

**WORTHING BOROUGH COUNCIL
HOUSING DELIVERY TEST
ACTION PLAN 2023**

Published June 2024



WORTHING BOROUGH
COUNCIL

**WORTHING BOROUGH COUNCIL
HOUSING DELIVERY TEST
ACTION PLAN 2023**

Contents	Page
1. Introduction	2
Context	2
Why an Action Plan has been prepared	4
Purpose and Objectives	5
Relationship with other plans and strategies for housing delivery	6
Approach and Methodology	8
2. Housing Delivery Analysis	9
Past performance on housing delivery	9
Current housing supply	12
Housing delivery	13
Potential barriers to delivery	15
3. Key Actions & Responses	16
Ensure housing delivery remains a Council priority	17
Review of Local Plan	17
Planning Policy	18
Improving our planning applications processes	20
Other initiatives to support housing delivery	22
4. Monitoring, Engagement and Next Steps	25
Monitoring	25
5. Conclusion	25

1. Introduction

Context

- 1.1 The Council in recognition of the Governments' commitment to boost the delivery of new homes responded to this challenge by undertaking a full review of the Worthing Core Strategy 2011, which had helped to set the strategy for development across the borough. The Worthing Core Strategy was the relevant adopted Plan during this Housing Delivery Test (HDT) Action Plan period.
- 1.2 The Worthing Core Strategy was adopted at a time when there was not a strong relationship between the housing targets set for Worthing within Regional/Structure Plans and the need and demand for new homes within the borough. This is because the previous targets took account of the significant development constraints faced by Worthing and were therefore strongly influenced by the capacity of the borough to accommodate new homes in terms of its physical and environmental characteristics.
- 1.3 The National Planning Policy Framework (NPPF) now requires that local planning authorities meet their full need for both market and affordable housing as far as is consistent with other policies in the Framework. In response to this significant change, together with other changes at national level, the Council committed to a full review of the Core Strategy and the progression of a new Local Plan.
- 1.4 Work commenced in 2015 on the new plan and in spring 2016 the first stage of Local Plan review (the Issues and Options stage) was published for consultation. In autumn 2018 the Council published its preferred options in its Draft Worthing Local Plan 2018. The Submission Draft Worthing Local Plan (SDWLP) was formally submitted to the Secretary of State on Friday 11th June 2021 for independent examination. Hearing sessions were conducted in November 2021.
- 1.5 The Inspector concluded that [Main Modifications](#) were required to make the plan sound. Following the Inspectors request the Council consulted on a schedule of proposed Main Modifications which he considered were necessary to ensure the soundness of the plan. These main modifications were consulted on for 6 weeks between Tuesday 5th April and Tuesday 17th May 2022.
- 1.6 The [Inspector's report](#) was issued to the Council on the 14th October 2022. The report concludes 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 provides an appropriate basis for planning in the borough.
- 1.7 On 8th November 2022, Members of the Joint Strategic Sub-Committee considered a report relating to the Inspector's findings. It recommended to the Full Council (28th March 2023) the adoption of the Worthing Local Plan (including modifications) and Policies Map. The Local Plan supersedes the Worthing Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003).
- 1.8 In line with the NPPF, the Plan looked to significantly increase housing delivery in a sustainable manner to help close the gap between the level of identified need and levels of housing delivery.

- 1.9 The newly adopted Plan notes that the Objectively Assessed Need (OAN) (based on the 2014 household projections published in September 2016) was 14,160 dwellings over the Plan period (at that time the end of the plan period 2036). This equates to 885 dwellings per annum (capped).
- 1.10 The level of identified housing need for the plan period is a much higher level of housing delivery than the borough has previously planned for or delivered. To put this into context, the previous Local Plan the Core Strategy 2011 set a housing requirement of 200 dwellings per annum and the average annual delivery rate since 2006 has been 295 dwellings (which includes a significant level of housing delivered on a large greenfield site at West Durrington). It should be noted that there was no intention that the 200 dwelling / year target should be seen as a 'ceiling'.
- 1.11 In light of the changes made to national planning guidance and the need to meet, as much as possible, the housing need for Worthing the spatial strategy taken forward in the adopted Plan is similar to that incorporated within the Worthing Core Strategy (i.e. placing a strong emphasis on regeneration and transforming key sites within the urban area). However, a key difference was the need to look more positively at potential development options, including greenfield sites located around the edge of the borough.
- 1.12 The most significant constraining factor when considering future development is land availability. Worthing is tightly constrained and there is little scope to grow beyond the current built up area boundary without merging with the urban areas of Ferring (to the west) and Sompting/Lancing (to the east) and without damaging the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the existing Built up Area that could deliver significant levels of growth. Therefore, the reality is that when compared to many other local authority areas, there are relatively few options for growth.
- 1.13 The spatial strategy set out in the new 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. The core principles set out in the Plan take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest value / sensitivity.
- 1.14 The strategy as set out in the Plan allocates 14 sites of which 13 seek to deliver housing, or mixed uses including housing and 1 that seeks to deliver only employment uses. These comprise a mix of urban sites that provide the greatest opportunity to deliver residential and wider regeneration and edge of town sites that have been assessed as being suitable for allocation for housing development. A key document that sets out the Council's approach to meeting housing delivery is the [Housing Implementation Strategy](#) that was published alongside the Submission Draft Worthing Local Plan. In summary, given the lack of available land in and

around the borough the scale of the developments planned are relatively small and there is a key focus placed on regeneration. In addition to the more significant urban sites proposed for allocation it is expected that small sites will play a greater role in housing delivery.

Why an Action Plan has been prepared

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

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

1.16 This update is the fifth Action Plan and its focus has been to consider whether there are any additional measures that can be included to help improve the delivery of new dwellings. This Action Plan has been prepared to consider the delivery rate and how the Council is responding to the challenge of building more homes at a faster rate. It sets out the challenges being faced and the actions the Council proposes to take to address housing delivery.

How is the Housing Delivery Test Measured?

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

How did Worthing perform against the Housing Delivery Test?

1.18 The fifth Housing Delivery Test published December 2023 covers the three monitoring periods 2019 – 2022. For test years 1 (2019/20) a figure of 805 is used - this is the annual requirement figure adjusted by the DLUHC to reflect circumstances resulting from the Covid-19 pandemic. For test year 2 (2020/2021) a

figure of 589 has been used, again adjusted as a result of the pandemic. The final year, test year 3 (2020/2021), a figure of 853 has been used which is the Minimum Local Housing need figure. The housing target in the Worthing Local Plan 2023 is not yet reflected in the Housing Delivery test.

Worthing Housing Delivery Test results

Year	Delivery Figure (net) ¹	Annual Housing Target
2019/2020	396	806
2020/2021	88*	589
2021/2022	249*	853
Total over 3 years	732	2248
The Housing Delivery Test measurement for Worthing is 732 / 2,248 = 32.5%.		

* There may be slight differences between the HDT delivery (net) figure when compared to the Historic Completions Table 3 this is due to the adjustments made for communal accommodation within that year in accordance with HDT Technical Note calculations.

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

Purpose and Objectives

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

1.21 This Action Plan covers the following issues:

- Relationships with other plans and strategies
- The historic performance on housing delivery
- Explains what the Council has been doing so far to boost housing delivery

- Analyses evidence on sites with planning permission (and sites allocated for housing development) to understand what barriers are preventing homes being built on these sites
- Sets out what actions the Council can take to increase the rate and number of homes built
- Monitoring

Relationship with other plans and strategies for housing delivery

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

Our Plan - Corporate Plan

1.23 [‘Our Plan’](#) was published in November 2022 and provides a framework for Adur & Worthing Councils for the coming three years. (This supersedes Platforms for our Places - Going Further: 2020-2022 as referred to in the previous iterations of the Housing Delivery Test Action Plans). Our Plan has been designed to be ‘organic’ and thus evolve as we go along. It is based on the following three principles:

1. Resilient
2. Adaptable
3. Participative

1.24 These principles are supported by five missions which are complex issues which must be addressed for Worthing (and Adur) to thrive long term. This includes supporting people to live healthy and safe lives, creating towns and places where people are able to afford to live well, and encouraging people to make changes that will help us all to address climate change. Of relevance to this action plan, the mission ‘thriving people’ sets out the following:

Residents can lead positive, healthy and independent lives. Access to the right support is there when they need it. They are included and valued in their local community. They can take part in decisions about their area and the services they receive.

1.25 The Plan recognises that in order to achieve this mission, everyone must have a safe, secure and sustainable home.

Housing Strategy 2020-2023: Enabling Communities to Thrive in their own Homes

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

- Deliver 1,000 affordable homes by 2025, of which 250 homes will be delivered directly by Adur & Worthing Councils (refer to paragraphs 3.23 - 3.25 for more information)
 - Create sustainable homes for people to live and thrive in
 - Utilise the Council's land and housing stock for self-delivery
 - Purchase sites for development where appropriate
 - Work with strategic partners to unlock and maximise affordable housing delivery across the Councils.
- 1.27 The strategy provides an overview of how the Councils will look to meet demand through self-delivery and partnership to progress the delivery of affordable housing. The Council will review ways in which different tenures could be offered to help complement affordable homes delivery and meet the needs of people throughout the housing market. These tenures could include discounted market sale, intermediate rent or shared ownership. As part of this review the Council will consider the need to set up a housing delivery company and/or joint ventures with development partners.
- 1.28 The Strategy also makes clear that the Councils will explore new and innovative partnerships and vehicles to create opportunities to increase the supply of affordable homes.
- 1.29 At a meeting of the Joint Strategic Sub-Committee in March 2023 it was agreed that the Adur and Worthing Housing Strategy 2020 - 2023 be extended until the end of March 2024. The Council will review and agree new key housing strategies for the district including the:
- Housing Strategy, which will include the Homelessness Prevention and Rough Sleeping Strategy
 - Temporary Accommodation Placement and Procurement Strategy

Further details on this decision can be accessed here:
<https://democracy.adur-worthing.gov.uk/ieDecisionDetails.aspx?ID=814>

HealthyAW 2021 - 2024 - Health & Wellbeing Strategy

- 1.30 [HealthyAW](#) focuses on those areas we know to have the strongest influences on people's health, which are the conditions in which people are born, grow, live, work and age, including: quality of housing.
- 1.31 The strategy sets out that providing a range of housing options to meet the needs of our communities through our [Pathways to Affordable Homes](#) is critical to realising our aims so that everyone in our community has the opportunity to thrive. Pathways to Affordable Homes is a programme of provision of EA/TA for those most in need. Pathways to Affordable Homes work will increase the range of options and opportunities for those with a housing need and Housing First is a priority in this work; it relies not only on the provision of 'a roof' and support, but also social infrastructure to enable

people to connect to their communities and build a home, not just a place to live.

Delivering Pathways to Affordable Homes

- 1.32 [Delivering Pathways to Affordable Homes \(2021\)](#) builds on the foundation of the Housing Strategy 2020-2023, the central concept of which is for everyone to have a place they can call home, whether it is owned, shared or rented. As a delivery plan it will run for 4 years and will help inform the next iteration of the Housing Strategy.
- 1.33 Working with delivery partners the Council has looked to deliver new and existing major sites such as Union Place, Fulbeck Avenue and Teville Gate. In addition a number of sites either within Council ownership or in partnership with others have delivered much needed Emergency/Temporary Accommodation.

Coast to Capital Local Economic Partnership

- 1.34 This is a local business led partnership between local authorities and businesses and plays a central role in determining local economic priorities and undertaking activities to drive economic growth and the creation of local jobs. It has a critical role in the delivery of local infrastructure to support growth in the local economy and helps unlock development. In turn this helps to support the housing delivery priorities of the Borough.

Adur and Worthing Growth Deal

- 1.35 The Adur and Worthing Growth Deal was signed in March 2017 as an ambitious 5-year partnership programme of regeneration focusing on key priorities across the area. The Growth deal between West Sussex County Council (WSSCC) and Worthing Borough Council is currently undergoing a refresh in order to continue attracting investment and combining resources to deliver local economic growth. This will enable the development of new homes and creating employment opportunities and community facilities. For Worthing, the Growth Deal priorities are:

- Worthing Town Centre*
- Decoy Farm
- Centenary House, Durrington

*The focus is on delivering 6 key sites and 5 areas of public realm identified within the [Worthing Investment Prospectus](#). Provisional funding allocated to progress Teville Gate House and Union Place.

Further information about the priorities can be found [here](#).

Approach and Methodology

- 1.36 The Council already has in place a long standing monitoring arrangement with West Sussex County Council and also maintains its own comprehensive monitoring

system that complements the work undertaken by WSCC. The [Annual Monitoring Report](#) provides an annual update (usually published each December and covers the previous financial year) reporting on key criteria used to assess the effectiveness of Local Plan policies. A key element are the updates regarding the housing land supply position. This includes an update on sites identified in the Strategic Housing Land Availability Assessment and Self Build and Custom Housebuilding Register. In addition the Council maintains and updates the Brownfield Register with the recent brownfield register being published in June 2024. This monitoring has identified that there are significant challenges to the delivery of housing typical of an authority with limited land availability and recognised constraints to development.

1.37 A number of sources of information/evidence have been, and continue to be, used to identify and assess any opportunities for residential development and to understand any barriers to delivery that need to be addressed. These include the following documents that are reviewed on a regular basis:

- Strategic Housing Land Availability Assessment
- Brownfield Register
- Self-Build and Custom Housebuilding Register
- West Sussex County Council Data
- Affordable Homes Delivery Group
- Housing Implementation Strategy.

2. Housing Delivery Analysis

Past Performance on Housing Delivery

2.1 Historically the housing targets for Worthing had been based on those set by Regional / Structure Plans and as previously explained, these did not have a strong relationship with the need and demand for new homes in the borough due to the physical constraints and resulting limited land supply. Since the adoption of the Core Strategy, Worthing had been meeting its adopted target and in fact had been delivering a surplus. However, it is acknowledged that this has not been the case since the NPPF has required local planning authorities to meet their housing needs in full. These changes at national level led to a Local Plan review and the Borough now has an adopted Worthing Local Plan (adopted 28 March 2023).

2.2 The table below is taken from the latest [Worthing Annual Monitoring Report 2022-23](#) and it indicates the recent levels of housing delivery. The base date of 2006 relates to the previously adopted Local Plan (the Core Strategy - now superseded) as this was the relevant adopted plan for the HDT. The new Worthing Local Plan 2023 has a base date of 2020. The table uses a net figure, which consists of new build dwellings minus demolitions, plus conversions.

Historic Housing Delivery - Dwelling completions 2006/2007 - 2022/23

Year	Net Additional Dwellings
2006 – 2007	266
2007 – 2008	260
2008 – 2009	380
2009 – 2010	252
2010 – 2011	241
2011 – 2012	143
2012 – 2013	172
2013 – 2014	245
2014 – 2015	351
2015 – 2016	484
2016 – 2017	347
2017 - 2018	482
2018 - 2019	293
2019 - 2020	396
2020 – 2021*	107
2021 - 2022	247
2022 - 2023**	269
Total 2006 – 2023	4,935

*There may be slight differences between the HDT delivery (net) figure when compared to the Historic Completions Table 3 this is due to the adjustments made for communal accommodation within that year in accordance with HDT Technical Note calculations.

**This HDT Action Plan focuses on the period up to 2021/22 but for information purposes, data for the period 2022/23 has been provided.

- 2.3 A total of 269 (net) new dwellings were completed in Worthing in the monitoring period 2022/2023. This represents a surplus of 39 against the annualised housing requirement of 230 dpa set out in the newly adopted Worthing Local Plan 2023.
- 2.4 To better reflect delivery trends, it is useful to look at the longer term timeframe. Given the monitoring period this action plan covers it is still relevant to look at the delivery against the Core Strategy which was the adopted plan during the last HDT test. It is clear that there has been a sustained period of 'overdelivery' in recent years when measured against the target set in the Core Strategy (200 dwellings pa). In fact, the level of housing completions since 2006 is 4,935 dwellings which against the Core Strategy target, provides a 'surplus' of 1,535 over the last 17 years. However, it should be noted that there was no intention that the 200 dwelling / year target was seen as a 'ceiling'. In the case of the new Local Plan this was only adopted in 2023 but its base date is 2020. It can be seen in the table above that in the first year 2020/21 there was a deficit against the new target; however, there has been a surplus against the target in the last 2 years of monitoring against the new Local Plan target (230 dwpa).

Housing approvals and completions against housing targets 2006 - 2022

Year	Housing Supply Target	Net Residential Approvals	Net Residential Completions
2006/07	200	382	266
2007/08	200	407	260
2008/09	200	460	380
2009/10	200	240	252
2010/11	200	193	241
2011/12	200	149	143
2012/13	200	1216*	172
2013/14	200	224	245
2014/15	200	145	351
2015/16	200	206	484
2016/17	598	479	347

2017/18	622	267	482
2018/19	873	213	293
2019/20	806	765**	396
2020/21	589	229	107***
2021/22	853	250	247

This year includes 700 dwelling permission at West Durrington and 265 dwelling permission at Worthing College. West Durrington is still under construction but close to completion. **This year includes HMRC site permitted development -254 dwellings, Land south of Coach and Horses – 240 dwellings and Colombia House permitted development -104 dwellings) *This includes a calculation as set out in the HDT Rule Book which resulted in a loss of 19.4 dwellings for 'Communal Dwellings' so for HDT purposes this results in the 88 HDT figure .*

Please note this table differs from Table 1 in respect of the HDT delivery (net) figure due to the adjustments made for communal accommodation within that year in accordance with HDT Technical Note calculations.

2.5 As can be seen from the table above, the number of homes delivered has, in general, kept pace with the number of homes permitted (all-be-it it can be expected that there are some permissions that are granted that are never 'built-out' despite proactive work by the Council to identify and where appropriate remove barriers to delivery however, there will still be cases where the Council has no control over this).It can be seen that in 2012/13 there was a significantly higher number of residential approvals (1216) as compared to completions. This is because the only site allocated in the Core Strategy, West Durrington, received planning permission for 700 dwellings.

Current Housing Supply

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

2.7 The previously adopted Core Strategy 2011 set a housing requirement of 200 dwellings per annum. The newly adopted Worthing Local Plan 2023 allocates suitable sites to accommodate the minimum of 3,672 new homes (230 per annum), including a number of greenfield and brownfield sites. Whilst this figure is still some way below the level of identified need it does represent a significant uplift on the housing requirements previously established for the borough within the County Structure Plan, the Regional Spatial Strategy and the Core Strategy.

Current housing supply is made up of the following sources :

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

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

Small sites of less than five dwellings (previous threshold was 6 across the County) continue to come forward. It is not practical to identify and assess all of these sites in terms of their deliverability. Therefore, in forecasting house building on these small sites, it is assumed that all dwellings under construction and 45% of those with planning permission but not yet started will be built. This is based on past evidence of completion rates and this approach was accepted by the Inspector at Examination.

Strategic Housing Land Availability Assessment (SHLAA) sites - The Council's SHLAA has provided the mechanism through which the quantity and suitability of land potentially available for housing development has been determined. The Council has an open call for sites when sites can be submitted at any point but 'calls for sites' are also undertaken by the Council. The SHLAA has been monitored and updated regularly to give the most up to date picture of housing delivery for Worthing. The methodology used to undertake this assessment was updated in 2020 (following consultation) to reflect changes to the NPPF and revised SHLAA methodology. The threshold was amended to include sites that are capable of accommodating five or more dwellings in order to ensure consistency with the threshold set by WSCC (commitments and small sites of less than five dwellings). The approach taken was accepted by the Inspector at Examination.

Strategic Allocations - The previously adopted Core Strategy only had one Strategic Allocation which was West Durrington, a now completed site with 700 new homes. The newly adopted Worthing Local Plan allocates 14 sites with 13 of them proposing either all residential or residential as part of a mix of uses.

Windfall Allowance - A windfall allowance takes account of housing development on sites which it is not possible to identify in advance (e.g. conversions, changes of use etc.). Historic small sites housing delivery data since the base date of the Core Strategy has been used to calculate a windfall allowance of 62 dwellings per year (2022/23 Annual Monitoring Report). To avoid double counting with the small sites commitments, the windfall allowance is not applied to the first three years of the projections.

Housing delivery

- 2.8 The spatial strategy as set out in the previous Local Plan (the Core Strategy) was set by its context. There was one strategic allocation identified in the plan - West Durrington which was allocated for 700 new homes and the site is now complete.
- 2.9 Against the backdrop of significant changes in national planning policy and growing housing need the Council took, where possible, positive steps to bring forward sustainable opportunities to deliver new development. Whilst the progression of a new Local Plan provided the main mechanism through which sites have been allocated the Council also considered ways in which housing delivery could be

increased in advance of the new Plan adoption. Two edge of town opportunities (Fulbeck Avenue and Land North of West Durrington (Coach and Horses)) were given support for development in advance of the adoption of the new Local Plan. These sites which sit within the built up area boundary, were included in the earlier Local Plan consultation 'Issues and Options' which raised the prospect of bringing these two sites forward in advance of the new Local Plan. In general this proposal was positively received and support was given to the Council taking this positive approach. Since that time an application for 240 new homes has been approved on the Land at North of West Durrington site and permission has also been granted for 152 modular dwellings on the Fulbeck Avenue site. Both sites are under construction and nearing completion.

- 2.10 The new Worthing Local Plan 2023 has been informed by a robust evidence base. This includes: a Landscape & Biodiversity Study; transport studies; a Strategic Flood Risk Assessment (SFRA); updated Strategic Housing Market Assessment (SHMA), the Retail and Other town Centre Uses Study and the Economic Research and Employment Land Review. These, and other studies, have helped to inform the assessment of sites that have been included in the adopted Local Plan. In addition to the evidence base, the Council's proposals were subject to wider public consultation including key stakeholders and landowners to identify and address any issues.
- 2.11 In addition, landowners and developers have also been invited to promote potential development sites (a call for sites) on a number of occasions. In fact, given the severe shortage of developable land, the Council encourages interested parties to put forward potential development sites at **any** time.
- 2.12 The Council has taken a proactive and robust approach to identify suitable and sustainable sites for residential allocation in the adopted Worthing Local Plan. All sites that were previously identified in the Core Strategy but not yet developed, were reviewed and new opportunities identified and assessed for allocation in the new Plan. The latest position of these sites can be found in the most recently published [Annual Monitoring Report](#).
- 2.13 The primary focus during the Local Plan Review had been to identify additional opportunities within the built up area boundary (BUAB) and on previously developed land. However, given the overwhelming housing need, sites outside of the BUAB were also robustly considered.
- 2.14 As a result the adopted Local Plan has allocated 14 sites of which 13 are expected to deliver residential either solely or as part of a mix of uses. These sites are considered to be 'deliverable' meaning they are viable, available and offer a suitable location for development. These include greenfield and edge of town sites where the evidence and robust assessment justified their inclusion as an allocation.
- 2.15 This process resulted in the allocation of the following greenfield or edge of town sites in the new Local Plan:

Caravan club - A2 - a Council owned site. The allocation which covers the southern part of the site seeks to deliver a minimum of 100 dwellings. The previous leaseholder, the Caravan Club, has surrendered their lease and the Council is considering options for the northern element of the site which includes the potential

for further residential development and further evidence will be gathered to undertake that assessment.

Fulbeck Avenue - A6 - a Council owned greenfield site.. Planning permission has now been granted for the erection of 152 apartments and development has commenced and nearly complete.

Upper Brighton Road - A14 - a privately owned greenfield site is allocated for residential development in the Plan with an indicative capacity of 123 dwellings.

Beeches Ave – A1 - a privately owned site which lies outside but adjacent to the BUAB and adjacent to the South Downs National Park. The 2.8 ha site is allocated in the Plan with an indicative capacity to deliver approximately 90 dwellings.

- 2.16 Prior to submitting the Local Plan all sites were robustly reassessed to justify their continued inclusion in the delivery strategy and to provide greater certainty of their capacity and delivery timescales. It will be important to ensure that the capacity of the available sites to deliver residential dwellings is maximised.
- 2.17 The approach taken to site selection has been endorsed by the Local Plan Inspector in his [report](#) following the Public Examination of the Plan. At Para 80 of his report he states:

‘This is not a borough blessed with a surfeit of options and opportunities for housing or employment development. Nevertheless, I am satisfied that the Council considered all reasonable options as part of the process. I am also content that the assessment of sites, carried out using the criteria in the SHLAA and supplemented by the SA and various specific and bespoke evidence base documents, provided a proportionate and robust basis on which to identify allocations.’

Potential barriers to delivery

- 2.18 The physical and environmental constraints of the borough strongly influence the capacity to accommodate new dwellings, with the sea to the south, the South Downs National Park to the north and sensitive gaps to the east and west forming an important component of the landscape setting of the town. A key challenge is to balance the need for development against the need to minimise the impact on the countryside and landscape character. There are also flooding and key infrastructure constraints which impact on the availability of land for development.
- 2.19 Additionally, many parts of the borough are already intensely developed or the local characteristics are such that they make it very difficult to facilitate further significant development. For example, there is a predominance of suburban housing with relatively few open areas where larger scale growth and change cannot be easily accommodated.
- 2.20 There is also a significant reliance on a relatively small number of larger sites in and around the town centre to bring forward major development. An associated problem is that the housing market in the area is dominated by a relatively small number of key landowners and major developers, reducing possibilities for the smaller developers. Additionally, some sites are subject to complex planning histories or

other complexities such as multiple ownerships. However, where possible, the Council is working proactively to address these issues.

- 2.21 The provision of appropriate infrastructure is important to support new development. The Council published an Infrastructure Delivery Plan (IDP) (January 2021) to ensure that the Worthing Local Plan is supported by necessary infrastructure provision. The delivery of the right levels and type of infrastructure is essential to support new homes, economic growth and to protect the environment. It is important to note that the IDP is a mechanism for identifying the future infrastructure requirements of development proposed as a result of the Worthing Local Plan. The Council will update its Infrastructure Delivery Plan working with key providers as required.
- 2.22 There is also a long standing under-provision of affordable and social housing. The Strategic Housing Market Assessment (SHMA) concludes that there is an affordable housing need of 490 dwellings per annum. However, given the significant land constraints the unfortunate reality is that just as with overall need there is no realistic way to ensure that this scale of affordable housing can be provided. The Council is however, being proactive in seeking delivery of affordable homes on its own sites and in particular seeking to provide Emergency and Temporary accommodation within the Borough.

Development costs and viability

- 2.23 The Local Plan is supported by a Whole Plan Viability Assessment (WPVA) (January 2021) to provide an appraisal of the Plan in terms of the impact of its policies on the viability of development expected to be delivered during the Plan period. It assessed whether the key sites (both greenfield and brownfield) which are key to the delivery of the housing strategy, are viable. In summary, this assessment reviewed the overall viability of the proposed Worthing Local Plan and concluded that the residential sites and policies contained within the Plan (unless stated otherwise) have good prospects of delivery. This includes those policies that have potential direct cost impact on development.

3 Key Actions & Responses

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

Ensure Housing Delivery Remains a Council Priority

- 3.2 Housing delivery, especially the provision of affordable housing, is already a high-level corporate and political priority for Worthing, as detailed in the Council's Corporate Plan - Our Plan. Strong corporate leadership will be an ongoing requirement to ensure housing delivery remains a focus across the Council. This is also reflected in other Council strategies and policy documents - see section 1 above.
- 3.3 The Council has an internal Affordable Housing Delivery Group with representatives from Housing, Planning, Finance, Legal, and Major Projects Teams to ensure a coordinated approach. The primary focus of the Affordable Homes Delivery Group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment.

Review of Local Plan

Adopted Worthing Local Plan

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

Community Infrastructure Levy

- 3.5 The Community Infrastructure Levy (CIL) is now the main way in which the Council collects contributions from developers for infrastructure provision in Worthing. It partly replaces the use of S106 planning obligations with the exception of affordable housing provision and some site specific requirements. As charging authority, Worthing Borough Council has the responsibility for managing, monitoring and reporting on CIL.
- 3.6 Regulation 121A of the CIL Regulations (as amended) now requires Worthing Borough Council to produce an annual Infrastructure Funding Statement (IFS). The purpose of the IFS is to provide information on the infrastructure projects the Council intends may be wholly or partly funded by CIL, to report on CIL in relation to the previous financial year, and to report on planning obligations, in relation to the previous financial year. From December 2020, the CIL collecting authority is required to publish the [IFS](#) on the Council's website.
- 3.7 Worthing Borough Council (WBC) has been charging CIL on liable new development, detailed in the WBC CIL Charging Schedule, which have been granted planning permission from the 1st October 2015. The charge allows the Council to raise funds from developers to pay for infrastructure that is needed as a result of development. The revised CIL rates can be seen found on the Council's website;

<https://www.adur-worthing.gov.uk/worthing-cil/about-cil/>

- 3.8 Although the CIL 'pot' is growing, it is accepted that CIL will not generate enough funds to completely cover the cost of new infrastructure needed to fully support the planned growth. As a result, infrastructure providers will also have to apply for funding from other sources, with CIL used as match funding where appropriate. It is also clear that there will be many competing demands on CIL funds which means that it is important that a clear and justified process for the spend and prioritisation of CIL was established. The latest [Infrastructure Funding Statement](#) covers the 2022 -23 period. This includes a report on the infrastructure projects (or types of infrastructure) which the charging authority intends may be wholly or partly funded by CIL (drawing on information included in the Infrastructure Investment Plan).

Planning Policy

- 3.9 There are a number of policy approaches that can help with the delivery of new homes whilst balancing the wider sustainable, community and economic needs of the borough. In order to deliver sites and respond to changes in the economy the Council can, depending on circumstances, take a flexible approach to the application of its adopted policies. This includes residential tenure mix, loss of employment and other land use, where appropriate.
- 3.10 The policies in the adopted Local Plan are kept under review to monitor their effectiveness. This is reported through the Annual Monitoring Report which can be accessed here:

<https://www.adur-worthing.gov.uk/adur-ldf/annual-monitoring-report/>

More effective use of land

- 3.11 A key policy in the new Worthing Local Plan DM2 Density, encourages the most efficient use of land which will usually mean, where appropriate, developing at densities above those of the surrounding areas. The optimum density of a site should be achieved through a design led approach to determine the capacity of a site.
- 3.12 Land is a scarce resource in Worthing and there are competing demands for its use. Given the significant need for additional homes it is important that the limited amount of land available is used efficiently when considering proposals for new residential development. To help steer the right level of densification to the right locations the Housing Implementation Strategy identifies a range of urban density thresholds and options that reflect the accessibility and potential of different character areas in and around the borough.
- 3.13 The expectation is that residential development of a family housing scheme should achieve minimum densities of 35dph whilst flats, mixed residential developments in or close to town centres or near public transport hubs should be achieving densities in excess of 100 dwellings per hectare. Where developments do not demonstrably optimise the housing density of a site then permission is refused. Unlike some, more rural, authority areas this is not a common issue in Worthing as the nature and

character of the borough means that the vast majority of proposals for development seek to maximise development.

Specific Site Policies

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

Supplementary Planning Documents

- 3.15 There are a number of Supplementary Planning Documents (SPD) relevant to the delivery of housing (where appropriate these will be update to reflect the most up to date policy position set out in the adopted Local Plan and to give clear guidance to developers and applicants):

[Tall Buildings Guidance SPD](#) - This document provides clear and consistent guidance on the design and location of tall buildings in Worthing.

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

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

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

[Developer Contributions SPD](#) - The purpose of the SPD is to summarise the different mechanisms which will be used and the relationship between them. This will help to provide clarity for developers when considering new development opportunities. An update of this SPD is required to ensure that guidance is in line with the newly adopted Worthing Local Plan and ensure that it reflects the latest S106 / Community Infrastructure Levy (CIL) position. The Council has drafted a new Affordable Housing SPD which will provide an update, and supersede, section 5 of the adopted SPD 2015. The aim of this new SPD is to provide advice on this affordable housing policy (Affordable Housing DM3) and how it should be interpreted and implemented. This is currently awaiting final approval for wider public consultation, which is anticipated to commence Summer/Autumn 2024.

Development briefs

- 3.16 Development briefs are prepared, where appropriate, to guide the future redevelopment of specific sites. By providing more detailed site analysis and development principles they provide landowners and developers with a clear

indication as to which proposals are likely to be granted planning permission which, in turn, reduces uncertainty.

3.17 The purpose of development briefs is to:

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

3.18 The Council will keep its guidance under review to ensure there is adequate information for a developer to know what is expected from new development, including at the stage of the initial investment/land purchase, and to ensure the relationship between local and national policy guidance is clear.

Improving our Planning Application Processes

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

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

Percentage of applications determined within the prescribed timetable

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

2021/2022	879	91%	81%	86%
-----------	-----	-----	-----	-----

Principal Planning Officer (Major Applications)

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

Pre-Application Advice Service

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

Planning Performance Agreements

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

Major Projects & Investments Team

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

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

Other initiatives to support housing delivery

Council Owned Land and land acquisition

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

3.27 Examples include sites such as :

- **Caravan Club A2**- Council owned site reviewed during the Local Plan review and now an allocation in the adopted Local Plan, which is expected to deliver at least 100 dwellings.
- **Grafton Site A7** - Council owned site previously identified as an Area of Change (AOC) in the Core Strategy and reassessed during the Local Plan review process; now allocated for mixed use development to include a minimum of 150 residential units. Proactive work underway to find a developer.
- **Union Place A13** - this site was an AOC in the Core Strategy and now an allocation in the new Plan, expected to deliver a minimum of 150 dwellings as part of a mix of uses. Due to the failure of the site to progress the Council acquired the site and entered into a land-pool agreement with government owned regeneration specialist LCR. An application (AWDM/1618/23) has been submitted which seeks to deliver a minimum of 216 residential units as part of a mix of uses.
- **Teville Gate A12** - this site was an AOC in the Core Strategy and now an allocation in the new Plan with a minimum capacity to to deliver 250 residential units as part of a mix of uses. In view of the years of market failure the Council purchased the site and has been actively discussing a disposal to Homes England to bring forward a more realistic development scheme. The site has now been sold to Homes England.

Land in Private Ownership

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

Affordable Homes

3.29 The Council has set up a cross service group to address the significant shortfall of affordable housing provision across the borough. The primary focus of the affordable homes delivery group is to identify opportunities for the delivery of affordable homes through more efficient use of Council owned land, together with the acquisition of land and premises for redevelopment. The **Pathways to Affordable Homes** (see paras 1.32 - 1.33 above) document builds on an already strong foundation to deliver more much needed homes across Adur and Worthing.

- 3.30 A significant number of households are being housed outside of the Borough because of the severe shortage of social housing. The Council's response has been to undertake a robust assessment of sites within their ownership to see what opportunities there are to deliver Emergency and Temporary Accommodation (EA/TA). An example of this is the ATC Headquarters, Victoria Road, a council site that was reviewed following the end of a lease. Planning permission AWDM/0119/23 has now been granted 21/04/23 for 11 residential units for EA/TA. To date some 36 units have been completed in Worthing through this scheme.
- 3.31 The Council are actively looking for sites across the borough where we can build our own temporary accommodation as well as privately-owned local properties that could be used to house these residents plus other members of the community who are on our housing list. Further innovative ideas are also delivering results with the Councils' Opening Doors project having saved more than £200k in Temporary Accommodation costs through working directly with landlords.

Working Groups and Cross Boundary Working

- 3.32 Planning Officers meet regularly with other districts and boroughs in West Sussex as part of Duty to Co-operate and to consider a range of cross boundary issues, including addressing the delivery of housing. This has allowed for best practice to be disseminated that when implemented could help to 'unblock delivery constraints.
- 3.33 The Council is also a member of the West Sussex and Greater Brighton Strategic Planning Board, which seeks to jointly address strategic planning and development issues. It maintains a close working relationship with the Coast to Capital Local Economic Partnership. The constituent authorities have prepared a Local Strategic Statement (LSS) which sets out long term strategic objectives and spatial priorities for delivering these in the short to medium term. The Board was in the early stages of preparing the third revision to the LSS (LSS3) which will explore options for meeting the area's unmet needs for housing, employment and infrastructure. However, the work on LSS3 was paused when the implications of water neutrality on the partnership were fully realised, in particular the non-delivery of housing sites across 3 local planning authorities within the partnership area. The introduction of a new planning system and the Planning White Paper and consultation draft of the NPPF suggesting that the duty to cooperate would be replaced has also impacted on the political momentum of the partnership. In this respect some Councils have decided to proceed with the preparation of Local Plan reviews under the new planning system. The Partnership is currently preparing a Position Statement which will set out the current position across the partnership in terms of plan preparation, potential solutions to address water neutrality and how best to develop a longer term strategy for the sub-region over the period 2030-2050 given the considerable constraints facing the area. It is still intended that LSS3 would be a non-statutory strategic planning framework to help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans. In the meantime, duty to cooperate discussions continue between authorities in the course of plan preparation and between authorities within the defined housing market areas within the wider partnership
- 3.34 Housing delivery is a key consideration and the Borough Council has made it known to other local authorities within the Partnership that, despite taking a very positive approach to development, that Worthing will not be able to meet its housing needs.

As a consequence, requests were made to neighbouring authorities as part of the 'Duty to Co-operate' (DTC) to ask whether they have any potential to help meet some of Worthing's housing shortfall. DTC Statements of Common Ground were signed between Worthing and all respective LPA's in West Sussex as part of the submission of the Local Plan.

Agents Forum

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

Corporate Marketing

- 3.36 The Council has sought to raise the profile of the Borough and the key development opportunities it offers. Initiatives include; [Worthing Investment Prospectus](#) and a dedicated website '[Time for Worthing](#)'.

Supporting Investment in Worthing

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

Relationship with developers, landowners and agents

- 3.38 The Council recognises the fundamental importance of building relationships with developers, landowners and agents within the borough.
- 3.39 Contact with these partners is an essential part of assessing whether sites are available for development as part of the Strategic Housing Land Availability Assessment. This is carried out on a regular basis to ensure that only those sites that are genuinely available can be considered as part of the potential housing land supply. As part of this, a 'Call for Sites' exercise is undertaken regularly. In addition, the Council has recently undertaken a new Housing Land Supply exercise to obtain information on the deliverability of development sites particularly with regards to estimated phasing of completions over a five year period using a baseline date of 1st April 2024. The information received will be used in developing and publishing the Council's housing monitoring and land supply information, Annual Monitoring Reports, and Strategic Housing Land Availability Assessments. It is intended that this exercise will be carried out annually (resources permitting) and provide robust evidence to demonstrate deliverability of development and will form part of the Council's overall approach to housing monitoring.

4. Monitoring and Next Steps

Monitoring

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

5 Conclusion

- 5.1 This is the fifth Action Plan produced by the Council. To help increase future housing delivery, the Council would welcome suggestions on any future actions from interested stakeholders.
- 5.2 This Housing Delivery Test Action Plan demonstrates the proactive approach being taken by the Council and its partners to increase the level of housing delivery in the borough. Significant steps have been taken within the Planning Service and beyond to help bring forward development sites and identify new ones. Some key actions set out in previous iterations of the action plans have now been delivered i.e the adoption of the new Worthing Local Plan, the bringing forward of two greenfield, edge of town sites in advance of the Local Plan (Coach and Horses and Fulbeck Avenue) and the appointment of a dedicated Principal Planning Officer (Major Applications) and a Major Projects & Investments Team.
Some of the key steps identified in this Action Plan include:
 - Commitment to implement the policies and deliver the allocated sites in the newly adopted Local Plan;
 - A focussed approach to bring forward existing development through land assembly, improved marketing and partnership working (often led by the Council);
 - A full and positive review of all potential development opportunities (including greenfield sites) within a robust and comprehensive Strategic Housing Land Availability Assessment which includes a regular 'call for sites';
 - Improved Development Management processes;
 - Agreement to bring forward two greenfield, edge of town development sites in advance of the Local Plan;
 - Encouragement for all appropriate developments to deliver a residential density higher than the surrounding area where there are no adverse impacts;
 - Alignment of plans and strategies (internal and external) to deliver housing objectives;

- A clear corporate commitment to deliver development on its own sites and to work with partners and other landowners to facilitate delivery on theirs;
- Continued cooperation with neighbouring local authorities.

5.3 It is clear that despite all these efforts being taken by the Council and its partners the level of housing delivery, whilst forecast to be higher than many previous years, will still fall significantly short of meeting the housing requirement established using the Housing Delivery Test Measurement Rulebook. It should be highlighted that the HDT monitoring period includes the years before the new Worthing Local Plan was adopted and therefore at that point the allocations had not yet been confirmed; as such increased delivery is forecast post -adoption. Although actions and interventions have been put in place that will help to increase housing delivery in the borough, the Council has no way of addressing the main constraint, which is a tightly drawn borough boundary, environmental constraints and extremely limited land availability.

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



WORTHING BOROUGH
COUNCIL