

WORTHING LOCAL PLAN 2020- 2036

LOCAL PLAN ROUTE MAPPER

TOOLKIT PART 4 –

**LOCAL PLAN SOUNDNESS & QUALITY
ASSESSMENT**

SUBMISSION

May 2021



**WORTHING BOROUGH
COUNCIL**



PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a partial plan policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question [cross referring to evidence](#) that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents.

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>
	Growth Strategy	
A	In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area	The strategy seeks to achieve the right balance between planning positively to meet the town's needs with the continuing need to protect and enhance the borough's high quality environments and open spaces within and around the town. The overarching objective is to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area. The core principles, take account of the characteristics of the borough and provide a clear direction for development which will steer development to the right locations whilst at the same time helping to protect those areas of greatest environmental value.
B	In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update	Worthing is tightly constrained and there is little scope to grow beyond the current built up area without damaging the borough's character and environment. Furthermore, the town is relatively compact and there are very few vacant sites or opportunity areas within the town that could deliver significant levels of growth. As such, ALL opportunities for development have been positively tested. To respond to this context, the Plan places a strong emphasis on the regeneration key previously developed sites within the urban area. In addition, 6 of the last 9 remaining available edge of town development opportunities have been allocated in the Plan.
C	List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery	<p>There are no opportunities for strategic large scale growth in and around Worthing due to limited suitable land being available. The following sites have been allocated for small – medium size development:</p> <ul style="list-style-type: none"> • A1: Land at Beeches Avenue – 90 Dwellings • A2: Caravan Club, Titnore Way – 100 Dwellings • A3: Centenary House – 250 Dwellings & 10,000 sqm - Office space (part re-provided) • A4: Civic Centre, Stoke Abbott Rd - 7,000 sqm - Integrated health hub • A5: Decoy Farm - 18,000 sqm - Industrial / Warehousing • A6: Fulbeck Avenue – 120 Dwellings • A7: Grafton – 150 Dwellings & 2,500 sqm – Commercial / Leisure / Retail • A8: HMRC Offices, Barrington Rd – 250 Dwellings & Care home / Sheltered accommodation • A9: Lyndhurst Rd – 150 Dwellings • A10: Martlets Way - 10,000 sqm Industrial / Warehousing • A11: Stagecoach, Marine Parade – 60 Dwellings & 2,000 sqm Commercial / Leisure

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		<ul style="list-style-type: none">A12: Teville Gate – 250 Dwellings & 4,000 sqm – Commercial / Leisure / Retail and 80 bed hotelA13: Titnore Lane – 60 DwellingsA14: Union Place – 150 Dwellings & 700 sqm - commercial / 90 room hotel / cinema extensionA15: Upper Brighton Rd – 123 Dwellings <p>Refer to Chapter 4: Site Allocations of the Worthing Local Plan. Each site allocation sets out ‘Development Requirements’ which lists what development proposals should include / address which also identifies any necessary supporting infrastructure.</p> <p>Part C: Delivery Schedules of the Infrastructure Delivery Plan (2020) sets out the required infrastructure provision / improvements needed to support the site allocations. This has been prepared in consultation with infrastructure providers.</p>				
1.	Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Local Plan includes a strategic policy (SP1) to establish a presumption in favour of sustainable development. The Plan clearly sets out the Issues and Challenges for the borough and establishes policies to address the Council’s priorities for the development and use of land. The spatial strategy seeks to achieve the right balance between planning positively to meet the town’s development needs (particularly for jobs, homes and community facilities) with the continuing need to protect and enhance the borough’s high quality environments and open spaces within and around the town. The overarching objective is therefore to maximise appropriate development on brownfield land and add sustainable urban extensions adjacent to the existing urban area.				
		Where development is not planned for, strong evidence has been collated and presented to justify the protection of three areas (Brooklands / Chatsmore Farm and Goring-Ferring Gap) as Local Green Gap and Local Green Space – see Topic Paper 2 – Land Outside the Build Up Area Boundary .				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reviewer Comments: The core principles established in the WLP take account of the characteristics of the borough and provide a clear direction for development in and around the town. The spatial strategy will help to steer new development to the right locations whilst at the same time helping to protect those areas of greatest environmental value / sensitivity. This approach conforms to the requirements of the NPPF and in the context of paragraph 35 the Council can clearly demonstrate how the Plan has been positively prepared, is justified and effective.				
2.	Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The WLP explains that Council's Strategic Housing Land Availability Assessment (SHLAA) has provided the main mechanism through which the quantity and suitability of land potentially available for housing development has been determined. Broadly, there are two forms of site allocated for development. The first are previously developed sites within the urban area (brownfield sites). These nine allocations present the best opportunity to deliver positive change and renewal within the existing built-up area boundary as they are already well served by sustainable transport and infrastructure. Given the levels of development needed and the requirement to plan positively to meet housing needs, brownfield sites alone are not sufficient. Therefore, the other type of site allocated for development are those located on the edge of the town. The Sustainability Appraisal together with associated evidence studies (including biodiversity, flood risk, accessibility, landscape and infrastructure capacity) were used to assess all potential sources including edge of town sites (most of which are greenfield). The conclusion of this comprehensive assessment has resulted in the allocation of six sites on the edge of Worthing which will contribute towards meeting some of the borough's development needs.				
		Strong evidence has been collated and presented to justify the protection of three areas (Brooklands / Chatsmore Farm and Goring-Ferring Gap) as Local Green Gap and Local Green Space – see Topic Paper 2 – Land Outside the Build Up Area Boundary .				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The WLP and supporting evidence (particularly the Housing Implementation Strategy and Topic Paper 2 – Land Outside the Built Up Area) clearly explain how the severe land constraints meant there are no opportunities for major growth areas. However, a very positive approach has been taken to development and all				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		available opportunities have been rigorously reviewed. This assessment process, which conforms to national guidance, has resulted in 15 allocations that are shown to be deliverable and justifiable.				
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower?</p> <p>If you are proposing any material change away from the level of housing indicated by the standard method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Given the high local need for housing and lack of available land all potential sites have been assessed positively and as a result all sites where the evidence suggests development is suitable have been allocated. This is also reflected in the Sustainability Appraisal which highlights that there are no reasonable alternatives except to meet the local needs as far as possible. The rationale for site allocation is set out within individual policies (chapter 4) and the Housing Implementation Study.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
4.	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There is no Green Belt in Worthing.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				

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		Reviewer Comments: In line with toolkit guidance a score of +2 has been given when the issue is not applicable.				
5.	Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Given the high local need for housing and lack of available land all potential sites have been assessed positively and as a result all sites where the evidence suggests development is suitable have been allocated. This is also reflected in the Sustainability Appraisal which highlights that there are no reasonable alternatives except to meet the local needs as far as possible. The rationale for site allocation is set out within individual policies (chapter 4) and the Housing Implementation Study. The same applies to the allocations for employment use which are related to existing employment sites and, in two instances, located on contaminated land that would not be suitable for housing.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
6.	Does the local plan policies update identify a housing requirement for designated neighbourhood areas?	Reviewer Comments: In simple terms, the severe lack of potential / available development opportunities means that ALL sites were positively tested and ALL sites that were shown to be sustainable and deliverable have been allocated in the Plan. There are no other options. This narrative is reflected in the Plan – particularly within Chapter 3.				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There are no Neighbourhood Plans / Areas in Worthing.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: In line with toolkit guidance a score of +2 has been given when the issue is not applicable.				

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7.	Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Refer to Chapter 4: Site Allocations of the Worthing Local Plan. Each site allocation sets out the indicative capacity of development to be achieved as well as setting out 'Development Requirements' which lists what development proposals should include / address which also identifies any necessary supporting infrastructure.				
		Part C: Delivery Schedules of the Infrastructure Delivery Plan (2020) sets out the required infrastructure provision / improvements needed to support the site allocations. This has been prepared in consultation with infrastructure providers				
		Implications of taking no further action: N/A				
D	What targets have you set for non-residential floorspace or employment land and, if relevant, the number of jobs to be created over the plan period? List these targets and the evidence source for this 'need' target?	Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Each site allocation provides clear detail on the expected mix and quantum of development. Whilst it is difficult to provide a precise capacity figure for each site at this stage of the process (before design and massing work has been undertaken) the Plan does provide an indicative figure for each allocation which is considered to make very efficient and sustainable use of the land available.				
		The strategy is to plan positively for sustainable economic growth, promoting and enhancing the economic role of the town and guiding its role within the wider sub-region. The Local Plan will help to achieve this by establishing a clear policy framework that facilitates growth and helps to meet quantitative and qualitative demand for all types of economic activity over the Plan period. The Council's Economic Research and Employment Land Review (2016 & 2020 update), the Retail & Town Centre Uses Study (2017 & 2020 update) and other related studies have informed the policy context in this Plan and provide the robust evidence base in regard to sectors or locations where employment uses are to be promoted or protected.				
		The research undertaken 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.				

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		Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.				
8.	Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: As with housing, the lack of suitable development sites in and 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 provide an opportunity for mixed use development and one site, Decoy Farm (Allocation A5), provides an opportunity to deliver a significant extension to the town’s main industrial estate. Policy SS2 (Site Allocations) states that during the period 2020-2036 a minimum of 28,000 sqm (adjusted to 24,000 sqm through a proposed Modification) of employment floorspace (industrial and warehousing) and 10,000 sqm of commercial (retail and leisure) floorspace will be provided – the associated table and individual site allocations indicates the sites that will deliver this need along with indicative capacities.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Preparing a Local Plan that delivers an appropriate balance between homes and jobs is always a challenge. This is even more so now that further flexibilities have been provided through changes to the use class order which means there is a greater ability for existing employment uses to change to residential or other uses. Despite this, the Council has sought to ensure that the Plan does deliver an appropriate balance. The policies that seek to protect some existing uses along with site allocations will go some way to meet the overall development needs identified in evidence studies. To meet these aims, the Council is working hard to support delivery of these key sites, particularly the main opportunity for employment growth at Decoy Farm (Allocation A5). In addition, the Council will continue to explore and promote opportunities to deliver appropriate development to help meet identified employment and retail needs.				
		The Council will continue to monitor the provision of, and demand for, employment land and will update evidence as required. This is particularly important at a time of economic uncertainty and changes being made to the planning system at the national level. This on-going work will help to inform any future review of policy.				

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9.	Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Planning for infrastructure to support growth has been key consideration throughout the preparation of the WLP. Refer to Chapter 4: Site Allocations of the Worthing Local Plan. Each site allocation sets out the indicative capacity of development to be achieved as well as setting out 'Development Requirements' which lists what development proposals should include / address which also identifies any necessary supporting infrastructure. Policy DM9: Delivering Infrastructure sets out that development will be required to take into account existing infrastructure and to provide or contribute to the provision (and where appropriate, maintenance) of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure. Part C: Delivery Schedules of the Infrastructure Delivery Plan 2020 sets out the required infrastructure provision / improvements needed to support the site allocations. This has been prepared in consultation with infrastructure providers. The Infrastructure Investment Plan 2020-2023 (for CIL) alongside other funding streams will also be used to help support the provision of essential infrastructure to support growth.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: When planning for development the Council has taken great care to ensure current and future infrastructure needs are assessed, considered and planned for. Importantly, the Council has worked with service providers and statutory undertakers throughout this process to understand their needs. Infrastructure provision alongside planned growth is a key component of the plan and (as reported within other responses) the Council's Whole Plan Viability Assessment has tested all development requirements. Linked to this, the Council has recently progressed an update to its Community Infrastructure Levy Charging Schedule and this helps to ensure that there is a robust and evidenced understanding of viability.				

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		To further help in the understanding of how infrastructure provision will be funded the Council has committed to update the Developer Contributions Supplementary Planning Document as a priority after the adoption of the WLP. (See the Local Development Scheme Jan 2021).				
10.	Can you demonstrate that the transport and other infrastructure needed to support <u>each</u> growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated? Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: There are no opportunities for strategic large scale growth in and around Worthing due to limited suitable land being available. 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.				
		Refer to Chapter 4: Site Allocations of the Worthing Local Plan. Each site allocation sets out the ‘Development Requirements’ which lists what development proposals should include / address which also identifies any necessary supporting infrastructure.				
		Policy DM9: Delivering Infrastructure sets out that development will be required to take into account existing infrastructure and to provide or contribute to the provision (and where appropriate, maintenance) of facilities, infrastructure and services made necessary by development, or where it gives rise to a need for additional or improved infrastructure. It outlines the main methods of securing developer contributions to help fund infrastructure provision.				
		Part C: Delivery Schedules of the Infrastructure Delivery Plan (2020) sets out the required infrastructure provision / improvements needed (and identified costs) to support the site allocations and the. This has been prepared in consultation with the relevant providers/ delivery agents.				
		The estimated Infrastructure Funding Gap is as follows: <ul style="list-style-type: none">• Policing = £391,875.53 (Based on cost estimates provided in 2020 IDP)				

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		<ul style="list-style-type: none"> • Outdoor Recreation = £10,589,777 (Based on Open Space Study 2019) • Indoor Sports Facilities = £7,860,268 (Based on Built Facilities Study 2019) • Transport - Strategic Road Network = £1,070,000 (Based on 3 Highways Agency schemes in 2013 IFG) • Transport - Local Road Network = £4,390,000 (Based on 19 WSCC transport schemes in 2013 IFG) • Walking & Cycling = £1,404,000 (Based on 5 cycle schemes in 2013 IFG) • Parking = £1,573,000 (Based on behavioural change scheme in 2013 IFG) • Flood Defences = £10,770,000 (Based on Flood Defence schemes in 2013 IFG) • Education = £8,540,000 (Based on Primary School Education scheme in 2013 IFG - based on WSCC response to IDP) <p>Total = £46,588,920.53</p> <p>Since October 2015 the following amounts have been collected in Worthing:</p> <ul style="list-style-type: none"> • £2,469,208.94 s106 • £1,198,556.34 CIL <p>The CIL Trajectory over the period 2021-2029 estimates a projected level of CIL funds collected of £10,690,000.</p> <p>It is widely accepted now that it is very easy for local authorities (particularly those in the SE) to demonstrate that there is a significant funding gap that won't be filled by CIL receipts</p> <p>Implications of taking no further action: There may be a lack of clarity around the funding of some forms of infrastructure (particularly health and highways).</p> <p>Mitigation / Action required (if necessary) to move scale to right: Further work is required to establish funding sources and mitigation for some forms of infrastructure (particularly health and highways). Engagement to date has been constructive but further clarity (to support the policy position) will be provided within the updated Developer Contributions SPD which is programmed as a priority after the adoption of the WLP. (See Worthing's Local Development Scheme Jan 2021). In addition, the review of the Council's Infrastructure Investment Plan will allow for consideration to be given to funding needs arising from the Local Plan – and this will help to inform prioritisation and spending decisions for CIL and other funding pots.</p> <p>Reviewer Comments: There are no strategic development sites planned in and around Worthing. However, that is not to say that the provision of infrastructure to support growth is not an essential part of the plan. The Infrastructure Development Plan has assessed needs across the borough and the individual site allocations identify</p>

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		the specific needs arising from those developments. Work is on-going to provide additional clarity as to how all key infrastructure needs will be met.				
	Process and Outcomes (see also Toolkit Parts 2 and 3)					
E	What are the cross boundary strategic matters affecting your local plan policies update? List these.	As detailed in the Council's Duty to Co-operate Statement (Section 4) the Key strategic issues for Worthing are: <ul style="list-style-type: none">• Housing Needs and Provision• Employment Needs and Provision• Transport• Flood risk and defences• Green infrastructure				
11.	Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council's Duty to Co-operate Statement clearly identifies the strategic matters for Worthing (parts 4 and 6). It also explains in detail who the Council has engaged with and how. It concludes with a summary of this process has influenced Plan preparation and decision making within the sub-region as well as outlining work being progressed to advance and agree Local Strategic Statement.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Duty to Co-operate Statement demonstrates clearly the work that has been undertaken across the sub-region to address strategic issues and meet with the legal tests and NPPF requirements. The very constrained nature of the sub-region alongside very high levels of forecast growth means that there are no easy solutions for meeting all identified needs (particularly in the very constrained authority areas such as Worthing). However, the work progressed to date has been constructive and a commitment to progress Local Strategic Statement 3 will help to robustly test all options for strategic levels of growth in the medium term.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
F	Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence? <i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i>	<p>There are no elements of the WLP that not in conformity with national policy.</p> <p>However, it is acknowledged that in response to the Climate Emergency, the Council has sought to advance policies that will best deliver sustainable development. In some instances, these are raising the requirements for design, construction, efficiency and Biodiversity Net Gain. Whilst these are all in line with the national aspirations in some instances they are arguably slightly in advance of the Government's timetable for change. In this regard, the Council is satisfied that there is clear justification and local evidence to support this position. The requirements have been tested within the Whole Plan Viability Assessment and it is an approach that the Council will be able to robustly defend if required.</p>				
12.	Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: This is not an issue for Worthing.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right:				
		Reviewer Comments: In line with toolkit guidance a score of +2 has been given when the issue is not applicable.				
13.	Is the local plan policies update: <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: 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. In addition, 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 Covid-19 pandemic.				
		There are no Neighbourhood Plans in Worthing.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Local Plan responds closely to the main Council objectives – it supports prosperous places, provides leadership of place and, when delivered, will help communities to thrive. Importantly, the Plan responds to the Council's Climate Change emergency declaration and has strengthened efforts to tackle climate change and support natural environments.				
14.	Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes - as set out in the Council's consultation strategy all specific consultation bodies (statutory and local) have been notified of the publication stage and invited to make comments. They have all been shared a copy of the representations procedure. The publication / consultation process was clearly explained within relevant notifications / on the Council's website and on social media. Due to unusual circumstances relating to Covid-19 a decision was taken to extend the consultation period to 8 weeks (instead of the normal 6 weeks). The statement of representations procedure has been made widely available. MHCLG has temporarily removed legal requirements to make certain development plan documents available for inspection at premises and to provide hard copies on request. The documents must, instead, be made available for inspection online. An interim SCI Addendum was published (2020) setting out temporary consultation methods / changes with regards to the Covid-19 Pandemic. This will be amended as and when restrictions are eased.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The consultation and engagement processes undertaken meet with the requirements of Regulations and the Council's Statement of Community Involvement . Some changes have had to be made in response to the Covid-19 Pandemic but where this has occurred it has been in line with Government guidance and it has been communicated clearly to all interested parties.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
15.	Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Sustainability Appraisal incorporates the requirements of the SEA legislation and has evaluated all reasonable alternatives, having regard to the requirement to meet local needs for housing as far as possible. 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. In preparing the Submission Draft version of the Local Plan a number of changes were made. The SA report has considered whether these needed to be further assessed as reasonable alternatives as part of the SA.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
16.	Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The SA has appraised all the Local Plan policies including strategic objectives and site allocations against the SA framework. The SA Report considered total and cumulative (including synergistic) effects of the Local Plan.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The constrained nature of the borough and lack of land available for development has meant that there have been very few reasonable alternatives to meet local housing need as far as possible. As such, and as reported in the SA, ALL reasonable alternatives have been comprehensively tested. The SA clearly indicates the reason why some options have not been allocated for development within the WLP.				
		Reviewer Comments: The SA presents this information in a clear and logical manner.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The SA Report highlights the mitigation that has been identified both in the Draft IIA Report (2018) and the SA Report (2021). The SA Report also shows how policies or site allocations have been amended as a result. The appraisal of the Local Plan shows that it is an appropriate strategy.				
		Implications of taking no further action:				
		Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments: The findings of the SA are presented in a clear and logical manner. It is clear how its conclusions have influenced the policies and allocations now contained in the WLP. The stages on SA progression provide a clear audit of this process.				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: An Integrated Impact Assessment has been undertaken to appraise and inform the Local Plan. This fulfils the requirements to undertake a Sustainability Appraisal, Equalities Impact Assessment, and also incorporates a Health Impact Assessment.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: The EIA meets with requirements. It has been progressed throughout the preparation of the Plan and has helped to influence the drafting of relevant policies.				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		Reason for score: A HRA Screening accompanied the Draft IIA Report (2018) . This considered the Local Plan in combination with other plans and projects and concluded no likely significant effects. Natural England have confirmed they concur with its findings. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: The HRA process has been progressed in line with guidance and this has been endorsed by Natural England.				
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A as the AA concluded that no mitigation measures were required.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: In line with toolkit guidance a score of +2 has been given when the issue is not applicable.				
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: N/A as the AA concluded that no mitigation measures were required.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: In line with toolkit guidance a score of +2 has been given when the issue is not applicable.				

		Assessment				
KEY QUESTIONS		<i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [for instance, because another local authority has agreed to plan for your unmet need], can you explain and robustly justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The WLP and supporting evidence (particularly the Housing Implementation Strategy) explain clearly that the full housing need requirement for the borough will not be met. In fact, there will be a shortfall of over 10,000 dwellings (74% of need). Whilst it is acknowledged that this is a relatively low level of provision of need against requirements the Council is confident that robust evidence has been prepared that supports this level of provision. The Council has taken a very positive approach to development and annual deliver rates have increased by 15% since the last Development Plan (the Core Strategy) was adopted. One example of this proactive approach is the allocation of 6 of the 9 edge of town sites that were tested for developed as the Plan was prepared. No ‘stone has been left unturned’ in the review of sites.</p> <p>Strong evidence has been collated and presented to to justify the protection of three areas (Brooklands / Chatsmore Farm and Goring-Ferring Gap) as Local Green Gap and Local Green Space –Topic Paper 2 – Land Outside the Build Up Area Boundary.</p>				
		Implications of taking no further action for local plan soundness and/or effectiveness: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		<p>Reviewer Comments: As evidenced in the WLP and the Housing Implementation Strategy (particularly Part 6) the Council has taken a very positive approach to development and taken many actions to bring forward and support growth. Despite this, and primarily due to lack of available land, the WLP will only deliver approximately 26% of the overall level of housing need. In an effort to reduce this level of shortfall, a formal request was sent to all local planning authorities in the sub-region to see if they had any ability to accommodate any of Worthing’s needs. Although all Districts and Boroughs continue to work constructively to try and meet sub-regional needs Worthing BC did not receive any positive solutions. There are no easy solutions in an area where a ‘constrained’ figure of need has already been accepted within a number of the constituent Local Plans.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
G	Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.	<p>Given the very constrained nature of the sub-region a number of the Districts and Boroughs are unable to meet their own housing needs. This has been accepted by Inspectors when the respective Local Plans have been examined (e.g. Adur / Arun / Brighton & Hove / Lewes etc. As a consequence, requests have been made to Worthing and other LPAs to ask whether any unmet need could be accommodated. However, as Worthing is unable to meet its own need we have not been able to respond positively. This position is widely known and accepted so a numerical figure of unmet need that Worthing could theoretically provide has never formed part of these requests. Work being undertaken to progress Local Strategic Statement 3 quantifies the individual and cumulative levels of housing shortfall across the sub-region / housing market area.</p> <p>Statements of Common Ground with all relevant parties will be prepared and agreed prior to the Submission of the WLP for Examination.</p>				
23.	Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: No. As Worthing is unable to meet its own identified needs the WLP does not include any policy to help meet unmet needs from other LPAs in the sub-region.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: There is no ability for Worthing to meet unmet needs from across the sub-region.				
24.	Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
	Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?	Reason for score: The Council includes a Housing Trajectory within its Annual Monitoring Reports. In addition, to support the WLP the Housing Implementation Plan includes an up-to-date housing trajectory. The WLP and related supporting documents provide a clear narrative that explains how the development strategy corresponds with the annualised delivery rates / forecasts that are embedded in the trajectory. To help in this understanding, an				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		indication has been provided within each site allocation as to whether they are expected to be delivered within the first 5 years of the Plan period or 5+ years. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: A housing trajectory has been prepared in line with guidance and best practice. Whilst some local authorities append this to their Local Plans we consider that, as it represents a point of time, it is better located within a supporting document (the Housing Implementation Strategy).				
25.	Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: As previously stated, the WLP will not deliver development to fully meet identified needs. As explained within the WLP and supporting documents (particularly the Housing Implementation Strategy) the appropriate 'policy on' housing requirement for the borough over the Plan period is 230 dwellings per annum. The housing trajectory indicates how and when this will be delivered and the sites allocated for development are split into two time periods (0-5 years and 5+ years). Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments: All- be-it against a constrained ('policy-on' figure) the WLP meets the requirement of the NPPF to provide a supply of available, viable and deliverable sites.				
26.	Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: No – Worthing is unable to meet its own identified needs so there is no 'headroom' or surplus available. All available and sustainable sites have been allocated in the Plan and there are no opportunities to identify reserve sites (although there is reference to the potential for development at Worthing United Football Club				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		providing the club can be suitably relocated). The Housing Implementation Strategy also provides details on other contingencies which may result in additional levels of housing coming forward. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: There is no ability for the WLP to provide any surplus provision and it is acknowledged that the full housing requirement for Worthing will not be delivered within the Plan period.				
27.	Is the Council reliant on the delivery of any 'windfall' sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Chapter 3 of the SDWLP explains clearly how the target for housing delivery in Worthing has been developed. It is explained that the housing land supply figures include 'windfalls' (871 dwellings) which are sites that deliver development but that have not been specifically identified in the Local Plan. An explanation of how this figure has been calculated can be found in the Housing Implementation Strategy (Section 5 and Appendix B).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The Plan makes an allowance for a level of windfall development. An explanation as to how this has been calculated and the compelling evidence to justify its inclusion is set out in the Council's supporting evidence. In summary, as evidenced through historic records, the nature of the borough means that a significant proportion of development comes forward as redevelopment / intensification on existing sites. Whilst, extremely hard to forecast, an allowance has been made for this form of provision in line with guidance and good practice.				
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Yes – informed by the Strategic Housing Market Assessment (SHMA) the WLP makes it clear what size, type and tenure of housing is required. Policy DM1: Housing Mix makes clear that the mix of housing should be				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		based on the most up to date evidence of housing needs and demands. Paragraph 5.7 sets out the mix recommended by the current SHMA (2020). Policy DM3: Affordable Housing sets out the amount (by site threshold) type and tenure of affordable housing required. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: Informed by evidence, the WLP is clear in terms of what size, type and tenure of housing provision is required to meet needs. Given the level of forecast shortfall against need it is inevitable that the demand for all forms of housing will not be satisfied. As such, in reality, the type of housing delivered is going to be strongly influenced by the character of the individual site and its location (along with prevailing needs). The WLP provides a clear approach to help inform this process and further guidance on the type of development expected is set out within the individual site allocations.				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: in line with the NPPF and related guidance the Council's Strategic Housing Market Assessment (SHMA) undertook a detailed assessment of the specific needs of different groups within Worthing. In response to this, the WLP Policy DM1: Housing Mix considers the needs of the ageing population and the need for family homes, HMOs and live/work units.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Informed by robust evidence, the WLP considers and plans for the needs of different groups in the community. As explained elsewhere, the WLP will only around 26% of the overall housing needs. As such, it will be vital to ensure that the needs of different groups are not overlooked and that the sites that are available accommodate a proportion of these needs. Where appropriate, the development principles for individual sites and other related WLP policies indicate where some of these needs can be met.				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
30.	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The affordable housing requirements (Policy DM3) are justified through evidence in the SHMA (2020) and Whole Plan Viability Assessment (2021). Whilst the Local Plan cannot deliver the full need for affordable housing due to a lack of available land for development.				
		Implications of taking no further action: Affordable Housing needs will grow with the resulting impacts on those in housing need.				
		Mitigation / Action required (if necessary) to move scale to right: Every effort will be made to ensure that a proportionate and viable level of Affordable Housing is provided alongside Market Housing in line with the policy position. The Council will also work with Registered Local Landlords (and other funding sources) to review whether there are any opportunities to bring forward developments that will deliver 100% affordable housing.				
31.	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The coastal West Sussex Authorities of Adur, Arun, Chichester and Worthing commissioned consultants to undertake the Coastal West Sussex Gypsy and Traveller Accommodation Assessment (GTAA). The main objective of the GTAA is to assist the respective authorities in determining an appropriate level of pitch and plot provision for the area to inform the policies and proposals of their respective Local Plans and related Development Plan Documents. It provides the Councils with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople during the period up to 2036. The study identified that there were no existing sites within Worthing and no identified current or future need. As a consequence, no new sites are required to be allocated. Whilst the evidence has not identified a need, and therefore no requirement to				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		provide sites, there is still a requirement to include a criteria based policy to provide a basis for decision making in the event that relevant applications do come forward (See SDWLP Policy DM4). Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: The GTAA study that was commissioned to help inform the Local Plan concluded that there was no identified current or future need for sites in Worthing. The work undertaken and related policy position meets the requirements of the Housing Act (1985), the Housing and Planning Act (2016), the NPPF (2019) and Planning Policy Guidance (2014) as amended by Planning Policy for Traveller Sites (2015) which included a change to the definition of Traveller for planning purposes.				
32.	Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The GTAA study that was commissioned to help inform the Local Plan concluded that there was no identified current or future need for sites in Worthing.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Informed by robust evidence, there is no need for the WLP to provide a supply of deliverable sites to meet identified needs.				
H	List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery	N/A – See response to section 31 above.				

May 2021

	KEY QUESTIONS	Assessment				
		Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.				
	Justified approaches to plan policy and content					
33.	Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text? [You may wish to check each policy setting a threshold]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: All thresholds included within the WLP are justified and deliverable and founded on robust and up-to-date local evidence. Individually and collectively the impacts of these requirements are tested within the Whole Plan Viability Assessment which concluded that, viewed as a whole, the emerging Local Plan proposals have a reasonable prospect of viability and will therefore meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. For example:</p> <ul style="list-style-type: none">Affordable Housing (DM3) - requirements / thresholds are based on the Council’s Strategic Housing Market Assessment, associated viability work and the NPPF requirement to limit contributions to ‘major’ development only.Open Space (DM7) - Schemes of 10+ dwellings will be required to provide open space on site in accordance with the Council’s adopted standards. Where it is not possible to provide open space on site, contributions will be sought to provide or improve open space off-site within the ward or nearby ward to which the development is located.Delivering Infrastructure (DM9) – thresholds are established in the respective CIL / S106 guidance and legislation.Sustainable Design (DM16) – c) - All major developments will need to achieve a 31% reduction (see above) and demonstrate how the design and layout of the development has sought to maximise reductions in carbon emissions in line with the energy hierarchy.Sustainable Design (DM16) – f) - Non-residential development of at least 1,000 sqm floorspace and residential or mixed use development consisting of more than 200 residential units should achieve BREEAM New Construction or BREEAM Communities ‘Very Good’ as a minimum rating based on the latest BREEAM scheme.Sustainable Design (DM16) – h) - Major development proposals should reduce potential overheating and reliance on energy intensive air conditioning systems and demonstrate this in accordance with the cooling hierarchy.				

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		<ul style="list-style-type: none"> Energy (DM17) - Major development within areas identified as heat network opportunity clusters, will be required to connect to district heating networks where they exist, or will be expected to maximise opportunities for the development of a future district heating network Biodiversity (DM18) - New developments (excluding change of use and householder) should provide a minimum of 10% net gain for biodiversity - where possible this should be onsite. Where it is achievable, a 20%+ onsite net gain is encouraged and is required for development on previously developed sites. Major developments will be expected to demonstrate this at the planning application stage using biodiversity metrics. This should be accompanied by a long term management plan. Green Infrastructure – e) - Major developments should demonstrate how they are meeting the requirements of this policy in their submitted sustainability statements and are encouraged to achieve Building with Nature Full Award (Excellent). Flood Risk and Sustainable Drainage –(DM20) - b) A site specific Flood Risk Assessment must be submitted with planning applications for: i) sites of 1 hectare or greater in Flood Zone 1 				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The thresholds set within the WLP (outlined above) are justified by local evidence and then tested within the Whole Plan Viability Assessment in line with national requirements / advice. The main threshold set is whether it is 'major' development (10+ dwellings). The tiered approach to affordable housing contributions / requirements set out in Policy DM3 is based on viability evidence.				
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary Planning Documents and why this is appropriate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: All strategic matters are address in the WLP.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The WLP addresses all strategic matters and there are no plans to progress any other Development Plan Documents. However, following the adoption of the WLP the Council will advance Supplementary				

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		Planning Documents (SPDs) to help support the policy position. This will include a range of updates and new SPDs. See details within the Council's Local Development Scheme (Jan 2021).				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy; and (iii) is the approach consistent with National Policy? [For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The designations and any related hierarchies established in the WLP are clearly set out, based on local evidence and in line with guidance: Examples are set out below: <ul style="list-style-type: none"> Biodiversity - Policy DM18 sets out the level of protection afforded to the different levels of protected sites in accordance with national policy. Retail – To guide policies and strategies, the Local Plan defines a network and hierarchy of centres. Worthing has a wide variety of shopping centres which include the main Worthing town centre, 3 district shopping centres and 23 local centres (8 medium scale and 15 small scale centres). The policy approach is one that supports development within these centres that responds to change and is appropriate to their role and function. The Historic Environment – Policies DM23 and DM24 clarify the different heritage assets within the town and explain how they will be protected, managed and enhanced over the plan period. DM23 provides a positive approach and proactive strategy for the conservation and enjoyment of the historic environment. Policy DM24 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. 				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The approach taken within the plan to levels of protection and different designations (and any related hierarchy) responds to local context and is consistent with national policy.				

	KEY QUESTIONS	Assessment				
		<p><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: In line with national guidance, the Plan is worded positively to support, rather than restrict, sustainable development. However, the Plan is also clear that the benefits of ‘growth’ are carefully balanced against the potential impact of future development. To achieve this, a level of protection has been provided to community facilities (DM8), retail areas (DM13), employment sites (DM11) and open spaces (DM7). Informed by supporting evidence the Plan provides clear rationale as to how and why these areas are protected. Importantly, the Plan and supporting guidance also provide explanation as to when alternative uses might be acceptable (certain to clear criteria / tests being met).</p>				
		<p>Strong evidence has been collated and presented to justify the protection of three areas (Brooklands / Chatsmore Farm and Goring-Ferring Gap) as Local Green Gap and Local Green Space –Topic Paper 2 – Land Outside the Build Up Area Boundary.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The Plan seeks to provide a positive and supportive framework for development and growth. However, to ensure that we achieve sustainable and balance outcomes it is vital that there is strong protection for existing uses – particularly those (like employment uses) under threat from housing or other uses. It should be noted that the Plan does not, at this stage, plan for the implementation and use of Article 4 directions to remove permitted Development Rights.</p>				

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37.	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: All standards and requirements are justified and deliverable. They are founded on robust and up-to-date evidence. Individually and collectively the impacts of these requirements are tested within the Whole Plan Viability Assessment which concluded that, viewed as a whole, the emerging Local Plan proposals have a reasonable prospect of viability and will therefore meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. For example:</p> <ul style="list-style-type: none"> the Affordable Housing requirements (DM3) are based on the Council's Strategic Housing Market Assessment and associated viability work. Policy DM7: Open Space, Recreation & Leisure is informed by an up-to-date Open Space Study (2019) which sets out recommended provision and access standards for open space (see Table 1 of the Worthing Local Plan). The Open Space Guidance Note (2021) provides further context and clarity regarding the application of the open space standards. Policies designed to increase sustainability and mitigate the impacts of climate change (e.g. provision of EV Charging points and water efficiency measures) are based on robust local evidence and the costs associated with their implementation have been assessed. 				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		<p>Reviewer Comments: All standards and requirements included within the Plan have been founded on robust local evidence and then tested within the Whole Plan Viability Assessment. They are justified and deliverable and, importantly, they are shown to be proportionate to the level and type of development planned for and the additional impacts / demand that this will place on infrastructure.</p>				

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	Deliverability					
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	<p>Reason for score: The Whole Plan Viability Assessment provided a robust review of all the development requirements proposed within the WLP. A number of development sites and scenarios were tested in detail. This concluded that when considered cumulatively the requirements from development set within the Plan and their relationship with overall scheme viability would not put the overall strategy at risk. The Assessment took into account the affordable housing requirements (DM3) which is the element that has most impact on development viability.</p> <p>The Assessment also took the implications of CIL into account. The Council is currently also revising its CIL Charging Schedule and the Examination was held in January 2021. In assessing the viability of the draft Local Plan, the conclusions of the Worthing Borough Council CIL study have been taken into account (Draft Charging Schedule rates). Those rates, rather than the adopted CIL rates, have been applied to the relevant appraisals in this study to ensure that this report is based on the most up to appropriate and available evidence and to reflect on whether the emerging rates and charging zones remain appropriate.</p> <p>Implications of taking no further action: N/A</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: In line with the conclusions of the Whole Plan Viability Assessment that, viewed as a whole, the emerging Local Plan proposals have a reasonable prospect of viability and will therefore meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms.</p> <p>It is acknowledged that the research undertaken to inform the Whole Plan Viability Assessment was assembled at a time when there remain economic uncertainties associated with Brexit and the global Covid-19 pandemic situation is dominating all aspects of the news and economy. This may run through into many potential areas of influence on matters affecting viability or deliverability, short term in particular. However, there could be a range of influences and effects, not necessarily all negative in their impact on viability or other matters. At the point of this assessment while there continue to be uncertainties, it is only possible to work with currently available information. The Council</p>				

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		will continues to consider how this picture may change and monitor it as best possible. Consideration will be given to any necessary updating of the evidence and local response in due course.				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Whole Plan Viability Assessment provided a robust review of all the development requirements proposed within the WLP. A number of development sites and scenarios were tested in detail. This concluded that when considered cumulatively the requirements from development set within the Plan and their relationship with overall scheme viability would not put the overall strategy at risk.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	Reviewer Comments: In line with the conclusions of the Whole Plan Viability Assessment that, viewed as a whole, the emerging Local Plan proposals have a reasonable prospect of viability and will therefore meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms.				
		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The monitoring framework comprise of the following format: <ul style="list-style-type: none"> • United Nations Sustainable Development Goals • Relevant United Nations Sustainable Development Goals Targets (targets that underpin each goal) • Relevant Local Plan Policies (including the delivery of planned development) • Local Plan Monitoring Indicators (this sets out relevant and available data that can readily be secured / captured) • Delivery Mechanism / Responsible Agency (identifies which organisations are responsible for the collection and monitoring of data) 				

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		Data will be secured / captured from a number of reliable and robust sources such as: West Sussex County Council, Public Health England, Environment Agency and Office for National Statistics.				
		Implications of taking no further action: The monitoring framework would not be as strong as it could be. This will make it harder to undertake an informed policy / Plan review.				
		Mitigation / Action required (if necessary) to move scale to right: Further work is required to ensure that the monitoring framework is robust and is informed by credible and accessible data sources.				
		Reviewer Comments: The WLP has incorporated The United Nations Sustainable Development Goals to enhance the sustainability credentials of the Plan. This is a new approach taken within the Local Plan and some data sources are still in early infancy. It is expected that the use of SDGs for monitoring purposes will become the accepted best practice and that the tools to monitor impacts will become more consistent and robust. As such, although the monitoring framework that has been established provides a clear mechanism to monitor the effectiveness of policies and the Plan it is expected that it can, and will be, strengthened in the coming months / years.				
41.	Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>? Where triggers for plan review and/or update are identified are they justified and proportionate?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Whilst, the monitoring framework that has been established provides a clear mechanism to monitor the effectiveness of policies and the Plan it is expected that it can, and will be, strengthened in the coming months / years. The Council's Annual Monitoring Report will be the main mechanism through which policies are monitored and triggers for review are hit – these are considered to be justified and proportionate. However, it is acknowledged that most authorities would include a form of mitigation / review should development sites didn't come forward as envisaged. Although the Council will take action to help the delivery of sites it is not appropriate to establish reserve allocations or alternative strategies as ALL potential opportunities have been robustly and positively tested and, as a result, all the sustainable sites in the borough have been allocated (- there are simply no alternatives).				
		Implications of taking no further action: The monitoring framework would not be as strong as it could be. This will make it harder to undertake an informed policy / Plan review.				
		Mitigation / Action required (if necessary) to move scale to right: Further work is required to ensure that the monitoring framework is robust and is informed by credible and accessible data sources.				

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		Reviewer Comments: The monitoring framework that has been established provides a clear mechanism to monitor the effectiveness of policies and the Plan. However, it is expected that it can, and will be, strengthened in the coming months / years. Alongside the annual review of policies, Part 1 of the PAS Route Mapper will be used to help determine when triggers for a review are hit. In the longer term, the Council is required to undertake a review of its's Plan within 5 years. As such, the work programmes for the Planning Policy Team established in the Local Development Scheme (Jan 2021) builds in the start of the review to commence towards the end of 2023.				
	Plan effectiveness (and associated policy clarity)					
42.	Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u> ? Does the evidence relied on to support those policies correspond/cover this whole period?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The WLP has a base date of 2020 and an end date of 2036. If adopted in 2022 as expected, this will provide a 15 year Plan period. Most of the evidence to support the policies correspond with the whole period. However, it is accepted that it is not appropriate for some evidence studies to have such a long timeframe (e.g. Retail Studies). Where this is the case, the Plan and supporting evidence explains why this the case and clarifies the timeframes that have been assessed. The Plan will be reviewed within 5 years of adoption and, where appropriate, the evidence base will be updated to reflect the new timeframe for the Plan.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: The expected adoption of the Local Plan is early 2022. What adopted this will provide for a 15 year period to 2036. If for some reason, there is any significant delay to this (1 year+) then the Council will review the base date and end date. In line with legal requirements, the Plan will be reviewed within 5 years of adoption.				
43.	Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Paragraph 43 of the WLP explains that - 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).				

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		Implications of taking no further action: Mitigation / Action required (if necessary) to move scale to right: Reviewer Comments: It is clearly explained that, when adopted, the new Local Plan will supersede all existing Development Plan policies.				
44.	Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: Care has been taken to ensure that all policies are clear, concise and unambiguous. Relevant policies (particularly Chapter 5 – Development Management Policies) provide decision makers with clear policies that reflect the Plan’s overarching aims. Implications of taking no further action: N/A Mitigation / Action required (if necessary) to move scale to right: N/A Reviewer Comments: An over-arching objective at the start of Local Plan preparation was to make the Plan as user-friendly as possible. As such, the Local Plan was prepared with this in mind. Comments received at that stage, along with further efforts to provide clarity, have helped to refine the Plan. The structure of the Plan and the wording of individual policies will help the reader to clearly understand objectives and requirements and this, in turn will help to inform future decision making as planning applications are determined.				
45.	For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map? Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		Reason for score: (i) Yes - The Local Plan uses a number of maps and diagrams to illustrate the location of development sites and key land use designations: <ul style="list-style-type: none"> • Regional Context – Page 11 • Local Context – Page 17 • Town Centre Image – Page 56 • Local Green Gaps – Page 60 • Local Green Spaces – Page 62 				

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		<ul style="list-style-type: none"> Site Allocations – Page 68-69 and then pages 70-99 <p>(ii) The Regulation 19 version of the Local Plan is 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 has been prepared and will be submitted for Examination alongside the Local Plan.</p> <p>Maps and graphics provided within the Local Plan have been included to help provide clarity or illustrate particular elements of the Plan. For example, Policy SP3: Healthy Communities includes a Settlement Health Map to aid understanding of the relationship between the built & natural environment and health.</p> <p>Implications of taking no further action: N/A</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: Great effort has been taken to improve the readability of the Plan and make it more user-friendly. This has included the addition of a number of graphics. A Mapping Extracts document was prepared to support the SDWLP - the changes illustrated have then been embedded in the revised WLP Proposals Map and Town Centre Inset that has been prepared for Submission.</p>				
46.	Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Care has been taken to ensure that all policies have been drafted in a positive manner. The wording is clear, concise and unambiguous. Relevant policies (particularly Chapter 4 – Site Allocations) clarify the type of development that the Plan is aiming to deliver.</p> <p>Implications of taking no further action: N/A</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: An agreed objective at the start of Local Plan preparation was to make the Plan as user-friendly as possible. As such, the Local Plan was prepared with this in mind. Comments received at that stage, along with further efforts to provide clarity, have helped to refine the Plan. The structure of the Plan and the wording of individual policies will help the reader to clearly understand what type of development the Plan is promoting.</p>				

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
47.	<p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p> <p>[Note: If you have said 'all development' this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Most policies within the Plan will apply to all relevant developments. However, where there will be applied differently depending on scale / location and use this is clearly explained within the policy and supporting evidence base (e.g. affordable housing policy DM3 and the specific development requirements of site allocations). The work programme established in the Local Development Scheme also clarifies the Supplementary Planning Documents that will be progressed to support the adopted policy position (e.g. the update of the Developer Contributions SPD to support policy DM9 (Delivering Infrastructure) and affordable housing contributions (DM3).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
I	<p><i>State how many policies are in your local plan update?</i></p> <p><i>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</i></p>	<p>The Plan is split into 5 parts that provides a clear and logical structure (see index Pages 6 & 7):</p> <ul style="list-style-type: none"> Part 1 - Introduction Part 2 – Vision and Strategic Objectives (including 3 Strategic Policies) Part 3 – Spatial Strategy (including 6 Spatial Strategy Policies) Part 4 - Site Allocations (including 15 allocations / policies) Part 5 – Development Management (including 24 Development Management Policies) <p>i) No policies repeat parts of other policies within the Plan</p> <p>ii) Other than Policy SP1 (the Presumption in Favour of Sustainable Development) the Plan does not repeat sections of the NPPF. However, where appropriate, to strengthen the local policy position reference is given to the relevant paragraph / requirement of the NPPF</p> <p>iii) In a few instances appropriate cross referencing is provided to other policies – this approach is only used to help the reader to understand the policy position (and to avoid unnecessary duplication of text).</p>				
		-2	-1	0	+1	+2

	KEY QUESTIONS	Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: 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).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Great effort has been taken to ensure that the Plan is user-friendly and avoids any unnecessary duplication. Inevitably, there is some cross-referencing in placing but care has been taken to ensure that this is kept to a minimum and does not impact on the structure / flow of the document.				
49.	<p>Do policies avoid duplicating other regulatory requirements (for example, building regulations)?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A number of policies do refer to building regulations but this is only on the grounds where the policy is promoting a higher requirement (to exceed the building regulation requirement) to be met. For example:				
		<p>Policy DM1: Housing Mix states that 'The Council will expect all new build dwellings to meet the optional higher Building Regulations Standard M4(2) for Accessible and Adaptable dwellings.'</p> <p>Policy DM14: Digital Infrastructure sets out 'All new dwellings, including those provided via building conversions must be designed and constructed in a way that enables them to meet or exceed the Government's Building Regulations relating to provision of high speed FTTP infrastructure in the home or any subsequent national equivalent standard should the Building Regulations and/or national policy be reviewed in the future.'</p> <p>Policy DM16: Sustainable Design states that 'All development (excluding householder applications) will be required to achieve the relevant minimum standards below unless superseded by national planning policy or Building Regulations.' Furthermore, National planning guidance makes clear that Local Planning Authorities can set energy performance standards in their Local Plan for new housing or the adaptation of buildings to provide dwellings that</p>				

		Assessment <i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i>				
		are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes (approximately 19% above current Building Regulations).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Care has been taken to avoid unnecessary duplication and cross referencing. However, Planning does not work in a vacuum and is partly influenced by other services / regulations. As such, when helpful to the reader, a limited number of references to other regulatory requirements are provided.				
50.	Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker? [For instance, policies should avoid using overly subjective terms such as “to the Council’s satisfaction”, “considered necessary by the Council” or “appropriate” without associated clarification.]	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: When formulating the policies, draft versions were shared with colleagues in Development Management to ensure that the policy requirements were clear to the decision-maker. A number of representations were submitted during Regulation 18 consultation that provided recommended amendments to help strengthen policy wording for clarity purposes. Where it was considered appropriate, these suggestions were addressed.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: At all stages of Plan preparation every effort has been made to ensure that policies are clear and unambiguous (each element of every policy has been robustly checked to ensure that it has a clear purpose).				
Date of assessment:		May 2021				
Assessed by:		Officers in the Planning Policy Team				
Checked by:		Ian Moody – Planning Policy Manager (Worthing)				
Overall Score:		95 (out of a possible 100)				

Comments:	<p>This detailed Part 4 (Route Mapper) assessment of the Submission Draft Worthing Local Plan (Reg 19 Version – Jan 2021) has provided an opportunity for officers to assess the key soundness requirements. This along with Route Mapper parts 2 and 3 have provided the Council with a comprehensive review of the Local Plan as at nears Submission.</p> <p>The assessment scored 95 out of 100 and for the five elements that didn't score a maximum rating (monitoring, infrastructure delivery, affordable housing and the Sustainability Appraisal) there is a clear acknowledgment of the work required to address minor deficiencies that would see the Plan score 100%.</p> <p>The score reflects the view of the Council that the Regulation 19 Plan is consistent with national policy. It has been positively prepared to provide a clear strategy to achieve sustainable development. It is a justified and appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. Finally, it is effective and deliverable over the plan period.</p> <p>Although this has been an assessment undertaken internally by officers of the Council's Planning Policy Team it is considered to represent an open and honest review. It helps to provide confidence to progress the Local Plan to Submission and then Examination at which point the Council will welcome the opportunity to justify the approach taken.</p>
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