WORTHING LOCAL PLAN 2020- 2036
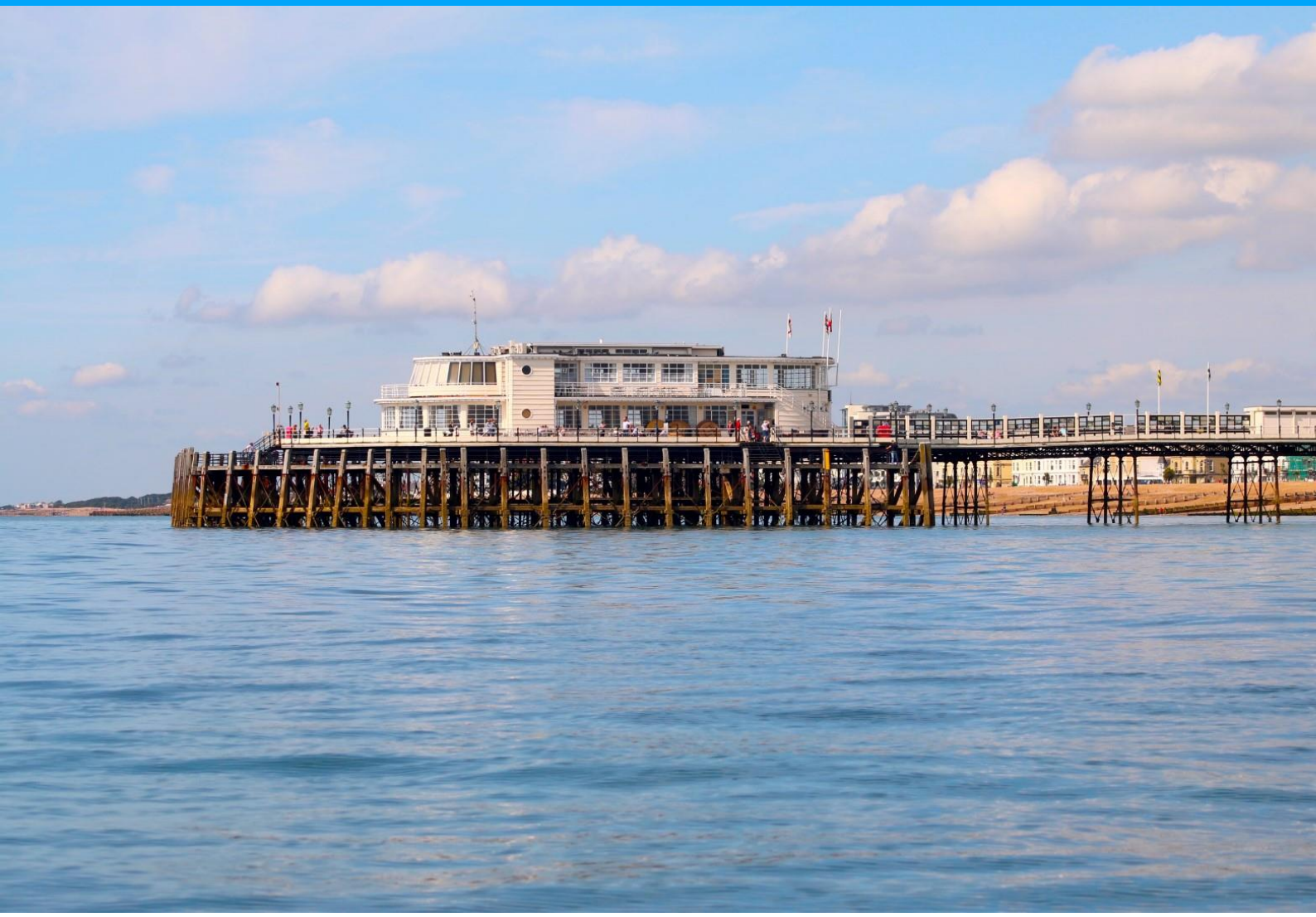
Sustainability Appraisal Report of the Submission Draft Worthing Local Plan

SUBMISSION

January 2021

WBC

WORTHING BOROUGH
C O U N C I L

Sustainability Appraisal Report of the Submission Draft Worthing Local Plan

January 2021

NON-TECHNICAL SUMMARY

Introduction

Sustainability Appraisal (SA) is integral to the preparation and development of a Local Plan and it is a requirement of Section 19 of the Planning and Compulsory Purchase Act 2004.

This SA will consider the impacts of proposed development options on people's health, and covers the criteria of Health Impact Assessment (HIA). The SA will also consider the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010. In addition it includes a Habitat Regulations Assessment (HRA) Screening.

The national Planning Practice Guidance recognises that the SA should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. The evidence base being prepared for the Local Plan has been used as the basis for the SA baseline data where appropriate.

Worthing Local Plan

The Local Plan when adopted, will provide a strategy for sustainable development and change in Worthing up to 2036. The Local Plan provides the broad policy framework and a long-term strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities.

The Sustainability Appraisal Framework

The social, economic and environmental impacts that may arise from the implementation of the Local Plan will be appraised on a topic basis. Baseline data has been collected on each of these topic areas to establish the existing situation within the borough, and the most important trends and issues.

A sustainability appraisal should incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004. These require that the policies, plans, programmes and objectives that influence the production of the Local Plan should be identified in the SA. These form the sustainability context, which together with the baseline data enable a range of sustainability problems/issues to be identified that should inform and be a particular focus of the SA.

The key issues identified above have been used to form overarching Sustainability Objectives.

Objective

1. Environmental Quality	To protect and improve air and water quality and reduce pollution.
2. Biodiversity	To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.
3. Land and Soils	Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.
4. Energy	To support the transition to achieving carbon neutrality, contributing to climate change mitigation.
5. Water Management	To ensure water is effectively managed to adapt to the effects of climate change.
6. Landscape and Character	To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.
7. Built Environment	To protect the built character of the townscape and secure the delivery of high quality design.
8. Historic Environment	To preserve and enhance the historic environment.
9. Healthy Lifestyles	To help people live healthier lifestyles and reduce inequalities through physical activity and maximise health and well-being.
10. Crime and Public Safety	To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.
11. Housing	To provide high quality, homes for all (including affordable), which includes a range of size, types and tenures that are appropriate to local needs?
12. Communities	To create and support sustainable vibrant communities where people enjoy living and to ensure equitable outcomes for all particularly those most at risk of experiencing discrimination, poverty and social exclusion.
13. Education	Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.
14. Economy	To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.

15. Town and Local Centres	Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.
16. Travel and Access	Improve access to and from sustainable modes of transport.

The Objectives will be used to assess how the various policy options being explored for the Local Plan could contribute to sustainable development – by comparing each policy or proposal's effects on each objective. To improve consistency with the Local Plan these have also been aligned with the UN Sustainable Development Goals.

Reasonable Alternatives

In preparation of the Submission Draft Local Plan there have been a number of changes made to the Local Plan. These are set out below along with an assessment of whether these need to be assessed as options for the Sustainability Appraisal. It is recognised that a number of these are changes to detailed policy requirements and that whilst these need to be assessed as part of viability work they do not alter the overall intention of the policy and therefore would not be likely to have significant effects. Equally a number of changes to the Local Plan have been a result of changes in national planning policy following publication of the 2019 National Planning Policy Framework (NPPF) which the Local Plan needs to be in general conformity with.

Likely Significant Effects

Overall the Local Plan scores positively against the majority of objectives. Part 3 of the Local Plan has mixed scores reflecting the competing demands to deliver housing and protect valued open spaces. Part 4 of the Local Plan, site allocations, tends to score negatively against environmental objectives but positively against social and economic objectives reflecting the potential environmental impacts of development. The appraisal shows many of these negative effects will be mitigated by the Development Management Policies within Part 5 of the Plan.

The EqIA found that overall the Local Plan will support the EqIA protected characteristics 'age', 'disability' and 'race'.

In relation to cumulative and synergistic effects, it is expected that the Local Plan will exacerbate existing trends identified in relation to energy, water and housing. In addition potential effects highlight that development allocated in the Local Plan may minimise the positive effect of other measures being implemented to improve air quality. In relation to this issue a synergistic effect was also identified in terms of the impact of air quality on health.

Mitigation

The appraisal of the Submission Draft Local Plan also identified mitigation to minimise negative effects and maximise positive effects. The main mitigation measures are as follows:

· Other policies within the Local Plan, when considered as a whole, have the potential to counteract the negative impacts of policies on a particular Sustainability Objective.

· Through the Sustainability Appraisal process, amendments to the wording of Local Plan policies have reduced the potential negative impact.

In addition detailed mitigation was identified for individual policies which was then incorporated into the wording within the Local Plan.

Monitoring

It is a requirement of the SEA Directive that the significant effects of a plan or programme are monitored.

The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Annual Monitoring Report for Worthing Borough Council.

A description of the measures envisaged for monitoring and how they relate to the Local Plan policies can be found in the Monitoring Framework topic paper that accompanies the Local Plan. These monitoring indicators will be finalised and confirmed in the SA/SEA Post Adoption Statement.

CONTENTS

1.   INTRODUCTION

1.1   Sustainability Appraisal and Strategic Environmental Assessment

1.1.1   Sustainability Appraisal (SA) is integral to the preparation and development of a Local Plan and it is a requirement of Section 19 of the Planning and Compulsory Purchase Act 2004.

1.1.2   SA incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the 'Strategic Environmental Assessment Regulations'). Strategic Environmental Assessment (SEA) ensures that potential environmental effects are given full consideration alongside social and economic issues.

1.1.3   This SA will consider the impacts of proposed development options on people's health, and covers the criteria of Health Impact Assessment (HIA). The SA will also consider the potential effects of the Plan on people in respect of disability, gender and racial equality impacts, in light of the Equalities Act 2010. In addition it includes a Habitat Regulations Assessment (HRA) Screening.

1.1.4   The findings of the earlier scoping work and draft report have been taken into consideration whilst finalising the Worthing Local Plan for Publication and Submission.

1.2   Structure of the Report

1.2.1   This SA Report is structured as follows:
Part 1 Introduction
Part 2 Context and Methodology - provides the background to SEA and sets out the methodology used.
Part 3: Overview of the Local Plan - explains how the Local Plan has been prepared and what is proposed within the Submission Draft version.
Part 4: Sustainability Appraisal Framework - provides the baseline information and identifies the key sustainability issues relevant to Worthing.
Part 5: Appraisal Findings - explains the likely significant effects of the Local Plan
Part 6: Recommendations and Next Steps - how the appraisal has influenced the Local Plan and the proposed monitoring framework.

1.3   Consultation Arrangements

1.3.1   Consultation on the Draft Report will run alongside the formal Regulation 19 Publication consultation on the Submission Draft Worthing Local Plan. Feedback from the consultations will be used to inform the examination of the Local Plan, Sustainability Appraisal, and any further work on Habitats Regulations Assessment (HRA).

1.3.2 Public consultation runs from 26 January to 23rd March 2021. You can view the Local Plan, associated supporting documents and evidence online, and access the comments form at https://www.adur-worthing.gov.uk/worthing-local-plan/

1.3.3 At this stage the Council is unable to place hard copies of the documents on deposit in the usual locations but this will be actioned at such time restrictions are eased. In certain circumstances, the Council will be happy to provide hard copies of the Local Plan to specific groups, particularly those with limited internet access.

1.3.4 If you know somebody who would like to take part and doesn't have internet access they can telephone the Planning Policy Team to request a copy of the comment form and information about the consultation.

Address: Worthing Borough Council
              Planning Policy
              Portland House
              44, Richmond Road
              Worthing, BN11 1HS
Email: planning.policy@adur-worthing.gov.uk
Telephone: 01273 263000

2.   CONTEXT AND METHODOLOGY

2.1   Introduction to Sustainable Development

2.1.1   The most widely used definition for sustainability is taken from the Brundtland Report, which was produced by the United Nations World Commission on Environment and Development in 1987. It defines sustainable development as: "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

2.1.2   The aim of sustainable development is to enable everyone to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. It is about considering long-term social, economic and environmental issues and impacts in an integrated and balanced way.

2.2   Strategic Environmental Assessment and Sustainability Appraisal

2.2.1   Section 39 of the Planning and Compulsory Purchase Act 2004, requires Local Development Documents (LDD) to be prepared with a view to contributing to the achievement of sustainable development. The requirement for a SEA is originally set out in the European Directive 2001/42/EC, which was adopted into UK law as the "Environmental Assessment of Plans and Programmes Regulations 2004". A SEA ensures that the environmental effects of certain plans and programmes, including land-use plans are taken into account.

2.2.2   SA is a requirement of Section 19 of the Planning and Compulsory Purchase Act 2004. SA incorporates the requirements of SEA, and for ease of reference, this document will refer to both processes as a SA.

2.2.3   SA is an iterative process that is undertaken alongside and intended to inform preparation of the Local Plan. It promotes sustainable development by identifying the significant social, environmental and economic impacts. It is an opportunity to consider options by which the Local Plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

2.3   Health Impact Assessment

2.3.1   There is no statutory requirement for a HIA and therefore there is no standard methodology to inform the HIA process. However, this is a recognised process for considering the health impacts of Local Plans and is widely seen as best practice.

2.3.2   A HIA is intended to help make decisions by predicting the health consequences if a proposal were to be implemented. In addition to assessing the health consequences it also produces recommendations as to how the good consequences for health could be enhanced and how the bad consequences could be avoided or minimised. The Planning Practice Guidance (PPG) states that a HIA may be a useful tool to use where there are expected to be significant impacts.

2.3.3   HIA is commonly defined as "a combination of procedures, methods and tools by which a policy, program or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population."

2.3.4   Health encompasses a wide range of social, economic and environmental factors that affect both people's physical health and mental well-being. These factors are known as the 'wider determinants' of health. It is recognised that health is a cross-cutting issue that touches upon many key planning policy areas within Local Plans (i.e. housing, transport, open space & recreation, public realm design, pollution etc). The Local Plan is one of many tools that can assist with addressing the wider determinants of health therefore supporting the priorities contained within Adur and Worthing Councils' Public Health Strategy 2018 - 2021 'Start Well, Live Well, Age Well' (2018).

2.3.5   Health Impact Assessment will therefore be incorporated within the Sustainability Appraisal through consideration of health as a topic and the inclusion of a health related objective.

2.4   Equalities Impact Assessment

2.4.1   An Equalities Impact Assessment (EqIA) is not a statutory requirement but it is a tool that assists Councils to comply with the requirements under the Equality Act 2010. The Act includes a public sector equality duty which aims to ensure that everyone has a fair chance in life. It contains a requirement for Local Authorities to consider the diverse needs and requirements of the communities in the borough when planning its services. Local Authorities also have a duty under the Race Relations (Amendment) Act, 2000, Disability Discrimination Act, 2005 and the Equality Act, 2006 (Gender Equality) to positively promote race, disability and gender equality.

2.4.2   Adur and Worthing Councils use EqIA, where appropriate, in order to improve the work of the Councils. The purpose of the EqIA is to improve the work of the Councils by making sure it does not discriminate and that, where possible, it promotes equality. It is a way of considering the likely effects of policies and decisions on different groups living and working in Worthing that are protected from discrimination by the Equality Act. The Equality Act protects people from discrimination on the basis of certain characteristics. These are known as protected characteristics of which there are nine:
- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

2.4.3   It is not necessary to include the characteristic of marriage and civil partnership except in relation to employment procedures. This characteristic is therefore not included in this EqIA.

2.4.4   Under the equality duty, public authorities are not required to follow any specific methodology or template to undertake EqIA but they need to be able to show that they have had due regard to the aims set out in the general equality duty. It is generally agreed that an EqIA should start at the earliest opportunity prior to policy development and is an ongoing and cyclical exercise enabling equality considerations to be taken into account before a decision is made.

2.4.5   It is considered that there will be similarities in assessment between the EqIA and the HIA in terms of 'health' and 'equalities' being characteristics that affect people i.e. the local population.

2.5   Habitats Regulations Assessment

2.5.1   A plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended), if it is considered likely to have significant effects on a habitats site.
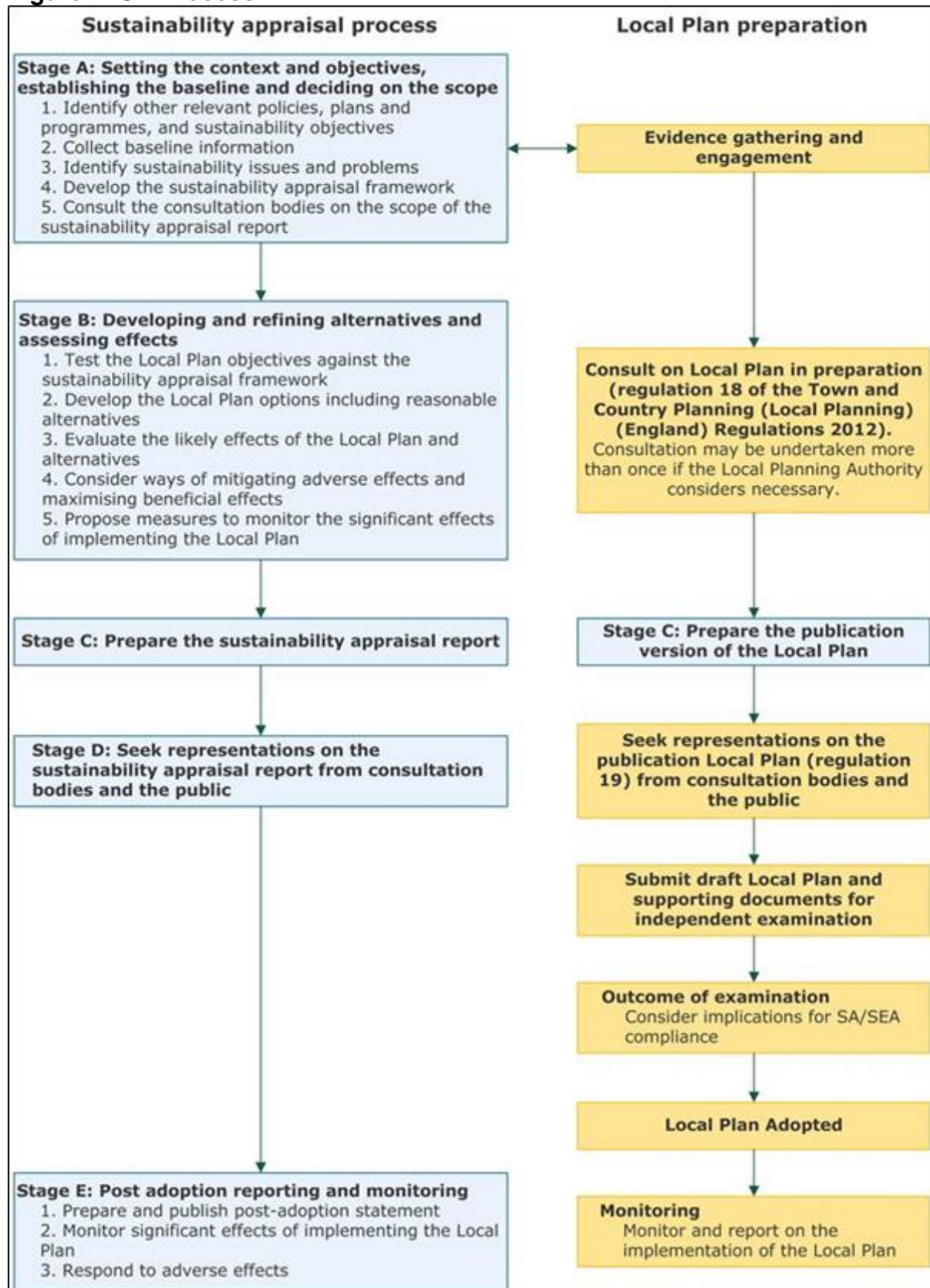
2.5.2   HRA assesses the impact of land-use plans against the conservation objectives of European Sites within certain distances of the borough. The HRA ascertains whether the plan's proposals would adversely affect the integrity of a site on its own, or in combination with the plans of neighbouring authorities.

2.5.3   As part of the previous Draft Integrated Impact Assessment Report, the Council undertook a HRA Screening of the potential effects of the Draft Local Plan on the Natura 2000 network to determine whether the Local Plan will either alone or in combination with other relevant projects and plans, be likely to result in a significant adverse effect upon European protected sites and therefore whether an Appropriate Assessment is required. This HRA screening statement found there to be no significant adverse effects on any of the identified European sites arising from the Draft Worthing Local Plan. No comments were received on the HRA Screening Report to suggest the conclusions of the Report were incorrect or fundamentally flawed.

2.6   Methodology

2.6.1   The SA Process is set out as a flowchart in Paragraph 13 of the Planning Practice Guidance. The SA process has five main stages (A-E) based on legal requirements. The SA process works in parallel with the preparation of the Local Plan and links across at all stages. The PPG includes a flowchart of the SA process which is illustrated in Figure 1:

Figure 1: SA Process

Figure 1: SA Process

Sustainability appraisal process	Local Plan preparation
Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope 1. Identify other relevant policies, plans and programmes, and sustainability objectives 2. Collect baseline information 3. Identify sustainability issues and problems 4. Develop the sustainability appraisal framework 5. Consult the consultation bodies on the scope of the sustainability appraisal report	**Evidence gathering and engagement**
Stage B: Developing and refining alternatives and assessing effects 1. Test the Local Plan objectives against the sustainability appraisal framework 2. Develop the Local Plan options including reasonable alternatives 3. Evaluate the likely effects of the Local Plan and alternatives 4. Consider ways of mitigating adverse effects and maximising beneficial effects 5. Propose measures to monitor the significant effects of implementing the Local Plan	**Consult on Local Plan in preparation (regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012).** Consultation may be undertaken more than once if the Local Planning Authority considers necessary.
Stage C: Prepare the sustainability appraisal report	**Stage C: Prepare the publication version of the Local Plan**
Stage D: Seek representations on the sustainability appraisal report from consultation bodies and the public	**Seek representations on the publication Local Plan (regulation 19) from consultation bodies and the public**
	Submit draft Local Plan and supporting documents for independent examination
	Outcome of examination Consider implications for SA/SEA compliance
	Local Plan Adopted
Stage E: Post adoption reporting and monitoring 1. Prepare and publish post-adoption statement 2. Monitor significant effects of implementing the Local Plan 3. Respond to adverse effects	**Monitoring** Monitor and report on the implementation of the Local Plan

Source: National Planning Practice Guidance Paragraph: 033 Reference ID: 11-033-20150209

2.6.2 Stage C of the process is preparation of the SA report. Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004 require preparation of an environmental report that identifies, describes and evaluates the likely significant effects on the environment of implementing the plan or programme and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme. The report should include the information referred to in Schedule 2 of the Regulations. Table 1 sets out where the requirements of Schedule 2 have been met in this report.

Table 1: Requirements of Schedule 2

The information referred to in Section 2	Where the requirements have been met in this report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Part 3
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Part 4 and Appendix B
c) The environment characteristics of areas likely to be significantly affected.	Part 3 and Part 4
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 2009/147/EC (Conservation of Wild Birds)and 92/43/EEC (Habitats Directive).	Part 4 and Appendix B
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Part 3 and Appendix B
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and	Part 5 and Appendix D

negative effects.	
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Part 5 and Part 6
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Part 5
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	Part 6
j) A non-technical summary of the information provided under the above headings.	Start of this report

2.6.3   The SA is being prepared by Worthing's Planning Policy Team who are also responsible for the development of the Local Plan. Internal and external stakeholders have been involved in the Sustainability Appraisal of the Local Plan.

2.6.4   The PPG recognises that the SA should only focus on what is needed to assess the likely significant effects of the plan. It should focus on the environmental, economic and social impacts that are likely to be significant. The evidence base being prepared for the Local Plan has been used as the basis for the SA baseline data where appropriate.

2.6.5   Given the important link between health and planning, it is considered prudent to incorporate a HIA within this Report to ensure that potential health impacts are fully assessed. Within the context of the Local Plan, the aim is to identify the main potential health and well-being impacts in order to identify any opportunities for the emerging planning policies to maximise health benefits, address existing health determinants and avoid any potential adverse impacts.

2.6.6   The SA Scoping Report was initially prepared and consulted on for the statutory five week consultation period from Monday 16 March to Monday 20 April 2015. The Scoping Report set out the methodology and framework for the SA of the Local Plan. The aim of this was to obtain comment and feedback on the scope and level of detail of the SA from the consultation bodies (defined by the Regulations), along with other stakeholders in relation to Equalities Impact Assessment and Health Impact Assessment.

2.6.7   The responses received resulted in the SA Framework and methodology being refined. The consultation bodies were consequently reconsulted on the revised framework and methodology from 7 March to 15 April 2016. The full SA Scoping

Report was published on the Council's website during the 'Your Town, Your Future' 2016 Local Plan consultation between 11 May and 22 June 2016. The Scoping Report provided an agreed 'basis' for appraisal; however it is important to note that the 'scope' for the appraisal is unlikely to remain static given that the understanding of sustainability problems/issues/objectives inevitably evolve over time and situations change.

2.6.8   The Draft Integrated Impact Assessment Report was prepared and published for consultation alongside the Draft Worthing Local Plan between 31st October and 12th December 2018. It provided an update on the sustainability baseline and context since the Scoping Report and set the methodology. It appraised the proposed Local Plan Strategic Objectives, all potential sites against the sites criteria and reasonable options identified in preparing the Draft Local Plan. It also reported on the total, cumulative and synergistic Effects of the Local Plan, and made recommendations for mitigation. It incorporated HIA and EqIA.

2.6.9   A list of responses received as part of the consultation on the scoping and draft IIA report are set out in Appendix A.

3. OVERVIEW OF THE LOCAL PLAN

3.1 Role of the Local Plan

3.1.1 The Worthing Core Strategy was adopted in 2011 and the intention was that it would help to guide development until 2026. However, it was recognised that there was a need to review this to reflect latest national policy, particularly with regard to how we now need to plan for housing.

3.1.2 This Local Plan when adopted, will provide a strategy for sustainable development and change in Worthing up to 2036. The Local Plan provides the broad policy framework and a long-term strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities.

3.1.3 Once adopted, the new Plan will replace the Council's local planning policies set out in the Core Strategy (2011) and the saved policies from the Worthing Local Plan (2003). It will inform the preparation of a number of future Supplementary Planning Documents (SPDs) and will be an important consideration in deciding planning applications. It will also inform related strategies and projects proposed by the Council, its partners and stakeholders.

3.2 How it has been prepared

3.2.1 The Local Plan has been prepared in a way that is flexible and able to adapt to change. However, it will be subject to continual monitoring to ensure that it remains relevant and effective. In addition, and in accordance with the NPPF, a review of the Local Plan will be undertaken within five years of adoption.

3.2.2 It should be noted that this Plan does not cover matters relating to minerals and waste as this is the responsibility of West Sussex County Council. The County Council is also responsible for all roads and transport planning in West Sussex except for the trunk roads (A24 / A27 / A264) which are the responsibility of Highways England.

3.2 Local Plan Area

3.2.1 The new Local Plan will cover most of Worthing borough. However, unlike the existing Core Strategy, it will not cover the land in the north of the borough that lies within the South Downs National Park. The National Park Authority is a planning authority in its own right and produces the Local Plan which sets planning policy for the South Downs National Park area as a whole.

Figure 2: Local Plan Area

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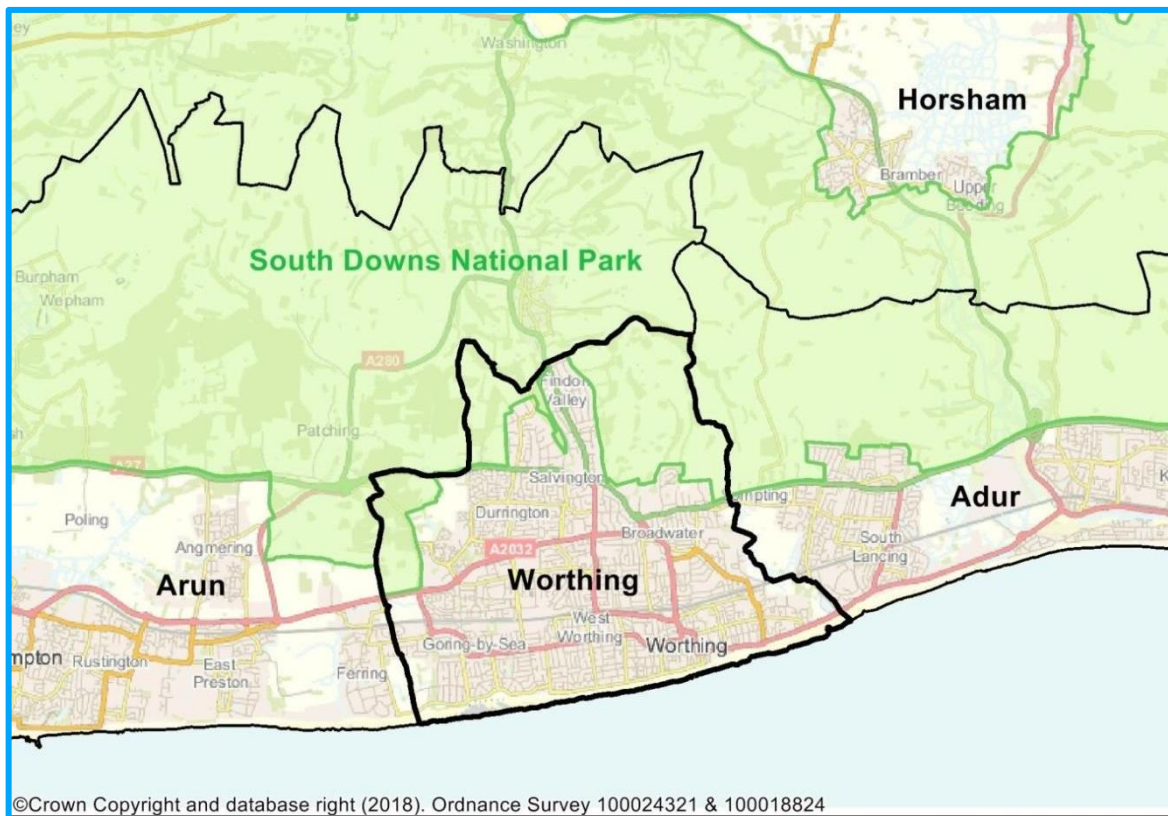
3.3   Sustainable Development

3.3.1   As evidenced and supported by the assessments referred to above, the purpose of the planning system is to contribute to sustainable development. This is a fundamental principle of the National Planning Policy Framework (NPPF) 2019 which defines 'sustainable' as meeting the needs of the present without compromising the ability of future generations to meet their own needs. In this regard, the NPPF sets three overarching objectives to be delivered through the preparation of plans and the policies in the framework:

- social - supporting strong, vibrant and healthy communities;
- economic - contributing to building a strong, responsive and competitive economy; and
- environmental - enhancing and contributing to our natural, built and historic environment.

3.3.2   To assist in understanding how these objectives are being met the Local Plan has been structured throughout to reflect these three themes. In addition, the Local Plan has embedded the United Nations Sustainable Development Goals (UN SDGs). These consist of 17 interconnected goals underpinned by targets designed to achieve a better and more sustainable future for all. They address the global challenges we face, including those related to poverty, inequality, climate change, environmental degradation, peace and justice.

3.3.3   The goals form part of the 2030 Agenda for Sustainable Development, which is a call for action by all UN member states. Implementation and success rely on countries' own sustainable development policies, plans and programmes. Local Planning Authorities are encouraged to localise the UN SDGs It is considered that the UN SDGs will enhance the sustainability credentials of the Plan and thus will provide a more robust monitoring framework.

3.3.4   The UN SDGs are becoming increasingly recognised and adopted by numerous public, private and voluntary sector organisations therefore working towards a common and shared consensus for sustainable development. The Royal Town Planning Institute (RTPI) endorses the use of the UN SDGs within Local Plans as best practice. The Monitoring Framework topic paper which supports the Local Plan establishes the monitoring framework for the Plan, sets out the compatibility of each goal and associated targets against relevant policies in the Plan.

3.4   What Has Informed this Plan

3.4.1   Although the Local Plan will reflect local issues and choices, it must be aligned to, and conform with national policy. Therefore, the preparation of the Local Plan must encompass the requirements of the Government's NPPF. It will also be influenced by local strategies, evidence documents and consultation responses. The following section provides a brief explanation of the key documents / stages.

Consultation Stages

3.4.2   The process of preparing a new Local Plan is made up of a number of consultation stages when residents, businesses and other stakeholders are asked to comment on the Council's proposals. The first stage of consultation, the 'Issues and Options' stage was undertaken in 2016 when the Council sought views on the key challenges for the borough and how Worthing should grow and develop. The responses informed the Draft Local Plan (published for consultation at the end of 2018) that set out the Council's preferred options to address the issues that had been identified.

3.4.3   This period of public consultation forms the 'Publication' stage of the preparation of Worthing's Local Plan. This forms the version of the Plan that the Council considers to be its legally compliant and 'Sound' Plan for submission to central government for independent Examinations.

3.4.4   Table 2 shows how the SA and HRA timetables will align with the Local Plan production.

Table 2: SA and Local Plan Timetables

Local Plan Stage	SA Stage	Consultation
	Sustainability Appraisal - Scoping Report Consultation with statutory consultation bodies and	16 March to 20 April 2015

	other interested parties.	
	Focused consultation with statutory consultation bodies on revised SA Framework.	7 March to 15 April 2016
Issues and Options Consultation 'Your Town - Your Future'	Sustainability Appraisal - Scoping Report (2015) published.	11 May to 22 June 2016
Draft Worthing Local Plan	Draft Integrated Impact Assessment (October 2018)	31 October to 12 December 2018
Submission Draft Local Plan	Draft SA Report	This consultation 26th January to 23rd March 2021
Submission	Proposed Major Mods Addendum (if necessary)	Estimated Q2 2021
Examination	Addendum to the SA to consider any Main Modifications	Estimated Q3 2021
Adoption	Post Adoption Statement	Estimated Q1 2022

Evidence Base

3.4.5   A key requirement in developing planning policies is that they are underpinned by robust and up-to-date local evidence. As such a significant number of studies have been undertaken on different subject areas. The full extent of the evidence base can be viewed on the Council's website.

3.4.6   The Local Plan is also accompanied by an Infrastructure Delivery Plan (IDP) which sets out the infrastructure requirements to meet the development forecast to come forward in the borough over the plan period.

3.4.7   The Council must also ensure that the aspirational policies identified in the Plan are realistic and deliverable. To make this assessment a Whole Plan Viability Assessment has been undertaken to assess the cumulative impact of the policy and development requirements on a range of development scenarios across the borough.

The Council's Ambitions

3.4.8   To be effective and respond to local priorities, the Local Plan has had regard to a variety of other strategies of the Council and its partners. In particular, this has included Adur and Worthing Councils 'Platforms for our Places - Going Further' which sets out the Council's ambitions for our places to 2022 and beyond.

3.4.9   In July 2020 the Council published 'And then... bouncing back in post pandemic Adur and Worthing'. The Local Plan will need to help support the place

based activities and interventions identified that will enable local communities to thrive, prosper, be healthy and resilient in response to the Coivid-19 pandemic.

4. SUSTAINABILITY APPRAISAL FRAMEWORK

4.1 Introduction to Worthing

4.1.1 Worthing originally developed as a popular Victorian and Edwardian seaside resort. It is now one of the largest towns in West Sussex, with around 110,700 residents and a working population of approximately 60,000 people. Its location on the south coast between the English Channel to the south and the South Downs National Park to the north provides a distinctive and much cherished setting. It is this high quality environment that helps to underpin and support the local economy and which is valued by those who choose to live, study, work and visit here. In turn, this helps to generate an increasing requirement for homes, jobs and leisure uses.

4.1.2 Worthing occupies an area of 3,369 hectares of the coastal plain, with the only breaks in an almost continuous band of urban development along the coast being at the far eastern and western ends of the borough. Whilst being principally a compact urban area, there are a number of highly valued greenspaces, parks and gardens within and around the town.

4.1.3 Worthing plays an important role within a wider sub-region with key links to other authority areas such as Brighton & Hove, Adur, Arun, Horsham and Crawley for housing, leisure and employment.

Figure 3: Local Plan Context
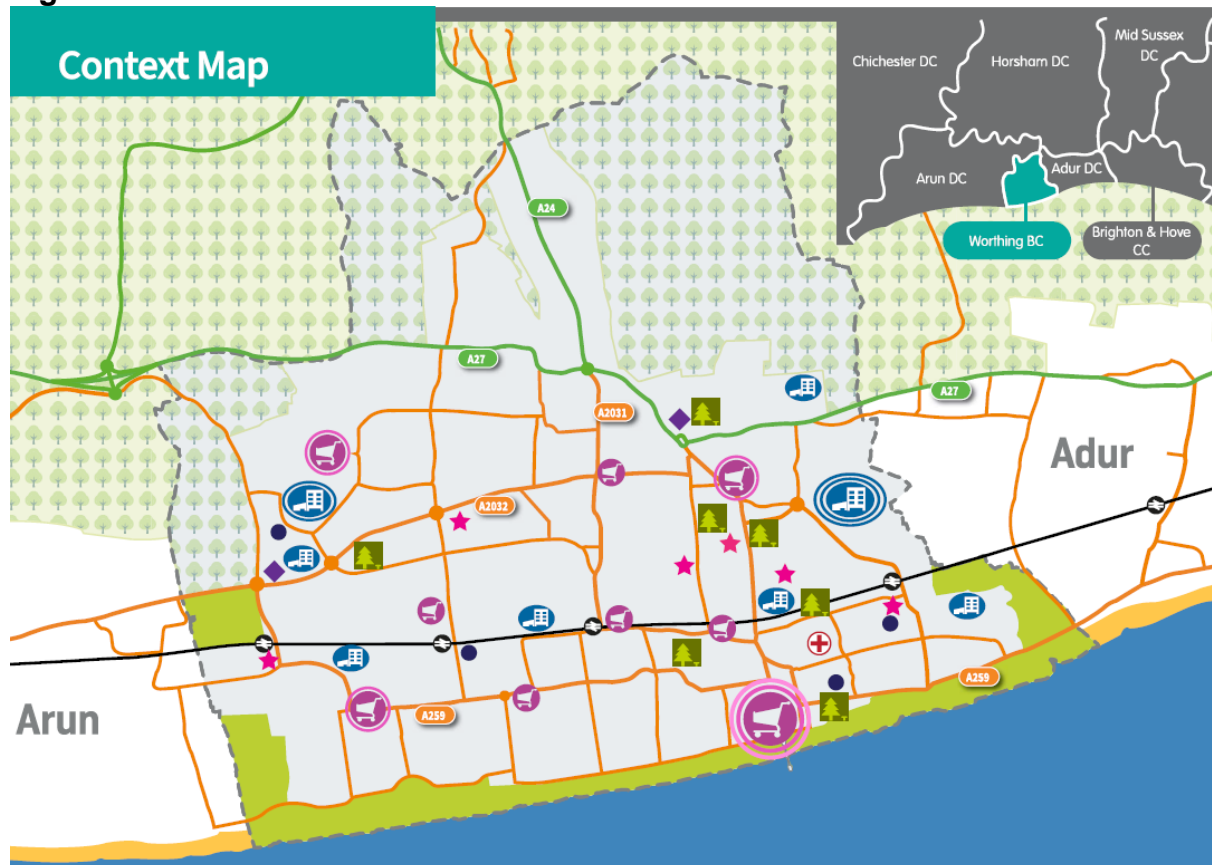
4.1.4 The seafront is one of Worthing's most important assets acting as a focus for many of the historical buildings, gardens and public spaces. Significant enhancements have been made to parts of the seafront and this is having a positive effect on local businesses with a range of new independent shops and eateries having opened in recent years. The town centre and seafront continue to offer the greatest opportunities for major redevelopment.

4.1.5 Outside of the town centre and seafront area, the borough is more suburban in character. The historic development of the town occurred through the merging of separate villages and centres such as Tarring and Broadwater. The expansion of the town in this way is still evident today with distinct areas centred on the parish church or local shopping areas that each have their own identity and character. A significant amount of growth was witnessed between World War I and World War II resulting in large areas of predominantly two storey residential developments which now extend to the foot of the South Downs.

4.1.6 In recent years the town has seen a resurgence in popularity as young people and families move into the borough, which is partly influenced by the affordability challenges faced within the residential market in Brighton and Hove.

4.2 Sustainability Appraisal Topic Areas

4.2.1 The social, economic and environmental impacts that may arise from the implementation of the Local Plan will be appraised on a topic basis. The topics focused on and how they relate to the SEA requirements are set out below:

Table 3: Topic Areas

Scoping Report Topic	Relevance to SEA, HIA & EqIA
Air Quality	SEA Topics: Biodiversity, Population, **Human Health**, Soil, Water, **Air**, Climatic Factors HIA EqIA
Biodiversity and Green Infrastructure	SEA Topics: **Biodiversity**, Human Health, Flora, Fauna, Climatic Factors
Climate Change Adaptation and Flood Risk	SEA Topics: Biodiversity, **Population**, **Human Health**, Fauna, Flora, Soil, **Water, Climatic Factors**, Material Assets, Cultural Heritage, Landscape HIA
Climate Change Mitigation and Energy	SEA Topics: Biodiversity, **Population**, Human Health, Fauna, Flora, Soil, Water, **Climatic Factors**, Material Assets, Cultural Heritage, Landscape HIA
Community and Well-being (including equality and health)	SEA Topics: Population, **Human Health** HIA EqIA

Economy and Employment	SEA Topics: Population, **Material Assets**
Historic Environment	SEA Topics: Material Assets, **Cultural Heritage**, Landscape
Housing	SEA Topics: **Population**, Human Health, Material Assets HIA EqIA
Landscape	SEA Topics: Biodiversity, Fauna, Flora, Soil, **Material Assets**, **Landscape**
Soils	SEA Topics: Biodiversity, Human Health, Fauna, Flora, **Soil**, Water
Transport	SEA Topics: Population, **Human Health**, **Air**, Climatic Factors HIA EqIA
Waste	SEA Topics: Population, **Climatic Factors** Landscape
Water	SEA Topics: Biodiversity, **Population**, Human Health, Fauna, Flora, Soil, **Water**, Climatic Factors

4.3   Sustainability Issues

4.3.1   Baseline data has been collected on each of these topic areas to establish the existing situation within the borough, and the most important trends and issues. The baseline data draws upon the evidence base being gathered for the development of the Local Plan; and existing information and statistics available from monitoring data.

4.3.2   The SEA Regulations and government guidance require that the policies, plans, programmes and objectives that influence the production of the Local Plan should be identified in the SA. These form the sustainability context, which together with the baseline data enable a range of sustainability problems/issues to be identified that should inform and be a particular focus of the SA. The full assessment of these can be found in Appendix B.

4.3.3   The key sustainability issues for Worthing that have been identified through the baseline data and review of the sustainability context are set out in Table 4 below.

Table 4: Key Sustainability Issues

Topic	Key Issues
Air Quality	• Road congestion and related pollution (air and noise) is already a significant problem in the borough so it is vital that a shift to active travel modes is achieved, sustainable transport measures are promoted and the potential impacts of new development are mitigated. • Air quality objectives may not be met if development does not provide sufficient mitigation. • Inappropriate development could result in additional AQMA's being declared at other locations. • Maintenance of air quality may become increasingly difficult due to growth from new developments.
Biodiversity and Green Infrastructure	• There is limited space available in Worthing to provide habitats. This means even smaller sites with biodiversity and the networks of wildlife corridors which provide connectivity are highly valued. • Limited land availability and high demand for housing puts pressure on open spaces and may threaten the biodiversity in these areas. • The links between the urban area and the South Downs to the north and coastline to the south provide valuable wildlife corridors and green infrastructure networks which will need to be protected and enhanced. However connectivity of green corridors can be limited due to the urban nature of the borough. • Smaller proposed interventions and urban innovative solutions are necessary to combat natural capital decline.
Climate Change Adaptation	• A vital challenge for Worthing is to ensure that the area is resilient to the predicted impacts of climate change which can include hotter, drier periods as well as increased rainfall and flood events. • It is important that adaptation and mitigation measures improve the resilience of communities, reduce inequality and bring a range of social benefits.
Climate Change Mitigation and Energy	• The Council has made a commitment to be carbon neutral by 2030 and 100% clean energy by 2050 but this is in conflict with a growing population and a high housing need.

	• It is important that the downward trend in CO_2 emissions is maintained. Buildings are a significant source of emissions. • Further growth and development is likely to cause increased emissions and waste, contributing to climate change unless mitigated.
Community and Wellbeing	• Taking proposed new development and demographic projections into account, it is clear that the town is going to experience an increase in population over the plan period. Whilst the need to deliver housing will be a priority, it is important to ensure that balanced and sustainable communities are created and supported through the provision of social infrastructure. • There is a need to address the high variation in levels of deprivation to reduce inequalities, ensure better health and wellbeing for all, and equal opportunities. • With the largest population growth among people in their 40's and significant proportion of over 60's the ageing population will have implications for demands on health and social care.
Economy and Employment	• Although Worthing has seen some key successes in recent years there is still much work to do to ensure that the borough continues to prosper, meets the needs of its residents and better fulfils its role within the wider sub-region. • There is relatively low educational attainment and skills in Worthing. It is important that residents of all ages and abilities can fulfil their potential and have the skills needed to fulfil their own objectives and secure employment. • The strong demand for industrial space coupled with a severe shortage of units in the borough mean that existing local businesses struggle to find suitable space to accommodate their expansion or relocation plans in the local market, while enquiries from businesses outside the Borough can rarely be met. • Given the limited land available for development and the high housing need a key challenge will be to also provide new premises to meet identified employment needs and support local business. • The high housing need may place pressure on other uses. It will be important to ensure that, where appropriate, existing uses are protected. This will include the safeguarding of employment sites and the protection of valued open spaces and community facilities.

	• Whilst retail will continue to perform an important role, the town centre will need to adapt to changing economic conditions and expectations, particularly at a time when it will be recovering from the impacts of the Covid-19 pandemic.
Historic Environment	• There is a need to conserve and enhance designated and non-designated heritage assets and the contribution made by their settings. • It will be important to accommodate change and growth whilst sustaining and enhancing the significance of heritage assets and the valued character of a place.
Housing	• Housing stock must meet current and future needs and take into account how the population is changing. In particular the needs of an ageing population. • The demand for housing through the housing register continues to exceed supply. There is a need to increase the amount and availability of affordable housing to take account of relatively high house prices and below average wages. • There is a significant need for housing in Worthing. It is important that the housing proposed meets the local need in terms of mix and affordability.
Landscape	• The need to maintain and enhance the high quality natural landscape • The need to conserve and enhance the character and setting of Worthing's urban areas and its relationship with the coast and SDNP.
Soils	• As development pressures increase, the consideration of development on Greenfield sites may impact high grade agricultural land. • Given the limited land available to meet development needs, it will be important to ensure an effective use of land on each available site and, where appropriate, the density of development is increased. • There are a limited number of opportunities remaining to meet housing need on brownfield sites. • Development of some brownfield sites may also present opportunities to remediate contaminated land.

Transport	• Road congestion and related pollution (air and noise) is already a significant problem in the borough so it is vital that a shift to active travel modes are achieved, sustainable transport measures are promoted and the potential impacts of new development are mitigated.
	• Areas of heavy congestion are likely to worsen as the population increases.
	• The growth of the town will increase pressures on transport infrastructure that is already approaching capacity
Waste	• The reuse of building materials should be promoted to reduce the amount of construction waste generated
	• In recent years the recycling rate has been increasing. It is important that this is maintained and further measures to promote recycling be encouraged to increase it further and reduce the proportion of waste sent to landfill.
	• It will be important to reduce the amount of waste produced to avoid further amounts sent to landfill as a result of development and population growth.
Water	• There is already a shortage of water resources which is impacting on the local ground and surface waters. This is likely to worsen as a result of further growth.
	• Vital groundwater supplies, coastal bathing waters and rivers are vulnerable to pollution and failing to reach quality targets.
	• It is important that ground and surface water quality is protected and where possible improved as part of development.

4.3.4   The Covid-19 pandemic has had a significant impact on all sections of society. Whilst it is too early to say how pronounced and long term these impacts might be it is widely accepted that there will be many implications for the local economy, for transport and for social structures. Like all local authorities the Council will have to respond positively to support post-Covid recovery. Planning will play an important role in this process and, if anything, the pandemic has emphasised the importance of the Local Plan's role in planning for sustainable, resilient and inclusive outcomes ('Build Back Better'). Although the Local Plan is designed to provide a clear framework for development it must be accepted that, in these uncertain times, there may need to be an even greater requirement for adaptability and flexibility.

4.4   Likely Evolution Without the Local Plan

4.4.1   The no plan scenario is considered to result in the following:
- further loss of employment and community uses for residential
- lack of sustainable transport infrastructure
- Unplanned development could adversely affect the local character and setting of Worthing by eroding areas of countryside and gaps between settlements
- greater increase in carbon emissions
- loss of biodiversity through piecemeal developments
- worsening of air quality, noise issues and congestion
- no improvement to streetscape, public realm and enhanced setting for heritage assets

4.5   The Sustainability Objectives

4.5.1   The key issues identified above have been used to form overarching Sustainability Objectives shown in Table 5. The Objectives will be used to assess how the various policy options being explored for the Local Plan could contribute to sustainable development – by comparing each policy or proposal's effects on each objective. To improve consistency with the Local Plan these have also been aligned with the UN Sustainable Development Goals.

4.5.2   Ideally sustainable development would result in positive effects on all the Objectives identified – although in reality it is likely compromises will have to be found and mitigation implemented to find a balance between social, economic and environmental needs.

4.5.3   It is recognised that although effort has been made to make these objectives discrete there are inevitably clear links between some due to the cross cutting nature of these issues, which could affect the results of the appraisal through double scoring.

4.5.4   Following the previous version of this Report that was published alongside the Draft Local Plan in 2018, the aims of Objective 4 Energy have been amended to reflect the Council's commitment to work towards carbon neutrality by 2030 and the UK commitment to becoming net carbon zero by 2050.

Table 5: Sustainability Objectives

Objective		Relevant UN SDG Targets	Supporting Criteria *Will the site/policy proposal under consideration…*
1. Environmental Quality	To protect and improve air and water quality and reduce pollution.	3.9, 6.3, 11.6	• Contribute to achieving good ecological status or potential as a requirement under WFD? • Ensure there is adequate capacity in water and wastewater infrastructure? • Minimise health risks associated with pollution? • Improve local air quality, especially in AQMAs?
2. Biodiversity	To conserve, protect and enhance habitats and natural species diversity, green infrastructure networks and wildlife corridors.	6.6, 15.5	• Achieve a net gain in biodiversity locally? • Ensure no net loss of Priority Habitat? • Deliver opportunities to protect, restore or enhance biodiversity? • Promote the connectivity of habitats as part of an ecological network?
3. Land and Soils	Improve land use efficiency by encouraging the re-use of previously developed land, buildings and materials.	11A, 3.9	• Direct development to brownfield sites before Greenfield? • Support remediation of contamination as part of the redevelopment of brownfield sites? • Protect agricultural and best and most versatile soil? • Will it encourage the re-use of buildings? • Will it help to reduce the number of vacant / derelict buildings?
4. Energy	To support the transition to achieving carbon neutrality, contributing to climate change mitigation.	7.2, 7.3, 12.5	• Increase the amount of energy from renewable and low carbon technologies? • Will it improve insulation, internal air quality and energy efficiency in existing housing to reduce fuel poverty? • Promote recycling, reuse and reduction of materials to reduce the levels of waste to landfill? • Will it help reduce carbon emissions?

5. Water Management	To ensure water is effectively managed to adapt to the effects of climate change.	6.4, 13.1	• Reduce demand for water to help manage droughts and? • Promote the use of Sustainable Drainage Systems (SuDS)? • Direct development to areas of lowest flood risk? • Will it safely manage and reduce the risk of flooding? • Will it minimise the impacts of climate change such as heatwaves on health and well-being, particularly on vulnerable groups?
6. Landscape and Character	To protect and enhance landscape, the quality, character and appearance of the landscape, maintaining and strengthening local distinctiveness and sense of place.	11.4, 11A	• Conserve and enhance the character and quality of natural landscapes, countryside and coast? • Protect and enhance the setting to the South Downs National Park? • Respect existing settlement patterns and maintains separation between settlements? • Will any new development be appropriately integrated with existing development and the surrounding environment?
7. Built Environment	To protect the built character of the townscape and secure the delivery of high quality design.	11.3, 11.4, 11.6, 11.7	• Promote high quality urban design? • Protect and enhance the character and local distinctiveness of townscapes? • Ensure integration of new development with their surrounding context? • Will it enhance and promote the perceived sense of place? • Will it enhance the quality of the public realm?
8. Historic Environment	To preserve and enhance the historic environment.	11.4	• Will it conserve or enhance heritage assets (including designated and locally important assets) and their setting? • Will it promote the sensitive re-use of historic or culturally important buildings where appropriate?
9. Healthy Lifestyles	To help people live healthier lifestyles and reduce inequalities through physical	11.7, 13.1	• Promote active travel by improving access to footpaths and cycle routes? • Provide opportunities for play, sport and recreation? • Promote access to healthier foods / allotments / food growing?

	activity and maximise health and well-being.		• Will it increase accessibility to social infrastructure including health care facilities, schools, social care and community facilities? • Will it improve the quantity and quality of publicly accessible open space?
10. Crime and Public Safety	To create safe sustainable environments which promote social cohesion, security and reduce fear of crime.	5.2, 3.6, 3.9, 11.7	• Promote sustainable mixed use environments? • Improve road safety for all users? • Ensure sites are designed in a way to promote natural surveillance? • Will it reduce levels of crime, the fear of crime and anti-social behaviour?
11. Housing	To provide high quality, homes for all (including affordable), which includes a range of size, types and tenures that are appropriate to local needs?	11.1	• Support increased dwelling completions to meet the local need? • Does it provide high quality homes within an attractive environment? • Deliver a mix of housing to meet identified needs of key local groups? • Will it increase the supply of affordable housing? • Will it reduce homelessness? • Will it provide adaptable homes for independent living for older and disabled people? • Will it provide homes that meet the needs of older people including extra care?
12. Communities	To create and support sustainable vibrant communities where people enjoy living and to ensure equitable outcomes for all particularly those most at risk of experiencing discrimination, poverty and social exclusion.	1.5, 11.1, 11.2, 11.7, 3.8, 9.1	• Provide key services and facilities? • Create communities that are adaptable to the needs of an increasingly elderly population including dementia friendly development? • Ensure infrastructure has sufficient capacity to support new communities? • Will it help reduce social inequality, poverty and social exclusion in communities in the area?

			• Will it promote accessibility for those who are elderly or disabled? • How will different groups of people be affected including BME, women, disabled, LGBT, older people, young people, and faith groups? Will it benefit the groups listed above?
13. Education	Raise educational achievement and skills levels to enable current and future residents to remain in work, and access good quality jobs.	4.2, 4.3 4.4, 8.6	• Improve accessibility to existing educational facilities? • Facilitate the provision of new high quality educational facilities? • Ensure adequate provision of skills/training facilities?
14. Economy	To attract and sustain inward investment and support sustainable growth of industry to improve the resilience and diversity of the local economy.	8.2, 8.3, 8.5	• Facilitate a sustainable visitor economy? • Provide space for new businesses and to enable the expansion of existing? • Increase the number, variety and quality of employment opportunities? • Facilitate the provision of good quality infrastructure to promote economic growth?
15. Town and Local Centres	Improve the range, quality and accessibility of wider town centre uses, and ensure the vitality and viability of existing centres.	8.9	• Provide new or improved leisure, recreational, or cultural activities? • Maintain or increase the amount of floorspace provided for 'town centre uses' within town centres? • Protect key retail areas? • Facilitate regeneration?
16. Travel and Access	Improve access to and from sustainable modes of transport.	11.2, 11.6	• Increase non-car accessibility to existing services/facilities? • Encourage active travel? • Promote accessibility and safe local routes for pedestrians and cyclists? • Ensure streets are designed to be safe functional and accessible for all? • Will it integrate with existing transport networks?

4.5.5. The compatibility of the objectives was originally published in the SA Scoping Report, March 2015. The revised objectives were then re-tested in the SA Report to support the Draft Worthing Local Plan 2018. It was evident from this assessment that many objectives are compatible meaning they strengthen and support each other. The main conflicts arise between objectives which have a focus on development such as housing (11) and economy (14) and the environmental objectives. Potential for mitigation and opportunities were identified.

5. APPRAISAL FINDINGS

5.1 Strategic Objectives

5.1.1 The Strategic Objectives of the Local Plan, link to the Vision and the three key roles for the planning system set out in the revised NPPF. The Objectives provide the direction for the spatial strategy and policies for the plan area.

5.1.2 Stage B1 of the SA process requires the Strategic Objectives of the Local Plan to be tested against the sustainability framework. This helps to identify where objectives are compatible and where conflicts may arise.

5.1.3 This was undertaken as part of the previous Draft Integrated Impact Assessment Report at the Draft Local Plan stage. Since the Draft Worthing Local Plan 2018 consultation an additional strategic objective has been added:

> **SO21** Facilitate affordable, clean, secure energy through the delivery of sustainable, energy efficient, low carbon development and an increase in renewable, decentralised, low carbon energy and heat networks to achieve radical reductions in greenhouse gas emissions

5.1.4 The full appraisal has been updated to include SO21 and can be found in Appendix C.

5.1.5 The assessment identified that many of the objectives of the Draft Worthing Local Plan and the SA framework are compatible, which means they strengthen and support each other. However some potential conflicts were identified and mitigation identified. Conflicts between competing concerns and land uses such as new development and the protection of the environment are always likely to arise. Mitigation and how it has influenced the Local Plan is included in Part 6 of this report.

5.2 Reasonable Alternatives

5.2.1 In-line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" whilst in-line with Schedule 2(8) there is a need to explain "the reasons for selecting the alternatives dealt with. The guidance states that a range of options should be identified and considered at an early stage in the Local Plan making process. These should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn.

5.2.2 The previous 2018 Draft Integrated Impact Assessment Report which published alongside the Draft Local Plan considered and tested the Local Plan policy options likely to have significant effects.

5.2.3 In preparation of the Submission Draft Local Plan there have been a number of changes made to the Local Plan. These are set out below along with an

assessment of whether these need to be assessed as options for the Sustainability Appraisal. It is recognised that a number of these are changes to detailed policy requirements and that whilst these need to be assessed as part of viability work they do not alter the overall intention of the policy and therefore would not be likely to have significant effects. Equally a number of changes to the Local Plan have been a result of changes in national planning policy following publication of the 2019 NPPF which the Local Plan needs to be in general conformity with.

5.2.4   A summary of key changes made to the Local Plan since the 2018 draft version has been prepared. The table below indicates any implications for the SA.

Table 6: Key Changes to the Local Plan

General
Great effort has been made to improve the readability and user-friendliness of the Plan through: a clearer narrative and more defined spatial strategy / enhanced use of graphics maps and colour / simplified policies / an improved structure. In addition, a number of changes have been made to strengthen the 'sustainability' of the Plan in response to the Council's climate emergency declaration. Whilst sustainability is very much the bedrock of the Plan other changes have sought to maximise the delivery of acceptable levels of development.

Part 1 - Introduction		Implications for the SA
Section / Policy	**Key Change**	
Intro	• Updated to reflect the stage of the Plan making process reached.	None
	• Reference to 'Platforms' has been relocated and reference also added to 'And then…..bouncing back in post pandemic Adur and Worthing'.	None
	• Section added on 'Sustainable Development' to capture the use of United Nations Sustainable Development Goals (UN SDGs).	The SA objectives have also been aligned to the UN SDGs
Characteristics	• Data updated	None
	• Information added on Climate Emergency / 100 City Pledge / CO2 emissions per capita / fuel poverty / carbon emissions / clean air / etc	The SA baseline and context now includes this
Issues & Challenges	• Climate Change elements strengthened • Text added relating to Covid-19 recovery and need for flexibility etc • Land availability map added (now cross referenced in text).	None

Vision & Objectives	• Vision and Strategic Objectives' now moved to 'new' Chapter 2	None
Part 2 - Vision and Strategic Objectives		**Implications for the SA**
	• New Chapter 2 created for 'Vision and Strategic Objectives'.	None
Intro	• Plan end date changed to 2036.	Reflected in SA context
V1	• 'Sustainable' added.	None
V3	• Reference added to the historic environment and heritage assets • Reference added to adding to the Borough's Natural Capital.	None
V4	• 'Sustainable' added.	None
V5	• New Vision added on aims to become carbon neutral with reference to active travel, sustainable transport and Electric vehicles.	None
V6	• New vision added on responding to climate change through mitigation and adaptation as well as delivering net gain in biodiversity.	None
Social Objectives	• S01 - 'Sustainable' added to reference to new homes • S07 - Text added: ... healthy, accessible and sustainable environment	None no change to aim of objectives – not likely to have significant effects
Economic Objectives	• S09 - Reference added to 'leisure' in relation to the town centre • S013 - Reference added to 'digital infrastructure'.	None no change to aim of objectives – not likely to have significant effects
Environment Objectives	• SO15 - Reference added to biodiversity net gains • SO17 - Reference added to sustainable sites. • S019 - Reference added to climate justice & climate targets / declaration / adaptation & mitigation measures / resilience • SO21 - New SO added relating to 'energy' / low carbon development.	None no change to aim of objectives – not likely to have significant effects SO21 has been tested along with other Strategic Objectives. See Appendix C.
Strategic Policies	• 'Presumption In favour of Sustainable Development' moved into this Chapter	None

		These have been tested as part of Total Effects of the Plan. See Appendix D
	• Two new Strategic Policies created: Climate Change / Healthy Communities	

Draft Local Plan - Part 3 - Spatial Strategy		Implications for the SA
Chapter 3	• New Chapter created. The majority of this chapter was previously included within Chapter 2 of the DWLP.	None
'Presumption'	• 'Presumption in favour of sustainable development' moved to 'new' chapter 2 - alongside 2 new strategic policies.	None
Intro / Context	• Updates made to Sub-regional context / LSS3.	None
SS1 - Spatial Strategy	• End date changed to 2036. • Reference to Areas of Change removed. Allocation references updated. • Reference added to 'natural resources'. • iii) reference added to the features that provide connectivity	None None None None
Development Needs	• All figures updated to reflect latest projections and change of Plan end date. • Table 1 revised to refine / simplify supporting text.	None None
SS2 - Development Sites	• Allocations re-numbered / capacity assumptions updated / some explanatory text (re. brownfield / greenfield) previously included in 'allocations' chapter now moved here. • Map showing location of all allocations added.	None None
SS3 - Town Centre	• New Spatial Policy 'Worthing Town Centre' added.	This have been tested as part of Total Effects of the Plan. See Appendix D.
Policy SS4 - Countryside	• References added or strengthened relating to: natural resources and biodiversity	None

Policy SS5 - Local Green Gaps	• Amendments made with regards to natural capital and green infrastructure. • Map has been amended to exclude Southern Water's land from Booklands.	None None
Policy SS6 - Local Green Spaces	• Map amended to exclude Southern Water's land from Booklands • Acknowledgement that Ilex Avenue Bridleway is an important multi-user recreation route.	None None
Part 4 - Development Sites		**Implications for the SA**
Introduction	• Updated - reference added to Allocations map that follows.	None
Development Principles	• Removed to avoid duplication- all elements are covered within DM policies and the specific allocations.	None – this wasn't policy
Beeches Avenue	• Previously included as Omission Site - now an allocation as it can be shown that the previously identified constraints can be overcome / mitigated. • Requirement for 100% provision of EV charging infrastructure.	This site was tested through the site criteria as part of the 2018 Integrated Impact Assessment Report to support the Draft Local Plan. This allocation has now been included within the appraisal for the total effects of the Plan. See Appendix D.
Caravan Club	• Capacity increased to 100 dwellings (from 75) • Reference added to ancient woodland and North Barn Farm. • Reference added to: protection of LWS / net gain in biodiversity & Green Infrastructure / ecological information / safeguarding of composting site. • Requirement for 100% provision of EV charging infrastructure.	In line with national policy we must meet our housing need as far as possible. No reasonable alternatives if capacity can be increased it should. None
Centenary House	• Capacity increased to 250 dwellings (from 100) • Reference added to highlight that the future requirements for office floorspace at this location are currently being reviewed in light of the Covid-19 pandemic.	In line with national policy we must meet our local need as far as possible. No reasonable alternatives if

		capacity can be increased it should.
Civic Centre	• Capacity - reference to 64 dwellings deleted - now just refers to 'Health Hub' • Reference added to the library and Worthing museum / listed buildings.	None informed through site development – the appraisal of this policy as part of total effects has been updated to reflect the change in uses.
Decoy Farm	• Capacity - increased from minimum of 15,000sqm to 18,000sqm • Reference added to delivery of footpath / cycleway across Local Green Gap. • Reference added to: safeguarding household waste site / remediation of contaminated land / Local Green Gap / Flood Zone 3 / creating link from PRoW to Loose Lane / enhancing Teville Stream / green infrastructure.	None – informed through site development. To meet local need as far as possible if capacity can be increased it should. None
Fulbeck Avenue	• Capacity - increased to 120 dwellings (from 50) • Reference added to: 'Somerset Lake' / flood storage facility / flood management / deciduous woodland / biodiversity / Green Infrastructure / LWS.	None – informed through site development. To meet local need as far as possible if capacity can be increased it should. None
Grafton	• Capacity - increased to 150 dwellings (from 113) and reduced floorspace to 2,500 sqm (previously 2,979 sqm) • Reference added to: wastewater & surface water pumping station.	In line with national policy we must meet our local need as far as possible. No reasonable alternatives if capacity can be increased it should.
HMRC Office, Barrington Road	• Capacity - Reference removed to 2,500 sqm B1. • Reference to relocation plans and recent developments updated.	None – informed through plans for wider site.
Lyndhurst Road	• Capacity - increased to 150 dwellings (up from 85) • Updated to reflect demolition of gas-holder - strengthened reference added to surface water drainage / contamination.	In line with national policy we must meet our local need as far as possible. No reasonable alternatives if

		capacity can be increased it should.
Martlets Way	• Site area amended to include 'nib'. • Reference to recent developments updated. • New text added to clarify that an element of residential development may be acceptable but only if it can facilitate the delivery of employment floorspace at Martlets Way and provide for the former gasholder site to be brought forward.	None informed through site development.
Stagecoach, Marine Parade	• Capacity - 3,500 sqm commercial space reduced to 2000 sqm • Reference added to: surface water drainage / contamination / heritage assets / historic rights of way.	None informed through site development
Teville Gate	• Capacity - decreased to 250 dw (from 300) and 4000 sqm commercial • Reference added to: remediation / protecting water quality / protection of Listed Buildings	None informed through site development
Titnore Lane	• Previously included as an Omission Site - now an allocation as it can be shown that the previously identified constraints can be overcome / mitigated. • Requirement for 100% provision of EV charging infrastructure.	This site was tested through the site criteria as part of the 2018 Integrated Impact Assessment Report to support the Draft Local Plan. This allocation has now been included within the appraisal for the total effects of the Plan. See Appendix D
Union Place	• Capacity increased to 150 dw (from 128) and 700sqm commercial space • Reference added to the protection of the listed buildings	None informed through site development. To meet local need if capacity can be increased it should be.
Upper Brighton Road	• Reference added to: Sompting Village Conservation Area / landscape and visual setting of the SDNP / avoidance of coalescence / Local Green Gap / biodiversity / Green Infrastructure /	None

	support aspirations of Sompting Estate. • Requirement for 100% provision of EV charging infrastructure.	
Worthing United FC	• Previously included as an Omission Site. A suitable site for relocation has not been identified so this is no longer included. Reference to longer term potential is made within Beeches Ave allocation.	None.
Worthing Leisure Centre	• Removed as no longer being taken forward as an allocation.	None. This site has been removed due to a lack of certainty around deliverability. It's inclusion at this time would therefore not meet the tests of soundness.
Part 5 - Development Management Policies		
DM1 - Housing Mix	• Updated to respond to the Strategic Housing Market Assessment. • Further clarification added on HMOs / conversions / accessibility standards	None no change to aim of policy – not likely to have significant effects
DM2 - Density	• Updated to further strengthen aspiration to make the most efficient use of available land - minimum density requirements updated.	None no change to aim of policy – not likely to have significant effects
DM3 - Affordable Housing	• Updated to respond to the Strategic Housing Market Assessment - in particular, the policy now proposes a differential rate for all major developments (10+dw) - flats (20%) / housing (30%) / greenfield (40%)	None no change to aim of policy – not likely to have significant effects. The affordable housing rate has been informed by the evidence and viability testing. Therefore no reasonable alternatives identified.
DM4 - Gypsy & Traveller	• No significant amendments	n/a
DM5 - Built Environment	• No significant amendments	n/a
DM6 - Public Realm	• Updated to reflect recent progress	None

DM7 - Open Space	• Updated to reflect Open Space, Leisure and Built Facilities study. This includes revised access standards.	None – has been informed by the evidence therefore no reasonable alternatives identified.
DM8 - Community facilities	• No significant amendments	n/a
DM9 - Infrastructure	• Updated to reflect latest approach to CIL (IIP) / S106 etc • New criterion added to refer to water / wastewater infrastructure • Note - the Infrastructure Delivery Plan has been updated	None
DM10 - Economic Growth / Skills	• Updated to reflect recent Employment Land & Economy study • New criterion added to refer to use of conditions	None – has been informed by the evidence therefore no reasonable alternatives identified.
DM11 - Employment Sites	• Updated to reflect recent Employment Land & Economy study • Revised to reflect new use class E	None – has been informed by the evidence and changes to national policy therefore no reasonable alternatives identified.
DM12 - Visitor Economy	• No significant amendments	n/a
DM13 - Retail & Town Centre	• Updated to reflect recent Retail & Town Centre Uses study • Bournaries to be renamed / revised in line with recommendations • Revised to reflect use class E and criterion added to refer to use of conditions • More flexibility added - but within the context of a clear vision and strategy	None – has been informed by the evidence and changes to national policy therefore no reasonable alternatives identified.
DM14 - Digital Infrastructure	• Updated to reflect recent progress • Policy restructured and expanded to cover to 'Fibre to Premises' and 'Telecommunications Infrastructure'	None
DM15 - Sustainable Travel	• Updated to reflect recent progress and updates made to Transport Study • Greater emphasis placed on sustainable modes / active travel.	None – has been informed by the evidence.

		None
DM16 - Sustainable Design	• Strengthened to: deliver higher energy efficiency standards; require higher levels of EPC rating / prevent overheating / minimise waste.	None no change to aim of policy – not likely to have significant effects. The impact of requirements has been tested through viability study.
DM17 - Energy	• Strengthened to deliver: on site renewables; efficient heating and cooling systems / district heating networks.	None no change to aim of policy – not likely to have significant effects.
DM18 - Biodiversity	• Strengthened to protect biodiversity & habitats and deliver biodiversity net gains (10% as a minimum with 20+% encouraged).	None no change to aim of policy – not likely to have significant effects. The requirement has been tested through viability study
DM19 - Green Infrastructure	• Strengthened to protect and enhance tree canopy and reference added to Building with Nature Full Award (Excellent).	None no change to aim of policy – not likely to have significant effects.
DM20 - Flood Risk / Drainage	• Updated to reflect latest guidance and best practice and respond to the findings of the recent Strategic Flood Risk Assessment.	None – has been informed by the evidence therefore no reasonable alternatives identified.
DM21 - Water Quality / Use	• Requirements to deliver SUDs and water efficiency measures have been strengthened.	None no change to aim of policy – not likely to have significant effects.
DM22 - Pollution	• No significant amendments	n/a
DM23 - Historic Environment (strategic)	• No significant amendments	n/a
DM24 - Historic Environment	• Policy restructured	None

5.3   Likely Significant Effects

5.3.1 The sustainability appraisal should identify describe and evaluate the likely significant effects. The Regulations also requires an assessment of secondary, cumulative and synergistic effects. Cumulative effects are important because the plan itself may not have a significant effect, but when added to other actions its effects may be significant and require additional mitigation. Synergistic effects are a subset of cumulative effects, where effects interact to produce a total effect greater than the sum of the individual effects. These often happen as habitats, resources or communities get close to capacity. Synergistic effects are assessed as part of the cumulative effects assessment.

5.3.2 Schedule 1 of the Regulations sets criteria for determining the likely significance of effects on the environment. These are:

1. The characteristics of plans and programmes, having regard, in particular, to—
(a)the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
(b)the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
(c)the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
(d)environmental problems relevant to the plan or programme; and
(e)the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—
(a)the probability, duration, frequency and reversibility of the effects;
(b)the cumulative nature of the effects;
(c)the transboundary nature of the effects;
(d)the risks to human health or the environment (for example, due to accidents);
(e)the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
(f)the value and vulnerability of the area likely to be affected due to—
        (i)special natural characteristics or cultural heritage;
        (ii)exceeded environmental quality standards or limit values; or
        (iii)intensive land-use; and
(g)the effects on areas or landscapes which have a recognised national, Community or international protection status

5.3.3 Ultimately, the significance of an effect is a matter of judgment and justification is included within the text. Given the uncertainties, there is inevitably a need to make assumptions. Assumptions are made cautiously. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on the merits (or otherwise) in more general terms.

5.3.4   The Submission Draft version of the Worthing Local Plan contains the following policies:

Part 2
SP1 Presumption In Favour of Sustainable Development
SP2 Climate Change
SP3: Healthy Communities

Part 3
SS1 Spatial Strategy
SS2 Site Allocations
SS3 Town Centre
SS4 Countryside and Undeveloped Coast

SS5 Local Green Gaps
SS6 Local Green Space

Part 4
A1 Beeches Avenue
A2 Caravan Club, Titnore Way
A3 Centenary House
A4 Civic Centre, Stoke Abbott Road

A5 Decoy Farm
A6 Fulbeck Avenue
A7 Grafton
A8 HMRC Offices, Barrington Road
A9 Lyndhurst Road
A10 Martlets Way

A11 Stagecoach, Marine Parade
A12 Teville Gate

A13 Titnore Lane
A14 Union Place
A15 Upper Brighton Road

Part 5
DM1 Housing Mix

DM2 Density
DM3 Affordable Housing
DM4 Gypsies, Travellers and Travelling Showpeople
DM5 Quality of the Built Environment
DM6 Public Realm
DM7 Open Space, Recreation and Leisure
DM8 Planning for Sustainable Communities / Community Facilities
DM9 Delivering Infrastructure
DM10 Economic Growth and Skills
DM11 Protecting and Enhancing Employment Sites
DM12 The Visitor Economy
DM13 Retail and Town Centre Uses
DM14 Digital Infrastructure
DM15 Sustainable Transport & Active Travel
DM16 Sustainable Design
DM17 Energy
DM18 Biodiversity
DM19 Green Infrastructure
DM20 Flood Risk and Sustainable Drainage
DM21 Water Quality and Sustainable Water Use
DM22 Pollution
DM23 Strategic Approach to the Historic Environment
DM24 The Historic Environment

5.3.5   Each policy was assessed against the separate Sustainability Objectives, using the scoring system detailed below to indicate whether they are likely to have a positive or negative significant effect:

Table 7: Scoring Criteria

+ +	Very positive effects – the option would significantly help in achieving the objective
+	Positive effect – the option would help in achieving the objective
/	Neutral effect – the option would neither help nor hinder the achievement of the objective
-	Negative effect – the option would be in conflict with the objective
- -	Very negative effect – the option would be in significant conflict with the objective

?	Uncertain – more information needed
0	No effect likely – there is no relationship between the option and the objective

5.3.6 Part 1 of the Local Plan does not contain any policies. Therefore the appraisals below relate only to Parts 2, 3, 4 and 5 of the Plan. Policy SP1: Presumption in Favour of Sustainable Development has not been subject to this appraisal as it is a model policy recommended for inclusion by PINS and therefore any SA findings would do little by way of influencing the policy.

5.3.7 The full appraisal of each policy in the Submission Draft Local Plan can be found in Appendix D and are summarised below in Table 8. The main findings from this Sustainability Appraisal are as follows:

5.3.8 Overall Part 2 of the Local Plan scores positively against the majority of objectives. Part 3 of the Local Plan has mixed scores reflecting the policies that range from allocating land for development and protecting other sensitive and valued areas. Part 4 of the Local Plan, site allocations, tends to score negatively against environmental objectives but positively against social and economic objectives reflecting the potential environmental impacts of development. However, it is expected that many of these will be mitigated through policies within Part 5 of the Plan. Part 5 of the Local Plan scores positively against most objectives apart from a small number of policies against Objective 11: Housing reflecting the competing demands for land from different uses.

5.3.9 The EqIA found that overall the Local Plan will support the EqIA protected characteristics 'age', 'disability' and 'race'. In particular Policy SP3, the delivery of housing, promotion of mixed use developments and the inclusion of high quality public realm will support health and wellbeing and inclusive environments. Many of the development management policies in part 5 will provide social benefits for communities through the provision of new housing, ensuring healthy communities, safeguarding open space and recreation, safeguarding community facilities and the provision of new social infrastructure. Policies DM8, DM9, DM10 will protect and support the provision of new education and training facilities.

5.3.10 In relation to cumulative and synergistic effects, it is expected that the Local Plan will exacerbate existing trends identified in relation to energy, water and housing. Potential effects are identified in relation to Environmental Quality and Travel and Access objectives highlighting the concern that the additional development allocated in the Local Plan may minimise the positive effect of other measures being implemented to improve air quality. In relation to this issue a synergistic effect was also identified in terms of the impact of air quality on health. In relation to the Communities objective at this stage it is unclear what the impact of the Local Plan will be in terms of both exacerbating and providing new facilities to alleviate pressures from a growing population with an increased proportion of people over the age of 60.

Table 8: Likely Significant Effects of the Submission Draft Worthing Local Plan

SA Objective 1. Environmental Quality																																															
LP Part 2		LP Part 3						LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
+	+	-	-	0	/	/	/	-	?	?	?	?	?	?	?	?	?	?	?	?	?	-	0	0	0	+	+	0	0	0	+	0	0	0	0	0	+	0	/	+	+	/	++	++	0	0

Conclusions - SA	Policies within the spatial strategy - part 3, and site allocations - part 4 of the Plan score as having predominantly negative and neutral or negative and uncertain effects, recognising the potential for development, especially those sites in close proximity to the AQMA, to increase traffic negatively impacting on air quality. This is balanced by strategic policies - part 2 and development management policies - part 4 of the Plan which provide mitigation and therefore score positively with very significant positive effects recorded against policies DM21 and DM22 reflecting the intention of these policies to protect and enhance the natural environment.
Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	The expansion of the AQMA suggests that air quality issues were worsening due to a combination of increased levels of traffic congestion and the growth in popularity of diesel vehicles. However following this an Air Quality Action Plan is in place and a local partnership has been established to coordinate actions to improve air quality, on a wider scale vehicle emissions are also expected to reduce. However, the scale of development proposed in the Local Plan may have the potential to negatively impact on these efforts. It is not possible to determine the extent of this in terms of whether the impact will be sufficient to reduce the level of improvement that may have otherwise been achieved, or prevent an improvement altogether. However it should be acknowledged that without the Local Plan development is still likely to come forward through windfall sites but without the mitigation provided through the policies within the Local Plan. In terms of synergistic effects it is recognised that although air quality impacts on environmental quality, it has a far greater impact on health.

SA Objective 2. Biodiversity			
LP Part 2	LP Part 3	LP Part 4	LP Part 5

SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
+	+	/	-	0	+	+	+	-	-	0	0	-	-	0	0	0	0	0	0	--	0	-	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	+	0	++	+	+	+	+	0	0

Conclusions - SA		The majority of the Local Plan scores positively overall in relation to this objective with Policy DM18 having very significant positive effects. The exception to this is the site allocation policies - part 4 of the Plan whereby greenfield sites have scored negatively reflecting the likelihood of some loss of habitats and the difficulties that may be faced in achieving net gains. Allocation A13 - Titnore Lane has been scored as having very significant negative effects recognising the potential impact on Ancient Woodland - an irreplaceable habitat. However mitigation has been identified for this policy to minimise this effect.
Conclusions - HIA / EqIA		This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects		Wider legislation commits to protecting and enhancing biodiversity including through growing a resilient network and providing net gains. The Local Plan will further support this and help identify opportunities for enhancement and delivery of net gains on the proposed development sites.

SA Objective 3. Land and Soils

LP Part 2		LP Part 3						LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
0	0	+	+	+	+	+	0	-	-	+ +	+ +	+	-	+ +	+ +	+ +	+ +	+ +	- -	+ +	- -	-	0	+	0	0	0	0	0	0	0	+ +	/	0	0	0	0	0	0	0	0	0	0	++	0	0

Conclusions - SA		Part 3 of the Local Plan - spatial strategy scores positively as policies require the effective use of land and protect the Best and Most Versatile Agricultural Land. Part 4 of the Plan - site allocations received mixed scores including both very significant positive effects and very significant negative effects reflecting the approach to allocate both brownfield and greenfield sites. Part 4 of the Plan - development management policies generally scores positively overall with policies DM2 and DM22 requiring remediation of contaminated land, effective use of land and minimum densities identified as having very significant positive effects.

Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	Only 8% of land is outside of the Built Up Area however this does contain areas of high quality Agricultural Land. The Local Plan will ensure that some of these key sites are protected despite the pressures for development.

SA Objective 4. Energy

LP Part 2	LP Part 3							LP Part 4															LP Part 5																						
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
++	?	-	-	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	+	++	++	0	0	0	0	0	0	0

Conclusions - SA	The spatial strategy - Parts 3 and site allocations - part 4 of the Plan score negatively recognising that new development is likely to increase carbon emissions. This is addressed through policies SP2, DM16, and DM17 which are identified as having very significant positive effects.
Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	Adur and Worthing Councils have declared a climate emergency and committed to becoming carbon neutral by 2030. The Local Plan includes mitigation to improve energy efficiency of buildings and promotes renewable, low carbon and decentralised energy schemes. However the delivery of new housing allocated through the Plan is likely to still result in increased emissions overall both short to medium term through construction and long term during occupation.

SA Objective 5. Water Management

LP Part 2	LP Part 3							LP Part 4															LP Part 5																						
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24

+ ++	+	-	-	0	0	0	+	/-	-	--	-	--	-	-	-	-	-	-	--	?	0	0	+	0	0	?	0	+	0	0	0	0	0	0	0	0	?	+	++	++	0	0	0

Conclusions - SA	Part 2 - strategic policies scores positively especially SP2 which seeks to improve the resilience of local communities. Part 4 - scores negatively with a number of sites identified being at a high risk of flooding scoring as having very significant negative effects reflecting that development in these locations will place additional people in areas at a high risk of flooding. Mitigation has been identified for these specific sites and also through development management policies in part 5 with DM21 and DM22 which seek to address flood risk and demand for water and are identified as having very significant positive effects.
Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	Worthing is at a significant risk of flooding from surface water but is also affected by groundwater, coastal and fluvial flooding. Flooding is likely to increase in intensity and frequency as a result of climate change. The Plan overall will likely increase the number of properties at risk, particularly from surface water flooding. In addition even with measures within the Plan to improve water efficiency the demand for water as a result of the Plan is likely to increase overall in an area classified as 'Serious Water Stress'.

SA Objective 6. Landscape and Character

LP Part 2		LP Part 3						LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
0	0	+	?	+	+	++	+	-	/	0	0	-	-	0	0	0	0	0	0	-	0	-	0	?	0	0	+	+	+	0	0	0	0	0	0	0	0	0	/	0	0	0	0	0	+	+

Conclusions - SA	Part 3 of the Plan - spatial strategy scores positive with Policy SS5 having very significant positive effects due to Its intention to prevent coalescence. Part 4 site allocations score negatively due to the potential impact of developing undeveloped sites, this is addressed through other policies in Part 5 - development management policies which score positively.
Conclusions - HIA / EqIA	This objective has no relationship with the HIA / EqIA.

| | Cumulative (including synergistic) Effects | There is a need to maintain and enhance the high quality natural landscape. The South Downs Local Plan plans for the areas within the National Park. This Local Plan will help protect the character and setting of the National Park from development outside of the Park, undeveloped coast and important views between settlements. Indirectly the protection of the undeveloped coast, countryside and important views between settlements may also support healthy lifestyles through the protection and provision of open space. |

SA Objective 7. Built Environment

LP Part 2	LP Part 3							LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
+	?	+	0	+	0	0	0	0	0	0	+	0	0	+	0	+	+++	+++	++	0	++	0	0	+	0	0	++	+	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	+	+

Conclusions - SA	All parts of the Plan score positively against this objective with very significant positive effects identified in relation to the allocation of brownfield sites and design policies.
Conclusions - HIA / EqIA	This objective has no relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	The Local Plan will help secure good design in terms of layout, buildings and public realm. This will complement and could support delivery of identified public realm improvement projects. Links are also identified between the achievement of this objective and the historic environment objective.

SA Objective 8. Historic Environment

LP Part 2	LP Part 3							LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
?	0	0	?	0	0	+	+	0	0	0	-	0	0	-	0	0	0	-	-	0	-	-	?	?	0	0	+	/	+	0	?	0	0	0	0	0	0	?	0	0	0	0	0	0	+++	+++

Conclusions - SA	Policies in Part 5 of the Plan - development management policies, that relate to the historic environment score as having very significant positive effects. However the policies for site allocations in Part 4 which contain or are located close to heritage assets score negatively although it is acknowledged that some could result in an improvement in their setting. Some of the Spatial Strategy Policies (Part 3) that relate to landscape and character also score positively due to protection of historic views between settlements, highlighting a link between this and the landscape & character objective.
Conclusions - HIA / EqIA	This objective has no relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	The number of heritage assets at risk has decreased over recent years. The Local Plan should preserve and enhance the historic environment.

SA Objective 9. Healthy Lifestyles

LP Part 2	LP Part 3							LP Part 4															LP Part 5																								
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
++	+	+	+	?	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	+	0	+	+	+	+	/	/	+	+	++	+	+	0	0	0	0	0	+	+	0	?	+	+	+	+	0

Conclusions - SA	All parts of the Plan score positively against this objective with very significant positive effects identified in relation to Policies SP3 which directly relates to the health of communities, A4 which allocates land for a new integrated health hub and DM7 which aims to protect and enhance open space, sport and recreation facilities. Part 5 of the Plan (development management policies) scores positively overall across a range of economic, social and environment policies reflecting the wide determinants of health.
Conclusions - HIA / EqIA	Policies in Part 3 of the Plan all score positively with regards to healthy lifestyles. It is considered that these will enable the protection of valued open spaces, green spaces and safeguarding of leisure uses which will help to promote opportunities for exercise and recreation thereby supporting the health of local communities. This will also support EqIA protected characteristics such as 'age', 'disability', 'race'. Policies SP3 and DM7 most relevant to this objective given that they are both health related policies and will help to address the wider determinants of health as well as encouraging healthy lifestyles. The policies will also support EqIA protected characteristics.

Cumulative (including synergistic) Effects	Pockets of Worthing suffer with deprivation in relation to health. The Adur and Worthing Council's Public Health Strategy 2018-2021 highlights significant health challenges including higher than average levels of obesity and alcohol misuse; low rates of physical activity; isolated older people and loneliness of all ages; early deaths from cancers; high incidence of mental health issues amongst our young people and low educational attainment. It sets out 5 priorities for enabling the better health and well-being of its communities. The Local Plan will also support this effort to reduce inequalities.

SA Objective 10. Crime and Public Safety

LP Part 2	LP Part 3							LP Part 4															LP Part 5																								
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
0	+	0	?	+	0	0	0	0	0	+ +	0	0	0	+	0	0	0	0	+	0	+	0	0	0	0	0	+	+	0	0	0	?	0	0	0	0	+	0	0	0	0	0	0	0	0	0

Conclusions - SA	Overall relevant policies score positively with the recognition that an improved public realm and redevelopment of vacant sites will help to increase natural surveillance reducing the fear of crime. Policy A3 scores as having very significant positive effects due to the proposed use of this site to provide enhanced facilities for the police and other public services.
Conclusions - HIA / EqIA	The promotion of mixed use developments and the inclusion of high quality public realm will support health and wellbeing and inclusive environments therefore supporting EqIA protected characteristics such as 'age', 'disability' and 'race'.
Cumulative (including synergistic) Effects	Worthing generally has a low crime rate however anti social behaviour is a key issue particularly in wards with higher levels of deprivation. However statistics show that crime in Worthing is decreasing. The Local Plan should ensure that new developments are designed in a ways that support this.

SA Objective 11. Housing

LP Part 2	LP Part 3	LP Part 4	LP Part 5

SA Objective 11 (continued)

SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
+	+	+	+	+	--	--	--	++	++	++	/	0	+	++	+	++	/	+	+	++	+	+	++	++	++	++	+	0	-	0	+	-	-	0	0	0	0	?	0	0	0	0	0	0	0	0

Conclusions – SA	This objective receives mixed scores reflecting the need for competing demands for land in a constrained area. Part 2 of the Plan (strategic policies) scores positively however part 3 (spatial strategy) has mixed scores with very significant negative effects identified as a result of protecting countryside, local gaps and local green spaces from development (SS4, SS5, SS6). This is balanced against Part 4 (site allocations) which scores as having very significant positive effects due to the contribution the sites will make to the delivery of new homes, again this balanced against the need for some sites to provide other uses. Within Part 5 (development management policies) those sites that directly relate to the delivery of housing score as having very significant positive effects whereas those policies that seek to protect and maximise other uses score negatively.
Conclusions – HIA / EqIA	It is considered that the provision of high quality homes will help to address local housing need and thereby support EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative (including synergistic) Effects	Within the wider area a number of Authorities are unable to meet their local housing need figure. The shortfall left by the Worthing Local Plan will further exacerbate this potentially impacting on affordability issues and the ability for local residents to find suitable accommodation.

SA Objective 12. Communities

LP Part 2		LP Part 3						LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
?	++	+	?	+	0	0	++	?	?	++	++	0	?	?	?	?	0	?	?	?	?	?	+	0	0	/	0	0	+	+	++	+	0	0	+	+	+	+	0	0	0	?	+	0	0	0

Conclusions – SA	There are very significant positive effects identified against this objective with Policies SP3, SS6, A3, A4 and DM8 due to the new or enhanced community facilities and services they will provide. A number of policies score as uncertain recognising that development may place pressure on existing community facilities and services.
Conclusions – HIA / EqIA	Many of the development management policies in part 5 will provide social benefits for communities through the provision of new housing, ensuring healthy communities, safeguarding open space and recreation, safeguarding

community facilities and the provision of new social infrastructure. These policies will support the EqIA protected characteristics.

Cumulative (including synergistic) Effects	Data suggests that people live at higher densities in Worthing compared to surrounding areas and resident numbers are growing. There are also a high proportion of people over the age of 60 and within the borough there are wards with significant deprivation resulting in inequalities. The Local Plan may place additional pressure on local services and facilities, however it may also provide opportunities in some areas to provide new local facilities.

SA Objective 13. Education

LP Part 2	LP Part 3							LP Part 4																LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
0	0	/	?	0	0	0	0	?	?	?	0	0	?	?	?	?	0	?	?	?	?	?	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	0	0	0	0	0	0	?	0

Conclusions - SA	A number of policies score as uncertain recognising that development may place pressure on existing education facilities. This is addressed through Part 5 of the Plan where policies DM8, DM9, DM10 will protect and support the provision of new education and training facilities.
Conclusions - HIA / EqIA	Policies DM8, DM9, DM10 will protect and support the provision of new education and training facilities and thereby support EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative (including synergistic) Effects	There is relatively low educational attainment and skills in Worthing particularly in the more deprived areas. The 2011 census results show that Worthing had the third highest unemployment rate in West Sussex however these numbers appear to be reducing. The Local Plan will protect existing and support the provision of new education and training facilities

SA Objective 14. Economy

LP Part 2	LP Part 3							LP Part 4																LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24

| ? | + | + | + | ++ | - | - | - | 0 | /+ | ? | ++ | 0 | + | - | 0 | + | + | + | 0 | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ? | 0 | 0 | + | + | ++ | ++ | + | + | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | + | 0 |

Conclusions - SA	The Plan has mixed scores against this objective reflecting the competing demands of delivering housing and employment floorspace in a constrained authority. Those sites and policies throughout the Plan that aim to support economic growth, regeneration and protect employment sites score as having very significant positive effects.
Conclusions - HIA / EqIA	Policy SP3 seeks to improve the provision of and / access to employment in recognition of the clear links between income and health. This will support the EqIA protected characteristics 'age', 'disability' and 'race'.
Cumulative (including synergistic) Effects	Wider strategies including the Adur & Worthing Growth Deal, Coastal West Sussex Economic Plan (2016-2020) and the Adur & Worthing Economic Strategy (2018-2023) set out to achieve growth, boost economic performance and help improve productivity and wages which are currently lower than elsewhere in the South East. The Local Plan will help ensure that whilst land is constrained where appropriate development will also deliver new commercial floorspace for new or expanding businesses. However despite the Local Plan there may still be a loss of offices as a result of Permitted Development Rights.

SA Objective 15.Town and Local Centres

LP Part 2	LP Part 3							LP Part 4															LP Part 5																								
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
0	0	+	+	++	0	0	0	0	0	0	0	0	0	++	+	+	+	++	+	0	++	0	0	+	0	0	0	++	0	0	0	+	+	+	++	0	+	0	0	0	0	0	0	0	0	0

Conclusions - SA	The Plan scores positively overall against this objective. The policies that most directly relate to this objective including the site allocations within the Town Centre and policies SS3 and DM13 which score as having very significant positive effects.
Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	Wider strategies including the Worthing Town Centre Investment Prospectus and the Worthing Seafront Investment Plan (2017) set out to promote regeneration and secure investment to deliver projects designed to complement and enhance regeneration of the town centre and improve the public realm. These will help support and improve the vitality and viability of the main Town Centre. The Local Plan also provides certainty to some of the vacant sites in the Town

Centre which will support regeneration and allows greater flexibility within the town centre whilst protecting the key retail areas.

SA Objective 16. Travel and Access

LP Part 2		LP Part 3						LP Part 4															LP Part 5																							
SP2	SP3	SS1	SS2	SS3	SS4	SS5	SS6	A1	A2	A3	A4	A5	A6	A7	A8	A9	A10	A11	A12	A13	A14	A15	DM1	DM2	DM3	DM4	DM5	DM6	DM7	DM8	DM9	DM10	DM11	DM12	DM13	DM14	DM15	DM16	DM17	DM18	DM19	DM20	DM21	DM22	DM23	DM24
+	++	?	?	+	+	+	+	+	/	/	+	+	/	+	+	+	/	+	+	+	/	+	0	+	0	+	+	+	+	+	+	+	+	0	+	0	++	0	0	0	+	0	0	0	0	0

Conclusions - SA	The Plan generally scores positively against this objective with some neutral scores. Policies SP3 and DM15 score as having very significant positive effects highlighting the link between active travel and health.
Conclusions - HIA / EqIA	This objective has no direct relationship with the HIA / EqIA.
Cumulative (including synergistic) Effects	Road congestion and associated pollution is a significant problem in Worthing. This is likely to continue to worsen without improvements, affecting residents, businesses, visitors and commuters and impacting the natural environment and human health. The West Sussex Transport Plan provides a strategic direction for transport planning in Worthing. The Local Plan will complement this by improving access to sustainable modes of transport. The Worthing Local Plan Transport Study has concluded that the scale of development proposed would not significantly worsen congestion

5.4 The Mitigation of Policies with Negative Effects

5.4.1 Mitigation is considered in a hierarchy: to avoid, reduce, and as fully as possible, offset negative effects. These are included in this report as recommendations to document whether these proposed measures have been incorporated into the Local Plan, and if not, why not.

5.4.2 The full appraisal of each policy in the Submission Draft Local Plan identified the following mitigation to minimise negative effects and maximise positive effects. These are set out in Part 6 of this Report and Appendix D. The main mitigation measures are as follows:

- Other policies within the Local Plan, when considered as a whole, have the potential to counteract the negative impacts of policies on a particular Sustainability Objective.
- Through the Sustainability Appraisal process, amendments to the wording of Local Plan policies have reduced the potential negative impact.

6.   RECOMMENDATIONS

6.1   How the SA has influenced the Local Plan

6.1.1   The mitigation identified in the Draft IIA Report (2018) that was published alongside the Draft Local Plan and that identified as part of this appraisal have been included in the table below, along with a summary of how it has influenced the Local Plan.

Table 9: Mitigation from 2018 Draft IIA Report

Policy / Topic	Recommendation	Outcome
Review of Objectives	Policies should seek to reduce the need to travel by car, promote and enable sustainable forms of travel, should specify how resources should be used sustainably and should seek to reduce various forms of pollution.	See Policies DM15 Sustainable Transport and DM22 Pollution
	Policies should seek to protect and enhance biodiversity and encourage the incorporation of multi-functional biodiverse design features.	See Policies DM18 Biodiversity and DM19 Green Infrastructure
	Policies should seek to make the best use of brownfield sites through maximising densities where suitable and appropriate.	Policy DM2 Density
	Policies should seek to minimise greenhouse gas emissions through incorporation of energy efficient design features and support for incorporation of low/zero carbon sources of energy.	Policies DM16 Sustainable Design and DM17 Energy
	Policies should specify how development should be resilient to the impacts of climate change and should promote sustainable resource use. Policies should take into account the risk of various types of flooding and seek to minimise flood risk.	Policies SP2 Climate Change, DM16 Sustainable Design, DM20 Flood Risk and DM21 Water Quality and Sustainable Water Use.
	Policies should seek to protect landscape character and promote high quality and sensitive design.	Policies SS4 Countryside and Undeveloped Coast, SS5 Local Green Gaps, DM5 Quality of the Built Environment
	Policies should seek to enhance and preserve the historic built environment and promote high quality and sensitive design.	Policies DM23 and DM24 Historic Environment
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs.	Policies SS1 Spatial Strategy, SS2 Development Sites

	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure including education provision.	Policy DM8 Planning for Sustainable Communities
	Policies and site selection will need to strike the correct balance in terms of meeting competing needs and allowing and enabling economic growth.	Policies DM10 Economic Growth and Skills and DM11 Protecting and Enhancing Employment Uses
	Policies should seek to ensure adequate and timely provision of necessary supporting infrastructure.	Policy DM9 Delivering Infrastructure
SP2 Spatial Strategy	The policy could be more explicit in specifically promoting new employment uses as part of development.	Policy SS1 Spatial Strategy specifically refers to safeguarding employment sites. Policy SS2 Site Allocations lists other uses in addition to housing.
AOC1 Centenary House		Policy A3 Centenary House
AOC4 Worthing Leisure Centre	High quality redevelopment and improved public realm within this prominent site could provide a positive outcome when assessed against the Built Environment objective.	This site has not been taken forward due to lack of certainty around delivery and timescales
AOC5 HMRC Offices, Barrington Road		Policy A8 HMRC Offices, Barrington Road
CP1 Housing Mix and Quality	Policy wording should ensure that accessibility standards only apply where feasible and viable to reduce some of the identified potential negative and uncertain impacts.	Policy DM1 requirement C to meet m4(2) has been tested through viability study.
CP2 Density	The impact of imposing minimum space standards on viability should be considered.	Policy DM2 point b acknowledges in exceptional cases lower densities may be acceptable if demonstrated it is necessary for character of surrounding area, viability or to secure housing mix.
CP7 Healthy Communities	The positive effects could be maximised by making specific reference to reducing pollution	Policy SP3 point v. recognises the links between poor health

59

		and poor air quality and noise.
CP12 Protecting and Enhancing Existing Employment Sites	To avoid the potential negative effects resulting from vacant properties, wording should be included in the policy to allow the release of those sites that are genuinely redundant or vacant for long periods.	DM11 point d allows for where premises are genuinely redundant.
CP17 Sustainable Design	This policy should be informed by viability work to understand the potential impact on the delivery of smaller sites. It should also include allowances for historic buildings as some measures to reduce emissions may not be appropriate.	Policy DM16 requirements have been tested through viability work. 5.236 acknowledges potential impact on historic buildings

Table 10: Mitigation from SA Report of the Submission Draft Local Plan

Policy / Topic	Recommendation	Outcome
SP2 Climate Change	This or more detailed climate change policies need to recognise the potential conflict with preservation of the historic environment, particularly in relation to Listed Buildings. The wider benefits of climate change adaptation to communities including the ways in which it can help reduce inequalities and promote social benefits should be promoted.	Para 5.236 SP2 j)
SP3 Healthy Communities	To maximise positive effects the policy should make reference to fuel poverty, and more generally the need to address inequalities and climate justice.	SP3 b) v.
SS1 Spatial Strategy	Most potential negative effects could be addressed through other policies in the Plan these should: promote active travel, require net gains in biodiversity, support transition to zero carbon development, ensure sustainable use of water resources, protect and conserve the historic environment.	See policies DM15, DM18, DM16, DM17, DM21, DM23 and DM24.
SS2 Site Allocations	Most potential negative effects are against environmental objectives and will be mitigated through other policies in the Plan. It is recommended that to maximise positive effects the levels of development set out in this policy are a minimum and that other policies in the Plan seek to maximise housing delivery as far as appropriate.	SS2 a) and b) specify minimum.
SS3 Town Centre	Positive effects could be further maximised through incorporation of wording to enhance/improve linkages between the town centre and seafront, and support high quality public spaces.	SS3 c) d) and e)
SS4 Countryside and Undeveloped Coast	The appraisal has identified that the positive effects associated with biodiversity could be further maximised by policy wording to improve and enhance green infrastructure. Policy wording that promotes enhanced access for pedestrians, cyclists equestrians and those with mobility difficulties will also maximise positive effects	SS4 e) SS4 e)

	associated with travel and health objectives and support EqIA protected characteristics	
SS5 Local Green Gaps	The policy scores neutral against the biodiversity objective. Positive effects could be maximised by the policy wording referring to enhancing Green Infrastructure networks. This could also provide positive benefits against the communities, health and travel objectives.	SS5 iv)
SS6 Local Green Spaces	Positive effects against the biodiversity objective could be further maximised by the policy encouraging these sites to be managed for biodiversity.	SS6 highlights the sites are valued for wildlife.
A1 Beeches Avenue	To minimise negative effects on environmental quality measures should be incorporated that deliver mitigation in line with requirements of the Worthing Air Quality Action Plan.	A1 c)
	To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.	A1 h) and DM18
	To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.	A1 f)
	To maximise positive effects on healthy lifestyles and Travel objectives walking links and access into the National Park should be improved.	A1 b)
A2 Caravan Club, Titnore Way	To minimise negative effects on biodiversity as a result of loss, biodiversity should be enhanced to achieve net gains.	A2 e)
	To ensure no negative effects against the water management objective a SuDs scheme should be delivered as part of development.	A2 c) and DM20
	To minimise negative effects on landscape & character boundary vegetation should be enhanced to limit views of the site from the National Park.	A2 a)
A3 Centenary House	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme to address the high risks posed by groundwater flood risk and in the future, as a result of climate change, surface water flooding.	DM20
A4 Civic Centre, Stoke Abbott Road	To minimise negative effects against the water management objective a SuDs scheme should be delivered as part of development.	DM20
	To minimise negative effects against the historic environment objective heritage assets and their settings should be protected.	A4 e)
	To maximise positive effects on travel and access development should create and enhance pedestrian routes to the town centre.	A4 b)
A5 Decoy Farm	To reduce potential negative effects against environmental quality objective the policy should ensure the Teville Stream is protected from contamination as a result of construction or land remediation.	A5 a) h)
	To minimise negative effects on biodiversity valued	DM18, A5 k)

	habitats should be protected and enhanced to achieve a net gain in biodiversity.	
	To ensure no negative effects against the water management objective the most vulnerable uses should be located in the parts of the site with lowest flood risk and a SuDs scheme should be delivered.	A5 a), c), d), h), j)
	To minimise negative effects on landscape & character development should protect and enhance the character of the Local Green Gap	A5 b)
	To maximise positive effects on travel links should be facilitated to proposed pedestrian routes in the Gap.	A5 e)
A6 Fulbeck Avenue	To minimise negative effects on biodiversity valued habitats should be protected and enhanced to achieve a net gain in biodiversity.	A6 a)
	To ensure no negative effects against the water management objective the most vulnerable uses should be located in the parts of the site with lowest flood risk, a FRA should consider all sources of flooding and mitigation provided to ensure development is safe and to reduce flood risk overall.	A6 c), d)
	To minimise negative effects on landscape & character woodland should be retained and enhanced to minimise the impact on views from the National Park.	A6 a)
A7 Grafton	To minimise negative effects against the water management objective mitigation should be provided to ensure development is safe and reduce the overall level of flood risk.	A7 b), c)
	To minimise negative effects against the historic environment development should seek to improve the current setting of heritage assets.	A7 f)
	To maximise positive effects on travel and access development should create and enhance pedestrian routes between the seafront and primary shopping area.	A7 h)
A8 HMRC Offices, Barrington Road	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme.	DM20
	Maximise positive effects on travel by improving access to and from Durrington Station.	A8 g)
A9 Lyndhurst Road	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme and to maximise positive effects on travel by providing attractive and accessible pedestrian and cycle routes from the site to the High Street and town centre.	A9 c)
		A9 g)
A10 Martlets Way	Mitigation has been identified to minimise negative effects on water management through development of a SuDS scheme.	DM20
A11 Stagecoach,	To minimise negative effects against the water management objective mitigation should be provided to ensure development is safe and reduce	A11 c)

Marine Parade	the overall level of flood risk. To minimise negative effects against the historic environment development should be sensitive to nearby assets and help to enhance their setting.	A11 f) g)
	To maximise positive effects on travel and access development should provide attractive and accessible pedestrian links between the seafront and Warwick Street.	A11 h)
A12 Teville Gate	To minimise negative effects against the water management a SuDS scheme should be developed to reduce overall risk.	A12 c)
	To minimise negative effects against the historic environment development should seek to protect and enhance heritage assets and their settings to ensure no significant harm is caused.	A12 d) e)
	To maximise positive effects on travel and access development should provide pedestrian and cycle routes from the station to the town centre and Morrisons.	A12 f)
A13 Titnore Lane	To minimise negative effects against the biodiversity objective Ancient Woodland should be protected with buffers and onsite biodiversity enhanced to achieve net gains.	A13 b) c) d) e) g)
	To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.	A13h)
	To minimise negative effects against the landscape and character objective visual screening from the National Park should be maintained and enhanced.	A13 f)
	To maximise positive effects against the health and travel objectives walking links and access to the National Park should be improved.	A13 b)
A14 Union Place	To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk. To minimise negative effects against the historic environment objective development should ensure it protects and enhances nearby heritage assets.	DM20

A14 b) |
A15 Upper Brighton Road	To minimise negative effects on environmental quality development should be required to incorporate measures that deliver mitigation in line with the requirements of the Worthing Air Quality Action Plan.	A15 l)
	To minimise negative effects on biodiversity those features of highest ecological value on the site should be enhanced to achieve net gains.	A15 b)
	To minimise negative effects against the water management objective a SuDS scheme should be developed to reduce overall risk.	DM20 A15 e)
	To minimise negative effects on landscape and character development should avoid coalescence and mitigate visual impacts from the National Park.	A15 d) p) q)
	To minimise negative effects against the historic environment development should ensure it protects	A15 e)

	and enhance the setting of nearby heritage assets.	
	To maximise positive effects on health development should improve walking links and access to the National Park.	A15 k) o)
	To maximise positive effects on travel development should improve pedestrian and cycle routes along Upper Brighton Road.	A15 k)
DM2 Density	The policy wording should refer to consideration that needs to be given to important landscapes and heritage assets when determining the appropriate density for a site.	DM2 a) i)
DM6 Public Realm	Where public realm is in close proximity to heritage assets it is important it relates to the local and historic context.	DM6 b)
DM11 Protecting and Enhancing Employment Sites	The policy should allow for some flexibility to minimise the likelihood of vacant premises.	DM11 d)
DM17 Energy	The policy should ensure energy schemes do not cause an unacceptable impact on landscape character and that they mitigate any impacts on the environment or local amenity.	DM17 d)
DM20 Flood Risk and Sustainable Drainage	This policy should require the adequate treatment of water prior to discharge to protect and where possible improve water quality.	DM20 d) iv)

6.2   Plan Finalisation

6.2.1   The Submission Draft Local Plan will, when adopted, provide a strategy for sustainable development and change in Worthing borough up to 2036. The Local Plan provides the broad policy framework and a long-term spatial strategy to manage development, respond to climate change, promote regeneration, protect the environment, deliver infrastructure and support vibrant healthy communities.

6.2.2   This version of the Local Plan will be subject for a period of public consultation that forms the 'Publication stage' of the preparation of Worthing's Local Plan. This is the version of the Plan that the Council considers to be legally compliant and 'Sound' for submission to central government for independent Examination by a government appointed Planning Inspector. At the end of the consultation period, all duly made comments will be made public and will be submitted to the Secretary of State, who will pass them to a Planning Inspector, along with the Local Plan and other relevant supporting documents for Examination.

6.2.3   A Planning Inspector will consider the submitted Plan and will then oversee an 'Examination in Public' where those who made representations through the consultation will have an opportunity to influence the Plan. After having heard representations the Inspector will either report back on the Plan's soundness or identify modifications that are necessary in order for the Plan to be sound. If the Inspector identifies the need for modifications to the Plan these will be prepared and

then subjected to consultation. An SA Report Addendum may be published for consultation alongside the modifications if they are significant in nature. Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' will be published that sets out (amongst other things) 'the measures decided concerning monitoring

6.3   Proposed Monitoring Framework

6.3.1   It is a requirement of the SEA Directive that the significant effects of a plan or programme are monitored.

6.3.2   The monitoring will be undertaken on an annual basis, where possible, and will be incorporated into the wider annual monitoring and presented in the Annual Monitoring Report for Worthing Borough Council. There may be some indicators which cannot be measured annually, and these will be monitored according to the timescales which are appropriate. Where relevant, the reporting will show where a situation has improved, stayed the same, or become worse, compared to the previous year's data.

6.3.3   The findings of this ongoing monitoring reporting process will assist the council in measuring how well the Plan contributes towards sustainable development, and will also inform future reviews of the plans and policies contained within the Local Plan.

6.3.4   A description of the measures envisaged for monitoring are set out below. Further details of these and how they relate to the Local Plan policies can be found in the Monitoring Framework topic paper. These monitoring indicators will be finalised and confirmed in the SA/SEA Post Adoption Statement.

Table 11: Monitoring Indicators

UN Sustainable Development Goal	Relevant target	Related Local Plan Policies	Related SA Objectives	Local Plan Monitoring Indicators
SDG 1: No Poverty	1.1 1.2 1.3 1.4 1.5	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM1: Housing Mix DM3: Affordable Housing DM4: Gypsy & Traveller & Travelling Showpeople DM10: Economic growth and skills DM16: Sustainable Design	1. Environmental Quality 12. Communities	Overcrowded households (PH England) Affordability of home ownership (PH England) Affordable homes delivered (WSCC data)
SDG 2: Zero Hunger	2.4	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM7: Open Space, Recreation & Leisure DM19: Green Infrastructure DM20: Flood risk and sustainable drainage		Obesity profile (PH England)
SDG 3: Good Health and Wellbeing	3.6 3.8 3.9	SP3: Strategic Policy on Healthy Communities DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM15: Sustainable Transport & Active Travel DM22: Pollution	3. Land and Soils 10. Crime and Public Safety 12. Communities	Percentage of adults walking for travel at least three days per week (PH England) Percentage of adults cycling for travel at least three days per week (PH England)
SDG 4: Quality Education	4.2 4.3 4.4 4.7 4.A	SP3: Strategic Policy on Healthy Communities DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM10: Economic growth and skills	13. Education	Qualifications (Nomis)

SDG 5: Gender Equality	5.2 5.4 5.B 5.C	DM5: Quality of the built environment DM9: Delivering Infrastructure DM14: Digital Infrastructure	10. Crime and Public Safety	n/a
SDG 6: Clean Water and Sanitation	6.1 6.3 6.4 6.5 6.6	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM9: Delivering Infrastructure DM16: Sustainable Design DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM22: Pollution	1. Environmental Quality 2. Biodiversity 5. Water Management	Bathing water profile (EA)
SDG 7: Affordable and Clean Energy	7.1 7.2 7.3	SP2: Strategic Policy on Climate Change DM9: Delivering Infrastructure DM16: Sustainable Design DM17: Energy	4. Energy	Fuel Poverty (PH England) The BEIS Renewable Energy Planning Database The Regional Renewable statistics
SDG 8: Decent Work and Economic Growth	8.2 8.3 8.4 8.5 8.6 8.9	SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM10: Economic growth and skills DM12: The visitor economy DM14: Digital Infrastructure DM16: Sustainable Design	13. Education 14. Economy 15. Town and Local Centres	Employment and unemployment (Nomis) Economic inactivity (Nomis) Workless households (Nomis) Employment by occupation (Nomis) Businesses (PH England)

SDG 9: Industry, Innovation and Infrastructure	9.1 9.4 9.5	SP2: Strategic Policy on Climate Change DM8: Planning for sustainable communities / community facilities DM9: Delivering Infrastructure DM10: Economic growth and skills DM14: Digital Infrastructure DM16: Sustainable Design DM17: Energy	12. Communities	
SDG 10: Reduced Inequalities	10.2	SP1: Presumption in favour of Sustainable Development		Access to Healthy Assets & Hazards Index (PH England) Life expectancy at birth (male and female) (PH England)
SDG 11: Sustainable Cities and Communities	11.1 11.2 11.3 11.4 11.5 11.6 11.7 11A 11B	SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities SS1: Overarching Spatial Strategy SS2: Development Sites SS4: Countryside and undeveloped coast SS5: Local Green Gaps SS6: Local Green Spaces DM1: Housing Mix DM3: Affordable Housing DM5: Quality of the built environment DM6: Public Realm DM7: Open Space, Recreation & Leisure DM9: Delivering Infrastructure DM15: Sustainable Transport & Active Travel DM16: Sustainable Design DM17: Energy DM18: Biodiversity	1. Environmental Quality 3. Land and Soils 6. Landscape and Character 7. Built Environment 8. Historic Environment 9. Healthy Lifestyles 10. Crime and Public Safety	Percentage of dwellings on PDL (WSCC data) Total amount of employment floorspace on PDL (WSCC data) Additional floorspace in the town centre (WSCC data) Additional employment floorspace (WSCC data) Estimated dwellings lost (WSCC data) Density of development (WSCC data)

		DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM21: Water quality and sustainable water use DM22: Pollution DM23: Strategic Approach to the Historic Environment DM24: The Historic Environment	11. Housing 12. Communities 16. Travel and Access	Percentage of dwellings on PDL (WSCC data) Listed Buildings on English Heritage 'Heritage at Risk' register (English Heritage)
SDG 12: Responsible Production and Consumption	12.2 12.4 12.5 12.8 12.B	SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change DM12: The visitor economy DM16: Sustainable Design DM22: Pollution	4. Energy	Recycling statistics (waste data flow) Air pollution: fine particulate matter (PH England) Air quality statistics from AQ Annual Status Report
SDG 13: Climate Action	13.1 13.2	SP1: Presumption in favour of Sustainable Development SP2: Strategic Policy on Climate Change SP3: Strategic Policy on Healthy Communities DM5: Quality of the built environment DM7: Open Space, Recreation & Leisure DM9: Delivering Infrastructure DM15: Sustainable Transport & Active Travel DM16: Sustainable Design DM17: Energy DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage DM21: Water quality and sustainable water use DM22: Pollution	5. Water Management 9. Healthy Lifestyles	Carbon emissions reduction annual report Developments granted planning permission contrary to EA advice Non residential buildings built to BREEAM standards

SDG 14: Life Under Water	14.1 14.2	SP2: Strategic Policy on Climate Change DM18: Biodiversity DM22: Pollution		Water Body Status Classification (EA Catchment Planning)
SDG 15: Life on Land	15.1 15.5 15.9	SP2: Strategic Policy on Climate Change DM18: Biodiversity DM19: Green Infrastructure DM20: Flood risk and sustainable drainage	2. Biodiversity	Planning applications within or abutting designated site, reserve or habitat (Biodiversity annual report)
SDG 16: Peace, Justice and Strong Institutions	16B	SP1: Presumption in favour of Sustainable Development		n/a
SDG 17 Partnerships for the Goals	17.14	SP1: Presumption in favour of Sustainable Development		n/a

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