



**WORTHING BOROUGH
COUNCIL**



**ADUR DISTRICT
COUNCIL**



DUTY TO COOPERATE STATEMENT OF COMMON GROUND

BETWEEN: Adur District Council & Worthing Borough Council and the South Downs National Park Authority

DATE: March 2018

1. Introduction

1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Adur District Council & Worthing Borough Council (A&W) and the South Downs National Park Authority (SDNPA). It sets out the position and understanding with respect to key relevant duty to cooperate matters, and agreed actions to resolve outstanding matters. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan-making.

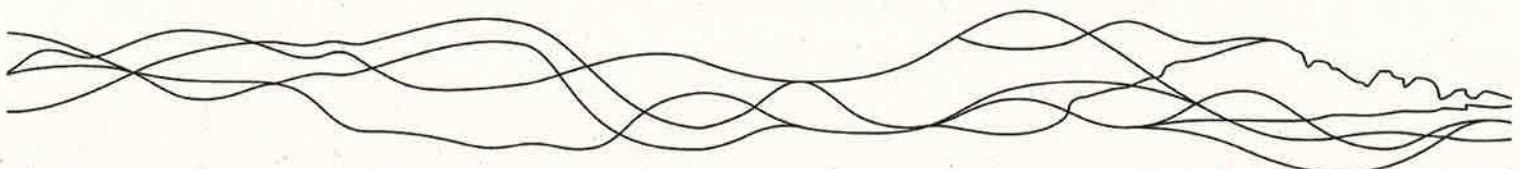
2. Context

2.1 Section 62 of the Environment Act 1995 requires all relevant authorities, including local authorities such as Adur District & Worthing Borough Councils, to have regard to the purposes of national parks. These are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the area;
- To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

2.2 As a National Park and Local Planning Authority, plan-making for the SDNPA is subject to the National Planning Policy Framework (NPPF) whereby Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the NPPF indicate development should be restricted. An example of such restrictions given in footnote 9 on page 4 of NPPF is policies relating to the development of sites within a National Park.

2.3 Furthermore, paragraph 115 of the NPPF states that great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads. It should also be noted that the DEFRA UK Government Vision and Circular 2010 on English National Parks and the Broads, referenced in the NPPF at this point makes clear that the Government recognizes that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them.



2.4 Adur & Worthing Districts fall partly within the South Downs National Park. This means that statutory planning responsibilities within the districts are geographically split along the National Park boundary. The South Downs Local Plan (SDLP) will supersede the Adur District Local Plan 1996, the Worthing Local Plan (2003) and the Worthing Core Strategy (2011) when adopted.

2.5 There are significant constraints to development within Worthing and Adur. The presence of the sea to the south and the SDNP directly abutting the urban areas to the north, along with narrow and sensitive gaps between settlements, means that opportunities for growth are extremely limited. All 3 authorities fall partly or wholly in the Coastal West Sussex Housing Market Area.

3. Purpose and objectives

3.1 The SDNPA is preparing its first Local Plan – the South Downs Local Plan (SDLP). The SDLP is a landscape-led plan, with ecosystem services (the provision of goods and services arising from natural capital) at its heart. The SDLP will provide a comprehensive development plan document to cover the whole of the National Park, and will include a policy to address all types of development, with the exception of minerals and waste.

3.2 The purpose of this SCG is to demonstrate clearly and concisely how strategic cross-boundary matters relevant to the SDLP, which are specific to the three authorities, have been and will continue to be jointly addressed. These focus on the issue of addressing objectively assessed housing need, and on how points of disagreement between the parties are being positively resolved. Further detail is given in the South Downs National Park Duty to Cooperate Statement and in the jointly prepared documents referred to below.

4. Addressing housing need within Worthing and Adur

4.1 It is agreed between the parties that the housing supply and objectively assessed need for the districts both within and outside of the South Downs National Park, is as set out in the Table 1 below:

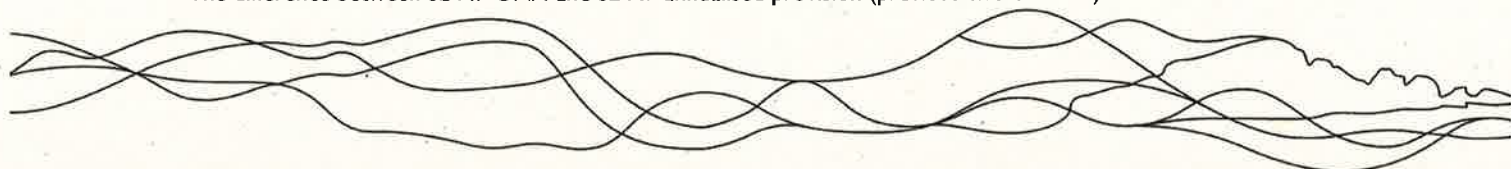
Table 1 Housing supply and need in the Adur and Worthing parts of the South Downs National Park

	A	B	C	D	E	F	G
HMA / District area	SDLP housing provision (total) ¹	SDLP housing provision (A divided by 19 years)	OAN inside SDNP ²	Unmet need inside SDNP ³ (C minus B)	Local Authority Local Plan provision (area outside SDNP) ⁴	Local Authority OAN per annum (whole area) ⁵	Total annual unmet need by L.A./ HMA ⁶ (B+E-F)
Adur	12	1	8	7	177	325	147
Worthing	1	0	3	3	200	636	436
Sussex Coast HMA	2971	156	274	112	2748	4481	1577

¹ As there are no housing allocations in SDLP Policy SD26 or any Neighbourhood Plan allocations, these totals consist of commitments plus windfall (to be provided over the Local Plan period 2014-33)

² South Downs HEDNA 2017 (Table 4)

³ The difference between SDNP OAN and SDNP annualised provision (previous two columns)



⁴ Housing provision figures are from Adur Local Plan 2017 and Worthing Core Strategy 2011 respectively

⁵ Objectively assessed housing need (OAN) taken from Adur Local Plan 2017 and Worthing Housing Study June 2015 respectively.

⁶ This is the difference between the total provision and the total OAN, for the whole area (both within and outside SDNP).

4.2 The South Downs Housing and Economic Development Needs Assessment (HEDNA) (September 2017) estimates the unmet housing need within the National Park, broken down by district and by HMA (Table 5). The annual unmet need in the **Adur** part of the National Park is **7 dwellings per annum** (a total of 133 dwellings over the Plan period), and in the **Worthing** part of the National Park is **3 dwellings per annum** (a total of 19 dwellings over the Plan period).

4.3 The three parties confirm that the figure for the objectively assessed housing need for Adur and Worthing includes the communities within the National Park which fall within those Districts. The level of unmet need in Worthing will be determined through the progression of the emerging Worthing Local Plan. Whilst a positive approach is being taken to bring forward sites to meet development needs there is no expectation that all needs can be met and, as a consequence, there is expected to be a very significant housing shortfall for Worthing. Adur has a shortfall of approximately 3,100 dwellings.¹

5. Addressing wider housing need

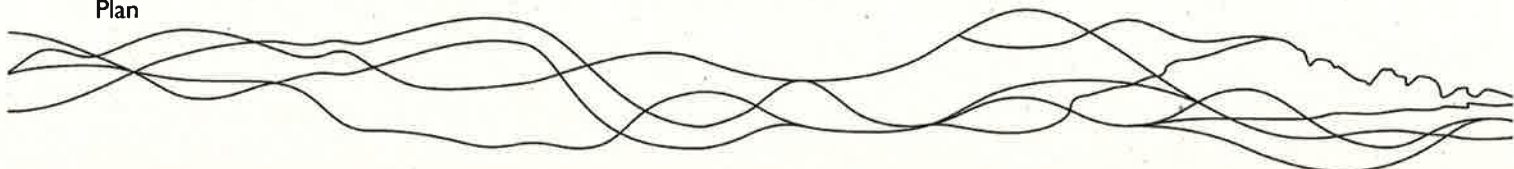
5.1 Adur and Worthing fall within the coastal West Sussex area and all parties acknowledge that there is a significant shortfall of housing throughout this area caused by the inability of all Authorities bar Arun to meet their own needs. The scale of the issue requires a sub-regional response and therefore on-going engagement across the sub-region through the West Sussex and Greater Brighton Strategic Planning Board will consider and test whether there are any opportunities for other local authority areas to meet some of the unmet housing need. Although all options will be explored, all parties agree that the South Downs National Park is not in a position to meet its own need let alone accommodate any of the shortfall arising from neighbouring areas.

6. Shoreham Cement Works

6.1 Adur & Worthing and the SDNPA are in agreement over the need to bring forward the sympathetic redevelopment and restoration of this site and are keen to work together on the preparation of an Area Action Plan for the site (as set out in Strategic Site Policy SD56). This work will need to include consideration of the impact on the local economies of Adur and Worthing along with traffic impacts.

6.2 SDNPA has started work on the AAP, commissioning consultants to provide baseline reports / surveys. This evidence base and early drafts of the AAP will be shared with both Districts at the appropriate time.

¹ Adur District Council & Worthing Borough Council representations to Pre-submission South Downs Local Plan



Signed on behalf of Adur District Council



Brian Boggis

Date: 7 March 2018

Position: Executive Member for Regeneration

Signed on behalf of Worthing Borough Council

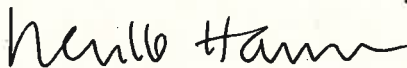


Kevin Jenkins

Date: 7 March 2018

Position: Executive Member for Regeneration

Signed on behalf of the South Downs National Park
Authority, Planning Authority



Neville Harrison

Date: 8 March 2018

Position: Planning Committee Chair

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