



WORTHING BOROUGH
COUNCIL

PROOF of EVIDENCE

James Appleton
Head of Planning and Development
Adur and Worthing Councils

WORTHING LOCAL PLAN - LAND SUPPLY AND NEED

1. Introduction

- 1.1 My name is James Appleton and I am the Head of Planning and Development for Adur and Worthing Councils. I have a BSC (Honours) degree in Environmental Planning. I am a chartered member of the Royal Town Planning Institute (RTPI) and have been employed as a local authority planner since 1985 working in a number of different local authorities, primarily in Development Management.
- 1.2 I currently lead both the Planning Policy and Development Management teams across Adur and Worthing Councils. I attended each day of the Examination into the Worthing Local Plan between [date] and [date] and gave evidence regarding a number of matters, including the overall spatial strategy, delivery of development sites and housing supply.
- 1.3 At the time of writing the Council has published an Annual Monitoring Report (CD E41) for the period 2022/23 which includes an updated Housing Land Supply statement, setting out a land supply of 7.05 years.
- 1.4 This proof of evidence outlines the evidence submitted by the Council on housing needs and housing land supply matters during the Worthing Local Plan examination; addresses the current housing requirement figure and provides evidence on the current housing land supply position, and the constituent elements of that supply. My evidence does not address the weight to be attributed to the delivery of housing or affordable housing or associated benefits of delivering housing, which are dealt with in the planning evidence of Mr Carpenter. Nor does it address landscape matters, which are dealt with in the evidence of Ms Christine Marsh.
- 1.5 The evidence which I have prepared and will provide for this appeal (reference APP/M3835/W/21/3281813), is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

2. Worthing Local Plan Process

2.1 Worthing Borough Council formally adopted the Worthing Local Plan 2020-2036 (WLP) (CD E38) at Full Council on 28th March 2023. The Local Plan forms part of the statutory development plan, which sets the strategic development and land-use priorities for Worthing (outside the South Downs National Park) up to 2032, and contains the policies against which development management decisions within that area will be made. The Local Plan supersedes the Worthing Core Strategy (2011) (CD E1) and the saved policies from the Worthing Local Plan (2003) (CD E8). The key stages of plan preparation were as follows:

i) Issues and Options Consultation – May 2016

2.2 The first stage of consultation on the emerging Plan was undertaken in 2016. The 'Issues and Options' document (CD E28), titled 'Your Town - Your Future', identified the challenges facing the borough and sought views and suggestions on how Worthing should grow and develop in the future. The Issues and Options document explained in the foreword that *“Given the limited amount of available land in the borough and significant environmental constraints it will be vital that the right balance is struck between new development and the need to protect the character and setting of Worthing which we value so greatly”*. It asked for views on how best to balance the delivery of growth and regeneration across the borough to meet future needs whilst at the same time protecting assets that were valued (p.3). On page 19, it explained that *“Worthing is bordered by the South Downs National Park to the north and the coast to the south. The majority of the Borough occupies the coastal plain, with the only breaks in an almost continuous band of development along the coast at the far eastern and western ends of Worthing. These gaps in development between Worthing and Sompting and Ferring and Goring maintain the individual identity of settlements and have retained stretches of undeveloped coast.”*

2.3 The Issues and Options consultation was undertaken between 11th May and 22nd June 2016. This also included consultation on the Sustainability Appraisal Scoping Report. An Issues and Consultation Report was subsequently published by the Council which recorded that *“A significant number of respondents argued strongly that all greenfield sites should be protected from development - or at least protected until such time that all*

brownfield option had been exhausted....The two sites that generated by far the most interest were the two large areas of land located to the west of the Borough between Goring and Ferring...the general view was that both gaps played an important role in terms of their landscape value” (p.7).

ii) Draft Worthing Local Plan – October 2018

2.4 Comments received at the Issues and Options stage, along with additional evidence, helped to inform the drafting of the Regulation 18 version of the Local Plan which set out the Council's preferred options. The Draft Plan explained at paragraph 2.42 that *“Outside of the National Park, there are small pockets of countryside that represent a very small and finite resource that is valued for its open space, respite from intense urban activity, and intrinsic character. Therefore, the countryside should be protected and where possible enhanced, particularly in terms of the additional benefits it can offer through agriculture, green infrastructure (for example to biodiversity and flood management/storage) and informal recreation such as cycling, walking and horse related activity. Given the limited amount of countryside in Worthing, it is important that the few uses that may be allowed in the countryside genuinely require a countryside location; cannot be located within the Built Up Area Boundary and maintain its rural character.”* Paragraphs 2.48 and 2.50 explained that *“The designation and protection of ‘Local Green Gaps’ helps to avoid coalescence and preserve the separate characters and identities of different settlements by providing physical and visual breaks. This is particularly important given the compact nature of Worthing and how few and fragile the breaks in development are on the coastal strip between Brighton and Chichester”* and *“These areas are open and either undeveloped or a managed landscape for recreational use. They create a sense of travelling between urban areas and form a critically important component of Worthing’s landscape setting.”*

2.5 The Draft Worthing Local Plan was published for consultation between 31st October and 12th Dec 2018. This also included consultation on a draft Sustainability Appraisal Report.

iii) Submission Draft Worthing Local Plan – January 2021

2.6 The comments submitted at the previous consultation stages, alongside a comprehensive evidence base, helped to shape the Submission Draft Local Plan (CD E2). The document

was published and representations submitted with regards to the tests of soundness and legal compliance during an eight week period (26th January to 23rd March 2021). This Regulation 19 Plan was supported by an updated Sustainability Appraisal Report and a post-hearing update produced. (CD E31 and E35).

- 2.7 Persimmon Homes submitted lengthy and detailed comments on the Regulation 19 Local Plan. Their submissions were supported by a concept masterplan (effectively the same illustrative masterplan as is proposed in this appeal) (CD A22); a design and access statement (CD A4), and Landscape and Visual Impact Assessment (CD A11) for the development now proposed in this appeal. It argued, *inter alia*, that the proposed housing requirement of 3,672 homes (i.e. the figure now included in policy SS2 of the adopted Local Plan) was unsound as it did not accord with national policy and was not effective in meeting housing needs. It also argued that the draft Local Plan was not positively prepared. It also raised concerns about the affordability of housing in Worthing and the economic consequences of the proposed housing requirement. Persimmon raised concerns over the unmet needs of neighbouring authorities and argued that the Council had not complied with the Duty to Cooperate; that it would be “*entirely unsustainable*” for the level of unmet need not to be addressed within the Worthing Local Plan and that the proposed housing requirement would be “*the very antithesis of sustainable development.*”
- 2.8 Persimmon also criticised draft policies SS4 – SS6, arguing that it was “*astonishing, entirely unsustainable and contrary to national policy, that the Council is seeking to introduce a series of policies including SS4, SS5 and SS6 which actively constrain the ability of the Council to respond to the unmet needs both within the plan period and beyond*”. It suggested that policy SS4 was not justified, did not accord with national policy in respect of housing need and must be deleted. As to policy SS5, it argued that “*Given the scale of the unmet need in Worthing, it is again astonishing that the Council is proposing to designate the entire area outside of the Built-Up Area Boundary as Local Green Gaps under Policy SS5. Such a policy places a further constraint on necessary and sustainable development to meet the housing needed by current and future generations*”.
- 2.9 Persimmon suggested that it would be necessary to allocate additional sites to address housing needs; that the appeal site was well-related to existing development, in an

accessible and sustainable location; and that it should be allocated to respond to the development needs of the area.

3.0 Public Engagement and National Park responses to the Emerging Spatial Strategy

- 3.1 It is important to stress the level of public support for the Council's spatial strategy and consultation responses received from the South Downs National Park (SDNP).
- 3.2 In connection with the Regulation 18 Consultation Draft there was strong support for this policy SP5 and SP6 (which later became SS5 and SS6) with 102 representations (including 7 organisations). Key reasons given in support were that the gaps provide an important break between development. They have multiple functions and have an important role for wildlife, biodiversity, landscape, health & wellbeing, recreation. The vast majority of representations on this policy were also linked to the proposed Local Green Space designation. It is noted that objections were also received from the House Builders Federation (HBF) (Regulation 18 see E 43; Regulation 19-E40) and the appellant. (CD E33 A,B,C,D).
- 3.3 The SDNP commented that the Chatsmore Farm site is of significant importance in maintaining the views from the SDNP of the coastal plain and for the separation of settlements. Proposed designation and justification in the supporting text was strongly supported.
- 3.4 In connection with the Regulation 19 Local Plan, the SDNP commented,
'The SDNPA acknowledges the challenges faced by Worthing Borough Council (WBC) in meeting housing need and the process to produce the Submission Draft Worthing Local Plan having robustly, exhaustively and positively sought to find sites suitable for development. The SDNPA appreciates and understands the constraints the Council faces in finding suitable sites. As stated in James Appleton's letter officers from the SDNPA and WBC have liaised throughout the preparation of the Worthing Local Plan (WLP) and the comments below on specific sites reflect that joint working. The Planning Inspector for the South Downs Local Plan, adopted in July 2019, acknowledged the priority given to the two purposes of the National Park and considered that the approach taken and level of development were suitable for this protected landscape. The SDNPA confirms that given

the constraints of the National Park as a protected landscape and the levels of development in the adopted South Downs Local Plan, there is no scope to deliver Worthing's unmet housing need. However, the SDNPA will continue to work closely with WBC in developing the WLP both bilaterally and through the West Sussex and Greater Brighton Partnership.

The SDNPA and all relevant authorities are required to have regard to the purposes of the South Downs National Park (SDNP) as set out in Section 62 of the Environment Act 1995. The purposes are 'to conserve and enhance the natural beauty, wildlife and cultural heritage of the area' and 'to promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public.'

3.5 In relation to policy SS5 (previously SP5): Local Green Gaps and SS6 (previously SP6): Local Green Space, the SDNP reiterated its comments made at the Regulation 18 consultation stage.

3.6 I have attached a further consultation response from the SDNP (CD B20) in respect of the appeal scheme. As part of the preparation for this appeal, the landscape proof of Ms Marsh was shared in draft with the SDNP authority and their views sought. Whilst it is not strictly relevant to my evidence, it is relevant to the issues in dispute and has only just been received, after proofs of evidence have been submitted by both the Planning and Landscape witnesses. The latest SDNP response reinforces comments made through the Local Plan process. It confirms its agreement with the landscape conclusions reached by Ms Marsh and states:

'In our view the proposed development would not further the purposes of the South Downs National Park in that it would not conserve and enhance its natural beauty or cultural heritage for the reasons set out in the landscape proof prepared by Christine Marsh of Hankinson Duckett Associates.'

4.0 Examination and Adoption

4.1 The Worthing Local Plan was formally submitted for independent examination on Friday 11th June 2021. Hearings were held on the topics of legal compliance and general

matters, including the Duty to Cooperate; the spatial strategy including policies SS1, SS4 and SS5; housing, including the housing requirement in policy SS2; and site allocations.

Key documents submitted to the Local Plan examination

4.2 The following documents were submitted to the examination and formed part of the evidence base supporting the Worthing Local Plan:

i) Topic Paper 1 - Housing Implementation Strategy (HIS):

4.3 The HIS (CD E13) set out how the Council had considered this key issue and the positive steps that had been taken to maximise the delivery of housing. This included justification of the approach set out in the Worthing Local Plan and the steps needed to ensure the effective implementation of policy. Within the context of key constraints faced by the Borough, the most significant of which is land availability, the Council acknowledged the significant level of shortfall against the Standard Methodology target. As such, no stone had been left unturned and the Council had looked robustly and positively at all sources of potential supply. This document is referred to further below.

ii) Strategic Housing Land Availability Assessment (SHLAA)

4.4 The SHLAA formed an assessment of land availability and identified a future supply of land which was suitable, available and achievable for housing and economic development uses over the plan period. The SHLAA is consistent with Government Guidance as set out in the Housing and Economic Land Availability Assessment published by the Department of Levelling Up, Housing and Communities in July 2019. This is discussed in greater detail in section 5.2 below.

iii) Duty to Co-operate Statement 2021

4.5 The Duty to Cooperate Statement 2021 (CD E32) is a detailed record of the work that Worthing Borough Council undertook in respect of the 'Duty' in developing the emerging Local Plan. This was supplemented by the Duty to Co-operate Addendum (June 2021) (CD E36) which highlighted the work that had been undertaken with other authorities

between January 2021 and the Submission of the SDWLP in June 2021. This was a particularly important stage in the process as it 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. This document collates the responses from other authorities to the formal request made by Worthing Borough Council in January 2021 to meet some of Worthing's unmet housing needs. It also includes the bilateral Statements of Common Ground (SoCG) signed by Worthing and the individual local authorities within the sub-region

iii) Worthing Landscape and Ecology Study (2015) and Appendices (2017)

4.6 This study (G7, G8) provided a landscape, visual and ecological assessment for sites around the edge of Worthing, and formed part of the evidence base for the site selection process.

iv) Sustainability Appraisal Report of the Submission Draft Worthing Local Plan (January 2021)

4.7 The Sustainability Appraisal (CD E31 and E35) was prepared iteratively throughout the plan-making process. The document included consideration of impacts of proposed development options on people's health via Health Impact Assessment (HIA); the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010; and a Habitat Regulations Assessment (HRA) Screening.

Arguments made by the Appellant at the Local Plan examination

4.8 Persimmon attended the hearings relating to housing and site allocations and submitted written representations in respect of other topics.

4.9 In respect of matter 1 (legal matters including the Duty to Cooperate), Persimmon argued that "*Given the long-known shortfall and the requirement in the NPPF and PPG to address strategic matters through joint working, it is astonishing that the Council seek to defer addressing this through LSS3 and Local Plan Reviews*".

4.10 In respect of matter 2 (spatial strategy), it argued that *“Instead of doing everything possible to meet its Objectively Assessed Need, the Council has instead applied restrictive policies to justify a lower housing target.”* In response to the question of whether the strategic balance between housing and other uses was appropriate and justified, it argued *“The answer is no. The WLP leans towards restrictive policies and, categorically, has not gone far enough towards meeting its Objectively Assessed Need. Other than statutorily-protected land, each and every opportunity needs to be considered fairly and openly, and opportunities for sustainable levels of growth which are available should be examined forensically by the Council as the means of fulfilling the over-arching requirements of the OAN”.*

4.11 On the question of whether the Local Green Gap policy in SS5 was justified and consistent with the NPPF, Persimmon argued,

“The answer is no. It is not appropriate to foreclose on potential housing sites (to boost land supply) by applying restrictive designations, including Local Green Space, that (a) do not meet the criteria for Local Green Gap designations, or (b) prejudice the outcome of new house building obligations...The plan-making process should not commence with designation of Local Green Space (or Local Green Gap) designations; otherwise the Local Plan is ‘strangled at birth’. Worthing Borough Council need to reassess each and every available site in the Borough, by revisiting the Local Plan”. Persimmon’s Matter 2 statement was accompanied by a landscape appraisal produced by CSA Landscape which argued that *“The Council’s spatial strategy is therefore grossly inadequate and results in a significant shortfall in the required level of housing to meet the Borough’s needs.”* In respect of the Local Green Gap boundary at Chatsmore Farm, it argued that *“Most fundamentally, the designation is blind to the fact that coalescence has already occurred over 50 years ago. It ignores the fact that through careful master planning development on this site could enhance recreational opportunities and still maintain the indent between Ferring and Goring-by-Sea by leaving land north of the Ferring Rife undeveloped. It is also worth noting that the site was not subject to a gap designation in previous plans. The question is what has changed more recently other than to limit remaining opportunities to deliver the housing need within the Borough? [...] Given the severe unmet housing needs of the Borough this is neither justified nor robust. In particular we consider that the land at*

Chatsmore Farm should be deleted or the boundaries substantially revised to allow the site to accommodate much needed development”.

4.12 On matter 3 (housing requirement), Persimmon argued that *“Rather than applying national policy, the WLP unsustainably proposes not to address housing needs and it intends to introduce additional restrictive policies which have been formulated without any regard being paid to the housing need which they serve to prevent being met. This is not only contrary to national policy, it is also a circular justification. In summary, it is unarguably the case that national policy has not been applied, and had it been there are no grounds for constraining the housing requirement to the extent proposed.”*

4.13 On matter 5 (site allocations), it argued that the approach to site selection was not justified; that the exclusion of Chatsmore Farm as an allocation was *“entirely unjustified”*; *“the allegation of substantial harm to the continued separation of settlements that coalesced decades ago is simply untenable”*; and that revisiting the alleged deficiencies in the site selection process was *“likely to result in the allocation of additional sites, which would need to be addressed through Main Modifications and subject to consultation.”*

Response by the Council to Representations

4.14 In response to the representations on behalf of Persimmon Homes the Council submitted that all available sites suitable for development had been allocated. It stated that the decision as to whether or not a site is considered suitable has been informed by robust evidence studies and clear justification has been provided (and reported) at every appropriate stage of Plan preparation. The Landscape and Ecology Report (2015) positively tested the potential development of all the site and also the partial development of some of the site which recognised the western parcel of the site was less sensitive.

4.15 Following representations from site promoters and the need for a positive, ‘no stone unturned’ approach to identifying suitable development sites the Council then requested further review of three sites (including part of Chatsmore Farm) which the original 2015 study judged to be ‘low’ suitability. The Councils Consultants (HDA) were also subsequently commissioned to assess the application for development at Chatsmore Farm (AWDM/1264/20) and concluded it would result in substantial adverse landscape and

visual effects on the local area and landscape setting to the National Park, Highdown Hill scheduled Monument and the conservation area and the sea views from the National Park; and substantially close the gap between Goring by Sea and Ferring adversely affecting the separate identities of the settlements. I am satisfied that through the Local Plan process the whole site had been carefully considered through evidence (including the Sustainability Appraisal). At various points in the process the partial and incremental development of parts of the site were also assessed, including the area which is the subject of the appeal proposal.

- 4.16 It is worth noting that the landscape study did identify the option of developing in the south west corner which it identified as being less sensitive. However, this option had been screened out of the SA as there was no realistic means of access to this part of the site (partly within Arun District). Further landscape evidence was also commissioned to assess the planning application submitted in 2020. If this had recommended that a portion of the site proposed for development was suitable, this would have been allocated for development in the Local Plan and appraised through the SA process.

The Local Plan Inspector's consideration and conclusions

- 4.17 Hearing sessions were held and concluded on 17th November 2021. On the 9th December 2021 the Council received the Inspector's Post Hearing Advice Letter (CD E6). This letter set out the additional work and modifications that the Inspector felt were required to make the Worthing Local Plan sound and legally compliant. The Inspector did not ask the Council to delete or modify the boundaries of the Built-Up Area or proposed Local Green Gap at Chatsmore Farm, nor suggested that the Council should revisit the housing requirement figure or proposed allocations.
- 4.18 The consultation on the Worthing Local Plan Main Modifications (CD E43) ran for 6 weeks between Tuesday 5th April and Tuesday 17th May 2022.
- 4.19 The Inspector's Report was issued to the Council on the 14th October 2022 (CD E37). In summary, the report concluded that, subject to the inclusion of a number of modifications listed in the report, the Submission Draft Worthing Local Plan was sound and legally compliant and provided an appropriate basis for planning in the Borough. It is apparent

from the Local Plan Inspector's report that other than in respect of the proposed designation of Chatsmore Farm and the Goring-Ferring Gap as Local Green Spaces, he rejected the arguments advanced by Persimmon, including in respect of the Local Green Gap policy SS5; the countryside and undeveloped coast policy SS4; the housing requirement and the need to allocate additional sites for housing.

4.20 Worthing Borough Council formally adopted the Worthing Local Plan 2020-2036 at Full Council on 28th March 2023.

5. The Adopted Worthing Local Plan: Land Supply

5.1 Policy SS2 (Site Allocations) of the adopted Worthing Local Plan states:

During the period 2020-2036

a) A minimum of 3672 dwellings (net) will be delivered in Worthing.

5.2 The policy then lists a number of allocations which will contribute to this figure together with information regarding employment and commercial floorspace to be delivered within the same timescale.

5.3 Paragraph 3.21 of the Plan explains the various sources of supply and the Council's Housing Implementation Strategy (CD E13) sets out how this figure was reached. This was made available as part of the evidence base supporting the Local Plan.

5.4 Paragraph 3.25 of the supporting text states:

' this housing target is a capacity based/policy on figure based on the level of housing that can be delivered within the Plan period, having regard to the identified constraints and development capacity'.

5.5 The table below paragraph 3.21 of the adopted Local Plan sets out how these constituent elements contribute to the total housing requirement figure.

5.6 Paragraph 3.26 of the WLP states:

*‘Taking the above into account, the Plan sets an average minimum housing target of **230 homes per annum to be achieved by 2036**. As explained further within the Housing Implementation Strategy, this is a target that is significantly higher (15%) than the levels of growth planned for within the Worthing Core Strategy. This, in part, reflects the positive actions taken by the Council to facilitate and support development in the borough. This increase beyond previous targets represents a challenging but realistic level of housing development that takes a positive approach to the allocation of sustainable sites whilst also providing the appropriate balance between meeting development needs and protecting the environment and character of the borough.*

5.7 In accordance with paragraph 77 of the National Planning Policy Framework (NPPF) 2023 (CD D7) the housing land supply should be assessed against the housing requirement in policy SP2 given that the plan is less than five years old.

6. Current Housing Land Supply Position

6.1 The recently published Worthing Annual Monitoring Report (AMR) for the period 1st April 2022 - 31st March 2023 (E41) includes five year housing land supply assessments for the period 2023-28.

6.2 The latest AMR contains three scenarios calculated variously against a requirement of 230 dwellings per annum (the adopted Local Plan target); 200 dwellings per annum (former Worthing Core Strategy target, now superseded) and the Standard Methodology figure of 885 as at the time of the Local Plan Examination. This is due the fact that the base date of that AMR (1st April 2022) pre-dated adoption of the Worthing Local Plan (date of adoption 28th March 2023).

6.2 However, in light of paragraph 77 of the NPPF and the fact that the Local Plan is less than five years old, for the purposes of this appeal it is considered appropriate to use the housing requirement figure in the adopted Local Plan rather than the figure from the previous Core Strategy or the standard methodology. This approach has been confirmed in a number of appeal decisions (CD J96 - CD J98).

6.2 A five year land supply calculation has been calculated (including a 20% buffer) using the housing requirement figure in the Worthing Local Plan. Policy SS2 provides the housing requirement figure for the plan period (3,672 net dwellings), which equates to an annualised target of 230 dwellings per annum. This results in a Housing Land Supply figure of 7.05 year supply at base date of 28th March 2023.

6.4 The following table is an extract from the AMR which sets out the latest housing land supply position:

	Worthing Local Plan	Dwellings (net)	Annual Average
a	Worthing Local Plan target 2020-2036	3672	230
b	Completed 2020 - 2023	623	
c	Number of years in plan period = 13		
d	Requirement 2023-2036 (a (3672) minus b (623))	3049	235
e	Five year target with no adjustment (230 x 5)	1150	
f	Shortfall of housing provision from 2020 (230 x 3 year = 690) minus completions (b)	67	
g	Five year target including shortfall (e +f)	1217	
h	20% Buffer (1217/100 x 20)	243	
i	Requirement for five years 2023 – 2028 with 20% buffer (g + h)	1460	292
	Supply:		
j	Commitments (large and small) at 1 April 2023 (net) (5 years)	1179	
k	All SHLAA sites (includes proposed allocations) (net figure)(5 years)	756	
l	Windfall allowance (62x2 years)	124	
m	Total Commitments (j+k+l) (1179+754+124)	2059	
n	Surplus (m-i) (2057-1460)	599	

- 6.5 This table demonstrates a 7.05 year supply of deliverable sites (2059 / 292). The sites relied upon to deliver this land supply are set out in tables within the AMR.
- 6.6 Commitments are defined as large sites of 5 or more dwellings and small sites of 4 or fewer dwellings that have extant planning permission and which are either under construction or have not yet started. West Sussex County Council provides the housing data for the authority (in partnership with Worthing Borough Council). 100% of all sites of 5 or more dwellings (net) are included in the supply.
- 6.6 West Sussex County Council (WSSCC) and Worthing Borough Council (WBC) jointly undertake an assessment of the likely delivery of small sites. WSSCC assumes that all dwellings under construction and 45% of those permitted but not started will be built in the first five years. This represents a take up rate of about 55% on all small sites in the county as a whole (based on historic completion data across the county). A monitoring assessment undertaken by WSSCC has indicated that a more realistic discount rate for Worthing is around 40% (i.e. a 60% implementation rate). However, for consistency, the County Council continues to apply the County wide figure for all authority areas as this reflects the average rate of 'non implementation'. This ensures that the Council's assessment of supply is robust. A table indicating those sites of 5+ dwellings considered deliverable as at 1st April 2023 is found in Table 5 included in the latest AMR (CD E41).
- 6.7 Paragraph 72 of the National Planning Policy Framework 2023 states:
Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.
- 6.8 An allowance for windfall is included in the Council's trajectory and consequently five year land supply calculations. This allowance is calculated annually, based on historic trends for small sites using a base date of 2006 (the base date of the Worthing Core Strategy) in order to take a long term view.
- 6.9 Whilst the figure fluctuates from year to year, there is no clear trend that would suggest there might be an overall decline in completions and, as such, it is considered that there is

compelling evidence to extrapolate these forward based on past evidence of delivery. To avoid double counting with the small sites commitments, the windfall allowance is not applied to the first three years of the projections. These small windfall sites are sites of less than 5 dwellings (prior to 2019 this was less than 6).

6.10 For information, at the time of the WLP examination, the figure used was 67 per annum. This figure is assessed annually; on the basis of the most recent assessment (see Appendices and published AMR). This figure has since been reduced to 62 dwellings per annum. Given this annual review, it is considered that the Council's approach is robust. The Local Plan Inspector addressed this matter in his Final Report (paras 177 and 178) and was content that it was legitimate to include a windfall supply within the 5 year deliverable supply. He concluded that,

'Clearly, the Council will need to monitor windfall development, but I am satisfied that there is compelling evidence that an average of 67 dwellings per year is likely to come forward. I am also content for this to form part of the 5 year deliverable supply.'

6.11 As set out above, a range of evidence was presented to the Inspector in order to demonstrate the availability, suitability and deliverability of sites allocated within the Worthing Local Plan. As such those sites allocated within the adopted Worthing Local Plan have been included in the land supply. (CD E41).

6.12 The issue of build out rates and lead in times was addressed at the Worthing Local Plan examination. The Inspector asked in question 40:

'What lead-in times and build-out rates have been applied to sites, both with and without planning permission? Have different approaches been adopted for sites with or without full planning permission? Are the assumptions used appropriate and justified? (Question 40)

6.13 The Council's response to this question is set out below:

'The Council is aware that delivery and build out rates are subject to variation depending on the size of site, whether greenfield or brownfield and issues such as local market 'absorption rates'.

West Sussex County Council (WSCC) collect and analyse the Council's housing data annually. They use agreed assumptions so for example on small sites they apply a different projected distribution of completions per year based on whether a site has full or outline permissions. In terms of larger sites they start with a general projection as a starting point, then sites with permission will get visited every year. This ensures that any projection amendments made to these sites will be based upon site observations when the site visit is undertaken.

Sites with outline permission do not get visited, but when the initial projections are applied consideration would be given to, for example, the time taken to deal with Reserved Matters and as such they would not project completions in year 1 or 2. The data is then sent to the respective local authorities for the data checking process to ensure the projections are as robust as possible by adding any site specific information, updates with case officers and any contact with developers and then amending projections where appropriate.

The Council sets out in the Annual Monitoring Report the trajectory of development with updates reflecting any changes to site delivery, any lapses of permissions and any new sites identified.'

6.17 During the Examination the Inspector raised a number of questions regarding the delivery of sites and the Council's Head of Major Projects gave evidence to satisfy the Inspector that a 5 year supply could be achieved on Council owned land. The Inspector concluded in his decision letter that:

'I am satisfied that this is a reasonable assessment of likely deliverable supply. This comfortably exceeds the likely five-year housing land requirement. It is possible that some sites may stall or take longer to start delivering new housing, especially taking into account uncertainties surrounding the outcome of Brexit and COVID-19. However, there is sufficient headroom to be reasonably confident that a five-year supply of deliverable housing land would exist at adoption.'

7.0 Deliverability of Sites

7.1 The NPPF defines a deliverable housing site that is available now, offer a suitable location for development and be achievable with a reasonable prospect that housing will be delivered in the site within 5 years. In particular the NPPF glossary states that:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

7.2 The SOCG (CD E2) sets out a number of sites disputed by the appellants. It is not clear why all Category A sites are disputed as at the 1st April 2023 the sites had planning permission and work had been undertaken on some of the sites. Given the housing need there is no question that there is no longer a need for the developments approved.

7.3 To assist the Inspector the following lists the sites under dispute and explains why the Council considers that the sites were deliverable within the next 5 years as at the monitoring period. I have also provided an update on site delivery since April 2023 and this demonstrates that the 5 year supply is robust with development underway on a number of sites with planning permission (albeit some smaller sites are not being progressed as at January 2024).

7.4 Given that the number of sites at any one point is relatively few (compared to other Districts) the Council has a much closer understanding of landowner and developer intentions for sites. This, together with site visits and liaison with Development Management colleagues, ensures that sites are only included where there is confidence of delivery in line with the guidance in the NPPF. The sites in dispute are listed below as set out in the Housing SOCG and are referred to as A or B (CD E2). However, the Council considers that all the 'other' sites fall within Cat B.

Category A sites

7.5 **40-42 South Street (CAT A)** - This is a site that had full planning permission as at 01/04/23 for 9 dwellings and the site visit demonstrated that works had commenced on site with the demolition of a rear extension. On this basis it was considered a deliverable site in the latest AMR.

Update - As pre-commencement conditions have not been discharged the permission has lapsed. The Agent has recently confirmed in writing that he is to resubmit the scheme for 9 units and his client's intentions are to build out the scheme within the next two years. Deliverability will be reviewed for the next AMR period. However, the site is a brownfield site in the town centre with a previous permission and therefore appears to be still deliverable as expected.

- 7.6 **HMRC (Allocation and CAT A)** - Outline planning permission was granted on the 30th April 2021 for 287 dwellings and a 68 bed care home. The site was then sold to a national housebuilder, Bellway Homes. Reserved Matters approval for Appearance, Landscape, Layout, Scale and access within the site, for 287 new homes (Use Class C3) together with car parking, landscaping and associated works was granted on 9th November 2022 (AWDM/0605/22).

The development is underway and as a mixture of flats (148) and houses (139) it is likely that delivery will be faster than 50 dwellings per year (the norm for volume housebuilders on greenfield sites). There is no reason why the development would not be completed within the 5 year period anticipated and the Council has been provided with the developers delivery timetable which confirms this permission..

Update - a subsequent application for the erection of part three, part four storey block of extra care apartments on northern land-parcel of former HMRC site was approved on the 11th October 2023 subject to the completion of a s106 agreement AWDM/0786/23. This scheme would deliver an additional 63 (C3) self-contained retirement flats with potential for all 350 dwellings coming forward in the next 5 year period.

- 7.7 **19 Manor Road (CAT A)** - Planning permission was granted in 2020 for the redevelopment of the site to provide 10 one and two bedroom apartments (AWDM/0762/19). A subsequent amendment to this application was submitted in August 2021 and the Planning Committee resolved to grant permission subject to a s106 planning obligation (AWDM/0762/19). The application was withdrawn prior to the completion of the planning obligation in October 2023.

Update - a new application has been submitted for the retention of the existing property and the erection of a new detached dwelling in the rear garden (AWDM/1690/23). It is likely that the redevelopment for flats may not now go ahead but at the time of preparing

the most recent AMR it was a site with planning permission (therefore a commitment) and it was reasonable to assume it would come forward for development. Unless there is any further change of circumstance it is likely this site would not be included in the next AMR 5 year projection.

- 7.8 **Jupps Garage (CAT A)** - Planning permission granted for the redevelopment of the site for 5 dwellings (AWDM/0480/20). A site visit during the monitoring period noted existing garage buildings demolished and appeared as if planning permission was being implemented. As a result it was considered deliverable as at 01/04/2023.

Update - Pre-commencement conditions have not been fully discharged and planning permission has now lapsed. The Agent suggests costs of building and interest rates have prevented his client proceeding with the development. The status of the site will be reviewed at the next monitoring period following further dialogue with the landowner. The Council is also assessing whether this site would be suitable to deliver affordable housing.

Category B Sites

- 7.9 **Beeches Avenue (Allocation)** - Outline planning permission was approved in December 2024 for up to 90 dwellings subject to the completion of a planning obligation (AWDM/0693/23). The application was received outside of the monitoring period (15th May 2023) but there had been considerable pre-application discussions between developers, the Council, the Highway Authority as well Members of the Planning Committee and public consultation events. In addition the developer is a local housebuilder who has a track record of delivery in the town and local area. Whilst the assumption in the 5 year supply was for only 40 units at the end of the 5 year period the latest update from the developer is that all 90 dwellings will be delivered within the next 5 year period.

- 7.10 **Caravan Club (Allocation)** - The Local Plan allocation was on only part of the site as the Camping and Caravan Club had indicated to the Council, as landowner, that the Club intended to remain on the northern section of the site. However, during the Local Plan Examination the Club indicated that they would surrender its lease entirely and this was noted in the Local Plan Inspector's report. The Council has reviewed options for the site and is selling the entire site. As the site is owned by the Council it has been easier to understand disposal timescales and to have early engagement with prospective

purchasers. As at 01/04/23 the Council was confident to advise planning colleagues of the likely delivery timescale. A national house builder is currently in negotiations to purchase the site and a planning application is expected in the next few months. Positive pre-application discussions have been undertaken with the developer for several months and the developer is confident that the site can deliver 25 dwellings at the end of the 5 year period.

7.11 Centenary House (Allocation) - The site is owned by the West Sussex County Council (WSSCC) and Sussex Police. As a result there have been considerable discussions with the County Council about the site's delivery timescales.

In August 2022, WSSCC issued a notice declaring Centenary House surplus to service operational requirements. In 2021, WSSCC set up a Joint Venture partnership with housing developer - Lovell Partnerships, which is already successfully redeveloping a number of sites across the County. The JV partnership has secured planning for 144 new homes, and is currently building 22 dwellings at a former school site in Adur District. The JV has already held pre-application discussions with the Council exploring options for the Centenary House site once divided from the Sussex Police prior to 01/04/23.

In July 2023 a planning application to create a new access into the site from Littlehampton Road to serve the Police station and Custody Suite was submitted (AWDM/0945/23). This would enable the site to be split allowing the release of the WSSCC retained land for residential development. In October 2023, a WSSCC key decision was approved for expenditure to construct the aforementioned access, formalise the separation of the site both logistically and legally, and also to commission development services to submit an application for residential development on the Council's retained land.

It is expected that a planning application will be submitted later this year, and the JV partnership considers that the delivery of at least 50 dwellings per 2027/28 is realistic and achievable.

7.12 Teville Gate (Allocation) - There have been various ambitious schemes for the redevelopment of the site. The Council facilitated the last development proposal by using Local Growth Funding (LGF) to demolish the existing buildings on the site. However, the scheme for 378 flats, an 83-bedroom hotel, a foodstore, a gym and retail, restaurant and

cafe uses was unviable and despite a resolution to grant permission the site was put on the market by the developer (AWDM/0325/19).

In view of the years of market failure, the Council purchased the site and has been actively discussing a disposal with development partners and more recently a disposal to Homes England to bring forward a more realistic development scheme. Previous proposals for tall buildings (up to 22 stories) were not viable given construction costs and values that could be generated in Worthing and current pre-application discussions have concentrated on assessing less ambitious but more viable development options. The Council is confident that working with Homes England the site can be brought forward for development. Given that the site is now cleared of all buildings and is in a highly sustainable location, a limited level of development towards the end of the 5 year monitoring period appeared to be reasonable during the last monitoring period. It is understood that negotiations with Homes England have progressed and a report on the disposal of the site is to be considered in March 2024.

7.13 Union Place (Allocation) - This is another example of the Council intervening where the market has failed to deliver redevelopment of a key brownfield site in the town centre. The site was purchased from a developer who had sat on the site for some time without bringing the site forward for development. An initial partnership scheme with London Continental Railways (LCR) secured a resolution to grant outline planning permission for 186 new homes, commercial floorspace, a 90 bed hotel and new multi-storey car park subject to the completion of a s106 agreement (AWDM/0461/20).

Following this resolution, the Council actively looked for a development partner and a local developer was selected. The Council is to enter into a Joint Venture partnership with the local builder, Roffey Homes and a new application has been submitted for a residential led scheme for the site. As at April 2023 the Council had undertaken considerable pre-application discussions and public consultation was undertaken on a scheme of circa 200 dwellings and at a lower scale than the previous outline scheme.

The current application (submitted in November 2023) proposes a mixed-use development between 4 and 11 storeys, comprising 216 residential apartments (including 20% affordable housing) and is likely to be going to Committee in February 2024. The delivery timetable has been agreed with the local developer who has a proven track record of

delivering a number of schemes in Worthing (notably the 15 storey Bayside development and the Warnes redevelopment scheme).

7.14 Upper Brighton Road (Allocation) - It is surprising that the appellant considers that this site would not deliver any housing within the next few 5 years. The Council provided positive pre-application advice in 2019 and at that stage the Planning Manager for Persimmon Homes indicated that the allocation of 123 dwellings was feasible and that the Company expected early implementation within 2 years.

Pre-application advice was undertaken with the Highway Authority and the Council was advised that Persimmon Homes was carrying out all the technical work to support an application including detailed ecological appraisals, Transport Assessment and landscape assessments.

The site is allocated and the current Planning Manager for Persimmon Homes suggests an application towards the end of 2024/25 and it is assumed that commencement would be in 2025/26. Looking at a conservative level of completions the Council had assumed 25 dwellings in 2026/27 and 50 for 2027/28. This is based on a build out rate of approximately 50 dwellings per year for volume builders on greenfield sites and is the delivery rate seen across the County.

The reduction in the number of completed dwellings in the latest AMR is considered reasonable but no doubt the appellant can provide an update on why this site will not come forward within the relevant 5 year period.

Other Sites

7.15 Jubilee Hall- There is a resolution to grant planning permission for the demolition of Jubilee Hall and No.10 Greenland Road and erection of 7 no. three-bedroom and 2 no. two-bedroom houses and 1 block of 5 two-bedroom flats subject to the completion of a s106 agreement (AWDM/0263/18). The applicant, Trustees of the New Life Church are keen to proceed, an agreement on an off-site affordable housing contribution has just been agreed and a local developer is to purchase the site. The matter is going back to Committee in February and there is no reason why this development will not come forward within the next 2 - 3 years. The developer who has an option on the site has a track record of delivering small housing schemes within the Borough.

7.16 **Former Canteen, Northbrook College** - Assessed as deliverable at 1/4/23. Planning application (AWDM/0632/20) was refused outside the monitoring period but the site is considered suitable for residential use. Positive pre-application discussions with officers, land owners and agents indicate that this site is deliverable.

Since the monitoring period the landowner (the Chichester College Group) has had positive pre-application discussions with Members and Officers about a disposal of the entire college site in order to develop part of the site for housing, whilst retaining the existing, more modern buildings for educational use. This site is considered as a SHLAA site and included on the brownfield register.

7.17 **Skywaves** - Assessed as deliverable at 1/4/23. A planning application was approved for 21 flats (AWDM/0207/22) subject to 106 and signed outside of the monitoring period. Discussions with developers have agreed on the delivery timelines. This is a 100% affordable housing scheme where the Council is working with the Registered Provider to deliver the scheme by providing s106 affordable housing contributions. Work has commenced with the demolition of the existing buildings on site.

7.18 **Clifton Road** - Assessed as deliverable at 01/04/23 as the Council is working in partnership to deliver the scheme with Turning Tides and Worthing Homes. Planning permission was granted for 13 dwellings outside the monitoring period (AWDM/0072/21) but delivery times are agreed with the developer, a local Registered Provider.

Update - the existing building has been demolished and conditions have been discharged.

7.19 **ATC Headquarters** - Assessed as deliverable as a planning application is currently being considered after positive pre-application discussions and the Council is the developer of the site for affordable housing. Planning application granted outside the monitoring period (21/04/23). Update - site cleared and planning permission being implemented.

7.20 **148 - 152 Montague Street** - Assessed as deliverable at 1/4/23 as Council is working with the developer to deliver affordable housing under the Open Doors scheme. Prior Approval Required and Granted (NOTICE/0011/23) outside of the monitoring period. Officers have agreed delivery timescales under the partnership working scheme. Update - there is likely to be a new application which will increase the site total to 12 units.

7.21 **The Montague Centre** - Assessed as deliverable as a long pre-application process and as at 01/04/2023 a planning application was being considered with Officer's support. Planning permission was granted outside of the monitoring period (06/10/2023) but the delivery timescale has been agreed with the developer.

Update - current application for a non-material amendment to change the description of development to exclude reference to the number of dwellings and to deal with the quantum of development by planning condition (AWDM/1624/22). This is to allow a subsequent s73 application. Discharge of condition applications recently submitted.

7.22 **2 to 14 Goring Road** - Assessed as deliverable as at 01/04/2023. A planning application submitted November 2022 (AWDM/1721/22) for 9 apartments. This is another partnership scheme with a developer under the 'Opening Doors' scheme and therefore there is confidence of deliverability. Planning permission was granted after the monitoring period (12/05/23).

7.23 **10 - 20 Marine Place** - Assessed as deliverable as a planning application was being considered on this sustainable brownfield site to build 9 new apartments following positive pre-application discussions (AWDM/1884/22). Planning permission has now been granted outside the monitoring period. There are no constraints to delivery.

7.24 **Former Debenhams, South Street** - Assessed as deliverable as positive pre-application discussions and planning application being considered during monitoring period (submitted November 2022). Planning permission was granted following signing of s106 agreement outside the monitoring period (12/12/2023). Works are underway on site and delivery timetable agreed with the developer.

7.25 **Columbia House** - Assessed as deliverable as positive pre-application discussions and Officers supporting the planning application for 78 flats on the site (AWDM/0711/22). Planning permission was granted in July 2023 subject to completion of s106 Agreement.

Update - it is understood that the developer has gone into administration after undertaking the prior approval conversion of the adjoining large office building. The Council is currently seeking the administrator to sign the planning obligation to release the planning permission to facilitate the disposal of the site. The site is a sustainable brownfield location close to the Durrington District Centre. There are no delivery constraints and contact with the previous builder had confirmed delivery within the 5 year period.

- 7.26 The above analysis demonstrates that the various sites, referred to as 'outside' Cat A or B, are sites where there was active engagement with current applications being progressed in a positive and proactive manner. Of the above sites, 8 now have planning permission, two have resolutions to grant and 4 sites are under construction. Whilst it is accepted that some sites may not now come forward and the appellant considers that no dwellings will come forward on the allocated site at Upper Brighton Road there is clear evidence that other sites will deliver far greater numbers than envisaged on 01/04/2023. Given that the Council considers that there is a 7 year supply there is sufficient headroom (as found by the Local Plan Inspector) to deal with any delayed delivery of certain sites.
- 7.27 On larger sites where the market has failed to deliver development, the Council has used funding from the Local Enterprise Partnership (LEP) funding to intervene to either facilitate development or directly purchase sites. The two main sites have been Union Place where the Council is taking development forward a Joint Venture partnership with a local builder and Teville Gate. At Teville Gate, Local Growth Funding (LGF) has been used to clear the site and assist the construction of a new headquarters building for the HMRC (now built and occupied) and assist the development of the adjoining land. The lack of implementation of an earlier scheme (which secured a resolution to grant permission - AWDM/0325/19 for 378 flats) prompted the Council to purchase the site and has been talking to development partners and more recently Homes England to ensure the site can come forward for development in a timely fashion. A report was presented to the Joint Strategic Sub-Committee Committee on 12th September 2023 setting out the position regarding the negotiations on the land deal (CD N1).
- 7.28 The relevant correspondence with Developers and landowners is attached as CD N2. The following table sets out the latest position based on the above updates and delivery timetables provided by developers and landowners. This demonstrates an improved position in terms of land supply due to increased delivery on allocated sites within the next 5 years.

Site	AMR Position	Appellants Position	LPA Update
40 - 42 South Street	9	0	9
HMRC	260	200	350
19 Manor Road	9	0	0
Jupps Garage	5	0	0
Uncontested	896	896	896
Total	1,179	1,096	1,246
Beeches Avenue	40	0	90
Caravan Club	25	0	25
Centenary House	50	0	50
Teville Gate	60	0	60
Union Place	200	0	216
Upper Brighton Rd	75	0	0
Total	450	0	441
Jubilee Hall	14	0	14
Former Canteen	20	0	20
22 Clifton Road	13	0	13
Skywaves	21	0	21
ATC Headquarters	11	0	11
148 152 Montague St	9	0	9
Montague Centre	42	0	42
2 - 14 Goring Road	9	0	9
10 - 20 Marine Place	9	0	9
Former Debenhams	80	0	80
Columbia House	78	0	78
Windfall	124	124	124
Total	2,059	1,220	2,117

8.0 Housing Delivery Test and Historic Delivery

- 8.1 The Worthing Housing Implementation Strategy (CD E13) considered Local Plan requirement targets and past delivery rates prior to the Submission Worthing Local Plan. The HIS set the context by explaining that past Regional and Structure Plans which set housing delivery targets for Worthing took account of the Borough's physical constraints. In this respect it has been accepted for many years that in view of its tightly drawn boundaries, Worthing would not be able to meet its future housing needs.
- 8.2 The NPPF now requires that local planning authorities try to 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, together with other changes at national level, the Council committed to review the existing Core Strategy and progress a new Local Plan.
- 8.3 The level of identified housing need at the time of submission of the Worthing Local Plan was 885 dpa (capped figures as calculated by the Standard Methodology) for the plan period - a significantly higher level of housing than the Borough previously planned for or delivered.
- 8.4 At the time of submission of the Worthing Local Plan, the Worthing Core Strategy formed the adopted Local Plan. This was prepared in the context of the South East Plan which set the housing requirements for Worthing at 4,000 dwellings between 2006 and 2026 (an average of 200 dw/pa). Along with a large development at West Durrington (700 dwellings) a key element of the Core Strategy was to focus on those sites and locations that could deliver regeneration and wider economic and community needs. At the time of submission, 4,312 new dwellings had been delivered (from 2006 to 2020) which equates to an average annual delivery rate of 308 dpa over this period (compared to a requirement within the Worthing Core Strategy of 200 dpa).
- 8.5 Whilst the actual average annual delivery rate since 2006 has been significantly higher (308 dwellings) than the requirement (200 dwellings per annum - Worthing Core Strategy Policy 7) it should be noted that there was no intention that the 200 dwelling / year target should be seen as a 'ceiling' and was in fact considered a minimum or 'floor'.

- 8.6 As such, although delivery rates have been lower than the 'policy off' Standard Method requirement (resulting in a failure to meet the Housing Delivery Test) they are generally consistent with the adopted Worthing Core Strategy (which itself recognised the constraints facing the Borough) and the recently adopted Local plan delivery target.
- 8.7 The latest AMR identifies that the number of dwellings delivered since 2020 was below the Local Plan target of 230 dwellings per annum. A drop in delivery by approximately 22 dwellings per annum is, I believe, a reflection of the status of the Development Plan at that time. The Council was progressing a new Local Plan, including the release of greenfield sites, and delivery rates will increase following its adoption in 2023. The certainty provided by an adopted Plan has prompted the Beeches Avenue allocation site to come forward and other sites are progressing such as the Camping and Caravan Club site. It was also reasonable to assume that the Upper Brighton Road allocation would come forward given the positive pre-application discussions with the appellant as mentioned previously. The latest AMR has regard to the undelivered 67 dwellings and demonstrates that in excess of 5 year supply can still be delivered. Furthermore as paragraph 7.26 above indicates, some sites are likely to be delivering greater numbers than previously anticipated. As such it is considered that this shortfall can be addressed.

9 AFFORDABLE HOMES SUPPLY/ DELIVERY

- 9.1 Given that it has been accepted through the Local Plan process that the Council cannot meet its objectively assessed housing needs then it is inevitable that there would also be unmet needs in terms of affordable housing. In view of the difficulties of delivering affordable housing (flats) on brownfield sites because of viability concerns, the adopted Local Plan reduced the affordable housing requirement to 20% (Policy DM3 of the WLP) and similarly CIL payments for such developments were also reduced. The supporting viability work, however, identified that a higher rate of affordable housing could be delivered on greenfield sites and therefore the affordable housing requirement was increased to 40%.
- 9.2 The Inspector in his question (Q66) sought to determine approximately how many homes would be delivered by the Worthing Local Plan, and how it compared with identified need

for affordable housing; and in Q67 how these figures compared to previous performance. (IL05 Inspector's Initial Matters, Issues and Questions to the Council).

- 9.3 In response to these questions (and prior to the Inspectors Modifications which included Titnore Lane and an increase in the number of units at Fulbeck Avenue) the Council acknowledged that the Local Plan allocations would be likely to deliver 463 affordable housing units during the Plan period. A table was presented to the Local Plan Examination setting out the proposed delivery on allocations. Since that time there has been additional affordable units delivered at Fulbeck Avenue (over and above the Local Plan requirement) with 70 out of the 152 dwellings (46%).
- 9.4 In terms of how the current approach compares to historic performance, the Council's Annual Monitoring Report (AMR) sets out the number of homes completed in each monitoring year along with the number of affordable homes completed. The figures used for total completions and affordable homes completions are derived from the annual completions monitoring data provided by West Sussex County Council (WSSC).
- 9.5 It should be noted that this data only captures those affordable housing units delivered and built out on sites and does not take into account use of financial contributions for affordable housing collected through legal agreements.
- 9.6 It should also be noted that national policy sets a threshold at which a local authority can seek affordable housing contributions from developments (major development at 10+dwellings). Given that much development within the Borough is on sites below this threshold, opportunities for seeking affordable housing through this method are limited. In addition, the Government's introduction of permitted development rights for office to residential (where affordable housing does not have to be provided) has again limited opportunities for local authorities to seek affordable housing from this form of development.

10 Proactive Approach Towards Increasing the Affordable Housing Supply

- 10.1 As with all housing types and tenures in the Borough, the evidence is clear that the Council will not be able to meet affordable needs in full. However, the Council is committed to take

all opportunities to deliver high quality affordable housing for people who are unable to access or afford market housing as well as helping people make the step from social or affordable rented housing to home ownership.

- 10.2 The Council is taking a proactive approach towards addressing the increasing housing need within the Borough. The Council, just like many other Councils in the country, has seen a significant rise in the need for emergency and temporary accommodation and this has required a step change in the way that the Council discharges its statutory duty to meet the needs of the homeless.
- 10.3 In March 2021 the Council published 'Pathways to Affordable Homes' outlining its ambition to deliver affordable homes in Worthing (CDI13). This is being addressed in a variety of ways - direct intervention and delivery, partnership working and facilitating development using s106 receipts and Government Funding.
- 10.4 As an example of direct delivery, in 2021 the Council purchased and refurbished the Downview Public House providing 9 flats for emergency and temporary accommodation (EA/TA). Subsequently in 2022, the Council completed development of a new block of 8 apartments adjacent to the Downview PH. The refurbishment of an old Freemasons lodge in Rowlands Road was also completed in 2021 providing a further 19 affordable apartments.
- 10.5 By working with key local partners such as Turning Tides and Worthing Homes (the Registered Provider that manages the ex-Council housing stock), a number of sites are coming forward to provide rented accommodation at a rent that local people can afford. This has meant purchasing sites directly and delivering new affordable units or providing funding to partner organisations to facilitate bringing forward complex sites to meet our housing needs. Three of these sites are set to deliver 100% affordable housing schemes within the next 3 years (Skywaves, Clifton Road and ATC Headquarters) delivering 44 new affordable homes.
- 10.6 The Council is also involved in innovative initiatives outside of direct delivery such as the 'Opening Doors' initiative which is a free residential letting service operating across Adur and Worthing. It offers landlords a comprehensive and free letting service including

financial security, legal assistance and landlord support. This helps increase the amount of affordable market rented homes available to local people. The scheme has been running for over 5 years and offers property owners, developers and private sector landlords a fee-free way of letting out their properties. The Council will guarantee rent for a fixed period, find the tenant and collect rent and has enabled the Council to reduce the Council waiting list by more than 100 households.

10.7 The Council will continue to take positive actions (which will include compliance with Policy DM3) to maximise the delivery of affordable homes. These include an update to the existing Housing Strategy, and a review of the Council's Temporary Accommodation Placement and Procurement policy, and creation of a A&W Homelessness Prevention partnership. An Affordable Housing Supplementary Planning Document is also being produced and is likely to be taken to Worthing Planning Committee in February 2023.