



WORTHING LOCAL PLAN 2020- 2036

DUTY TO CO-OPERATE ADDENDUM

SUBMISSION

June 2021



**WORTHING BOROUGH
COUNCIL**

WORTHING LOCAL PLAN

DUTY TO CO-OPERATE STATEMENT – ADDENDUM JUNE 2021

1.0 Introduction

- 1.1 Prior to the publication of the Worthing Local Plan (WLP) Submission Draft for consultation the Council published the Duty to Co-operate Statement (January 2021). This was a statement of the work that Worthing Borough Council had undertaken in respect of the Duty to Co-operate in developing the emerging Local Plan.
- 1.2 As set out in the Localism Act 2011 the ‘Duty’ does not stop at any particular time as the Council is required to engage constructively and actively on an on-going basis on planning matters that impact on more than one local planning area.
- 1.3 The purpose of this Addendum is to highlight the work that has been undertaken with other authorities since January 2021. This is a particularly important stage in the process as this was a time during which other local authorities and key stakeholders were able to view and consider the Council’s Submission Draft version of the WLP.
- 1.4 A number of meetings were held between key officers representing each authority during this period and it was made clear that officers from Worthing BC would be available throughout to respond to any questions relating to the WLP.
- 1.5 As summarised below, the outputs from this are captured within two separate, but related, pieces of work:
- Responses from other authorities to the request to meet some of Worthing’s unmet housing need (see separate Appendix A)
 - Statement of Common Ground (see separate Appendix B)

2.0 ‘Request’ Letter (Appendix A)

- 2.1 At the end of January 2021 a formal ‘request’ letter was sent to the following local planning authorities that make up the West Sussex and Greater Brighton Strategic Planning Board (WS&GB):

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

- 2.2 The ‘template’ letter that was sent by Worthing BC is set out at the start of Appendix A. In summary, the letter provided an overview of the spatial strategy established in the WLP and the related ‘policy-on’ figure for housing that can be delivered within the Plan period, having regard to the identified constraints and development capacity. It clearly explained that 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 over 10,000 dwellings.
- 2.3 The letter acknowledged that this is a very high level of unmet but went on to explain that the Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. In this regard, all authorities were asked whether they might have any ability to meet any of Worthing’s unmet housing need. In making this request, Worthing BC acknowledged that each of the respective authorities was at a different stage of Local Plan production and that this would influence the response that each authority would make. Furthermore, Worthing BC is very aware of the housing pressures across the sub-region and the significant challenges most authorities faced in meeting their own needs.
- 2.4 The responses from all 9 authorities are set out in full within Appendix A. In some instances these are specific responses to the ‘formal’ letter but for most, the response to the letter forms part of the authorities Regulation 19 representation.
- 2.5 In addition to the response to the ‘request’ letter some authorities raised some questions relating to the WLP within their representations. This Addendum does not seek to address these specific points as Worthing BC has responded to these issues within the ‘representations’ table and also, where appropriate, within either updated evidence or through proposed Modifications to the WLP. Furthermore, the more recent Statements of Common Ground (see section 3 below) help to address some of the points raised.
- 2.6 In general, in response to the ‘request’ letter most authorities recognised the constraints faced by Worthing and the significant difficulties posed by limited land availability. Some authorities explained that they experienced similar constraints and

that, following Examination of their Local Plans, it had been accepted that they were unable to meet their own housing needs (e.g. Adur, Brighton & Hove, Lewes, Crawley and the South Downs National Park Authority). Other authorities highlighted the great difficulties that they faced in meeting their own housing needs (primarily due to environmental and infrastructure constraints).

- 2.7 Overall, the letters clarified that none of the authorities are currently able to assist Worthing in meeting its unmet housing needs. However, in some cases it was explained that the authority in question would consider the considerable unmet housing needs identified in the wider Sussex Coast HMA (including Worthing) in taking forward their Local Plan. Furthermore, most responses also highlighted the importance of progressing Local Strategic Statement 3 to provide a longer-term strategy for the sub-region.

3.0 Statement of Common Ground (Appendix B)

- 3.1 To support the Submission of the WLP the Council invited the 9 authorities listed in paragraph 2.1 (along with West Sussex County Council) to work with Worthing BC to prepare and agree an updated Statement of Common Ground (SoCG). A draft SoCG was circulated to all parties in April 2021 after the close of the Regulation 19 consultation period. As such, before agreeing to the Statement, all authorities had had an opportunity to review the WLP and the updated evidence base and its implications for strategic matters.
- 3.2 Appendix B sets out the 10 separate Statements of Common Ground that have been agreed in May or June 2021. These have been signed by either the respective Cabinet / Executive Member or a senior officer. Each Statement sets out the context for Worthing; the sub-regional context; a summary of the Worthing Local Plan; and other matters that will impact on future co-operation. Some authorities (particularly those with well-advanced) emerging Local Plans have also added a 'context' section for their own authority area. Importantly, the Statements then set out a number of conclusions that both authorities have agreed.
- 3.3 The bi-lateral Statements are very similar in content but there are some variations. This partly reflects the different stages of Plan preparation reached by the respective authority and also allowed from some authorities to highlight points they had raised within the Regulation 19 representation (see paragraph 2.5 above).
- 3.4 In summary, the parties agree that they have worked jointly constructively and on an on-going basis (and will continue to do so) on relevant cross-boundary matters relevant to the plan-making process. All Statements agree that there are no key areas of disagreement between the parties relating to the emerging Worthing Local Plan.

4.0 Conclusion

- 4.1 In line with the requirements of the Localism Act and the NPPF, this Addendum (read in conjunction with the Duty to Co-operate Statement – Jan 2021) has aimed to demonstrate the extent of positive and diligent on-going co-operation and engagement that has taken place and continues to take place with relevant authorities on those spatial issues which impact on areas outside of Worthing and/or involve joint working and support.
- 4.2 The Addendum (and related Appendices) demonstrate the work undertaken by Worthing BC since January 2021. This included a formal request to other local planning authorities in the sub-region to ask if they had any capacity to meet some of Worthing's unmet needs. As explained above, at this time, no authorities were able to respond positively to this request.
- 4.3 It is clear that there are no easy solutions for meeting all housing needs within the wider sub-region. Levels of housing needs are very significant as are the development constraints. However, it is accepted by all parties that future work is required to address unmet needs. Whilst a number of joint measures to help housing and employment delivery are on-going via the WS&GB Strategic Planning Board and the Economic Board, longer term housing and employment needs can only be addressed via a full review of the Local Strategic Statement (LSS3) and through local plan reviews.
- 4.4 LLS3 will help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans. This demonstrates the level of commitment on behalf of the constituent local planning authorities to working collaboratively in line with the requirements of the NPPF (although as explained elsewhere there will be little or no ability for Worthing to significantly increase the rate of housing delivery in the Borough). A Statement of Common Ground is being prepared and will set out the current position for all the authorities represented by the Board with a work programme for taking forward LSS3.
- 4.5 The constructive and on-going co-operation and engagement across the sub-region has helped other authorities in their understanding of the challenges faced by Worthing BC in its efforts to meet housing needs and the positive work that has been undertaken to try to address this. This has allowed for agreement to be reached on some key conclusions as set out in the Statements of Common Ground.
- 4.6 Worthing BC will continue to work constructively and on an on-going basis on relevant cross-boundary matters relevant to the plan-making process.

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