a shortfall of 59 Gypsy and Traveller pitches. (It has no assessed need for Travelling Showpeople provision). HDC acknowledges the position of Adur and Worthing Councils not being able to assist with unmet needs from Horsham District at this time.

## **6 Other Matters**

- 6.1 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.
- 6.2 ADC, WBC and HDC have engaged in discussion regarding other strategic cross-boundary matters. It is agreed that there are no further cross-boundary matters relevant to the plan-making process.

## **7 Conclusion**

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

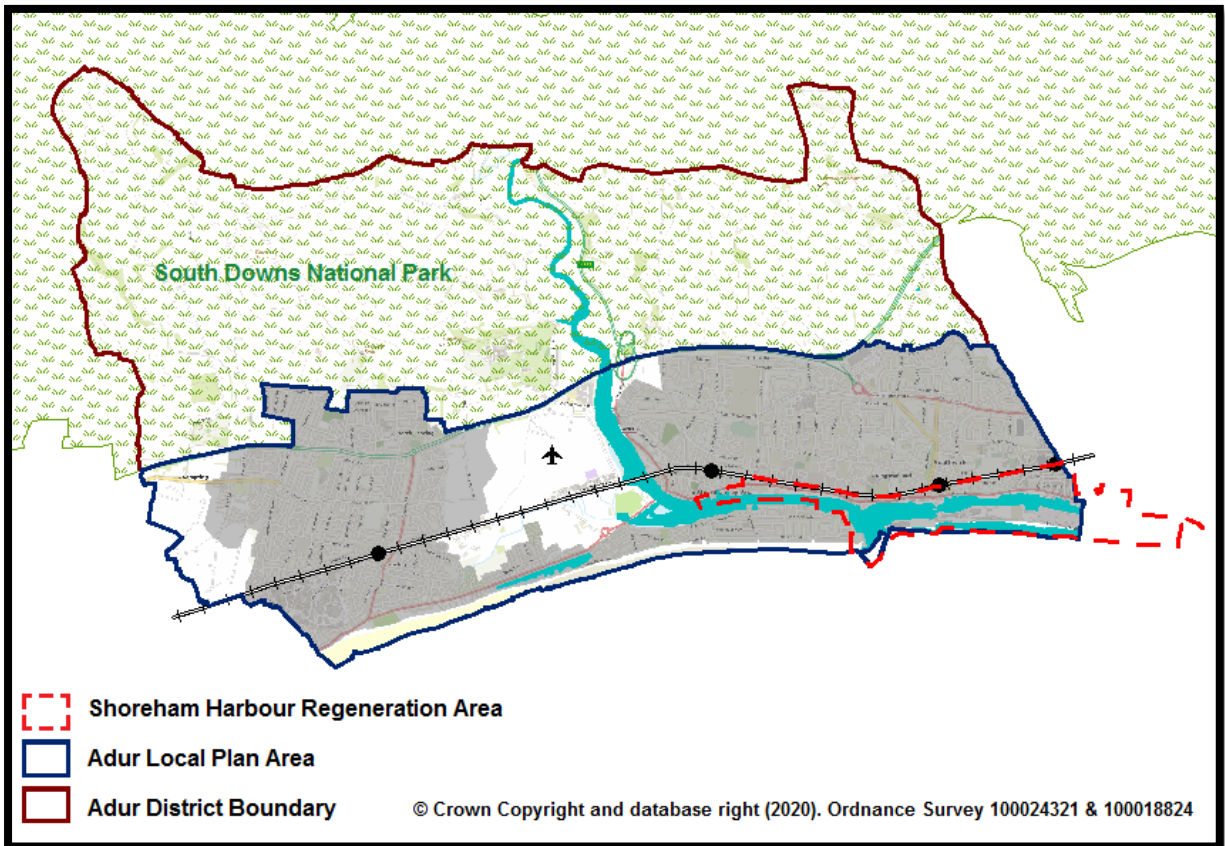
# Appendix A – Map of Horsham District.



<p><b>Horsham District Council</b>          Parks, Sport &amp; Leisure          West Sussex, BN12 1PL          Tel: 01323 810000          www.horsham.gov.uk</p> <p>Reproduced by permission of Ordnance Survey map on behalf of H.M.S.G. © Crown copyright and database rights (2020).          Ordnance Survey Licence 100023865</p>	<p>Horsham District</p>	<table border="1"> <tr> <td>Reference No :</td> <td>Date : 27/02/2020</td> <td>Scale : 1:65,000 at A2</td> </tr> <tr> <td>Drawing No :</td> <td>Drawn :</td> <td>Checked :</td> </tr> <tr> <td></td> <td></td> <td>Revisions :</td> </tr> </table>	Reference No :	Date : 27/02/2020	Scale : 1:65,000 at A2	Drawing No :	Drawn :	Checked :			Revisions :
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## Appendix B – Map of Adur



## Appendix C: Map of Worthing Borough



Worthing Borough, shown in relation to Adur and Horsham