

**WORTHING LOCAL PLAN 2020- 2036**

# **LOCAL PLAN ROUTE MAPPER**

**TOOLKIT PART 2 –**

**LOCAL PLAN FORM & CONTENT  
CHECKLIST**

**SUBMISSION DRAFT**

**January 2021**



**WORTHING BOROUGH  
COUNCIL**



## PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 2: LOCAL PLAN FORM & CONTENT CHECKLIST

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	<b>General Requirements</b>		
1.	Include any relevant material that is set out in a government policy statement(s) for the area for example a national policy statement(s) for major infrastructure and written ministerial statements.	NPPF Para 5, 6	N/A
2.	Contribute to the achievement of sustainable development.	NPPF Para 8, 9, 16	<p>Paragraph 1.24 sets out the role that the planning system has with delivering sustainable development. The Local Plan includes Policy SP1 (Presumption in Favour of Sustainable Development) (p.36).</p> <p>The Plan goes even further and has incorporated the United Nations Sustainable Development Goals (Agenda 2030) in order to enhance its sustainability credentials as well as providing a robust monitoring framework (see paragraphs 1.25-1.26). The Monitoring Framework identifies which relevant Sustainable Development Goals applies to the policies to highlight which goals can be delivered through the policies.</p>
3.	Apply the presumption in favour of sustainable development.	NPPF Para 11	The Local Plan includes Strategic Policy 1 (The Presumption of Sustainable Development) which embeds the principles established in the NPPF firmly within the Plan.
4.	Provide a positive vision for the future; a framework for addressing housing needs and other economic, social and environmental priorities.	NPPF Para 15	The structure of the Local Plan reflects the three key themes established in the NPPF – economic / social / environmental. Chapter 2 of the Local Plan sets out a clear Vision and a set of Strategic Objectives. Collectively this establishes a robust and positive framework for development which

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			provides the appropriate balance between promoting 'growth' and protecting sensitive landscapes and vulnerable (but valued) land uses.
5.	Plans should be: Aspirational and deliverable / Contain clear and unambiguous policies / Accessible through the use of digital tools / Serve a clear purpose avoiding duplication	NPPF Para 16	Great effort has been taken to ensure that the Plan is user-friendly. Based around a clear and logical format the Plan uses colours and graphics to enhance readability and accessibility. Whilst some cross-referencing is provided the policies embedded in the Plan avoid duplication and, using best practice examples, they are clear and unambiguous (each element of every policy has been robustly checked to ensure that it has a clear purpose).
<b>6.</b>	<b>Plan Content</b>		
7.	Include strategic policies to address priorities for the development and use of land. They should set out an overall strategy for the pattern, scale and quality of development.	NPPF Para 17, 20	Chapter 3 ('The Spatial Strategy') incorporates 6 Spatial Policies. Supported by the 'context' set out in chapters 1 and 2, these Spatial Policies clearly establish: the strategy for development in Worthing; areas where growth is planned and supported; sensitive areas that should be protected; and the overall scale of development that will be delivered.
8.	Outline which policies are 'strategic' policies	NPPF Para 21	The Plan is very clearly structured. Chapter 2 ('Vision and Strategic Objectives) includes 3 strategic policies and Chapter 3 ('The Spatial Strategy') incorporates 6 Spatial Policies. The allocations then follow in Chapter 4 and the 24 Development Management Policies are embedded in Chapter 5. The format of the Plan lends itself to being able to review and update discreet sections as and when required.
9.	Strategic policies should look ahead over a minimum 15-year period <u>from adoption</u> .	NPPF Para 22	The end date of the Local Plan (and related policies) is 2036. If, as expected, the Plan is adopted in late 2021 / early 2022 then there will be

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			15 / 16 years until the end date. Furthermore, the Plan will be reviewed within 5 years of adoption.
10.	Indicate broad locations for development on a key diagram, and land use designations and allocations on a policies map.	NPPF Para 23	<p>The Local Plan uses a number of maps and diagrams to illustrate the location of development sites and key land use designations:</p> <ul style="list-style-type: none"> <li>• Regional Context – Page 11</li> <li>• Local Context – Page 17</li> <li>• Town Centre Image – Page 56</li> <li>• Local Green Gaps – Page 60</li> <li>• Local Green Spaces – Page 62</li> <li>• Site Allocations – Page 68-69 and then pages 70-99</li> </ul> <p>The Regulation 19 version of the Local Plan will be supported by a Mapping Extracts document that clearly illustrates all the mapping changes that will be required to the current Proposals Map. A revised version of the Proposals Map and Town Centre Inset will be submitted for Examination alongside the Local Plan.</p>
11.	Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period.	NPPF Para 23	<p>Policy SS1 (Overarching Spatial Strategy) – sets out overarching strategy to deliver identified need. Policy SS2 (Development Sites) – sets out a target of delivering a minimum of 4,100+ dwellings (net) over the plan period. Paragraphs 3.12 – 3.21 explain how the housing target has been developed. This section, and the proceeding paragraphs explain how the very significant development constraints in and around Worthing means that, despite taking a very positive approach to development, it is not possible to meet the Borough's Objectively Assessed Needs. This position is supported by a robust evidence base which is further demonstrated within the Council's Housing Implementation Strategy.</p>

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12.	Include non-strategic policies to set out more detailed policies for specific areas.	NPPF Para 18, 28	Chapter 5 includes 24 detailed Development Management policies that provides clear requirements that will help to guide development in Worthing and the determination of planning applications.
13.	Set out contributions expected from development, and demonstrate that expected contributions will not undermine the deliverability of the Plan.	NPPF Para 34, 57	The Local Plan clarifies the requirements / contributions that will be required from a range of development types. The need for these contributions is established in the Infrastructure Delivery Plan and they also respond to overarching objectives (particularly sustainability policies to respond to the Council's Climate Emergency declaration). Relevant policies include DM3 (Affordable Housing) / DM7 (Open Space, Recreation & Leisure) / DM9 (Delivering Infrastructure) / DM18 (Biodiversity) / DM19 (Green Infrastructure). To understand the impact of these requirements, and ensure that they do not make 'viable' development unviable the Council commissioned consultants to undertake a detailed review. The findings are published within the Whole Plan Viability Assessment which is available to view on the Council's website. Further more detailed advice will be included within an update of the Council's Developer Contributions SPD which will be prepared following the adoption of the Local Plan.
<b>Housing</b>			
14.	Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point.	NPPF Para 60	The Council has recently commissioned an updated SHMA using the standard methodology as set out in National Guidance and also a target being proposed through the Local Plan Review that is based on the specific locational circumstances and characteristics of the Borough particularly the acute lack of land. The findings of this work have provided a starting point for the assessment of housing needs in the borough.

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15.	Identify the size, type and tenure of housing needed for different groups.	NPPF Para 61	A number of Housing studies have been published during the preparation of the Local Plan. The most recent and relevant is the Adur & Worthing Strategic Housing Market Assessment (SHMA) (March 2020). This provides a detailed assessment of the housing needs of different groups which has informed the relevant housing policies – particularly DM1 (Housing Mix) and DM3 (Affordable Housing). In addition, the Council has published a Gypsy & Travellers Needs Assessment and this has informed policy DM4.
16.	Where a need for affordable housing is identified, specify the type of affordable housing required.	NPPF Para 62	Informed by the SHMA, Policy DM3 (Affordable Housing) and associated supporting text clearly sets out the affordable housing required (size and tenure).
17.	Expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups	NPPF Para 64	As clearly explained within Local Plan Paragraph 5.48 the policy seeks to provide 75% social / affordable rented housing and 25% intermediate housing which meets the 10% test.
18.	Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.	NPPF Para 65	Informed by information on particular development sites and the characteristics of the surrounding area the site allocations (Chapter 4) provide an indicative density / capacity assumption for each site.
19.	Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	NPPF Para 67	In line with guidance, for each allocation (Chapter 4) the Local Plan indicates whether the site is expected to be delivered within 0-5 years or 6+ years. The sites within the 0-5 year category are generally those which are well advanced (e.g. plans have been prepared / pre-application discussions have taken place / funding is available). The Council is confident that 6+ year sites will be delivered within the life of the Plan but there is less delivery certainty at this time. Given the

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			<p>nature of the sites in Worthing and the difficulty in forecasting delivery timeframes (particularly in the current climate) it was not felt appropriate to split the longer term sites into 6-10 year and 11-15 year periods. In reality, the longer term sites will be reassessed within 5 years during the review of the adopted Plan.</p> <p>The assessment of deliverability and timeframes has informed the Council's Housing Land Supply assumptions and related housing trajectory.</p>
20.	Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	NPPF Para 68	<p>For reasons that are explained within this document and within the Local Plan, the significant constraints in and around the Borough means that the Council will not be able to meet its objectively assessed housing needs in full. Even after taking a very positive approach to development only approximately 31% will be met. The NPPF is not clear on this matter but it would clearly not be sensible to plan to meet 10% of the housing requirement on small / medium site allocations within a Plan in such a constrained area. A more sensible approach would be to consider what proportion of the allocated sites are small / medium sites. In this regard, given the lack of available land for significant growth it is perhaps not surprising that 4 of the 15 site allocations are less than 1 hectare in size (in fact 9 of the 15 sites are under 3 hectares). The site allocations, along with extant permissions and windfall assumptions clearly demonstrates that a high proportion of the Council's housing supply will be delivered on small / medium sites.</p>
21.	Support the development of entry level exception sites, suitable for first time buyers, unless the need for such homes is already being met within the authority's area.	NPPF Para 71	<p>The guidance on entry-level exception housing allows for sites that would not normally be considered acceptable for residential development (i.e. those outside built-up area boundaries and classed as</p>

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			open countryside) to come forward on the basis of making affordable housing provision, similar to the long-standing principle of rural exception sites, but with slightly different qualifying criteria. Given the nature of the borough and the character of the sites that are available / deliverable this reference is not particularly relevant to Worthing. However, Policy DM3 (Affordable Housing) makes it clear that the exact tenure split for each site will be a matter for negotiation taking into account up-to-date assessments of need – this will include the positive consideration of ways in which the needs of first-time buyers can be met.
22.	Include a trajectory illustrating the expected rate of housing delivery over the plan period, and requiring a buffer of 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan.	NPPF Para 73	<p>To provide an up-to-date understanding of housing delivery assumptions the Council publishes a detailed Housing Trajectory (with related commentary) within the Annual Monitoring Report. To ensure that the most up-to-date figures are used to support the Regulation 19 Version of the Local Plan the latest Housing Trajectory is published within the Housing Implementation Strategy. This will be submitted for Examination alongside the Worthing Local Plan.</p> <p>Whilst very much related to the strategy included within the Plan the Council considers it preferable to publish the trajectory alongside the Plan (rather than within it). The reason for this is that the trajectory represents a 'point in time' and the Local Plan is designed to have a longer 'shelf life'.</p>
23.	Be responsive to local circumstances and support rural housing developments that reflect local needs.	NPPF Para 77	Worthing is a predominantly urban area and, as such, this requirement is not relevant.



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24.	Identify opportunities for villages to grow and thrive, especially where this will support local services.	NPPF Para 78	Worthing is a predominantly urban area and, as such, this requirement is not relevant.
25.	Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	NPPF Para 79	Worthing is a predominantly urban area and, as such, this requirement is largely not relevant. However, there are important areas of countryside to the east and west of the borough – these are protected from inappropriate development (such as isolated homes) through Policies SS4 (Countryside & Undeveloped Coast) / SS5 (Local Green Gaps) and SS6 (Local Green Spaces).
<b>Economy</b>			
26.	Create conditions in which businesses can invest, expand and adapt.	NPPF Para 80	The Worthing Local Plan places a strong emphasis on economic growth and 'Economy' is one of the three pillars upon which the Plan is structured. There are specific Strategic Objectives relating to the economy that will help Worthing to build on its strengths, help local businesses to grow and equip the borough's workforce to be ready for future challenges and emerging sectors. Informed by studies (such as the Economic Land Review) the Plan seeks to protect key employment uses and plan positively for sustainable economic growth to meet qualitative and quantitative needs. To support these aims the Plan includes a number of sites for employment use and supports the regeneration of the Town Centre. There are 6 related Development Management Policies including one to support digital infrastructure that will help to improve the town's regional competitiveness and create high value jobs. Where appropriate, flexibility has been embedded within policies to reflect the uncertain prevailing economic conditions.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
27.	Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.	NPPF Para 81	See response to section 26 above. In addition, Plan contains specific policies to support and protect sectors of the economy that are of particularity to Worthing (e.g. Town Centre uses, tourist facilities, the digital sector).
28.	Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.	NPPF Para 81	The research undertaken to inform the Plan has highlighted the need to retain employment premises and land in the borough. In addition, the study recommends planning to accommodate a minimum of 32,000 sqm (or 6.8ha) employment floorspace, with the need roughly split for office space (9,000 sqm) and warehousing and distribution (23,000 sqm). The Council's Retail Study estimates a need to provide a maximum of 9,200 sqm of comparison floorspace (non-food) and 1,250 sqm of convenience retail (food) to 2026. As with housing, the lack of suitable development sites around the borough means that the delivery of the employment and commercial needs identified in these studies will be very challenging. However, a number of the development sites allocated in the Plan provide an opportunity for mixed use development and one site, Decoy Farm, provides an opportunity to deliver a significant extension to the town's main industrial estate.
29.	Seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.	NPPF Para 81	There are significant constraints (primarily access / land ownership / contamination) attached to the employment opportunities within the borough. The specific allocations set out how these can be addressed. Furthermore, the Council is working actively with partners and stakeholders to bring forward these sites. In addition, the Council is driving investment in digital infrastructure and is working in partnership with West Sussex County Council to install full-fibre technology across the borough as part of the Gigabit Coast Project.

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			<p>When delivered, this will help to attract inward investment and support economic growth.</p> <p>On a more strategic level one of the key constraints impacting on Worthing's economy is congestion on the Strategic Road Network. Although there is no easy solution, the Plan seeks to encourage a modal shift towards more sustainable modes of transport and the Council will continue to support the efforts of Highways England to come up with a realistic and deliverable plan to improve traffic flows on the A27.</p>
30.	Be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.	NPPF Para 81	The need for a degree of flexibility to respond to changing economic circumstances is always important but is particularly so at a time of great uncertainty (Covid-recovery / Brexit / the changing nature of the High Street etc). For this reason, although the relevant policies and allocations are clear and robust, a greater degree of flexibility has been built in to ensure the Plan remains relevant and valid at a time when it is very difficult to predict the future.
31.	Recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.	NPPF Para 82	See responses to sections 26, 27 and 29 above. In addition, the Council is working hard to understand the needs of different sectors (existing and emerging). This has helped to inform the objectives to deliver a digital transformation within the borough. It will also influence the future use of the Council owned Decoy Farm which is the most significant employment allocation within the Plan.
32.	Enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.	NPPF Para 83	Worthing is a predominantly urban area and, as such, this requirement is not relevant.

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33.	Enable the development and diversification of agricultural and other land-based rural businesses.	NPPF Para 83	Worthing is a predominantly urban area and, as such, this requirement is not relevant.
34.	Enable sustainable rural tourism and leisure developments which respect the character of the countryside.	NPPF Para 83	Worthing is a predominantly urban area and, as such, this requirement is largely not relevant. However, the South Downs located to the north provide significant opportunities for leisure and tourism. Although the Council is not the responsible Planning Authority for the National Park area, the Worthing Local Plan does seek to improve accessibility to the Park area. Furthermore, through Policies SS4-SS6 the Plan seeks to protect the sensitive open gaps to the east and west of the borough which are also valued for recreation / tourism / openness by residents and visitors.
35.	Enable the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.	NPPF Para 83	There is limited space within Worthing for new development and, as such, there is great pressure on all available land. Policies in the Local Plan (particularly DM7 (Open Spaces) and DM8 (Planning for Sustainable Communities)) ensure that, in general, existing community facilities are protected and that proposals for appropriate new or improved / expanded existing facilities are supported. This position is supported by the Council's Infrastructure Delivery Plan.
36.	Recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.	NPPF Para 84	Worthing is a predominantly urban area and, as such, this requirement is not relevant.
37.	<b>Town centres</b>		
38.	Define a network and hierarchy of town centres and promote their long-term vitality and viability.	NPPF Para 85	A key objective of the Local Plan is to regenerate the town centre (Vision 2) and strengthen the area as a location for shopping, leisure and

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			<p>business (Strategic Objective SO9). These aims are then supported by a Spatial Policy for the Town Centre (SS3) which seeks to create a place where people want to spend time in and where investors want to invest. These overarching objectives are then supported by a number of more detailed policies particularly:</p> <ul style="list-style-type: none"> <li>• DM6 – Public Realm</li> <li>• DM12 – The Visitor Economy</li> <li>• DM13 – Retail and Town Centre Uses</li> </ul> <p>Policy DM13 further clarifies the hierarchy of retail centres in Worthing and explains how these function. The policy sets out clear planning guidance for how change in all areas should be managed and supported over the Plan period.</p>
39.	Define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations.	NPPF Para 85	<p>The Proposals Map and Town Centre Inset Map will clearly indicate all town centre and retail boundaries. Initially this will be illustrated within a Mapping Extracts document (to support the Reg 19 consultation) but will then be transposed onto the Proposals Map before the Plan is Submitted for Examination. Policy DM13 (Retail and Town Centre Uses) clearly explains the role of the retail Hierarchy in Worthing and the requirements / expectations within different designated areas. Less formally, this is also supported by the identification of Character Areas within the town centre (explained within page 140 and illustrated on page 56).</p>
40.	Retain and enhance existing markets and, where appropriate, re-introduce or create new ones.	NPPF Para 85	<p>The Local Plan sets out an approach that supports and encourages a range of uses and activities within the Town Centre. This includes the promotion of existing and new regular and specialist markets as part of a regular events programme designed to add vibrancy to the town</p>

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			centre and increase dwell time. See the Town Centre section of the Spatial Strategy (particularly Paras 3.35 and 3.36).
41.	Allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.	NPPF Para 85	The future role and function of the Town Centre(s) is clearly established within Policy SS3 (Town Centre) and Policy DM13 (Retail & Town Centre Uses). These provide clear direction whilst also providing a good degree of flexibility to reflect uncertain and changing economic conditions. To help reflect the identified development needs of the borough the Plan allocates four residential / mixed-use development sites in and around the town centre (allocations - A7 / A9 / A11 / A14).
42.	Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.	NPPF Para 85	There are suitable and viable town centre sites available in Worthing to accommodate main town centre uses. Allocations A4, A7, A11 and A14 are located within the exiting town centre boundary and will deliver a range of community, retail and leisure uses. In addition to these allocations, the Plan establishes clear policy requirements that encourages the retention of existing (and delivery of new) town centre uses to support the continued prosperity of the town / district and local centres.
43.	Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.	NPPF Para 85	The 'Spatial Approach for the Town Centre' includes an aspiration to increase the amount of residential development as this will help increase vitality, activity and footfall and enable regeneration. Increasing densities in sustainable location will also help to ensure that the most efficient use of land is made. In recent years there have been a number of planning permissions granted for residential development in the town centre. The Plan encourages the continuation of this trend – particularly through the allocation of four residential or mixed-use

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			development sites in and around the town centre (allocations - A7 / A9 / A11 / A14).
44.	<b>Healthy and safe communities</b>		
45.	Achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles.	NPPF Para 91	The Local Plan contains Strategic Policy on Healthy Communities (Policy SP3). The policy sets out a number of policy requirements designed to promote the creation of strong, vibrant and healthy communities as well as reducing health inequalities. The policy also requires a major residential and commercial development to undertake a screening for a Health Impact Assessment (HIA), and a full HIA if necessary, proportionate to the development proposed, to demonstrate the health outcomes on the health and well-being of communities.
46.	Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.	NPPF Para 92	The Local Plan contains Policy DM8 (Planning for Sustainable Communities / Community Facilities). Policy requirements a) – d) relate to the provision and use of community facilities and other local services.
47.	Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.	NPPF Para 92	Supporting text paragraphs 2.25-2.26 of the Local Plan refers to the Council's Public Health Strategy 2018 - 2021 'Start Well, Live Well, Age Well' (2018). The Public Health Strategy contains five priorities for action which contribute to the ambitions shared by the West Sussex Health and Wellbeing Board (West Sussex Joint Strategic Needs Assessment). The priorities have been woven into the requirements set out in SP3: Healthy Communities and therefore the policy take into account and support the delivery of the Council's Public Health Strategy.

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
48.	Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.	NPPF Para 92	Policy DM8 (Planning for Sustainable Communities / Community Facilities). Policy requirement e) sets out the Councils' approach to safeguarding the unnecessary loss of valued facilities and services.
49.	Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.	NPPF Para 92	Policy DM8 (Planning for Sustainable Communities / Community Facilities). Policy requirements a) – d) are relevant. Supporting text paragraph 5.106 also applies.
50.	Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.	NPPF Para 92	Policy DM8 (Planning for Sustainable Communities / Community Facilities). Refer to requirement c) of policy. Supporting text paragraph 5.104 is relevant.
51.	Consider the social, economic and environmental benefits of estate regeneration.	NPPF Para 93	Given the characteristics of Worthing there is not a specific Estates Regeneration programme highlighted in the Local Plan. However, the key aim of improving the quality of life for all (particularly those on areas of relatively high levels of deprivation) is firmly embedded within the Vision, Strategic Objectives and related policies. Working with internal and external services the Council has a clear strategy to tackle multiple complex social and economic issues from inclusivity, economic growth, health and well-being and crime-reduction.
52.	Promote public safety and take into account wider security and defence requirements.	NPPF Para 95	<p>The Local Plan seeks to deliver safe, accessible and inclusive environments. The following policies are particularly relevant:</p> <ul style="list-style-type: none"> <li>• Policy DM5 (Quality of the Built Environment). Refer to policy requirement vii) and x). Supporting text paragraph 5.61 is relevant.</li> <li>• Policy DM6 (Public Realm). Refer to policy requirement b).</li> </ul>



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53.	Provide open space, sports and recreational facilities which meets the needs of the local area.	NPPF Para 95	Policy DM7 (Open Space, Recreation & Leisure) sets out the standards for the provision of open space as well as setting out the Council's approach to safeguarding existing open space, or sports and recreation buildings/facilities. The policy also support proposals for built sports facilities and formal sports provision where they are in accordance with policies in the Local Plan.
54.	Protect and enhance public rights of way and access.	NPPF Para 98	Policy DM7 (Open Space, Recreation & Leisure recognise that Communities value a connected network of Public Rights of Way, Bridleways and access routes to the countryside and the wider South Downs National Park. There are a significant number of equestrians on the urban fringes of Worthing. The supporting text (paragraph 5.89) sets out that where appropriate, major development on the edge of town should provide connectivity with at least one multi-user access route around the fringe of Worthing to allow existing and future residents to access the wider countryside.
<b>55.</b>	<b>Transport</b>		
56.	Should actively manage patterns of growth in support of objectives in Para 102. Significant development should be focused on locations which are/can be made sustainable. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas - this should be taken into account in plan-making.	NPPF Para 103	Options for growth in and around Worthing are extremely limited and all development sites are located within, or adjacent to, the built up area boundary. As a consequence, all sites have reasonable or very good accessibility. Despite this, the Local Plan seeks to minimise the impact of new development on the transport network through encouraging and requiring improvements to support sustainable modes of transport. The Local Plan Transport Study also identifies junctions that will need to be improved.
57.	Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length	NPPF Para 104	A key focus in the Local Plan is the regeneration of key sites in and around the town centre. The mixed use development of these sites

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	of journeys needed for employment, shopping, leisure, education and other activities.		within the heart of the borough will help to minimise the movements within the borough. Outside of the town centre the majority of development sites are located within, or close to district and neighbourhood centres which provide a range of land uses / facilities.
58.	Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.	NPPF Para 104	There are no opportunities for strategic large scale growth in and around Worthing. However, the Local Plan Transport Study identifies improvements required at key junctions to support growth. The A27 running east-west through the north of Worthing over-capacity and increases journey times significant through (and within) the borough – as such, the Council will continue to support Highways England as they develop improvement plans for this stretch of the strategic highway network.
59.	Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans).	NPPF Para 104	<p>Policy DM5 (Quality of the Built Environment) a) vi) sets out that all new development should include a layout and design which: take account of potential users of the site; create safe conditions for access, egress and active travel (walking and cycling) between all locations.</p> <p>Policy SP3 (Healthy Communities) a) ii. Protect and enhance safe and accessible active travel routes and Non-Motorised User routes to enable exercise and physical activity as part of everyday life;</p> <p>Policy DM15 (Sustainable Transport &amp; Active Travel). Supporting text paragraphs 5.217-5.222 &amp; 5.224 set out further information on walking and cycling networks, Local Cycling and Walking Infrastructure Plans as well as cycle parking. Criterion a) sets out: Worthing Borough Council will promote and support development that prioritises active travel by walking, cycling, Non-Motorised User routes and public transport, and</p>

	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
			reduces the proportion of journeys made by car. This criterion is underpinned by a number of policy requirements.
60.	Provide for any large-scale transport facilities that need to be located in the area and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.	NPPF Para 104	N/A
61.	Recognise the importance of maintaining a national network of general aviation airfields.	NPPF Para 104	N/A
62.	Provide adequate overnight lorry parking facilities, taking into account any local shortages.	NPPF Para 107	N/A
63.	In assessing sites that may be allocated for development in plans, it should be ensured that: appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; safe and suitable access to the site can be achieved for all users; and any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.	NPPF Para 108	The Local Plan Transport Study has reviewed all allocations to assess the transport impacts forecast (capacity and congestion) from each development. The study then sets out ways in which any potential impacts can be mitigated. This is linked to the overarching objective to support improvements for sustainable transport modes which are established in the Plan and also within supporting documents such as: the WSCC Sustainable Transport Investment Programme and the Adur & Worthing Local Cycling & Walking Infrastructure Plan. The costs related to all Plan requirements are assessed within the Whole Plan Viability Assessment.
64.	Development should only be prevented on highways grounds if there would be an unacceptable impact on highway safety,	NPPF Para 109	Policy DM15 (Sustainable Transport & Active Travel). Refer to supporting text paragraph 5.225.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
	or the residual cumulative impacts on the road network would be severe.		The Worthing Local Plan Transport Study (2018) provides an assessment of the impact of potential housing and employment development on the transport network and identifies appropriate mitigation and improvement measures. The study indicates that the development of the proposed Local Plan allocations can be accommodated if a suitable package of mitigation measures is provided.
<b>65.</b>	<b><i>Communications</i></b>		
66.	Support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections, setting out how high-quality digital infrastructure is expected to be delivered and upgraded over time.	NPPF Para 112	Policy DM14 (Digital Infrastructure) of the Local Plan takes a positive approach to the expansion of digital infrastructure. This includes requirements for the provision and upgrade of 'fibre-to-the-premises' and other telecommunications infrastructure.
<b>67.</b>	<b><i>Making effective use of land</i></b>		
68.	Promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.	NPPF Para 117	Available development land is extremely scarce in Worthing. For this reason, the Local Plan (particularly Policy DM2 - Density) takes a robust and positive approach to ensure that the most efficient use is made of development sites whilst at the same time ensuring that the appropriate policy tests are in place that will ensure the amenities of new residents (space standards) and neighbouring occupiers (design) are not negatively impacted. Although the character of the site and surrounding area will have a major influence of the appropriate density the Plan makes it clear that for the majority of sites the density of new development will be expected to be higher than the prevailing density of the surrounding area.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
69.	Set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.	NPPF Para 117	As explained elsewhere, despite taking an extremely positive approach to development the lack of available land means that there is no realistic prospect of objectively assessed needs being met. Worthing is a largely urban borough and opportunities for significant greenfield development are limited. As a consequence, a strong focus in the Local Plan is on the regeneration and the redevelopment of previously developed sites. This is reflected in the Vision (V2 and V3), the Strategic Objectives and the Spatial Strategy. Nine of the allocations included within the Plan will deliver a significant proportion of development on brownfield sites within the existing built-up area.
70.	Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.	NPPF Para 118	<p>Policy DM7 (Open Space, Recreation &amp; Leisure) recognise that Communities value a connected network of Public Rights of Way, Bridleways and access routes to the countryside and the wider South Downs National Park.</p> <p>Policy DM18 (Biodiversity). Policy refers to net gain in biodiversity. Refer to supporting text paragraphs 5.257-5.260.</p> <p>Policy DM19 (Green Infrastructure). Policy recognises that multi-functional green infrastructure can form networks that conserve and enhance the natural environment by providing ecological connectivity, opportunities for species migration and facilitating Biodiversity net gain.</p>
71.	Recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, and carbon storage or food production.	NPPF Para 118	<b>Wildlife</b> – Policy DM18 (Biodiversity). Policy refers to net gain in biodiversity. Refer to supporting text paragraphs 5.257-5.260. Also refer to Policy DM19 (Green Infrastructure). Policy recognises that multi-functional green infrastructure can form networks that conserve and

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			<p>enhance the natural environment by providing ecological connectivity, opportunities for species migration and facilitating biodiversity net gain.</p> <ul style="list-style-type: none"> <li>• <b>Recreation</b> – Policy DM19 (Green Infrastructure). Refer to supporting text paragraph 5.269.</li> <li>• <b>Flood risk mitigation</b> – Policy DM19 (Green Infrastructure). Refer to supporting text paragraph 5.269. Also see Policy DM20 (Flood Risk &amp; Sustainable Drainage).</li> <li>• <b>Cooling / Shading</b> – Policy DM19 (Green Infrastructure). Refer to supporting text paragraph 5.269.</li> <li>• <b>Carbon storage</b> – See Policy SP2 (Climate Change) – refer to policy requirements e), f), &amp; g). Also Policy DM19 (Green Infrastructure). Refer to supporting text paragraph 5.269.</li> <li>• <b>Food production</b> – See Policy SP3 (Healthy Communities) – criterion b) vi). Also refer to supporting text paragraph 2.34. See Policy DM19: Green Infrastructure. Refer to supporting text paragraph 5.269.</li> </ul>
72.	Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.	NPPF Para 118	<p>There is relatively very little derelict or vacant land in and around the borough. The only significant contaminated / vacant / derelict sites are allocated for development / regeneration within the Plan:</p> <ul style="list-style-type: none"> <li>• A5 – Decoy Farm</li> <li>• A8 – Former HMRC Offices</li> <li>• A9 – Lyndhurst Rd (Former Gas Holder)</li> <li>• A10 – Martlets Way</li> <li>• A12 – Teville Gate</li> <li>• A14 – Union Place</li> </ul> <p>The development principles related to each site include criteria to mitigate and address any contamination. Outside of these sites the Plan</p>

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
			establishes presumption in favour of sustainable development and the spatial strategy and associated policies support the development of suitable brownfield land.
73.	Promote and support the development of under-utilised land and buildings.	NPPF Para 118	See response to section 72 above.
74.	Support opportunities to use the airspace above existing residential and commercial premises for new homes.	NPPF Para 118	A positive approach to intensification is firmly established within the Plan – particularly within policy DM2 (Density). Specific reference to the use of airspace above buildings is made within the supporting text (para 5.28).
75.	Reflect changes in the demand for land.	NPPF Para 120	Land available for development is a very rare resource in Worthing. As such, there are many competing demands for its use. The role of the Local Plan is to understand the demand from different land uses and respond through – allocations / protection / release. In this regard, the plan has been informed by a range of evidence such as: an Employment Land Review / Retail & Town Centre Uses Study / Strategic Housing Market Assessment / Hotel Futures Study / Open Space & Leisure Study. In summary, the needs of all uses is great – particularly housing. The Plan therefore responds to this through allocating 15 sites for development. The uses being delivered best reflect demand and the characteristics of the sites in question. Additionally, the Plan seeks to ensure that a balance housing, leisure, community, and employment needs is delivered and retained so other policies seek to protect specific uses.

	A. NPPF Requirement	B. NPPF Paragraph Reference	C. Record your assessment results
76.	Support development that makes efficient use of land, taking into account the need for different types of housing and other forms of development, local market conditions, the availability and capacity of infrastructure and services, the character and setting of the area, and the importance of securing well-designed, attractive and healthy places.	NPPF Para 122	See response to section 68 above. The plan seeks to ensure that all development (not just housing) makes the most efficient (but sustainable use) of the limited amount of land that is available. The compact nature of the borough means that there are not great disparities.
77.	Avoid homes being built at low densities where there is an existing or anticipated shortage of identified housing needs, and where appropriate include the use of minimum density standards.	NPPF Para 123	See response to section 68 above. Policy DM2 (Density) does require minimum density standards to be met – this varies depending on the area of the town in question. In reality the character of Worthing and the type of development planned for means that for the vast majority of sites the density of development delivered will exceed these figures significantly. Further evidence to support the Council's approach to density is set out in the Housing Implementation Strategy.
78.	<b>Design</b>		
79.	Set out a clear design vision and provide maximum clarity about design expectations.	NPPF Para 125 & 126	Policy DM5 (Quality of the Built Environment). Policy requirements a) i) – x) sets out the design expectations to be achieved in new developments. Also see supporting text paragraphs 5.59 – 5.73. Where appropriate, the Council will prepare Masterplans / Design Guides / Design Codes for particular sites or areas.



	<b>A. NPPF Requirement</b>	<b>B. NPPF Paragraph Reference</b>	<b>C. Record your assessment results</b>
80.	Ensure that developments will function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development, and create places that are safe, accessible and inclusive.	NPPF Para 127	Policy DM5 (Quality of the Built Environment). Policy requirements a) i) – x) sets out the design expectations to be achieved in new developments. Also see supporting text paragraphs 5.59 – 5.73. Where appropriate, the Council will prepare Masterplans / Design Guides / Design Codes for particular sites or areas.

81.	<b>Green Belt</b>	
82.	Set out proposals for new Green Belts within strategic policies. This should demonstrate why normal planning and development management policies would not be adequate, any major changes in circumstances, consequences for sustainable development, the need for Green Belt to support adjoining areas, and how new Green Belt would meet other objectives of the Framework.	NPPF Para 135  Not relevant – there is no designated Green Belt within Worthing borough.
83.	Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. Even when exceptional circumstances are demonstrated strategically to take land out of the Green Belt, it is still necessary to demonstrate that exceptional circumstances exist at the site level.	NPPF Para 136  Not relevant – there is no designated Green Belt within Worthing borough.

84.	Strategic policies should make as much use as possible of suitable brownfield sites and underutilised land and optimise the density of development including promoting an uplift in minimum density standards in town and city centres and locations well served by public transport. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.	NPPF Para 137 & 138	Not relevant – there is no designated Green Belt within Worthing borough.
85.	When defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development, not include land which it is unnecessary to keep permanently open, identify areas of safeguarded land between the urban area and the Green Belt where necessary, make clear that the safeguarded land is not allocated for development at the present time, be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period, and define boundaries clearly.	NPPF Para 139	Not relevant – there is no designated Green Belt within Worthing borough.

<b>86.</b>	<b><i>Climate change, flooding and coastal change</i></b>		
87.	Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperature.	NPPF Para 149	<p>The Local Plan contains a number of policies that relate to climate change adaptation and mitigation. The following policies are particularly relevant:</p> <ul style="list-style-type: none"> <li>• Policy SP1: Presumption in Favour of Sustainable Development</li> <li>• Policy SP2: Climate Change</li> <li>• Policy SP3: Healthy Communities</li> <li>• Policy DM5: Quality of the Built Environment</li> <li>• Policy DM6: Public Realm</li> <li>• Policy DM7: Open Space, Recreation &amp; Leisure</li> <li>• Policy DM9: Delivering Infrastructure</li> <li>• Policy DM15: Sustainable Transport &amp; Active Travel</li> <li>• Policy DM16: Sustainable Design</li> <li>• Policy DM17: Energy</li> <li>• Policy DM18: Biodiversity</li> <li>• Policy DM19 Green Infrastructure</li> <li>• Policy CP20: Flood Risk and Sustainable Drainage</li> <li>• Policy CP21: Water Quality and Protection</li> <li>• Policy CP22: Pollution</li> </ul> <p>The Council has published a <a href="#">Planning &amp; Climate Change Position Statement (2019)</a> which provides guidance on the relevant planning policies (within the context of climate change) that must be taken into account when formulating development proposals. This is a live document and will be regularly reviewed.</p>
88.	Support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.	NPPF Para 149	Strategic Objective 19 - Ensure development helps the borough to adapt and increase its resilience to the effects of climate change, now and in the future within the context of the Government's commitment of Net Zero by 2050 and the Council's Climate Emergency Declaration.

			<p>The Local Plan contains a number of policies that relate to future resilience of communities and infrastructure to climate change impacts. The following policies are particularly relevant:</p> <ul style="list-style-type: none"> <li>• Policy SP2: Climate Change</li> <li>• Policy SP3: Healthy Communities</li> <li>• Policy DM6: Public Realm</li> <li>• Policy DM7: Open Space, Recreation &amp; Leisure</li> <li>• Policy DM19 Green Infrastructure</li> </ul>
89.	Increase the use and supply of renewable and low carbon energy and heat by providing a positive strategy for energy from these sources, identifying suitable areas for renewable and low carbon energy sources, and identifying opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.	NPPF Para 151	<p>Policy DM17 (Energy) supports the development of renewable, low carbon and decentralised energy schemes.</p> <p>Policy DM16 (Sustainable Design) requires development to connect to an existing low carbon energy network, or provide capacity to connect to any proposed future networks where feasible and viable.</p>
90.	Strategic policies should manage flood risk from all sources.	NPPF Para 156	Policy DM20 (Flood Risk and Sustainable Drainage) addresses and seeks to manage flood risk from all sources taking climate change and the lifetime of development into account.
91.	Avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.	NPPF Para 167	<p>Policy SS4 (Countryside and Undeveloped Coast) (criterion d) sets that any development in the countryside and undeveloped coast should not result in a level of activity that has an adverse impact on the character or biodiversity of the area.</p> <p>Policy DM20 (Flood Risk and Sustainable Drainage) requires a Flood Risk Assessment to take account of the vulnerability of development and its users to flood risk and ensure it is made safe.</p>
<b>92.</b>	<b>Natural environment</b>		

93.	Contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils, recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services.	NPPF Para 170	Part 3 of the Local Plan designates land as Countryside and Undeveloped Coast (Policy SS4), Local Green Gaps (SS5), and Local Green Space (SS6).
94.	Plans should: distinguish between the hierarchy of international, national and locally designated sites, take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure, and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.	NPPF Para 171	<p>There are no international designated sites within the Worthing Local Plan area.</p> <p>Policy DM18 (Biodiversity) distinguishes between national and locally designated sites and sets out the mitigation hierarchy.</p> <p>Policy DM19 (Green Infrastructure) sets out the strategic approach to Green Infrastructure across the borough and how this relates in individual development sites.</p>
95.	Conserve the special character and importance of Heritage Coast areas.	NPPF Para 173	N/A - there is no designated / defined Heritage Coast within Worthing borough.
96.	Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, and identify and pursue opportunities for securing measurable net gains for biodiversity.	NPPF Para 174	<p>Policy DM18 (Biodiversity) requires major developments to achieve a 10% net gain for biodiversity and where achievable brownfield sites should deliver a 20% net gain onsite.</p> <p>Local Wildlife Sites are illustrated within the Mapping Extracts document and will then be included on the Proposals Map when the Plan is Submitted for Examination.</p>
97.	Ensure that a site is suitable for its proposed use taking account of ground conditions, any risks arising from land instability and contamination, and the likely effects of pollution on health, living conditions and the natural environment.	NPPF Para 178 & 180	Policy CP23 (Pollution and Contamination) aims to avoid risks from hazards and all sources of pollution to protect human health and the natural environment.

98.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.	NPPF Para 181	Policy CP23 (Pollution and Contamination) considers pollution from all sources including the impact on air quality. It includes specific requirements for air quality assessments. Development sites (A1 & A15) located close to the Worthing AQMA include specific wording that will help to ensure that the impacts from new development on air quality are mitigated.
99.	Ensure that new development can be integrated effectively with existing businesses and community facilities.	NPPF Para 182	The Local Plan seeks to ensure that new development is carefully integrated within the borough and that the character and amenity value of the surrounding area is protected. In particular, Policy DM5 (Quality of the Built Environment) ensures that new development remains 'neighbourly' and does not negatively impact of neighbouring occupiers / uses.
<b>100.</b>	<b>Historic Environment</b>		
101.	Set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.	NPPF Para 185	The Local Plan contains Policy DM23 (Strategic Approach To The Historic Environment) which provides a positive and proactive strategy for the conservation and enjoyment of the historic environment. This Policy will help to inform the work programme for managing the historic environment after the Local Plan has been adopted. Policy DM24 (The Historic Environment) that follows, then sets out those things that proposed development should take account of and that the Council will consider when making decisions on relevant planning applications.
<b>102.</b>	<b>Minerals</b>		
103.	Provide for the extraction of mineral resources of local and national importance.	NPPF Para 204	West Sussex County Council and the South Downs National Park Authority (SDNPA) (the "Authorities") have worked in partnership on the preparation of the West Sussex Joint Minerals Local Plan (the "Plan"). The Plan covers the period to 2033 and is the most up-to-date statement of the Authorities' land-use planning policy for minerals. There are no existing mineral extraction sites in Worthing. In addition there are no site allocations or safeguarded minerals areas, wharfs or railheads.

104.	Take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials.	NPPF Para 204	See response to section 103 above.
105.	Safeguard mineral resources by defining Mineral Safeguarding Areas.	NPPF Para 204	See response to section 103 above.
106.	Encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place.	NPPF Para 204	See response to section 103 above.
107.	Safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals, the manufacture of concrete and concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.	NPPF Para 204	See response to section 103 above.
108.	Set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health	NPPF Para 204	See response to section 103 above.
109.	Recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction	NPPF Para 204	See response to section 103 above.
110.	Ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high-quality restoration and aftercare of mineral sites takes place.	NPPF Para 204	See response to section 103 above.



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