



**Issues and Options Consultation
May - June 2016
Summary of Representations**

Introduction

This report summarises the representations received during the Worthing Local Plan Issues & Options consultation. It should be read in conjunction with the 'Issues and Options Consultation Report - August 2016'. All responses to the consultation are available to view in full on the Council's website and as hard copies in the Council Offices (Portland House, Richmond Road, Worthing).

COMMENTS ON CONSULTATION	
E4 E6 E12 E16 E51 E92 E121 E124 E133 E137 M44 M61 M81 M86 M93	Whilst the consultation process was largely well received a total of 15 people / organisations commented on the consultation process itself. Some thought that the Plan should have been better advertised and more widely circulated. Some found the consultation document long and the response form complicated. Others thought that more information was needed to help them form an opinion on the questions we asked. It was recommended that plain English is used and a glossary of terms provided.

GENERAL COMMENTS	
E6 E7 E12 E22 E33 E36 E61 E82 E92 E96 E106 E119 E124 E125 E133 M2 M6 M7 M13 M32 M43 M44 M45 M56 M60 M61 M62 M67 M71 M72 M73 M75 M76 M81 M82 M83 M85 M86 M87 M89 M90 M91 M96 M97	<p>A wide variety of general comments were received from 44 respondents. Some addressed the Plan as a whole, but most touched on the questions in the consultation document (environmental, housing, infrastructure, heritage and design matters). The general comments are summarised here, and the specific comments are summarised under the relevant consultation question below.</p> <p>Since some important issues that underpin the Plan are outside of the Council's control, it was suggested that a centralised, more strategic approach was needed. It was recognised that the level of housing need in the area was more than the Borough could provide given its environmental constraints. Developers are especially keen to ensure that Councils work together to consider how housing needs can be delivered in tandem with neighbouring authorities. Several respondents referred to the "Duty to Cooperate", including Adur District Council and Mid Sussex District Council who both committed to continued engagement. It was noted that Adur also has unmet housing need.</p> <p>A recurrent theme in a number of consultation responses was the hope that Worthing could become a 'leader' in sustainable development with a strong environmental focus. More detail on this appears under other questions below.</p>

VISION

Q1a - Do you agree with the Vision we are trying to achieve?

Q1b - Does it provide a clear direction for the Worthing Local Plan?

Q1c - Is there anything you think we have missed which you would like to see incorporated in the Vision?

E1 E4 E7 E9 E21
E35 E36 E51 E52
E56 E58 E59
E60 E69 E75 E92
E93 E96 E102
E106 E119 E124
E127 E130 E133
E136 E137 M1a
M4 M24 M25 M32
M43 M44 M45
M62 M67 M69
M71 M75 M78
M79 M81 M82
M83 M84 M85
M86 M92 M93
M94 M96

52 people / organisations comment on the Vision

- 30 agree (or broadly agree) with the vision, and 24 say it provides a clear direction
- 3 disagree with the vision, and 6 say it is too generic / vague
- 3 think the vision should be more ambitious / bolder
- 1 respondent thinks the vision should be short and punchy, followed by a Mission statement

A recurrent theme is the desire for Worthing to be known for sustainable development (12) with a strong environmental focus (9). Respondents would like Worthing to plan positively and sustainably for climate change, emphasising green technologies and energy efficiency with neutral / low carbon / low methane output. They would like sustainable transport and improved air quality. Southern Water state that increased demand for water/waste management must be met without compromising strict environmental standards.

9 respondents, including 5 organisations, address the importance of committing more to the natural environment, to protect and enhance it. The countryside, trees, parks, gardens, wild, open and local green spaces are referred to. West Sussex County Council (WSCC) stress that easy access to the beach and countryside is important. A few respondents (3) say the seafront is key to regenerating the town. Some note that retaining the intrinsic character of the town is essential, including protecting its buildings of historic and tourist interest from the pier to the fishermen's huts and beach huts (5 including 2 groups).

Several refer to the need to use land efficiently, using brownfield sites and increasing density (4) but avoiding overdevelopment by considering the height, massing and scale of the townscape in relation to streetscape and design (2). Several developers ask that the Vision plans positively to meet *all* needs, whilst some respondents ask that affordable housing should be emphasised.

There are conflicting views on the economic aims of the vision, from support, to concern that business has too much focus, and that development needs to be resilient to economic change. WSCC stress the importance of linking positively with the wider area. Others raise the issue of improved routes and transport links (2). Views expressed on the social and community aspect of the vision propose a sense of shared space, with a compassionate and cooperative approach, the retention of existing facilities and improvement / provision of good disabled access (5).

STRATEGIC OBJECTIVES

Q2a - Do you agree with the proposed objectives? If, not, what changes would you like to see?

Q2b - Are the objectives sufficiently distinctive and locally specific?

E1 E4 E7 E51
E58 E59 E69 E75
E92 E93 E96
E119 E124 E127
E130 E133 E136
E137 M1a M4
M24 M25 M28
M32 M43 M56
M62 M70 M71
M72 M78 M79
M81 M82 M84
M85 M86 M92
M93 M94

40 people / organisations comment on the strategic objectives (most points are covered in more detail in later sections)

- 18 agree with the objectives, of which 4 want to add to them or qualify them
- 10 agree they are sufficiently distinctive and locally specific
- 2 comment that, whilst laudable, their viability is questionable, and 1 says they should be SMART
- 7 say the objectives are too generic / high level and should: specify the historic and natural assets of the town; reflect planning matters at sub-area level; acknowledge matters that affect individual sites; be more detailed and provide definitions.

Community Strategic Objective

A key theme is that housing should be sustainable and designed for life (7). In particular, WSCC says the Plan should recognise the challenges arising from an ageing population. Others stress that mixed use development helps to reduce the need to travel. And that environmentally sustainable and energy efficient development helps to promote low carbon / methane lifestyles.

There are a variety of views (9) on housing provision. Developers seek the maximum number of homes to meet *all* identified needs, and note that 'safeguarding family homes' is at odds with the environment objective for 'full and efficient use of land'. A few ask for clarification on the number and type of homes needed, and what "affordable" actually means. Other views expressed include: that second homes should not have priority; that homes should be included in the town centre to keep it vibrant; that greenfield land should not be developed; and that Worthing should not be overdeveloped.

8 respondents comment on infrastructure and community facilities. Affordable, regular and improved public transport / cycle provision a recurrent theme, along with adequate car parking. It is felt that an objective on health should be added, with details given on how inequalities can be reduced, and a commitment to delivering more open space and sports facilities.

Economic Strategic Objective

4 people / organisations comment on employment. The blanket retention of key employment areas is seen by some developers as too inflexible (this is picked up further under Question 3). One respondent asks why only high value jobs are referred to, and another suggests referring to the links between the workforce and local education.

Some comment on retail, business, tourism and culture (4). Suggestions include improving the town centre shopping experience by encouraging independent/specialist shops and upgrading existing units. It is thought desirable to offer conference facilities to improve the town's attractiveness, and that business and cultural activities should be improved generally. One respondent proposes using the Pavilion more and improving its appearance. Another suggests tourism should outweigh local services.

5 respondents address the role of new development and infrastructure. One developer suggests it would be helpful to: identify the gateway locations within the plan; recognise the positive contribution new housing makes; recognise that the construction industry supports local jobs and businesses; provide a clear statement of what infrastructure investment is required where.

Others comment that new development should be sensitive to the environment, integrating with existing residential areas. One respondent suggests that a public banking option should be established that benefits Worthing residents and businesses.

Environment Strategic Objectives

The environment objective received a lot of interest, reflecting the recurring theme that many would like to see a sustainable plan with a strong environmental focus. Broadly, considering climate change effects is welcomed although more detail is requested (3). The Sussex Wildlife Trust (SWT) suggest reflecting the details of objective 1 in the Core Strategy.

WSSC and the South Downs National Park Authority (SDNPA) suggest improving and creating new connections between the town, downs and sea, and to other green spaces. The SDNPA also suggest maximising the positive contribution the National Park makes to local residents' quality of life. 5 people / organisations stress that protecting the green gaps between towns and the green spaces within the town is important. A green infrastructure plan could help deliver environmental improvements (1), and SWT suggest reflecting the details of objective 6 in the Core Strategy which seeks to add to natural capital..

The Woodland Trust propose wording to protect ancient woodland and ancient trees, and to ensure that new development incorporates existing trees and a range of new suitable native tree species.

Historic England (HE) would like the Plan to promote a positive strategy for the historic environment and historic assets, and give advice on aligning different elements of the plan with National policy. The High Salvington Mill Trust state that protection should be extended to buildings of historic and/or tourist interest.

A few comment on the seafront and coastline (3). They support protection of the undeveloped coastline but think that not all of it should be enhanced (so as to retain some authenticity and environmental relief). The seafront, however, could be improved.

The Environment Agency (EA) ask that the following things are referred to: avoiding development in areas with the greatest risk of flooding; the water environment and protecting groundwater and surface water quality; the Water Framework Directive, water resources and water efficiency.

Three respondents wrote in support of the sustainable transport objective. One group proposes electric busses and park and ride.

One developer asks that the objective seeking full and efficient use of previously developed land is amended to read *maximise the development potential of previously developed land*.

ECONOMY

Q3a - Do you agree with the key challenges identified for the economy? Are any missing?

E1 E4 E35 E51
E59 E69 E75 E90
E92 E102 E107
E119 E124 E133
E136 M4 M24
M25 M28 M43
M62 M67 M71
M72 M79 M97
M93 M84 M85
M74 M92

In response to the first part of this question six respondents agreed with key challenges identified. However, two respondents commented that whilst the challenges were an excellent ambition they were mainly outside the Council's control. One respondent considered that the challenges were too vague and there was a need to focus on what they were trying to deliver.

Key Challenges that are missing

Four respondents referred to educational/training facilities - that Worthing should aim to become a centre of academic excellence. More focus should be given to high quality training of new and varied skills to change the nature of the employment offer and not just a focus on training for existing local jobs(2). Respondents considered that this approach would help rectify the economic value imbalance between local and 'exported' resident expertise and reduce out-commuting (2)

A number of comments suggested that the plans focus should be on the global economy and emerging markets and not just have a focus on existing employment (2). The plan should promote inward investment (1), cater for all types of business (1) but consider where the priorities lie. The plan should help create an environment that is open to new ideas and ways of doing things(1)

There were a number of comments about the need for the plan to support young start up business. Suggestions included: low cost office/studios (1) / nurturing/incubator spaces for startups (2) / improve existing and provide new conference facilities(2) help businesses move central areas by lowering rates(1).

- A key challenge should be to make the most efficient use of available sites (1) and protect key areas (1)
- The plan needs to acknowledge the fragile state of the commercial property market, as identified in evidence base, and therefore the challenge of delivering viable employment developments (1)
- SDNPA - the plan should help develop the rural economy and possibly allocate land for small business units(1)
- There is no mention of A27 proposals and the impact this will have on the local economy (3).
- Need to encourage investment in sustainable green industries and local energy (2) and the need for the plan to refer to potential to grow high tech industry/ space for pharmaceuticals to expand / distribution centre.(2)
- Historic England commented that there were opportunities for heritage led regeneration helping to create successful places for business to locate and attract inward investment.

Other missed challenges were considered to be:

- how to encourage living wage from all employers in Worthing area (2)
- improve public transport to help the local economy (2)
- encourage business activities appropriate for the character of the town (1)

	<ul style="list-style-type: none"> • how to provide space for voluntary groups (1) • working and running businesses from home (1) • providing space for community uses and public services (1)
Q3b - Should the Local Plan continue to protect key employment areas or should it be more flexible in its approach?	
E1 E4 E7 E9 E35 E49 E51 E56 E69 E58 E59 E61 E75 E90 E92 E93 E102 E106 E124 E133 E136 M1a M4 M24 M25 M28 M62 M71 M72 M79 M81 M84 M87 M92 M93 M96	<p>11 respondents that considered that the Plan should continue to protect key employment areas in line with the current policy. However, 8 respondents considered that whilst there was a need to protect the best assets based on clear evidence there needed to be some degree of flexibility in certain cases. This flexibility by identified to be of particular importance for Areas of Change as these offer opportunities for regeneration and renewal. It was also considered that within the current estates there could be greater flexibility of uses and an intensification of development.</p> <p>Several respondents considered that the current policy approach is far too restrictive, particularly when applied to those sites situated outside of the key estates and that more flexibility is required. This would allow for adaptability and resilience in the face of change. Flexibility would also allow for the delivery of more office/lab space for high value SME's. On respondent questioned the need for a hierarchy of need approach.</p>
Q3c - In addition to the sites already identified as having the potential to deliver employment land are there any other sites that could accommodate employment growth?	
E1 E59 E69 E75 E92 E93 E102 E124 E136 M4 M24 M28 M62 M67 M71 M92	<p>3 respondents who considered that there were no more additional sites that could accommodate employment growth. However, 9 respondents identified a number of sites that they considered might offer employment opportunities. These included:</p> <ul style="list-style-type: none"> • former railway sheds by West Worthing station (1) • GSK playing fields (1) • under used office blocks like Columbia House and Centenary House, Teville Gate (1) • the gateway area around Worthing Station to form of a new digital hub with supporting retail and leisure provision (1) • potential for delivery of employment land near East Worthing Industrial Estate without the delivery of EWAR (1) • filling 'gaps' within industrial estates (1) • significant potential within the town centre (1) • retail /services could be incorporated within new developments (1) • One respondent highlighted the contradiction of seeking to provide new sites while existing sites are being lost through permitted development (eg MGM House)

RETAIL AND THE WORTHING TOWN CENTRE

Q4a - Have all the key challenges for retail areas and the Worthing town centre been identified, if not, what has been missed?

Q4b - Are retail centres functioning well - how can they be improved?

Q4c - How could new development in the town centre enhance the town's identity and attract more visitors?

E1 E4 E5 E22
E32 E33 E36 E48
E51 E58 E59
E60 E61 E69 E92
E93 E96 E99
E75 E90 E102
E106 E107 E119
E130 E124 E126
E133 E136 M3
M1a M4 M24 M25
M28 M62 M67
M69 M71 M82
M96 M93 M84
M85 M86 M92
M93

Overall 49 individuals / organisations responded to the retail and Town Centre section. Most respondents agreed with the key challenges that had been identified but raised / highlighted the following issues (summarised in themes below): enhance the evening economy; redevelop the Guildbourne Centre; improve accessibility / cohesion; improve the mix of uses of diversity in the town centre.

Retail Centre / Mix of Town Centre Uses

- retail centres looking dated and in need of modernisation(4)
- town centre lacks cohesion and good choice of retailers / and is tired / unwelcoming (3)
- keep Worthing distinctive by avoiding national chains and focus on small boutiques / independent shops / artisan stores (7)
- no more big supermarkets; they are destroying small shops (2)
- high quality retail provision is shrinking replaced with poor quality retail / bars (4)
- there should be greater flexibility for community groups and other uses to take over vacant units (3)
- encourage a wider variety of uses / users (including employment / residential) and greater diversity in town centre (5)
- reduce rates for leaseholders to encourage variety and start-ups (2)
- redevelop the Areas of Change / key sites (r)
- less development in town centre and better use of existing buildings (2)
- focus on quality (use and design) not quantity- Worthing has enough places to eat and shop (3)
- Worthing needs to identify its own character rather than compete with other centres (2)
- plan will need to reflect changing habits of online shopping and going into town for experiences (1)
- deliver better leisure facilities including cinema, seafront destinations and better choice of restaurants (2)
- sustain theatre / events improvements and invest in town centre (1)
- encourage sustainable food shopping and Fair-trade (2)
- Worthing should model itself on Chichester and Brighton Laines (2)
- Town centre needs large anchor store (1)

Guildbourne Centre

9 respondents specifically commented on the Guildbourne Centre with all highlighting the need to: redevelopment this site; decrease number of vacant units; and improve the environment for shoppers / users.

	<p>Montague Street</p> <ul style="list-style-type: none"> ● parts of Montague Street are unwelcoming and retail offer has declined (2) ● Bath Place off Montague Street should be made to look more inviting with high quality street cafes (1) ● area between Montague Street and the seafront suffers from unattractive redevelopment (1) <p>Vitality / Evening economy</p> <ul style="list-style-type: none"> ● encourage people to live in the town centre to add vitality and area vibrant and safe/inviting (2) ● add vitality and diversity to the town to make it more vibrant (4) ● encourage development of upper floors in town centre (1) ● town centre is deserted/unwelcoming after 6pm. Deliver later opening / cafe culture to enhance evening economy (8) <p>Accessibility</p> <ul style="list-style-type: none"> ● key issue is the ease of access to town (and other centres) - including the need to improve: parking /affordable parking; bus links; provision for cyclists; sustainable transport options; and links from the stations (6) ● improve accessibility of retail amenities for disabled residents and tourists (2) ● improve connectivity, cohesion and signage (4) <p>Public Realm/environment</p> <ul style="list-style-type: none"> ● improvements needed to public realm / town needs a clean-up (3) ● maintain and increase tree cover. Trees create a sense of place and local identity, providing focal points and landmarks, improving air quality, moderating temperature, reducing flash flooding, and contributing to wellbeing (Woodland Trust + 1). ● it is essential that public spaces around shops should remain public and that they are improved (3) ● provide shelter, seating, shade and planters; add more shade and improve street cleaning (1) ● invest in good public realm using quality materials and design (1) <p>Lower order centres</p> <ul style="list-style-type: none"> ● Goring and West Worthing, where parking is available, are functioning well (1) ● West Worthing has a nice feel especially with the Saturday market stalls (1) ● Tarring Rd is considered to be run down and difficult to utilise due to parking limitations (1) ● Rowlands Rd should be promoted (1)
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TOURISM

Q5a - Have the key challenges for tourism been addressed?

Q5b - In what ways can the tourism offer be improved?

E1 E4 E7 E36
E51 E58 E59 E69
E75 E92 E96 E99
E102 E106 E107
E114 E124 E126
E133 E136 M1a
M4 M24 M25 M45
M54 M62 M67
M69 M71 M72
M82 M84 M85
M86 M93 M96
M97

Most respondents to this question considered that most of the key challenges for tourism had been identified.. However, a number of suggestions were made as to how the tourism offer could be improved - in particular, a number of respondents suggested ways in which the seafront offer could be enhanced.

Challenges missing

- what type of tourists is Worthing trying to attract? (2)
- there needs to be a greater emphasis placed on culture (1)
- promotion of tourism should not be limited to the town centre (1)
- beachfront homelessness / street drinking has negative impact on tourism and they need help (2)
- good access (parking / public transport / sustainable modes) to the town is vital to tourism (1)
- improve provision for cyclists - invest in better cycle links (national cycle route 2 and links to SDNP) (2)
- make route from train station more attractive - visitors currently get lost and confused (1)
- make Worthing completely accessible so that people with any disability can visit / enjoy the town (1)

Activities / improvements

- great need to improve area to west of the pier (lido / Grafton) (5)
- there needs to be more activities for all age groups - particularly children (e.g. paddling pool) (3)
- indoor facilities required - more things for tourists to do on a wet day (3)
- greater use should be made of the seafront / promenade / sea sports / beach (7)
- provide for boat trips to other coastal towns and Rampion wind farm (3)
- encourage and support tourism but protect residents from noisy outdoor events (1)
- other suggestions include aquarium (1) new miniature golf course (1) ice-rink (1) maritime museum (1) cycle track (1)
- build on cafe culture

Visitor accommodation

- encourage new hotels (2)
- promote caravan site / camping / encourage 'green' tourism (3)

South Downs National Park

- access to the SDNP is important to residents as well as tourists - Worthing is a gateway to the Park (3)
- clear, sustainable and safe access links into the wider areas including the SDNP should be promoted (2)

	<p>Heritage</p> <ul style="list-style-type: none"> ● plan needs to seek to conserve/enhance the quality of the historic environment to encourage tourism (Historic England) ● heritage assets play a significant role in tourism and should be better exploited (Worthing Society) <p>Marketing / Events</p> <ul style="list-style-type: none"> ● greater effort should be given to promote the Borough as a distinct/unique seaside destination (4) ● reopen the tourist information (4) ● the Council should advertise the town's attractions more effectively / bring back 'Sunny Worthing' slogan (2) ● don't waste money on advertising - use website (1) ● build on cultural offer and introduce themes (e.g. music / arts / history) (1) ● don't try to compete with Brighton and Chichester - Worthing has its own charm (1) ● provide online 'what's on' diary and maintain and enhance wonderful range of events (2) ● reduce theatre rental rates for local non-profit and low profit groups (1) ● hold science and technology seminars in the assembly hall (1)
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COMMUNITY AND LEISURE FACILITIES	
Q6a - Do you agree with the main challenges identified in planning for the provision of different infrastructure needs? Are any missing? Q6b - Do you have any suggestions for how the Local Plan could resolve these? Q6c - Are you aware of any particular community and leisure needs?	
E4 E7 E16 E32 E36 E49 E51 E56 E69 E75 E92 E96 E106 E107 E119 E124 E126 E133 E136 M4 M24 M25 M53 M62 M67 M69 M71 M82 M84 M85 M86 M93 M95	<p>33 people/organisations comment on community/leisure facilities. 9 agree with the main challenges identified and 2 mostly agree.</p> <p>Respondents identify a variety of challenges:</p> <ul style="list-style-type: none"> ● valuing community life and supporting not-for-profit organisations that run local facilities (3) ● protecting the NHS and schools from cuts, outsourcing and privatisation (2) ● Investing in mental health and recovery services (1) ● considering the changing dynamics of church growth and church decline in Worthing, and recognising the value of churches as a community resource and support (2) ● upgrading facilities (1) ● planning for the needs of an increasingly ageing population without creating "grey ghettos" (1) ● identifying infrastructure requirements, funding them (including specifying how CIL is spent), and implementing them (3)

Several respondents propose methods of working together and approaches to take:

- Map community organisation, networks and volunteers to define their needs (1)
- Set up a stand in town / hold evening workshop - get the community to identify infrastructure needs (1)
- Work closely with residents association (1)
- Give support for residents associations (particularly from Cllrs) (1)
- Provide more information on what facilities are available, and spend more on promoting facilities and events (2)
- Provide community notice boards and facilities in town centre for community groups to use (1)
- At community centres: have regular question time for Council and local MP; talks and interest groups / education on different issues; "pay as you feel/can afford" cafe with food from foodbanks and fairshare to help poorer local residents (1)
- Council should establish a public banking system which ploughs profits back into community instead of shareholders (1)
- WSCC will continue to work with WBC on infrastructure provision and mitigation to meet the needs of development

Responses relating to specific sites:

- The Assembly Hall is a very under-used resource that could be an asset (1)
- Use Lido stage for free outdoor performances / Lido could be improved to provide better community events space (2)
- Open Colonnade House as free cultural centre (art fairs and installations) (1)
- Turn aquarena into ice rink (1)
- Provide parking for splashpoint and aquarena (1)
- Turn an old disused light industrial warehouse by the tip into a roller-skating rink and run it at costs kids can afford (1)
- Install miniature golf course in the green space next to Splashpoint Leisure Centre (1)

Comments on open space, links and easy access:

- Protect and maintain parks / open space / recreation parks, and deliver more (3)
- Provide paved areas through green spaces for elderly residents and wheelchair users to more easily enjoy these areas (1)
- Protect and provide more allotments (1)
- Encourage community gardens which produce food locally and provide sheds for tools (1)
- Plan for green infrastructure (1)

Comments on leisure and play:

- Protect and deliver more sports / leisure facilities (important to health and wellbeing) (5)
- Provide new indoor leisure facilities / free tennis courts (1)
- Provide a climbing wall (1)
- Invest in artificial (3G) surfaces at public and school cricket and football pitches to increase usage and allow for other recreational uses by both public and schools (1)
- Provide more adult outdoor exercise equipment. Existing free exercise equipment is brilliant and should be extended into other areas. Build one on Goring Green, or further west on the beach. Also a military style obstacle course (3)
- Provide more and better play facilities / outdoor spaces / activities for children, and young people / teenagers including those

	<p>that offer a challenge / allow reasonable risk taking (4)</p> <ul style="list-style-type: none"> ● Provide more / bigger / better swimming facilities / water activities and themed weekend courses (3) ● Ensure leisure uses in residential areas are appropriate (1) ● We need new multiplex cinema (1) ● Develop free broadband (1) <p>Comments on Health and social care:</p> <ul style="list-style-type: none"> ● Seek to protect and invest in health services and facilities to meet demand (5) ● Consider spending CIL on medical facilities (1) ● Invest in mental health services (1) /Consider dementia friendly public realm (1) ● Improve infrastructure for elderly care (1) ● Future proof for local societal change and cater for an aging population (2) ● Provide and improve infrastructure for disabled people throughout the borough (2 groups/organisations) <p>Comments on Education and community:</p> <ul style="list-style-type: none"> ● Consider WSCC's published service plans, including on school places (WSCC) ● Seek to protect and invest in education services / schools, including increasing provision for new developments (3) ● Provide more community centres (e.g. like the one in Durrington near Tesco) which can be utilised at low cost. Can one be built in Goring? And a central community centre for nurturing community projects that can reach the general public (3) ● Encourage better intergenerational interests/interaction (1) <p>Comments on housing and land use:</p> <ul style="list-style-type: none"> ● Ensure affordable housing needs are met (1) ● There is a need to allocate land within existing and new communities (1) ● Support flexible change of use for premises and land to meet the needs of the community sector (2) ● Invest in community energy (1) ● Improve provision for cyclists. More bike stands (2)
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TRANSPORT

Q7a - Do you agree with the main challenges identified? Are any missing?

Q7b - Do you have any suggestions for how the Local Plan could better promote sustainable transport?

E3 E4 E5 E7 E12
E16 E17 E32
E36 E47 E48 E51
E53 E59 E60 E61
E66 E69 E75 E82
E90 E92 E96 E99
E102 E106 E107
E114 E119 E121
E124 E125 E126
E127 E133 E136
M1a M2 M4 M24
M25 M28 M56
M61 M62 M66
M67 M71 M72
M82 M84 M85
M86 M89 M92
M93 M96 M97

58 people / organisations comment on transport.

- 9 respondents agree with the challenges, and 2 generally agree.
- 3 respondents (inc. Sustrans) disagree that “there are limited sites where sustainable modes of transport are most suited”:
- 1 respondent disagrees with statement that Worthing has “good rail links along the coast and to London”.
- 1 respondent asks the Council to refer to improved provision for cyclists.

A number of other challenges are identified:

- road traffic accounts for a significant part of Worthing’s carbon footprint and this requires a large modal shift away from the private car to sustainable modes of transport (Sustrans)
- promotion of alternative modes of transport is only part of the solution (1)
- the Plan does not address traffic congestion on the main town routes (1)
- the A27 west of Worthing is very congested and the A259 and A27 east is often congested outside of peak periods (1)
- transport is a major and growing problem and will remain a challenge with capacity the biggest issue (3)
- transport needs to be safe and affordable (1)
- we need proposals and the power to deliver an integrated, sustainable transport system including cycling lanes (1)

Comments on transport assessments and modelling:

- Highways England (HE) - the Council must robustly model the transportation impacts of the local plan proposals and provide mitigation measures on the Strategic Road Network where detrimental impacts are identified. Even with careful planning and promotion of alternative transport measures, the Plan is likely to have a significant cumulative impact on the A27.
- HE is already working with the Council on some sites. Sites that could come forward must be subject to a robust Transport Assessment. Any impacts identified will need to be managed to ensure that the plans are deliverable.
- WSCC supports the intention for a Transport Study and note that it will need to use the new model for Worthing, Adur and Arun being developed by Highways England, as well as comply with national policy and guidance.
- WSCC also require Infrastructure and transport mitigation packages to be identified alongside allocation of sites.
- the Local Plan must have regard to the West Sussex Transport Plan and consider the WSCC published service plans.
- Adur will continue to work with Worthing to ensure transport network issues
- any new transport study must consider existing problems on Upper Brighton Road/West Street and A27 (1)
- Transport Assessments and the Infrastructure Delivery Plan must be undertaken/updated as a priority (1)

Comments on overarching matters:

- focus on safe and suitable transport infrastructure which meets the needs of the community, all modes of transport and

- mitigates the effects of development (WSCC)
- show that sustainable transport is a local priority in Worthing by encouraging and investing in it (5). As a minimum should support the objectives of the West Sussex Walking and Cycling Strategy (Sustrans)
- use sustainable transport initiatives to make heritage and public realm improvements (Historic England)
- ensure that new roads or improvements conserve the historic environment (Historic England)
- Arundel by pass would greatly help with congestion west of Worthing on the A27 (1)
- do not rely on new development to provide a solution to existing problems ensure that new development does not have a negative impact on transport (8)
- focus development near stations and areas well served by amenities (2)
- Create 'clear ways' into the town centre (2)
- ensure that transport infrastructure links housing to community facilities, employment locations and welfare facilities (1)

A number of respondents comment on Highways England's proposals to widen the A27. This is not within the remit of the Worthing Local Plan, however the issues raised are undoubtedly relevant. The comments are summarised as follows:

- The A27 should not be widened (5 including two organisations) because it would: increase traffic flow through residential areas; increase congestion; lower air quality; be contrary to sustainable transport result in a loss of homes which would be difficult to replace; bisect Worthing Town; disrupt services; disrupt north-south access; change the character of north Worthing
- The A27 improvements should: be a priority (2); focus on air pollution / single carriageway sections (1); provide dedicated NMU crossings (1)
- Instead, HE should deliver a bypass north of Worthing, linked to Long Furlong and the Steyning bypass (2)

Comments on encouraging and improving overall use of public transport:

- the public transport system should be integrated, with a transport hub at rail stations (1)
- make public transport free within the borough (1)
- improve the connections between town and rail (1)
- improve public transport to the town day and night, and serving the more densely populated areas (2)
- provide a small train/tram shuttle to serve outlying areas to and from the town centre (1)
- make better sustainable transport options out into the South Downs (SDNPA)

Comments specific to trains:

- press for a higher speed rail link to London and improved services to other major towns/cities (1)
- lobby rail operators for frequent "shuttle" trains (e.g. Barnham-Worthing and Hove-Worthing) (1)
- improve the reliability of trains and reduce costs (2)
- increase the number carriages on trains and provide more space for bicycles and better cycle provision at stations (2)

Comments specific to busses:

- improve bus routes and services generally (2) and reduce prices (5)

- encourage bus operators to provide late bus services to all areas (2)
- provide better bus links between Worthing and Brighton north of the seafront to relieve pressure on the A27 (2)
- increase frequency of busses to the Downs (1)
- provide a full and frequent bus service to/from High Salvington including Sundays and evening provision (1)
- consider location of bus stops to reduce queueing behind, and to maximise reach and efficiency of service (1)
- encourage transport operators to go green with electric busses (2)

Comments on cycling, walking and horse-riding:

- encourage cycle tourism by opening up access to the South Downs Way and attractions to the north (1)
- review Worthing's cycle network and secure funding for safe cycle ways including quiet street routes (11 Inc. Sustrans)
- work with Sustrans to implement the cycle routes proposed into and around Worthing in the West Sussex Walking and Cycling Strategy - cycle routes should be continuous throughout the county (2 including Sustrans)
- work with Sustrans to extend and widen the seafront cycle path from Shoreham to Littlehampton (7)
- join up cycle paths / achieve continuous (totally separate) cycle lanes into and around Worthing, particularly on key routes (to hospital / colleges / business parks / leisure / all the main locations in the town) (6)
- use one lane of existing dual carriage roads into town to provide totally separated cycle lanes (1)
- improve the main north artery cycle route including to the station (1)
- provide a network of secure cycle storage hubs at strategic points along key routes and at stations (4)
- pilot a 'boris' bike scheme in a few places (2)
- we need to shift the population's mindset and achieve a modal shift - promote cycling and walking for health (2)
- refer to the West Sussex Rights of Way Improvement Plan (RoWIP) (2 including WSCC)
- improve facilities / ensure provision for all non-motorised users (NMU) (2)
- provide dedicated NMU crossings as part of HE proposed A27 improvements (British Horse Society)
- provide walking signage (London style) and ensure adequate seating for walkers to rest regularly (1)
- if Upper Brighton Road is allocated then include cycle routes and new footpaths - see Sompting Neighbourhood Plan
- encourage walking buses for school children (1)

Comments on cars and park & ride:

- Introduce a park and ride scheme from the A24, A27 and A259 (6)
- provide electric / solar car charging throughout the town (4) and consider free parking for electric cars (1)
- control, or exile cars from the town centre / try a 'car free' day every month in the town centre (2)
- introduce a properly considered speed reduction network / humps / 20s plenty signage on all residential roads (3)
- penalise driving / have tougher penalties on anti-social driving and parking on pavements (1)
- provide adequate parking (1) which is reasonably priced (2)

ENVIRONMENT

- Q8a - Do you agree with the main environmental challenges identified? Are any missing?**
Q8b - Do you have any suggestions for how the Local Plan could reach a balance between competing needs?
Q8c - Are there are circumstances you consider where regardless of mitigation, development would be inappropriate?
Q8d - What value to you place on the borough's green spaces, particularly those around the town?

E1 E4 E5 E6 E7
 E17 E22 E35 E36
 E43 E51 E56 E58
 E59 E69 E75 E92
 E96 E99 E102
 E107 E114 E119
 E121 E122 E124
 E126 E127 E130
 E132 E133 E136
 M4 M24 M25 M28
 M43 M44 M45
 M54 M62 M63
 M66 M67 M70
 M71 M75 M76
 M77 M81 M82
 M83 M84 M85
 M86 M93 M94
 M96

58 respondents commented on the environment. 12 respondents agreed with the challenges. 1 respondent partially agreed. A variety of suggestions were made for additional challenges and how the Local Plan can reach a balance between competing demands. Overarching comments include that the Council should challenge the housing numbers proposed for the area owing to land constraints (1) and that it would be important to identify baseline and monitoring mechanisms with actions to take if the plan is not effective (1). Other comments are reported under themes:

Comments on flood risk:

- follow the flood risk hierarchy when allocating/developing sites, and avoid highest areas of risk (Environment Agency)
- increasing development , especially on green spaces, exacerbates flood risk (2)
- no development should be permitted without providing flood mitigation measures (1)
- the Strategic Flood Risk Assessment should be updated as a priority (1)

Comments on water supply and sewerage:

- a challenge relating to the water environment is missing (Environment Agency)
- the Plan should refer to the Water Framework Directive (Environment Agency)
- water efficiency should be up front in the plan (Environment Agency)
- increased demand for water/waste management should be met without compromising environmental standards (S Water)
- good, clean water supply needs to be retained / available (1)
- no development should be permitted without providing adequate water recycling / water conservation measures (1)
- no development should be permitted without providing suitable and effective sewage processing / SuDS (2)

Comments on waste and recycling:

- a challenge relating to waste and recycling is missing - aim to exceed nationally set recycling targets (4)
- have regard to WSCC's Waste Local Plan: existing waste sites must be protected and their functioning uncompromised by new development and associated infrastructure. Consult WSCC on applications next to or near waste sites (WSCC)

Comments on air and pollution:

- a challenge on air pollution is missing (1) plan should require the national guidelines for air quality to be met in all instances (1)
- need to refer to 'remediation of land through redevelopment' (Environment Agency)

	<p>Comments on climate change and CO2:</p> <ul style="list-style-type: none"> ● need to refer to mitigating and adapting to the impact of climate change (Environment Agency) ● pleased to see climate change highlighted as a key challenge (2) ● plan should state that Worthing and Adur will become carbon neutral by 2020 (1) ● rising CO2 emissions have been overlooked (1) <p>Comments on energy:</p> <ul style="list-style-type: none"> ● new housing should deliver energy saving measures and a significant element of renewable energy. New and refurbished buildings should be properly insulated / have solar PV / solar thermal panels / achieve self-sufficient power generation (4) ● a challenge on fracking is missing: ban fracking in West Sussex (1) ● seek centralised energy infrastructure (2) <p>Comments on designated and safeguarded landscape areas:</p> <ul style="list-style-type: none"> ● have regard to the SDNP, its Plan, role and duties, and support relevant legislative and policy intentions (SDNPA) ● ensure that the England Coast Path National Trail route is unaffected when considering key sites (Natural England) ● have regard to WSCC's Minerals Local Plan (WSCC) ● the plan should protect the downs (3) <p>Comments on landscape and biodiversity:</p> <ul style="list-style-type: none"> ● commit to conserving wildlife and encouraging diversity in flora to encourage bees (3) ● a challenge is missing on pesticide use. Pesticides should be banned in public spaces (1) ● do not develop sites that function as part of a habitat network or have biodiversity value unless there is an overwhelming development need. The following sites should be considered carefully: best and most versatile agricultural land; habitats and wildlife corridors and stepping stones; areas likely to have protected species (3 including Natural England) ● refer to increasing natural capital in order to truly deliver sustainable growth (Sussex Wildlife Trust) ● development should minimise impact on surrounding habitats, especially woodlands, ponds and wetlands/floodplains (1) ● refer to avoiding harm to designated sites and irreplaceable species (Natural England) ● a Landscape and ecology study is just one part of the evidence and must be seen as part of the balance of evidence (3) ● developments should include green infrastructure (1) ● prioritise the environment over development for business (1) <p>Comments on rurality, gaps, greenspace, and pathways:</p> <ul style="list-style-type: none"> ● consider rural areas and commit to protecting the environment, green and open spaces (5) ● consider WSCC's published service plans such as Rights of Way (2 including WSCC) ● protect gaps that stop settlements coalescing and designate smaller areas as local green space in town (4) ● protect greenfields including farmland / woodland / natural amenity, and focus development on brownfield sites (3)
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- protect public parks /gardens /places of special and historic interest and ensure development is sympathetic to them (2)

Development design

- deliver denser development, especially in town centres where there are sustainable transport nodes, key services facilities (1)
- consider allocating sites suitable for taller development or identifying tall building corridors/areas (1)
- encourage and invite sustainable building practices and innovation (2)
- all development should include trees/planting and public/community spaces (prioritise health of population) (4)
- all hard surfaces should be permeable (2)
- maintain Worthing's distinctive character/setting (1) and ensure developments are high quality (1)
- use new development to provide mitigation and enhance existing features / environment / retain a good balance (3)

43 people / organisations said there were circumstances where development should not occur regardless of mitigation:

- in green spaces around built up areas (including strategic gaps) or in places that would impact negatively on green spaces (15)
- development that impacts negatively on the SDNP / downs (6)
- in ancient woodland / green fields around Titnore Lane area / where development would result in the loss of mature trees, and in the buffer zone that should surround ancient woodland to protect it (4)
- development that impacts negatively on the seafront, coastline or promenade, e.g. "high-rise" at or near the seafront (7)
- development that impacts negatively on heritage (3)
- in areas of flood risk (4)
- in agricultural land given its importance to food security (2)
- where development does not achieve net gains to biodiversity or fails to use current ecological studies (Sussex Wildlife Trust)

37 people / organisations valued the borough's green spaces highly. Generally respondents thought that these areas provide a wider public role, and that as the population grows the value of green space also grows. People commented on their importance to wildlife, health, tranquillity, well-being and quality of life (for all ages / locals / visitors). People also thought that green areas enhance the town, providing space and that developing them would be detrimental.

Persimmon Homes said that green spaces *within* the town should be protected, and also asked us to clarify what is meant by green space. One respondent thought that open green space, play areas and sports pitches have equal importance in creating an environment that contributes to health and wellbeing for all. Sussex Wildlife Trust said that the Plan should achieve a holistic approach to the protection of the Borough's natural capital assets - not just obvious sites. Several respondents consider areas of woodland to be part of the borough's "green spaces" and the Woodland Trust would also like to see small woodland creation.

HOUSING

Q9a - Should housing delivery be given higher priority than other development needs (e.g. employment land, community facilities)?

E1 E2 E4 E6 E7
E10 E32 E36 E59
E61 E75 E90 E93
E96 E102 E107
E119 E122 E47
E92 E97 E102
E106 E124 E126
E127 E128 E136
M1a M4 M24 M25
M28 M32 M44
M45 M62 M69
M67 M71 M81
M83 M87 M92
M93 M84 M75
M90 M85 M86

No significant concerns were raised in relation to the 'housing context' and the figure of housing need (OAN) set out in the consultation document. However, the majority of respondents to this question (34) answered 'no' - housing should not be given a higher priority than other development needs. To support this the following points were made:

- development must be balanced / mixed / sustainable
- it is vital that all development is supported by appropriate levels of infrastructure provision
- there is too much housing in this area and there is a risk of becoming a dormitory town
- community facilities and employment should be given priority

Three respondents argued that factors pushing housing demand should be addressed at Government level and that OAN housing targets do not take geography / infrastructure into account. The Council should come up with an achievable figure.

With reference to housing and other uses the High Salvington Residents' Association argue that the widening of the A27 will result in the demolition of homes at a time of acute housing shortage.

A total of 11 respondents (including 9 landowners / developer) answered 'yes' as they felt that housing should be given a higher priority than other uses. Comments to support this view included:

- consider the negative impact of failure to meet the housing need
- there is a chronic under provision / high demand
- some 'other needs' are aspirational or unachievable
- suitable housing is basic human right / fundamental need

Q9b - How should we best address specialist housing needs (e.g. affordable housing; family housing; self-build housing; sheltered & extra care; houses in multiple occupation)?

E1 E2 E4 E10
E51 E59 E69 E90
E92 E96 E97
E102 E106 E107
E122 E124 E128
M1a M4 M24 M25
M28 M44 M62
M67 M71 M96

Relatively few comments were received in response to this question or on the specific housing types listed above. The comments that were received are summarised below:

- ensure appropriate mix of development to respond to needs (2)
- invite innovation and look for successful models from elsewhere (Urban Splash, HAB Housing, Pocket Living) to develop a fresh approach to the larger sites / provide work-life pods (3)
- encourage self-build schemes (2)
- fund local people to renovate tired housing stock (2)

<p>M93 M53 M83 M84 M77 M78 M92 M86</p>	<ul style="list-style-type: none"> ● consider using vacant housing stock and spaces. Sensitive convert older properties (5) ● resist conversion to HMOs - recognise issues with HMOs (4) ● deliver a variety of housing types flexible enough to adapt to different needs (3) ● housing to meet local needs should be priority / low cost housing for local first time buyers (4) ● maintain current provisions of sheltered and extra care accommodation and deliver more to meet needs (2) ● landlords should not discriminate against people on benefits. Develop a system for registering or licensing landlords (2) ● Increase the type and quality of provision for homeless people, not leaving it solely to voluntary groups (4) ● Provide night shelters all year round so homeless have safe space to stay until space in hostel (4) ● Need clear statement in plan about housing and integrating refugees and displaced people (1) <p><u>Social / affordable housing</u></p> <ul style="list-style-type: none"> ● deliver social housing in blocks and not in amongst market housing (1) ● prioritise / reserve land for social housing providers (5) ● reinvest income from social housing back into social housing / Do not sell social housing / remain 'affordable' (5). ● affordable family housing / Have key worker part rent/part buy schemes with initial 100% rent option (5) ● many people can't afford an "affordable home" of any kind. Need genuinely affordable housing (2) ● S106 funding should be used for social and community funding not diverted to other areas (1) ● Details provided on Rentplus's affordable housing model (1)
<p>Q9c - Efficient use of land will help to raise densities and contribute towards meeting development needs. What potential impacts of this should the Council try to mitigate?</p>	
<p>E10 E12 E16 E17 E32 E35 E36 E51 E56 E59 E61 E69 E75 E82 E92 E96 E97 E102 E106 E114 E121 M4 M24 M25 M28 M32 M62 M69 M67 M71 M81 M86 M96 M97 M93 M94 M77 M92</p>	<p>Most respondents to this question raised the need to ensure that new developments were supported by adequate and improved infrastructure provision to be delivered in line with (or in advance of) new development. (9) The following themes were raised:</p> <p><u>Transport / parking</u></p> <ul style="list-style-type: none"> ● Plan integrated public transport with hubs at rail stations / promote public transport use (1) ● Take into account existing parking issues before considering new requirements (5) ● Provide electric car charging points (2) <p><u>Community facilities</u></p> <ul style="list-style-type: none"> ● Provide community facilities (e.g. doctors / schools / leisure) to support existing population before any new is agreed (5) <p><u>Environment / Health and wellbeing</u></p> <ul style="list-style-type: none"> ● Assess the Borough's natural capital to ensure capacity is available to facilitate sustainable growth (1) ● Prevent over-development to protect quality of life - monitor pollution, prevent overcrowding, monitor social deprivation, review life expectancy & mental health (9)

	<p><u>High Density Building (medium and high rise)</u></p> <ul style="list-style-type: none"> • No high rise on seafront / conform to the existing skyline (4) • Limit height of new buildings to 7 storeys or 23m (3) • No high rise at all (1) • Density must be appropriate - avoid over-development (2) • Higher densities required to meet high levels of housing need (2) • Seek to intensify development and deliver higher densities on town centre sites and areas well served by facilities (8). • Land should be developed to full potential - but not to detriment of residents (3) <p><u>Design</u></p> <ul style="list-style-type: none"> • All development to consider environmental impact / incorporate appropriate mitigation (3) • Ensure all development: is of high quality design; complements character of area; creates vibrant places (7) • Consider how new development integrates into historic areas / ensure no adverse impact on heritage (2) • Consider and encourage adaptive reuse of historic buildings (2 including Historic England)
<p>Q9d - Should the Council include a policy that would resist the inappropriate development of residential gardens?</p>	
<p>E2 E4 E6 E7 E10 E16 E17 E32 E36 E51 E56 E58 E59 E61 E69 E75 E96 E99 E106 E114 E119 E124 E126 E127 E128 E136 M3 M1a M4 M24 M25 M28 M32 M43 M44 M45 M62 M69 M67 M54 M71 M81 M86 M92 M93 M94</p>	<p>32 respondents (including 7 groups / organisations) considered there should be a policy that resisted the inappropriate development of residential gardens. Reasons for this included that provide for green infrastructure / biodiversity and that they are highly valued spaces that will increase in importance as urban densities increase. Several other respondents agreed that gardens should be protected unless there were exceptional reasons why they could be developed.</p> <p>10 respondents (including 5 groups / organisations) did not feel that a policy was required and that appropriate development should not be prevented in gardens. These forms of development should not be resisted as a matter of course and should be considered on their merits. Appropriate infill and development can help to meet the wider objectives of the Local Plan. One respondent considered the question asked in the consultation was very leading.</p>

DEVELOPMENT OPTIONS WITHIN THE TOWN

Q10a - Do you agree that the sites listed provide the most significant development and regeneration opportunities to deliver housing, employment and leisure uses within the town?

E2 E4 E7 E32
E36 E59 E67 E69
E82 E92 E93 E96
E102 E116 E124
E133 M1a M4 M24
M25 M32 M43
M62 M69 M67
M54 M71 M79
M81 M96 M93
M84 M80 M75
M87 M70 M92
M83 M85 M86

The vast majority of those that responded to this question agreed that the sites listed provided the most significant opportunities to deliver development within the town and many of these linked their comments to the need to build of brownfield sites first. (20)

Other respondents agreed but felt that their delivery should be balanced against infrastructure provision and the need for development to fit in with the character of the surrounding area. (7)

- Two respondents felt that there had been enough development in the town and these sites are required (2)
- These sites are part of the solution but many appear undeliverable in the short term (1)
- Hargreaves argue that the land at Worthing united FC is within BUAB and so should be regarded as 'within the town' and should be identified as an opportunity to bring forward development in the short term..
- Persimmon Homes and WD Northern Site Consortium state that there should not be an over-reliance on urban sites which are often difficult to bring forward and, when delivered, often deliver flatted developments. Greenfield sites will be required and these can be delivered faster (2)

Q10b - Do you have any particular comments on how any of the identified sites should be developed and for what mix of uses?

E1 E4 E5 E6 E13
E30 E36 E49 E51
E59 E69 E73 E75
E92 E97 E100
E102 E106 E107
E124 E126 E132
M118 M3 M23
M54 M59a M1 M4
M24 M25 M67
M54 M71 M79
M81 M96 M92
M93 M94 M80
M88 M86

Respondents to this question expressed great support for the quick delivery of most of these key sites, particularly Union Place, Grafton, the Guildbourne Centre and Teville Gate.

General Comments

- In line with NPPF all sites should seek to deliver net gain in biodiversity - a green infrastructure strategy would assist in this assessment (1)
- Further assessment of some sites is required to review flood risks and levels of potential contamination (1)
- Deliver a balanced mix of sustainable uses across all sites - including residential / leisure / community / employment (8)
- Limit heights of seafront development to respect character of surrounding area (2)
- Use central sites for social housing (2)
- No high-rise (1)
- Intensify development / land use - particularly for town centre sites (1)
- Don't over-develop these sites and ensure they are in-keeping with surrounding areas (2)
- Royal Mail argue that it will be important that any redevelopment does not impact on existing operations and amenity (1)

- ECE Planning - do not agree with “Areas of Change” approach to development delivery - they have so far failed to deliver any meaningful amount of development - and suggest instead that sites allocations are included within the plan. Without allocations Plan is not compliant with NPPF (1)

Site Specific Comments

- Use Lyndhurst Rd site for multi-storey car park then develop other car parks in town centre (1)
- Grafton - develop with a range of cafes and restaurants (1)
- Develop Stagecoach site for low cost housing to increase town centre footfall (1)
- Stagecoach site would make ideal creative quarter with links to Warwick Street (2)
- No need for cinema in Union Place as this would have negative impact on existing cinemas (1)
- Don't build on Worthing Utd FC (1)
- Roffey Homes state support the identification of the Aquarena for residential and possibly commercial/public car park/ public seafront cafe and public space. Planning application to be submitted soon with a 3 year build programme. (1)
- ECE Planning state that the description of the Aquarena opportunity should read “residential-led, mixed use development site” and that the table should refer to the significant potential public benefits of development. (1)
- Rabbit Waste Management Ltd provide a development brief for the Decoy Farm site proposing two scenarios for a waste management facility. (1)
- EA state that part of Decoy Farm lies within flood zone 2 & 3 (sequential approach needed). The site is adjacent to Teville stream and development would need to be carefully designed so as to improve and not negatively impact on it (1)
- EA state that appropriate remediation of British Gas site is required with consideration of surface water drainage (1)
- EA raises concern that no reference is made as to how these sites have been through the sequential testing in respect of flooding and have particular concerns over : Aquarena/Stagecoach/Grafton/Decoy Farm (1)

Teville Gate

- Develop Teville Gate to include multi-screen cinema and retail (2)
- Redevelop area around station to form new digital hub with additional retail and leisure (1)
- Could bus depot move to this area to form transport hub (1)
- EA state that any development needs to consider culverted watercourse that runs through it (1)
- Carter Jonas LLP / Mosaique Capital Ltd support inclusion and state that site is suitable, available. Development can provide a high quality mixed of uses - providing improved links and landmark buildings. A higher density of housing will be sought than in previous applications. It is anticipated that a planning application will be made in Autumn 2016 (1)

HMRC Site

- Any development should incorporate community facilities (doctors / retail / offices) (2)
- Use site for housing / green space (housing and not just flats) (2)
- Development must be high quality and blend in (no high rise) (2)
- Use site for employment / small business units (2)

	<ul style="list-style-type: none"> • Development should be of high quality and could include small business units (1) • WYG for Mapeley Estates Ltd state that the site is located in a highly sustainable location with good transport link. A high density residential development should be sought to meet the borough's housing needs and ensure scheme is viable. There is a need for a flexible approach and the site should not be subject to protection under CS4 (1) <p><u>Martlets Way (and HMRC)</u></p> <ul style="list-style-type: none"> • Keep Martlets Way green (1) • Develop Martlets Way and HMRC site for medium-rise residential (1) • Martlets Way - site lies on major aquifer and remediation of this site would aid in protection of groundwater resources (1) • Rapleys (on behalf of Rabbit Group) Martlets Way should be recognised as a residential site. It should be combined with the HMRC site into one opportunity and promote joint working between landowners. There would need to be an equalisation of benefits offering employment and residential floor space within the joint area. (1) • WYG (for Mapeley Estates Ltd) Agree that Martlets Way and HMRC sites are important and in principle could be redeveloped but they are challenging sites and may not come forward for redevelopment if policies are too restrictive.(1)
<p>Q10c - Are there any other potential development sites within the current built up area that should be assessed?</p>	
<p>E4 E16 E67 E73 E92 E102 E116 E124 E75 M1a M4 M24 M25 M54 M62 M96 M93</p>	<p>7 respondents said 'no' in that they felt that all key regenerations sites had been identified.. In addition the following suggestions were made:</p> <ul style="list-style-type: none"> • Golf course (does Worthing need two right next to each other) (1) • Bring derelict buildings / retail units back into use (2) • Charmandean Centre (1) • Guildbourne Centre (1) • Numerous car parks should be used more efficiently (1) • Plaza Bingo Hall (1) • Post office and town hall (1) • Areas of seafront / main arterial corridors with potential for tall buildings (1)

EDGE OF TOWN DEVELOPMENT OPPORTUNITIES

Q11a - Given the housing needs in the Borough do you have any views as to which of the listed sites should be developed or protected?

Q11b - If any of these (in full or in part) are to be allocated for development do you have any views on how they should be developed?

Q11c - If any of these sites are not allocated for development do you have any views on how they should be protected enhanced or used?

E1 E4 E7 E12
E18 E30 E32 E51
E53 E56 E58 E59
E64 E69 E73 E75
E81 E82 E90 E92
E94 E96 E97 E98
E99 E102 E104
E106 E115 E116
E123 E127 E130
E134 E136 M3
M8 M28 M31
M32 M58 M28
M44 M45 M54
M56 M61 M64
M62 M67 M68
M69 M70 M71
M72 M74 M75
M77 M82 M83
M85 M86 M90
M92 M93 M94
M98

NOTE - the 183 respondents that commented on the two Goring sites are listed in Appendix A at the end of this report.

The majority of representations submitted during the Issues & Options consultation related to the greenfield sites that had been identified as possibly having some potential to deliver development. The vast majority of these related to the two large sites to the west of the Borough between Goring and Ferring (sites 4 & 5). Apart from the representations submitted by landowners and developers promoting their development there was general objection / concern about the loss of greenfield sites from most other respondents. However, it should be noted that the level of concern / objection raised varied significantly between sites - over 180 respondents submitted comments on the Goring sites whilst some of the smaller development opportunities attracted only a handful of responses. General comments on these opportunities are set out below, followed by comments made on the individual sites.

General Comments

- given spatial constraints the plan should consider the potential release of a much wider range of edge of settlement sites to meet the full OAN (1)
- there should be no development of greenfield sites - there are enough brownfield sites / we need green space which is essential for health and well-being (10)
- brownfield sites should be developed before any greenfield sites (2)
- greenfield sites should be protected - this is government view and should be upheld (1)
- if all needs can't be delivered within the town then the landscape evidence should be used to determine which sites are brought forward (1)
- WSCC will work with WBC to consider all proposed sites and advise on infrastructure requirements, flooding, the transport evidence base and mitigation. When considering infrastructure to support housing, safe and sustainable links across the Borough and into the wider area, including SDNP, should be considered within the Plan (1)
- these greenfields sites should NOT be protected- we need more housing, schools and doctors (1)
- ensure that sect 40 of the NERC Act 2006 and para 158 of NPPF remain at heart of plan (SWT)
- Landowner of western two fields that lie within the West Durrington strategic allocation (but which are not currently allocated for development) request that the fields are taken forward as an allocation for development in the new LP (1).

General comments on how these opportunities should be developed if they were to be allocated:

- with adequate supporting infrastructure e.g. medical uses / schools / transport (2)
- deliver a mix of uses (1)

- development should be low rise only (2)
- ensure development is sustainable (3)
- high quality & imaginative design - no more 'boxes' (2)
- give priority to local residents (1)
- family housing and not flats (2)

General comments on how on how sites should be used / protected if they are not allocated for development:

- retain green spaces for nature, amenity and leisure use (5)
- local produce farming (1)
- plant more trees and enhance green links and corridors (1)
- Landowner for western part of West Durrington sites suggest that if the sites is not allocated then existing use should continue but no additional protection/designation should be given (1)

SITE 1 BEECHES AVENUE & SITE 2 WORTHING UNITED FC

Development at Beeches Avenue is not suitable site because:

- access via Beeches Ave already very congested at junction with A27 (7)
- A27 is already at over-capacity and problems are at their worst at the Lyons Farm interchange (5)
- development would increase traffic chaos and dangers (2)
- development would have negative impact on air quality / levels of pollution (2)
- no decision can be made until plans for A27 are known (3)
- surface water drainage is inadequate at present with debris/mud regularly being washed down Beeches Avenue (3)
- building over the natural drainage of the fields above Beeches Avenue would cause further problems (2)
- doctor's surgery is closing and nearest local surgery (Broadwater) oversubscribed (1)
- local schools are already at capacity (2)
- sites are important to landscape / SDNP and development would have negative impact on views and wildlife (3)
- where would Worthing Utd FC (which provides vital sporting facility) relocate to (3)
- overlooking of existing properties would have negative impact on property values (1)
- there are several colonies of bats in the area of the paddocks (1)
- development at Beeches Ave was refused before because local infrastructure could not cope - this is still the case (1)
- site should be protected and taken into SDNP to be used for open space / recreation (2)

Development may be suitable:

- If development has to occur on both sites close off top of Beeches Ave/Pines Ave with access through Lyons Way (1)
- development might be appropriate (1)
- SDNPA broadly support the findings of the Landscape Study. Beeches Ave opportunity is likely to have impacts on the

	<p>SDNP by virtue of its relationship with the Park in terms of character and views. The relationship with the adjacent PROW could be made more explicit in the site assessment.. High quality landscape and urban design of any development could potentially enhance the settlement edge in this location. (1)</p> <ul style="list-style-type: none"> EA highlight that sites lie within groundwater Source Protection Zone 1 and careful consideration will be required when drawing up wastewater treatment proposals (1) <p>Suitable:</p> <ul style="list-style-type: none"> housing would be the obvious and best use for this site but only if traffic / infrastructure issues can be addressed (2) Hargreaves argue that the Beeches Ave site is appropriate for approximately 90 dwellings. It is not within SDNP not subject to flooding or environmental constraints. It does not have high amenity value nor does it prevent coalescence. The best performing and most appropriate edge of town site and should be prioritised for housing development (1) Hargreaves argue that, to be consistent, land at Worthing Utd should be included within the 'town sites' for 60 dwellings as it is within BUAB. It should be allocated for housing with the relocation of the football club to another site (1)
	<p>SITE 3 - UPPER BRIGHTON ROAD</p>
	<ul style="list-style-type: none"> Sompting Parish Council argue that site should not be developed as this would create a ribbon development as pressure for development grows. It should be protected by local green space designation with public accessibility improved (1) concern over possible housebuilding on land that might be the playing field for Bramber school (2) existing infrastructure cannot cope with existing pressures (1) sustainable transport system is required in this area including cycle routes and new footpaths (1) Development would exacerbate the A27's desperate traffic problems which are at their worst at the Lyons Farm (1). The current proposals for improvement to the A27 through Worthing following the existing route will not cope adequately with current and future traffic flows even before any new development. Housing would be the obvious and best use for these sites but only if infrastructure needs are addressed (1) EA state that the site lies within groundwater Source Protection Zone 1 and careful consideration will be required when drawing up wastewater treatment proposals Adur DC state that the site lies adjacent to Adur and (land in Adur) is currently designated as strategic gap and countryside in the adopted Adur Local Plan and emerging Adur Local Plan 2016. Regard should be given to the emerging Adur Local Plan allocation (and supporting evidence) "land at West Sompting" in any assessment, especially transport. New pedestrian and cycle links are likely to be created from this allocation eastward across the gap to Worthing. Any adverse impact on the setting of Sompting CA should be avoided and consideration should be given to the aim of improving West St and/or the A27 and wider transport network to reduce through-traffic in Sompting village. Persimmon Homes - Given the need for growth, the Council should look to release sites ahead of the review process. Owing to the scarcity of developable land some, if not all, edge of town sites should be brought forward. Persimmon have submitted landscape and transport evidence to show that even the northern part of the site does have development potential. It is considered some 150 homes could be delivered and in the short term.

SITE 4 - GORING AND FERRING GAP & SITE 5 - CHATSMORE FARM

183 respondents (70% of the total) raised strong concerns about the potential development of these sites (note - the reference numbers of the respondents that commented on the Goring sites is included as Appendix A at the end of this report). The majority of these respondents only commented on these opportunities but others also made additional comments on other issues. In addition to these respondents 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 be assumed that they were opposing development in these locations.

The majority of the representations on the Goring sites were made by individuals, most of whom lived in the Goring & Ferring area. However, representations were also received from a number of group & organisations including: South Downs National Park Authority; Ilex Conservation Group; Worthing Society; Goring Chase Residents Association; Ferring Parish Council;

The vast majority of the 'Goring sites' 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. The overwhelming view was that the gaps are valued in their entirety there was general objection to any level of development. A variety of reasons were given by those seeking to protect these areas and these include the following themes (listed in order of how many people raised each point):

Need for protection (173) - respondents set out a variety of reasons as to why the two sites should be protected from development. Reasons are expanded on below but some repeated themes were that: there are preferable sites; any building would set a precedent; once gone it will be gone for good; the area should be protected for local people and future generations. A variety of means to protect the land were suggested including: protection by the National Trust; inclusion within the SDNP; designation as Local Green Space; identification as a community asset; creation of managed marshland area; use of covenant; granting Village Green status.

Landscape character (143) - a repeated theme raised is that the sites had very high landscape value and that they provided a unique setting between the sea and the South Downs National Park. The uninterrupted views were highly valued into and from the gaps - where the countryside meets the sea. SDNPA state that development at Chatsmore Farm would be likely to have significant impacts to and from SDNP - including those from Highdown Hill. Both sites contribute to the Goring/Ferring Gap which is perceivable from the SDNP and provides an important break to development on the coastal plan. The SDNPA would consider objecting to development as a result.

Wildlife & Biodiversity (113) - strong concerns were raised with regards to the impact that development would have on wildlife. In particular many respondents referred to birdlife and how the sites provided an ideal habitat for roosting and migration. Other forms of wildlife and nature (including Ilex trees) were referred to within representations.

Settlement pattern (92) - a repeated concern was the impact that any development of these sites would have on the existing settlement pattern and the individuality / identity of the area. The Council is urged to avoid the coalescence of settlements, prevent urban sprawl and protect the historic gap. Several respondents thought that development would be contrary to Strategic Gap policies.

Loss of agricultural land (87) - respondents were concerned with the loss of grade 1 agricultural land.

Flood risk (76) - respondents raised flooding issues and were concerned that development would exacerbate flooding issues relating to coastal flooding (site 4), flooding from Ferring Rife (site 5) and surface water flooding (sites 4 & 5).

How the site is used / valued (43) - Respondents referred to a number of ways that the land was used and enjoyed by local residents and visitors / tourists. Users included walkers, dog walkers and bird spotters. Others referred to the physical and mental health benefits that these accessible areas (referred to as green lungs / breathing spaces) provided. Several residents raised concern about the potential loss of sports pitches (site 4).

Location (40) - The two sites provide a highly valued natural area / rural environment which is highly accessible from urban area.

Infrastructure (36) - respondents raised concern with regards to the ability for existing infrastructure (particularly roads / schools / medical facilities / parking provision) to cope with additional development in this area.

Other comments on Goring sites (not objections)

- Chatsmore Farm should be included in the CIL area as currently it is not and this is a criminal error by the LPA (1)
- Cycle path required if development does go ahead (1)
- Care needed to ensure England's Coastal Path National Trail route is unaffected (1)
- These sites should be called Goring Gap South and Goring Gap North (2)
- There is no need for a caravan site here (6)
- If developed only a small area should be used and development should be high class (1)
- Chatsmore Farm could be used for sports pitches / rugby club (2)

Persimmon Homes

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 and providing a network of green infrastructure (opening up what is otherwise private land). Their representation includes the following points:

- Agree with key challenges identified and that Plan needs to make difficult decisions
- Vision and objectives are appropriate - although reference could be given to the need for family accommodation

	<ul style="list-style-type: none"> ● Housing needs are high and there is no room for procrastination ● There should not be an over-reliance on urban sites as these are often difficult to bring forward ● Landscape study is just one document that must be seen in the context of other elements of the planning balance ● It is a fallacy to suggest these settlements enjoy their own identity. Due to how settlements have developed the separation of settlements in the West and Goring have been massively compromised. ● Landscape study judgements on the sensitivity of areas is a matter for professionals but may differ depending on the individual carrying out the assessment ● <u>Goring & Ferring Gap</u> - Considered that north east part of the site has the ability to accommodate development without having a material impact on the sense of separation between Goring & Ferring. The area is already well vegetated, contains suburban influences (playing fields) and would not significantly impact on views to or from Highdown Hill. ● <u>Chatsmore Farm</u> - Further evidence will be submitted to show that landscape constraints relating to a meaningful level of development can be resolved through suitable mitigation and sympathetic layout. HDA report recognises that part of site (zone B) might be suitable for development - but the line drawn is arbitrary that has no relationship with any landscape features. A more logical and appropriate development area would be to include all of the land south of the Ferring Rife. Planting alongside the rife could reinforce natural limit of development. Setting of SDNP would be respected and perception of a break in development would be maintained for those driving along A259.
	<p>SITE 6 - CARAVAN CLUB</p>
	<ul style="list-style-type: none"> ● SDNPA would be concerned if the Caravan Club was to be redeveloped. It would be difficult to find an alternative site in the locality and the South Downs Visitor Accommodation Review (2014) identifies future growth in the demand for all types of accommodation. Overnight stayers tend to spend more than day visitors. This site's proximity to the park means that facilities and attractions in the South Downs are likely to benefit from it (1) ● EA suggest that if the site is taken forward green corridors should be retained with an adequate buffer to existing wetland features on and adjacent to the site. There is an opportunity to create wetland and ponds (1) ● the Caravan Club should be retained and enhanced as a tourist attraction and amenity (4) ● Woodland Trust request that the ancient semi natural woodland adjacent to the site buffered from proposed development ● Landowner of area to the north supports the allocation of this site and may be willing to allow for relocation of Caravan Club on land within their ownership. Development could link sits with well designed pedestrian / cycle link (1)
	<p>SITE 7 - WEST OF FULBECK AVENUE - (See also response to question 11d below)</p>
	<ul style="list-style-type: none"> ● agree with development at Fulbeck Avenue (5)

	<p>SITE 8 - NORTH OF WEST DURRINGTON - (See also response to question 11d below)</p> <ul style="list-style-type: none"> ● EA state that the site lies within groundwater Source Protection Zone 1 - careful consideration will be required when drawing up wastewater treatment proposals (1) ● SDNP Authority suggest that Zone A of the North West of Durrington site should be laid out as parkland to complement the setting of the SDNP and Castle Goring (1) ● Site should be given priority as a logical extension to WD development (1) ● access to site 8 should be from appropriate locations of the spine roads and not A27 (1) ● Notwithstanding landscape study conclusions regarding the west of the site an appropriately landscape design could be achieved to deliver additional housing (1) ● WD Northern Site Consortium supports a balanced approach to allocation. The Consortium will be submitting more detailed evidence in support of this site (1) ● SDNPA broadly supports the Landscape Study findings. Development on this site is likely to have impacts on the National Park by virtue of its location and relationship with the SDNP in terms of character and views. The site is assessed as partly developable and in broad terms the potential limit of development on the site is considered acceptable, however the following points need further consideration: <ul style="list-style-type: none"> ➤ Castle Goring Conservation Area boundary has been extended to include all the parkland to the south of Castle Goring, effectively meaning that the western boundary of site 8 now abuts the CA boundary for its entire length. This would lead to an assessment of increased sensitivity for this part of the site. ➤ Zone b is identified as having less sensitivity, but site analysis doesn't include reference to the views from the PROW which runs between zone b and c. These views are towards the SDNP and the CA and include Highdown Hill and Ancient woodland in the backdrop. These are sensitive views which should be flagged. ➤ New features of WD strategic development zone don't appear to have been considered. How would development affect the permitted open space along the southern boundary and views towards the Downs/Castle Goring.. ➤ The conclusions on this site which find that Zone A is not suitable for development is supported. It is suggested that taking into account the extended CA that this area is even more sensitive than the existing assessment allows for. If Zone B is included for development then it should provide a street structure and GI network which allows for the long distance views identified to the west.
<p>Q11d - Land West of Fulbeck Avenue (site 7) and Land north of West Durrington (site 8) are already within the Built Up Area boundary. In light of significant housing needs should the Council take a positive approach and look to bring forward these sites in advance of the adoption of the new Local Plan?</p>	
<p>E1 E4 E15 E32 E34 E35 E36 M43 E51 E123</p>	<p>The majority of respondent to this question either agreed (15) or raised no objection in principle (7) to these two sites coming forward in advance of the adoption of the Local Plan. Other respondents (3) agreed with this positive approach but suggested that this should only be after the brownfield sites have been delivered.</p>

E43 E44 E64 E65 E68 E69 E73 E75 E82 E90 E92 E94 E96 E102 E124 E136 M3 M1a M25 M32 M44 M45 M62 M67 M71 M93 M83 M86	<ul style="list-style-type: none"> • Hargreaves agreed but considered that same approach should be afforded to Worthing Utd site as it is within BUAB (1) • The WD Northern Site Consortium supports this approach as this is the most appropriate site to come forward early (1) • 7 respondents replied 'no' to this question primarily due to: other recent developments in the area; infrastructure capacity; and distance to sustainable transport opportunities.
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PLANNING POLICIES	
Q12a - Do you have any views on how any of the listed policies should be worded?	
E4 E7 E92 E97 E102 E106 E133 M1a M4 M71 M72 M75 M76 M78 M80 M81 M82 M84 M85 M86 M93 M94 M90 M91 M92	<p><u>General comments</u></p> <ul style="list-style-type: none"> • policies need to be positively prepared/flexible in their approach to ensure that the Local Plan can respond to changes (1) • use plain English that is clear, unambiguous, intelligible, and accessible (3) • too vague to comment at this stage - will comment in detail as plan emerges (3) <p><u>Presumption in favour of sustainable development</u></p> <ul style="list-style-type: none"> • Support inclusion of this presumption and promotion of PDL redevelopment (2) <p><u>Quality of the built environment and public realm</u></p> <ul style="list-style-type: none"> • Development should be high quality that protects the character of the town (1) <p><u>The historic environment</u></p> <ul style="list-style-type: none"> • Policy should protect all facilities/buildings that merit protection for historic relevance and tourist interest (1) • Historic England state that there should be specific policies for development affecting a heritage asset • 4 respondents (including High Salvington Mill Trust) say that there is a need to control new development near High Salvington Windmill so that it does not have an adverse impact • The Worthing Society argue that there needs to be a clear strategy for Conservation Areas, locally listed buildings, the role of conservation in future development and a review the Local Interest List. Conservation needs to be higher up the agenda

with stronger enforcement and a clearer policy on when action is needed.

Sustainable design

- Consider use of grey-water within any development (1)
- Require higher water, energy (electricity/gas/wood/pulp) efficiency levels above national standards (1)
- Need to expand policy to address all issues of sustainable design, not just water efficiency (2)
- Support inclusion of sustainable design policy (1)
- Promote efficient and sustainable water resources and wastewater assets (Southern Water)

Energy

- Define what is meant by “low carbon” (2)
- Require energy efficiency and seek to reduce energy consumption (2)
- Add ... require a high proportion of energy used ...Possibly define “high” as economically feasible or practicable (1)

Housing Mix and Quality

- If there is an expectation to the Nationally Described Space Standards being applied then this needs to be supported by clear evidence of need, viability and timing (2)
- Ensure an appropriate architectural mix.....exceed national energy and sustainability standards (1)

Affordable Housing

- Define “affordable” (1)
- Affordable housing provision should be mandatory, not optional (1)
- All suitable plots of land, i.e. derelict, should be given to housing associations in preference to property investors (1)
- Affordable housing policies need to be flexible to allow for delivery of starter homes in accordance with the NPPF (1)
- Detailed wording is suggested by one organisation (re the threshold, the target tenure split, and the allowance of negotiation where viability is compromised). The policy should reflect PPG’s exclusion of sites of 10 units or below from direct provision or tariff-style contributions, and should include both Starter Homes and rent to buy affordable housing (1)

Density

- Ensure new housing development does not exceed 10 houses per acre (1)
- Specify density of residential and mixed use development in different parts of the Borough (1)

Gypsies, Travellers and Travelling Showpeople

- Policy should be positively phrased to consider applications favourably provided they conform with Council’s criteria (2)

Protecting and enhancing existing employment sites

- Plan must be more flexible in approach: protect higher quality employment sites, not all sites. Core Strategy wording is too

stringent in retaining employment uses outside of protected employment sites; remove this element of the policy (1)

Visitor Economy

- Re-position Worthing as a seaside resort (1)
- Seek to retain existing visitor facilities and accommodation not just support new (2)
- Value of heritage assets to visitor economy needs to be highlighted (1)
- Support provision of visitor facilities (i.e. toilets, map kiosks/stands benches etc) (1)

Retail hierarchy

- discourage dispersed retail development on the periphery of the town (1)

Transport and connectivity

- Provide parking for town centre (1)
- Focus on transport hubs (1)
- Specific HGV policy required (1)

Delivering infrastructure

- Include the requirement for timely delivery of infrastructure to mitigate the impacts of development (WSCC)
- Protect and enhance the network of Public Rights of Way across the borough, including the provision of new links within the borough and to the wider area including the SDNP (WSCC)
- Increased demand for water/waste management should be met without compromising strict environmental standards (Southern Water)

Green infrastructure

- Encourage the creation and enhancement of an integrated green infrastructure network and policy (2)

Biodiversity

- Wording suggested focussing on net biodiversity gains in line with para 109 NPPF, protecting locally designated sites and priority habitat with aim to protect and enhance, and to include reference to the beach and marine environment (SWT)
- Support biodiversity policy, but would encourage emphasis on the creation and enhancement of an integrated green infrastructure network and policy (EA)

Planning for sustainable communities

- Policies should support the delivery of new routes and community facilities (not just improvements) where new development gives rise to the need (WSCC)
- Increase the number of local social and community facilities (1)
- Specific need for GP surgeries and schools (1)

	<p><u>Pollution and contamination</u></p> <ul style="list-style-type: none"> ● Support but could go further and include remediation and opportunities to improve sites through redevelopment (EA) ● Define what is an “acceptable” level of pollution (2) ● Include reference to lighting and the supporting evidence for the SDNP Dark Nights Skies reserve (SDNPA) ● Ensure development does not lead to an unacceptable level of pollution risk (1) ● Protect groundwater / surface water from pollution; Protect sensitive development from odour pollution (Southern Water) <p><u>Water quality and protection</u></p> <ul style="list-style-type: none"> ● Support but should directly refer to Water Framework Directive (EA) ● Add in NO High Volume Hydraulic Fracturing (HVHF) operations in Worthing (1) ● Meet increased demand for water/waste management without compromising strict environmental standards (S Water) <p><u>Flood risk and sustainable drainage</u></p> <ul style="list-style-type: none"> ● Emphasise drainage system requirements for new developments (1) ● Support but encourage inclusion of adherence to flood risk management hierarchy and should state that development be directed away from sites at highest risk to flooding (EA) <p><u>Telecommunications</u></p> <ul style="list-style-type: none"> ● Establish approach...which avoids the placement of cellular communication towers in close proximity to schools, residential areas, hospitals, retirement homes and community centres (1) ● Add (or have as standalone policy) requirements for digital and wireless connectivity / infrastructure to support growing and future residential and business need (1)
<p>Q12b - Are there any policies missing from the list?</p>	
<p>E51 E69 E90 E92 E97 E102 E130 M1a M4 M24 M25 M45 M62 M67 M71 M72 M96 M81 M97 M92 M93 M94</p>	<p>Two respondents simply answered ‘no’</p> <p><u>Replacement / loss and relationship to saved policies</u></p> <ul style="list-style-type: none"> ● Some existing policies need to be included in new LP (1) ● Plan appears watered down compared to what we have now and existing (good) policies will be lost (1) ● LP should place emphasis on the creation and enhancement of an integrated green infrastructure network and policy <p><u>Locations / Sites</u></p> <ul style="list-style-type: none"> ● In line with NPPF Sites should be allocated and not simply identified as Areas of Change (ECE Planning) ● Landowner says that 2 fields to the east of Titnore lane should be allocated (1)

	<ul style="list-style-type: none"> • Have site specific policies for any sites selected for development (1) • Any policy in respect of stagecoach site should be flexible in terms of quantum and mix of uses (1) <p><u>Tall buildings</u></p> <ul style="list-style-type: none"> • Tall buildings review / policy required to allow and encourage more tall buildings (2) <p><u>Infill</u></p> <ul style="list-style-type: none"> • Ensure Plan covers inappropriate development of residential gardens so as to conform with NPPF paras 48 and 53 (1) <p><u>Infrastructure</u></p> <ul style="list-style-type: none"> • Ensure adequate parking provision for new developments / prevent parking on grass verges (1) <p><u>Community / social</u></p> <ul style="list-style-type: none"> • Plan should seek to address rough sleeping / anti-social behaviour (1) • Include policy / reference to disabled access / facilities (2) • Add policy to address the need for social housing (1) <p><u>Natural environment / Gaps</u></p> <ul style="list-style-type: none"> • Include Trees and Woodland / Ancient Woodland policy (Woodland Trust) • Include policy on green gaps (1) • Include a policy specifically relating to the setting of the National Park that also complies with NPPF para 113 and S62 of the Environment Act (SDNP)
<p>Q12c - Are all the listed policies required?</p>	
<p>E7 E51 E75 E124 E136 M4 M24 M25 M62 M67 M81 M92 M93 M94 M70 M86</p>	<p>9 respondents agreed that all policies were required with 2 others agreeing but suggesting that they should be kept under review.</p> <p>2 respondents argued that the policy on protecting and enhancing existing employment sites is not required as it could be harmful to wider objectives of the Plan if worded in a restrictive manner.</p>

APPENDIX A

Goring Sites Respondents

Respondents - referring to both sites (Site 4 Goring & Ferring Gap and Site 5 - Chatsmore Farm)

WIO-M								WIO-E										
1	16	26	39	51	85	105	115	4	20	30	41	55	67	79	90	102	117	135
3	17	27	40	52	86	106	116	8	21	31	42	56	68	80	91	103	118	136
4	18	29	41	55	93	107	117	9	22	32	43	57	69	82	92	105	120	
5	19	30	42	57	96	108	118	11	23	33	45	59	70	83	93	106	122	
9	20	33	44	58	99	109	119	13	24	34	46	60	71	84	94	110	123	
10	21	34	46	59	100	110	120	14	25	35	49	61	72	85	95	111	124	
11	22	35	47	62	101	111	121	15	26	37	50	62	74	86	98	112	125	
12	23	36	48	65	102	112	122	16	27	38	52	63	75	87	99	113	129	
14	24	37	49	67	103	113		17	28	39	53	64	77	88	100	114	131	
15	25	38	50	72	104	114		19	29	40	54	65	78	89	101	116	133	

- Respondents referring to just Southern Gap - WIO-E-108 / WIO-E-109 / WIO-M-124
- Respondents referring to just Chatsmore Farm - WIO-M-123