



Issues and Options - Consultation Report

August 2016

Worthing Borough Council is progressing a new Local Plan. The first stage of consultation (the Issue & Options stage) was undertaken in May and June 2016 when the consultation document ('Your Town – Your Future') was published for comment. This report provides an overview of this consultation and a high level summary of the comments that were submitted to the Council. The report should be read in conjunction with a more detailed summary of all representations. These documents, and a full version of all representations received, are available to view on the Council's website and as hard copies in the Council's offices (Portland House).

Background

A full review of the Core Strategy is required to respond to significant changes to the planning system at the national level, particularly how local planning authorities need to plan for housing. The work programme to progress a new Local Plan, set out in a revised Local Development Scheme, was published by the Council in March 2015. Since that time key elements of the evidence base have been updated and in spring 2016 the Council was in a position to publish the Issues and Options consultation document titled 'Your Town – Your Future'. This was the first stage of wider consultation which will help to influence how the town will grow and develop in the period up to 2033.

In April 2016, following consideration at Planning Committee (9th March), the Executive Member for Regeneration approved the Issues and Options document for consultation.

'Your Town - Your Future'

The purpose of this early stage of consultation was to invite comments from interested parties on all relevant topics to help identify the issues that the Council should address in the new Plan. Receiving comments at this stage helps to ensure that the Plan sets off in the right direction and covers the things it needs to cover. It also helps to inform what further evidence is necessary beyond that we have already collected or plan to collect. It was made very clear in the consultation material that the Council was not, at this stage, proposing any policies or stating which sites should be allocated for development in the new Plan.

Respondents were asked to comment on a draft Vision and set of Strategic Objectives. The consultation document then identified the key challenges that will be faced over the Plan period. Whilst comments were invited on all aspects of the new Plan, the draft document helped to steer the debate by setting out some key questions as to how these challenges may be best addressed.

The document set the context by explaining the very high levels of development needs in the Borough and the reasons why all possible opportunities to deliver this need will need to be considered as the new Local Plan is progressed. The development options part of the document was split into two sections: development options within the town (Areas of Change); and edge of town development opportunities.

Consultation Process

The six week consultation period commenced on May 11th and closed on 22nd June. During that time, and in line with the Council's Statement of Community Involvement (SCI), a wide variety of methods were used to engage with interested parties. All consultation documents were made available to view on the Council's website and hard copies were distributed to all libraries in and around Worthing.

During the consultation period the Council's Communications Team assisted with the consultation and, in particular, they ran a campaign using social media. A variety of media outputs were used to engage with interested parties including: a customised Google Map; print and online posters; animated infographics; and video interviews with lead Councillors. Efforts were also made with local radio and press outlets to encourage them to give the consultation coverage.

In addition to the above:

- Separate briefing sessions / presentations were held for staff, Members and community groups
- Officers met with community groups on request e.g. Worthing Society and resident associations
- Statutory consultees and all interested parties on the Council's database were informed of the consultation and invited to comment
- Newsletters and posters were widely circulated
- The main consultation document was supported by a set of FAQs and a bespoke response form was prepared (print version / hard copy and for the first time as an E-form)

Level of Response

In total, 261 respondents submitted representations during the consultation period. Some of these covered a range of issues in great detail whilst others (in fact the majority) were submitted in response to a single issue.

Over 80% of the responses submitted were made by individual members of the public with the remainder coming from organisations and groups. The level of response is significantly higher than that received by the Council at comparable stages of consultation on the Worthing Core Strategy.

Overview of Consultation Process

Overall, the consultation was fairly well received and many of those involved (particularly those who attended briefing sessions and meetings) were grateful for the opportunity to help steer the direction of the Plan. However, there was some criticism in that some respondents thought that there should have been greater awareness of the consultation. In addition, some respondents thought the consultation document was too long whilst (to counter these) others thought that more detail should have been provided.

The new E-form was used by 137 respondents. The submission of comments using this method by over half of the respondents represents a positive step forward as their entry straight into the database helped to ensure that comments could be managed in an efficient and timely manner.

The campaign co-ordinated by the Council's Communications Team was particularly effective. As an example, during the consultation period:

- 19 Facebook posts were placed that received over 32,000 total impressions with 5,177 people clicked onto the post to read more and 334 people shared or commented on the content
- 20 twitter posts were placed which resulted in over 18,000 total impressions
- a google map of sites received 9,400 views
- the Worthing Local Plan section of the Council's website received 2,292 views (858 unique users) that were directly from the Council's social media posts

In addition to the data set out above, the 'Social Media Report' is useful as it provides an analysis as to what tools generated the most engagement. In this regard, it is clear that the content that generated the most interest was the uploading of a google map that illustrated the location of the potential development sites. The findings of the report will help to guide the engagement strategy for future consultation stages.

The local newspaper and radio station did run a number of stories that linked to the consultation but, despite efforts made by officers, it is fair to say that this coverage was not as extensive as we had initially hoped for.

Overall, whilst lessons can always be learned for future work of a similar nature, it is considered that the consultation was a success. There were very few concerns raised about the process, the use of an E-form worked well and the Council can clearly demonstrate how a variety of methods were used to engage with a high number of groups / individuals. Whilst this engagement would have helped to generate the relatively high level of response it should also be acknowledged that the content of the consultation (particularly the inclusion of greenfied sites) is likely to have driven a higher level of interest than would otherwise have been the case.

Summary of Comments

The high level summary below provides an overview of the main comments received during the consultation. A more detailed summary, including a breakdown of responses to all questions, has been published alongside this report.

Vision and Strategic Objectives

(50 - approximate number of respondents on this issue(s))

The majority of those that responded to these questions agreed that the Vision provides a clear direction for the WLP and that the strategic objectives provided robust aims against which the Plan can be progressed. However, others were of the view that these elements were too vague, not locally specific and lacked clear targets. Others felt the Vision should be used to clarify exactly what the town wants to be. To address these concerns specific suggestions were made in regards to sustainability, transport, tourism, economy etc.

Economy (30)

In general, respondents thought that the Council had identified the key challenges facing the economy and expressed the importance of retaining / protecting key employment sites. However, there was also a call for flexibility to ensure that these sites were used in the most efficient manner. The Council was urged to support business start-ups. A number of additional sites were suggested which could provide for new / upgraded employment land.

Retail and the Worthing Town Centre (35)

Overall, most respondents were agreed that much more could be done to improve the retail offer in the town and the appeal of the town centre. Repeated comments include:

- Urgent need to redevelop Guildbourne Centre and other key sites
- Desire to deliver more vibrancy and mix of uses (particularly leisure)
- Need for greater cohesion and better links to the seafront
- Develop and support an evening economy
- Need to improve accessibility
- Encourage diversity and create environment for local / independent stores

Tourism (40)

In general, about half of those that responded on this issue thought that the Council had identified the key challenges facing tourism. However, it was generally agreed that more could be done to improve the tourism offer and repeated comments include:

- Develop indoor leisure facilities
- Enhance seafront / lido / promenade to better utilise this resource
- Promote and encourage a more inclusive night-time economy
- Develop a clear niche (e.g. cafe culture / watersports / cultural offer / heritage)

Community and leisure facilities (20)

A variety of individuals and interest groups highlighted particular issues that need to be addressed / enhanced. These include:

- Church groups / Places of Worship
- Indoor leisure facilities
- Sports facilities (particularly swimming / indoor leisure)
- Health / care facilities
- Facilities to cater for a range of ages (particularly young and old)

Transport (40)

Disregarding the representations made on the potential development sites the issue that generated some of the most detailed comments was transport. Recurring themes were:

- the need to encourage sustainable modes of transport to help improve accessibility and reduce impacts on the environment
- the desire to improve cycle facilities and routes
- the need to improve public transport and reduce costs
- that new development should not exacerbate existing transport issues
- that focus should be given to improving congestion on A27

Environment (35)

A wide variety of comments were submitted but a recurring theme raised was the need to provide greater emphasis on helping to mitigate the impacts of climate change and ensure development is sustainable. In this regard, detailed comments and suggestions were made with regards to air-quality, flood-risk, water quality and sustainable construction. The following areas were highlighted as being particularly sensitive to development - seafront / ancient woodland / SDNP / gaps / and agricultural land.

Of those that responded to question 8d, all respondents were agreed that green spaces in and around the town were highly valued (for all ages, health, wildlife, tranquillity, leisure and well-being).

Housing - general (50)

The strong consensus of those that responded to question 1a is that housing should not be given higher priority than other development needs as the WLP should be seeking to deliver a mix of uses (particularly employment / leisure) to provide balanced and sustainable communities.

A wide range of suggestions were made as to how the WLP could address the needs of specialist accommodation (1b). These included:

- how housing could be delivered to meet the demands of an aging population
- affordable housing to meet local needs

- making better use of existing housing stock
- delivering Lifetime homes

(1c) In general, respondents were not opposed to raising densities to help address housing needs but this was on the condition that adequate infrastructure is provided and that the development didn't have a negative impact on townscape / existing occupiers. There was a mixed view as to whether (and where) high rise developments could be acceptable.

(1d) The vast majority of respondents were of the view that the Council should include a policy that would resist the inappropriate development of residential gardens although a number of comments acknowledged that it might be appropriate in some circumstances.

Development Options Within the Town (40)

In general, respondents agreed that the sites listed (Areas of Change) provide the most significant development and regeneration opportunities to deliver housing, employment and leisure uses within the town. There were no significant concerns raised with regards to the redevelopment of any of the sites but a number of suggestions were made as to how the sites could be developed and for what mix of uses (particularly Teville Gate, HMRC site / Martlets Way and the Stagecoach site).

Very few additional areas / sites were put forward to be considered as Areas of Change (new suggestions were Charmandean Centre and railway sheds at West Worthing Station).

Edge of Town Development Opportunities (210+)

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. Many of these respondents went on to suggest that these areas should be protected and that they should provide much needed green infrastructure (both informal and formal) and that they could be designated in a number of ways (Local Greenspace Designation / Nature Reserve / sports pitches / SDNP).

The consultation document asked for comments on the 8 edge of town development opportunities that had been identified as opportunities that might have some potential to meet development needs. Perhaps not surprisingly, it was the inclusion of these sites that generated the most response during the consultation. However, it is important to note that the level of response attributed to sites varied significantly. 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.

Site 4 - Goring / Ferring Gap & Site 5 - Chatsmore Farm (180+)

183 respondents (70% of the total) raised strong concerns about the potential development of these sites. The majority of these respondents only commented on these opportunities but others also made additional comments on other issues.

The vast majority of these respondents (178) referred to both sites in their comments with only 4 differentiating between the two areas. Whilst it was acknowledged that development already links Goring and Ferring the general view was that both gaps played an important role in terms of their landscape value. A variety of reasons were given by those seeking to protect these areas from development and these include the following (listed in order of how many people raised each point):

1. Need for protection
2. Landscape character- setting (Sea/ SDNP) / views
3. Protect settlement pattern / avoid coalescence & urban sprawl
4. Wildlife - particularly birds (roosting / migration)
5. Flood risk - coastal / Ferring Rife
6. Loss of grade 1 agricultural land
7. How the site is used and valued - physical / mental health & well-being
8. Provides natural area / rural environment accessible to urban area
9. Infrastructure

In addition to the 183 respondents set out above it should be noted that a number of other respondents felt strongly that no greenfield sites around Worthing should be developed. Whilst these respondents did not explicitly mention the Goring sites it can obviously be assumed that they were opposing development in these locations.

Persimmon Homes, who have a controlling interest in both these sites, submitted a representation stating that both sites could be developed in a sympathetic and sustainable way to help meet the Council's housing needs.

Beeches Avenue (15)

Discounting the Goring sites, Beeches Avenue received the most comments. In particular, concerns were raised in relation to: impacts on junction to A27; flood risk; SDNP; air quality; landscape and nature. Whilst there was an overriding objection to development here some respondents were of the view that the development would have less of an impact if access could be taken through the football club.

Other greenfield options (35+)

Relatively, very few comments were submitted on the other greenfield opportunities. Some recurring / important comments were that:

- the Caravan Club site should be retained for the existing use

- potential flood risk must be addressed / mitigated
- Development at Brighton Rd would have negative impact on Worthing Sompting Gap
- Football club should not be considered until such time that a suitable replacement has been delivered

The vast majority of those that responded to Q11d agreed (or raised no objection) to the bringing forward of the two sites (Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8)) in advance of the new Local Plan. These were already located in the Built Up Area boundary and the question explained that this would help to demonstrate that the Council was taking a positive approach to housing delivery in light of significant housing needs. However, it should also be noted that several respondents argued that these sites should not be developed as the area was already 'full' and that existing infrastructure was struggling to cope.

Planning policies (20)

Most respondents were agreed that the list of suggested policies covered the key areas that the WLP would need to address. A number of additional policy areas or wording suggestions were suggested in regard to:

- Heritage / protection of Salvington windmill
- Delivering infrastructure
- Protection of trees
- Sustainable construction

Next steps

To sit alongside this summary report, a more detailed schedule of all comments has been prepared. The report, schedule and full versions of all representations submitted are available to view on the Council's website and as a hard copy at the Council offices (Portland House). All respondents have been informed of this and thanked for taking the time to respond and get involved in the preparation of a new Local Plan.

Alongside the Council's existing evidence the comments received through this consultation will help to steer the drafting of the new Plan and, where appropriate, the commissioning or preparation of new evidence. A more detailed timetable for the next stages of Plan preparation will be prepared and agreed over the summer.