

Adur & Worthing Councils Portland House 44 Richmond Road Worthing West Sussex, BN11 1HS www.adur-worthing.gov.uk

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Dear Mike,

Representation from Adur District Council and Worthing Borough Council on the Draft Chichester Local Plan 2018

Thank you for consulting Adur District Council and Worthing Borough Council (Adur and Worthing Councils - AWC). AWC welcomes the progress made on the Chichester Local Plan (WLP) and acknowledges the efforts made to maximise opportunities to meet development needs in the District.

We note that the Plan seeks to provide 12,350 dwellings over the period 2016-2035 to meet Chichester's OAN, plus an allowance for meeting unmet needs from that part of the South Downs National Park that lies within Chichester District. We also appreciate following our recent meeting that the delivery of this quantum of development is dependent on infrastructure provision which may require public subsidy to ensure timely deliver and no doubt this will be reflected in your updated Infrastructure Delivery Plan. Given the requirement for additional public funding to deliver your planned growth we recognise the considerable challenge to deliver any additional development during the plan period given the significant infrastructure constraints.

As you are probably aware, development opportunities in both Adur and Worthing are highly constrained due to their location between the South Downs and English Channel.

The Draft Worthing Local Plan (Regulation 18 published October 2018) reported that the identified need for Worthing over the plan period equated to 753 dwellings pa (capped). This calculation was based on the latest data set (2016) published at the point in time using the Standard Methodology. In light of more recent announcements from central government this figure has been recalculated using the 2014 data set. This recalculation results in an increased requirement of 873 dwellings pa (capped). This equates to a total need of 14,841 dwellings over the plan period (as currently set). Work on the supply of homes indicated that some 4,182 dwellings could be delivered over the same period. This results in a significant shortfall

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with Worthing only meeting 39% of the identified need. Whilst it is recognised that further work is required to robustly reassess all sources of supply i.e 'no stone unturned' (this work is ongoing) it is clear that given the constraints that the Borough is subject to, we will never meet that need as currently calculated.

Following our recent Duty to co-operate meeting, hopefully, you now have a better understanding of the significant land constraints of Worthing's Local Plan area and there is a recognition that the Council is taking a proactive approach towards maximising opportunities to deliver as much housing as possible and we agreed to work towards a Statement of Common ground in the summer.

Although the Adur Local Plan was adopted in December 2017, the adopted target delivers just 54% of the Objectively Assessed Need identified through the Local Plan review (resulting in a shortfall of 3,107 dwellings). As such, Adur district is unable to accommodate any of Worthing's unmet need. Furthermore, the future review of the Adur Local Plan will of course be based on the Standard Methodology, and is likely to result in a further, significant shortfall.

AWC will be working together to undertake a range of work, including consideration of densities, urban capacity, intensification opportunities, etc in order to ensure that development opportunities are maximised, whilst taking account of our environmental constraints primarily the lack of available land.

Adur and Worthing Councils have been engaging with Chichester District and other local authorities in the Housing Market Area and further afield via the West Sussex and Greater Brighton Strategic Planning Board. Following agreement of Local Strategic Statement 2, we look forward to working together to explore how the sub-region's development needs can be met in the longer term. The appointment of a Strategic Planning Manager will greatly assist work on the next Local Strategic Statement.

Yours