

Plan Section	Policy	Policy Name	Summary of Representation	Rep ID	Organisation (if applicable)	Changes to Plan	Officer Response
	Whole Plan		In general, approve the plan and especially pleased to see the commitment to sustainable development and climate change adaptation / mitigation.	SDWLP-13	N/A	No	Support is noted
	Whole Plan		In general a good plan and I welcome the emphasis on sustainability and climate change adaptation.	SDWLP-14	N/A	No	Support is noted
	Whole Plan		Plan is sound and that all appropriate opportunities for consultation have taken place.	SDWLP-15	Goring Residents Association	No	Support is noted
	Whole Plan		Fully support the emphasis in the plan on climate change and sustainability	SDWLP-18	Transition Town Worthing	No	Support is noted
	Whole Plan		We find the plan to be sound. The Council has worked hard, over a long period, with its excellent professional planning staff, commissioning research from consultants and consulting with its residents and neighbours, to produce a plan which meets, as far as it can, the housing needs of the borough while protecting, as far as it can, its few remaining green fields and stretches of open coastline.	SDWLP-27	Ferring Conservation Group	No	Support is noted
	Whole Plan		Supports the Local Plan	SDWLP-30	N/A	No	Support is noted
	Whole Plan		Represents nearly 2000 members. Would like to confirm that the Plan: - Complies with legal requirements - Consulted with local residents - The plan is a sound document	SDWLP-39	Goring Residents Association	No	Support is noted
	Whole Plan		Having reviewed the document, National Grid has no comments to make	SDWLP-41	Avison Young (on behalf of National Grid)	No	Comments noted
	Whole Plan		We are pleased to see Climate Change been recognised more significantly in this iteration of the plan.	SDWLP-57	Sussex Wildlife Trust	No	Support is noted
	Whole Plan		Recommend that some work to assess impact of Covid-19 on retail and office space is carried out before the examination.	SDWLP-63	CPRE	No	As explained within WLP 1.54 the Covid-19 pandemic has had a significant impact on all sections of society and it is acknowledged that, in these uncertain times, there may be an even greater requirement for adaptability and flexibility. The extent of many of these implications are still largely unknown all policies so it is not considered to be appropriate to revise policies now. However, all policies will be monitored on a regular basis to ensure that they remain effective and deliverable. All implications, along with any significant changes to the planning system at the national level will help to inform the review of the WLP (to take place within 5 years of adoption).
	Whole Plan		Plan is not justified because reasonable alternatives have not been considered. It is not deliverable because of the inherent contradiction between different imperatives in the Plan which cannot be satisfactorily reconciled. Plan must look at alternative ways (suggested) to bring about qualitative improvement and development across the town, while responding to the Climate Change. The long term societal impact of Covid-19 should be considered.	SDWLP-67	Cllr Helen Silman & Cllr Jim Deen (Labour Group)	No	It is considered that the Plan provides a clear and consistent strategy for development in the Borough. Whilst it is acknowledged that added emphasis has been placed on mitigating climate change the Plan still provides a consistent and aligned policy framework that seeks to balance the requirements of all land uses and community needs. It is unclear what alternative approaches to development have been proposed that have not already been consulted on and tested within the Plan and supporting evidence (particularly the Sustainability Appraisal). As explained within WLP 1.54 the Covid-19 pandemic has had a significant impact on all sections of society and it is acknowledged that, in these uncertain times, there may be an even greater requirement for adaptability and flexibility. The extent of many of these implications are still largely unknown all policies so it is not considered to be appropriate to revise policies now. However, all policies will be monitored on a regular basis to ensure that they remain effective and deliverable. All implications, along with any significant changes to the planning system at the national level will help to inform the review
1		Whole Chapter	Support	SDWLP-01	N/A	No	Support is noted
1		Paragraph 1.52	Fully support this overarching requirement	SDWLP-18	Transition Town Worthing	No	Support is noted
2	SO	Strategic Objectives	Section 2 of the plan strikes the right balance between economic, social and environmental needs. We commend the commitment to a sustainable environment in para 2.6	SDWLP-27	Ferring Conservation Group	No	Support is noted
2	SO	Strategic Objectives	SO1 - Does this take account of changes to types of housing required following the pandemic? Recent studies have indicated less desire for flats and increased requirement for houses - possibly driven by needing space to work from home.	SDWLP-13	N/A	No	Although the Plan suggests the most appropriate housing mix for new development this is not prescriptive. There will always be a need for some flexibility and this need is even greater as we respond to and recover from the Covid-19 pandemic (as highlighted in WLP para 1.54)
2	SO	Strategic Objectives	SO1 - Does this take account of changes to types of housing required following the pandemic? Recent studies have indicated less desire for flats and increased requirement for houses - possibly driven by needing space to work from home.	SDWLP-67	N/A	No	Although the Plan suggests the most appropriate housing mix for new development this is not prescriptive. There will always be a need for some flexibility and this need is even greater as we respond to and recover from the Covid-19 pandemic (as highlighted in WLP para 1.54)
2	SO	Strategic Objectives	SO9 and SO10 should include an emphasis on independent retailers	SDWLP-18	Transition Town Worthing	Yes	It would not be appropriate to provide this level of detail within the Strategic Objectives. However, it is agreed that the Town Centre policy (SS3) should make reference to the support for independent retailers. Amend Para 3.35 after first line add: range of uses. In addition, there has been a change in the type of retailer that shoppers are choosing. There is now a stronger demand for smaller, local independent businesses and particularly those that offer environmentally friendly and ethical products. The town centre..... Amend first bullet point just below para 3.36 to add the following text: mix of uses. Encourage and support new forms of retail, particularly small local independent retailers
2	SO	Strategic Objectives	Supportive of the amendments made to SO15 and SO16	SDWLP-57	Sussex Wildlife Trust	No	Support is noted
2	SO	Strategic Objectives	Strategic Objective 15 - welcomes this objective	SDWLP-64	Sussex Ornithological Society	No	Support is noted
2	SO	Strategic Objectives	Strategic Objective 17 - Concerned that the use of the word 'maximise' here does not encourage excessive density.	SDWLP-13	N/A	No	A key aim of the Plan is make the most efficient use of available land - however, it is considered that there are enough checks and balances in the Plan (and supporting documents) that will ensure that sites aren't over developed in a way that would impact negatively on the character of an area or on the amenities of neighbouring occupiers.
2	SP1	Presumption in favour of sustainable development	Is there a need for this policy as it repeats NPPF?	SDWLP-63	CPRE	No	The inclusion of this policy helps to integrate the NPPF at the local level and local planning authorities are advised to include this within their Local Plan (as is the case within the recently adopted Adur Local Plan).

2	SP1	Presumption in favour of sustainable development	Presumption of Sustainable Development wording should mirror national policy. Currently inconsistent.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	Yes	Although the existing wording set out in the WLP clearly reflects the position established in the NPPF it is agreed that there are some very minor variations. For consistency it is proposed that c) is amended as follows: c) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, the Council will grant permission unless: i. the application of policies in the National Planning Policy Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.
2	SP2	Climate change	Strongly support together with the inclusion of SO19, 20 and 21	SDWLP-13	N/A	No	Support is noted
2	SP2	Climate change	Fully support	SDWLP-18	Transition Town Worthing	No	Support is noted
2	SP2	Climate change	Recommend additional bullet points added to 2.20 to refer to the Borough's natural capital and biodiversity assets. Recommend additional bullet point to SP2 to refer to nature recovery networks.	SDWLP-57	Sussex Wildlife Trust	Yes	Noted. Recommended amendments will be made. Add bullet point to 2.20 - 'demonstrate that the development will protect and enhance the borough's natural capital and biodiversity assets' Add bullet point to SP2 - 'k) Development must not compromise land that is required to deliver towards a nature recovery network.'
2	SP2	Climate change	Recommend strengthening the policy with a specific target for tree canopy and woodland cover.	SDWLP-58	Woodland Trust	No	It is considered that SP2 e) and g) adequately address this - particularly when then supported by Policy DM19 (Green Infrastructure)
2	SP2	Climate change	It should be made clear that site-specific circumstances and viability will be taken into consideration in the application of this policy.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Whole Plan Viability Assessment has assessed the policy requirements and related financial contributions set out in the WLP - this has concluded that, viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. Whilst there will always need to be some degree of flexibility in these matters the Council will continue to promote and support development that helps to mitigate the potential negative impacts on the environment.
2	SP2	Climate Change	Clarification needed on climate change especially the Government response to the Future Homes Standard consultation.	SDWLP-63	CPRE	No	Comment is noted. It is considered that the WLP provides a clear policy framework to help mitigate the impacts of climate change. The addition of Strategic Policy 2 (Climate Change) strengthens this further. The Government have consulted on and published their response to The Future Homes Standard which they state will be implemented from 2025. Whilst the WLP has certainly taken the Government's 'direction of travel' into consideration the implications of these proposed new standards will be taken into full account when the WLP is reviewed (within 5 years of adoption).
2	SP2	Climate change	Support V3 & V4. Welcome Policy SP2 and Policy SP3.	SDWLP-103	Natural England	No	Support is noted
2	SP3	Healthy Communities	- Good to see recognition of local food production under SP3 vi - Pleased to see noise pollution included here under 2.30 but would seek clarification as to what noise is included. Town centre events can cause distress to residents.	SDWLP-13	N/A	No	Comments noted. This policy needs to be read in conjunction with Policy 22 (Pollution) which covers noise.
2	SP3	Healthy Communities	Pleased to note environmental considerations included.	SDWLP-18	Transition Town Worthing	No	Support is noted
2	SP3	Healthy Communities	Support V3 & V4. Welcome Policy SP2 and Policy SP3.	SDWLP-103	Natural England	No	Support is noted
2	SP3	Healthy Communities	- requirement for HIA should be removed for commercial development and residential threshold increased to 50 - it should also be confirmed that individual site-specific circumstances and viability shall also be considerations.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	It is considered that major commercial development have the potential to positively influence health and well-being and therefore the Council maintains the requirement for a HIA. No specific triggers have been set for residential development as very few major residential schemes come forward and it is considered that any major residential scheme that does come forward, should be assessed for impacts on the wider determinants of health. Further clarity on the policy approach and the application of the HIA will be covered in a Supplementary Planning Document.
2	SP3	Healthy Communities	Healthy Communities Policy should address housing provision as a key determinant of health by an additional clause that aims to take advantage of additional opportunities for housing	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	Comments noted. This is a strategic policy that needs to be read alongside other relevant housing policies in the Plan. Policy SP3 criterion b) iii refers to the provision of high quality and energy efficient homes.
2	Vision	Vision	Support emphasis in V1-V6 on climate change.	SDWLP-18	Transition Town Worthing	No	Support is noted
2	Vision	Vision	Support inclusion of natural capital in V3 and biodiversity net gain in v6.	SDWLP-57	Sussex Wildlife Trust	No	Support is noted
2	Vision	Vision	Overall the Plan demonstrates a proper balance between development objectives, environmental objectives and the importance of recognising the value of our heritage assets to the character and identity of Worthing.	SDWLP-102	Worthing Society	No	Support is noted
2	Vision	Vision	Vision and Strategic Objectives' cannot be reasonably rejected. The objectives are all desirable. The flaw is that only one way to deliver the vision is offered. The vision in Part 2 is not compatible with the delivery of the goals set out in Parts 3 and 4.	SDWLP-67	Cllr Helen Silman & Cllr Jim Deen (Labour Group)	No	There have been previous opportunities to comment on the proposed Vision and the wording now established in the WLP has been widely support. The Plan has been designed to be read as a whole and all sections are compatible with each other.
3	SS1	Spatial strategy	Fully support your arguments	SDWLP-01	N/A	No	Support is noted
3	SS1	Spatial strategy	Supports protection of green spaces and the emphasis on developing brownfield sites.	SDWLP-16	Goring Residents Association	No	Support is noted
3	SS1	Spatial strategy	Pleased to see protection of gaps but do not feel developing greenfield sites is the right way forward.	SDWLP-18	Transition Town Worthing	No	Noted. Given the level of housing needs a robust review of all opportunities was required. Where evidence indicates that greenfield sites can be delivered sustainably then those sites have been allocated.
3	SS1	Spatial strategy	Policies are unsound. The Plan is not meeting the minimum housing needs calculated using the standard method. The plan does not specify in policy the level of unmet needs to be addressed in neighbouring areas and fails to reconsider rejected sites and the relative benefits of allocation against adverse impacts.	SDWLP-45	House Builders Federation	No	Although a very positive approach has been taken to development the Plan is clear that all needs will not be met and that there will be a significant shortfall (10,488 dwellings). This is very clearly explained in policy 3.27 and there is no need or requirement to set this out within a policy. All potential sites have been robustly and positively assessed and there is clear evidence provided as to why sites that aren't allocated for residential development are either protected or allocated for alternative uses.
3	SS1	Spatial strategy	Remove sentence in d) i) referring to density.	SDWLP-49	ECE (on behalf of St Williams)	No	The approach is considered to be justified. Whilst the Plan aims to make the most efficient use of available land it is important that the Plan also establishes appropriate checks and balances to ensure that the level of development is appropriate to each site / opportunity.
3	SS1	Spatial strategy	In assessing the results of the various consultations, balancing housing provision against the wellbeing of the residents and maintenance of Worthing as being an inspiring location to live, we believe that the Local Plan is sound and for purpose.	SDWLP-52	Goring & Ilex Way Conservation Group	No	Support is noted
3	SS1	Spatial strategy	Encourages WBC to provide more information in the Plan about how proposals for development of small sites will be encouraged and implemented	SDWLP-53	Mid Sussex District Council	No	The updated Housing Implementation Strategy provides further detail on how the Council will support the delivery of suitable and sustainable small scale residential developments. Given the lack of strategic / major development sites in and around the Borough this form of development makes a vital contribution to the overall supply of housing in Worthing.

3	SS1	Spatial strategy	Insufficient focus on housing delivery - wording suggested that would refer to the Council engaging positively with landowners and developers to ensure all potential development sites are supported where they make efficient use of land and are in compliance with the rest of the development plan. The Plan fails to consider Montague Shopping Centre as a potential development site - add to the SHLAA Suggests amendments to remove wording relating to density	SDWLP-54	WSP (on behalf of NewRiver)	No	The Plan, when read as a whole, places a very strong emphasis on housing delivery. There is also a key aim to support the regeneration and redevelopment of town centre sites and it is made clear that the delivery of appropriate residential development as part of these schemes is supported. The additional wording suggestion would not enhance the Plan as it is already made clear that the Council would support any options for sustainable development that make efficient use of and that comply with other relevant policies. The 'call for sites' to inform the SHLAA is always open and the Council continues to encourage landowners and developers to put forward any opportunities that could help meet development needs. Some of the Montague Centre has been considered and reported within the SHLAA and permission has since been granted for residential development on the upper floors of part of this area (above the former Beales Department Store). Other specific (identified and / or promoted) opportunities that may be available in this area and the wider town centre will be considered during the annual review of the SHLAA and the Council will continue to welcome appropriate proposals to make efficient use of land in suitable and sustainable locations. With regards to the suggested deletion of density wording - whilst the Plan aims to make the most efficient use of available land it is important that the Plan also establishes appropriate checks and balances to ensure that the level of development is appropriate to each site / opportunity.
3	SS1	Spatial strategy	Supports point d)iii) of SS1 Recommend in 3.7 considering a call for sites to help deliver a Nature Recovery Network	SDWLP-57	Sussex Wildlife Trust	No	Support is noted. Whilst the Council will continue to support and promote sites to help deliver a Nature Recovery Network it is not considered that a change to paragraph 3.7 is necessary. The Green Infrastructure Strategy, currently being progressed, will help to identify appropriate opportunities.
3	SS1	Spatial strategy	Support policy and criteria C and D	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Support is noted
3	SS1	Spatial strategy	No objection to the Submission Draft Local Plan and accepts that Worthing has undertaken a thorough assessment of all opportunities to meet its future housing needs by maximising densities within the urban area and allocating 6 of its 9 greenfield sites. Adur District is unable to assist by meeting any of Worthing's housing shortfall but we will continue to work proactively with neighbouring authorities.	SDWLP-98	Adur District Council	No	Support is noted
3	SS1	Spatial strategy	Lewes District will not be in a position to be able to assist in meeting any of Worthing's unmet housing need.	SDWLP-99	Lewes District Council	No	Comments noted
3	SS1	Spatial strategy	Support the commitment to maximise capacity within the existing urban boundaries and the allocation of several edge of centre sites. We recognise the constraints faced by Worthing faces and the significant difficulties posed by limited land availability. City Council is not in a position to help meet any of Worthing's unmet housing development needs.	SDWLP-100	Brighton & Hove City Council	No	Comments noted
3	SS1	Spatial strategy	Is unable to meet any unmet housing needs arising from Worthing borough within Crawley borough's boundaries. The need to progress the West Sussex and Greater Brighton Statement of Common Ground for preparing the update to the Local Strategic Statement (LSS3) is crucial and CBC will strongly support this process.	SDWLP-101	Crawley Borough Council	No	Comments noted
3	SS1	Spatial strategy	Support this policy and specifically d) iii) Policy SS6 - welcome the designations.	SDWLP-64	Sussex Ornithological Society	No	Support is noted
3	SS1	Spatial strategy	Supports the Council's greenfield housing sites through the Regulation 19 Local Plan. Council are not meeting their housing requirement. More greenfield sites are needed in the Plan and, as part of that re-structuring of the Plan, the affordable housing burden on greenfield sites should be shifted to 30%. Unmet need is unsound.	SDWLP-65	Persimmon Homes	No	All potential edge of town development sites were robustly and positively reviewed during the preparation of the Plan - unless clear evidence exists to demonstrate why they shouldn't be developed they have been allocated. Clear viability evidence has been prepared and published to support the Council's policies, including the affordable housing policy. This demonstrates that greenfield sites are more able to deliver a higher proportion affordable housing (when compared to previously developed sites) to help meet a significant affordable housing need.
3	SS1	Spatial strategy	Spatial Strategy Policy and Para 2.4 state the Plan is meeting the needs of local communities but given housing shortfall this isn't justified.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	Although a very positive approach has been taken to development the Plan ('no stone has been left unturned') it is clear that all needs will not be met and the reasons for this are clearly explained and justified within the Plan and supporting evidence. It is acknowledged that there will be a significant shortfall (10,488 dwellings) and this is clearly explained in policy 3.27.
3	SS2	Development sites	Some allocation densities may result in properties that are too small or can only be achieved through flats	SDWLP-18	Transition Town Worthing	No	Whilst there is a clear aim to make the most efficient use of available land, when read as a whole, the Plan also establishes appropriate checks and balances to ensure that the level of development is appropriate to each site / opportunity (this includes the need to meet appropriate space standards).
3	SS2	Development sites	Strongly support the assertion that there is no way in which the Council could deliver much more than a quarter of the sites that would be required to meet its housing need.	SDWLP-27	Ferring Conservation Group	No	Support is noted
3	SS2	Development sites	Support inclusion of site A13 for residential development.	SDWLP-33	Tetra Tech Planning (on behalf of Clem Somerset)	No	Support is noted
3	SS2	Development sites	Worthing United Football Ground should be identified as an additional site within Policy SS2 with an approximate capacity of around 60 dwellings.	SDWLP-34	RHPC (on behalf of Hargreaves Management Ltd)	No	The inclusion of Worthing Utd as an allocation would be dependent on the successful relocation of the football club. This has not yet happened and the Council does not currently have the confidence that this can be achieved. However, the Plan (para 4.12) makes it very clear that an alternative use would be considered positively if this issue can be overcome in the future.
3	SS2	Development sites	Policies are unsound. The Plan is not meeting the minimum housing needs calculated using the standard method. The plan does not specify in policy the level of unmet needs to be addressed in neighbouring areas and fails to reconsider rejected sites and the relative benefits of allocation against adverse impacts.	SDWLP-45	House Builders Federation	No	Although a very positive approach has been taken to development the Plan is clear that all needs will not be met and the reasons for this are clearly explained and justified within the Plan and supporting evidence. It is acknowledged that there will be a significant shortfall (10,488 dwellings) and this is clearly explained in policy 3.27 - there is no need or requirement to set this out within a policy. All potential sites have been robustly and positively assessed and there is clear evidence provided as to why sites that aren't allocated for residential development are either protected or allocated for alternative uses.
3	SS2	Development sites	Further justification is needed re site capacities especially where allocations are below numbers permitted or capacities should be revised. This should also be informed by density evidence.	SDWLP-47	Horsham DC	No	The approach taken to allocating sites with Planning Permission is clearly explained in paragraphs 4.3 to 4.5. All potential capacity figures will be kept under review as schemes progress and, if appropriate, modifications will be proposed for the Plan and subsequent related monitoring reports. Further work is also being progressed to update and strengthen the Housing Implementation Strategy.
3	SS2	Development sites	Capacity figures for permissions should be updated and a further review of housing capacity for other allocated sites undertaken with a view to increasing capacity.	SDWLP-49	ECE (on behalf of St Williams)	No	The approach taken to allocating sites with Planning Permission is clearly explained in paragraphs 4.3 to 4.5. All potential capacity figures will be kept under review as schemes progress and, if appropriate, modifications will be proposed for the Plan and subsequent related monitoring reports. Further work is also being progressed to update and strengthen the Housing Implementation Strategy.
3	SS2	Development sites	Concerns relating to overdevelopment, tall buildings and loss of sunlight.	SDWLP-51	N/A	No	Whilst there is a clear aim to make the most efficient use of available land, when read as a whole, the Plan also establishes appropriate checks and balances to ensure that the level of development is appropriate to each site / opportunity. This will help to protect the character of surrounding areas and the amenities of neighbouring occupiers.

3	SS2	Development sites	Fails to consider Montague Shopping Centre as a potential development site.	SDWLP-54	WSP (on behalf of NewRiver)	No	The Plan provides clear encouragement for the diversification of the town centre and supports the delivery of residential uses in appropriate locations. In recent years the Council has approved a number of applications for town centre residential development - including development in the Montague Centre (above the former Beales Department Store). This form of development helps to make more efficient use of land, helps to diversify uses in the town centre and helps to add vitality - as such, the Council will continue to support appropriate developments of this nature. It would not be appropriate to allocate the Montague Shopping Centre as there is not a specific site area or identified opportunity.
3	SS2	Development sites	Plan target of 3,672 has the potential to have some adverse impacts on biodiversity.	SDWLP-57	Sussex Wildlife Trust	No	Although a significant level of development is planned this is still much lower than the level of identified needs for the Borough. In part, this is due to the need / desire to protect valued and environmentally important areas, Furthermore, the WLP requires and encourages biodiversity enhancements.
3	SS2	Development sites	Support policy but suggest site name for A10 is amended to Land off Martlets Way including SGN and the Nib Land	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	It is not considered appropriate to amend the name of this allocation / site (see more detailed response to Allocation A10)
3	SS2	Development sites	Although it is noted that there is a planning application has recently been refused at Land North of Goring station which is not being taken forward in the local plan as an allocation. Should both the local plan development and the Goring station site come forward it would be anticipated that there would be a severe impact on the highway network	SDWLP-61	On behalf of WSCC	No	Comments noted. The WLP Transport Study did assess the potential impact of all potential developments (including Chatsmore Farm). An appropriate and significant package of mitigation measures would be required as and when sites come forward.
3	SS2	Development sites	Development Sites - Local Plans should meet full local housing need unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits - the evidence base doesn't justify this. The impact of possible sites such as Chatsmore Farm have not properly been assessed in relation to the NPPF. - The SA does not consider the effects of policy SS2 in terms of the impacts of not meeting the full housing need and the findings are not robust. Should have a 20% buffer - Additional clause in policy is needed to recognise need for housing and ensure that the Council will approach additional residential proposals positively.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	In line with the requirements of the NPPF, the Council has presented clear evidence to demonstrate that all potential development sites have been positively tested. There are no sites that are suitable, available and deliverable that haven't been allocated for development. See Topic Paper 2 (Land Outside the Built Up Area) for reference to Chatsmore Farm. The SA has assessed the impact of Policy SS2 as part of the likely significant effects of the Plan. The appraisal findings can be found in Appendix D. Whilst the appraisal acknowledges that the level of development set out by this policy falls significantly below the levels of housing need identified, it is considering the effects of the Plan from the baseline. Therefore despite the shortfall the Plan is still considered to have some positive effect as a result of the allocations made. The option of not meeting the identified housing need was not tested as the only reasonable option to comply with the NPPF is to meet the local housing need as far as possible. It is agreed that, in line with recent guidance and advice, the Council should apply a 20% buffer. The figures (and related Housing Land Supply) set out in the Housing Implementation Strategy will be updated accordingly.
3	SS2	Development sites	SGN support the inclusion of the former gasholder site as part of Allocation A10. Worthing's housing need is in a more precarious position to its employment land need. Council should offer greater balance between the two through a mixed-use scheme. Council to reconsider the development potential of draft allocation A10.	SDWLP-68	Carter Jonas (On behalf of Southern Gas Networks)	No	It is not considered appropriate to amend the proposed mix of uses (see more detailed response to Allocation A10)
3	SS2	Development sites	Unsound, as it fails to deliver an appropriate strategy to meet forecasted needs. Council has not proportionately considered the available evidence to reach its conclusion on a suitable balance. Council has not maximised the effectiveness if the draft WLP and its potential to deliver a greater target within the plan period.	SDWLP-68	Carter Jonas (On behalf of Southern Gas Networks)	No	Clear and robust evidence has been used to inform the WLP and a careful balance has then been struck between allocating sites for development and protecting the most environmentally sensitive areas. A further balance has then been struck to ensure that, for development sites, the plan delivers the appropriate mix of uses (particularly residential and employment uses). In part, this has been influenced by the character and location of the specific sites / opportunities available.
3	SS2	Development sites	The site selection process is entirely opaque, unjustified, ineffective and meeting housing needs and not positively prepared. The SA relies on the Landscape and Ecology Study which does not consider the correct portion of Chatsmore Farm. The SA is not clear in how sites have been assessed and these findings incorporated.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	Given the need to comply with national policy in meeting local housing need all available sites suitable for development have been allocated. The decision of whether or not a site is considered suitable has been informed by robust evidence studies and clear justification has been provided (and reported) at every appropriate stage of Plan preparation. The Landscape and Ecology Report (2015) positively tested the potential development of all the site and also the partial development of some of the site which recognised the western parcel of the site was less sensitive. Following representations from site promoters and the need for a positive, 'no stone unturned' approach to identifying suitable development sites the Council then requested further review of three sites (including part of Chatsmore Farm) which the original 2015 study judged to be 'low' suitability. Our Consultants (HDA) were also subsequently commissioned to assess the application for development at Chatsmore Farm (AWDM/1264/20) and concluded it would result in substantial adverse landscape and visual effects on the local area and landscape setting to the National Park, Highdown Hill scheduled Monument and the conservation area and the sea views from the National Park; and substantially close the gap between Goring by Sea and Ferring adversely affecting the separate identities of the settlements. In summary, it is clear that the whole site has been carefully considered through evidence (including the SA). Subsequently, the partial and incremental development of parts of the site have also been assessed, including the area which is the subject of the application for development made in 2020.
3	SS2	Development sites	Council need to explore all available sites in the Borough and allocate more land for housing: there are sites that are suitable, available and deliverable that are capable of contributing to the Councils unmet housing need. It is in this context, that the allocation of part of the land at Sea Lane, Worthing is put forward as a deliverable site for either (a) housing and open space or (b) the relocation site for Worthing Rugby Club, alongside open space. The precursor to these objectives is removal of the restrictions of both Policy SS5 and SS6.	SDWLP-70	Persimmon Homes	No	The Council has presented clear evidence to demonstrate that all potential development sites have been positively tested and there are no sites that are suitable, available and deliverable that haven't been allocated for development. In addition, the Plan and supporting evidence. Topic Paper 2 (Land Outside the Built Up Area) robustly justifies the approach taken to these areas and related policies SS4 to SS6.
3	SS3	Town centre	Should respond to uncertainty and be more flexible with greater emphasis on para 85a of NPPF	SDWLP-54	WSP (on behalf of NewRiver)	No	It is considered that the WLP establishes clear policies that take a positive approach to the growth, management and adaptation of the town centre. Careful consideration has been given to the drafting of the relevant policies to ensure that they are flexible enough to respond to changing demands and circumstances. This is particularly important at a time of great change for town centres.
3	SS3	Town centre	Policy fails to acknowledge importance of biodiversity, additional bullet point suggested.	SDWLP-57	Sussex Wildlife Trust	Yes	Proposals should comply with all relevant policies and requirements set out in the Plan (including CM18 Biodiversity and DM19 Green Infrastructure). However, it is considered appropriate to highlight this requirement within this strategic town centre policy given the likely intensification of development in this area alongside the need to deliver a high quality environment and biodiversity net gain. As such, add a new policy criterion at the end of Policy SS3: g) As part of the development of the Green Infrastructure Strategy the Council will consider opportunities to integrate biodiversity within the town centre to address climate adaptation and ecological connectivity
3	SS3	Town centre	Town Centre - in not meeting local housing need, it will not be possible to maintain the competitiveness of Worthing Town Centre	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	A very positive approach has been taken to development but, as clearly explained within the Plan and supporting evidence, it is simply not possible to meet all needs. Whilst it could be argued that a higher level of growth would better support the economy of the Town Centre this absolutely does not override the very clear and evidenced need to protect environmentally sensitive areas. The Council will continue to support and promote the town centre to ensure that it remains competitive.
3	SS4	Countryside and undeveloped coast	Support	SDWLP-57	Sussex Wildlife Trust	No	Support is noted
3	SS4	Countryside and undeveloped coast	Support	SDWLP-103	Natural England	No	Support is noted

3	SS4	Countryside and undeveloped coast	Countryside - This policy which actively constrains the ability of the Council to respond to the unmet housing need should be deleted.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS4	Countryside and undeveloped coast	Policy SS4 - Support, especially f). Amend policy wording in the light of the proposed changes to paragraph 175 of the NPPF Policy	SDWLP-73	South Downs National Park Authority	Yes	Comments noted. To reflect the proposed revised para 175 of the NPPF, future proof the WLP and provide additional clarity additional wording will be added to the end of SS4 f) Amendment: f) ...and landowners. Any development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape.
3	SS5	Local green gaps	Areas appear correctly identified	SDWLP-01	N/A	No	Support is noted
3	SS5	Local green gaps	It is imperative that protection is given to Worthing's green gaps as identified in the plan.	SDWLP-15	Goring Residents Association	No	Support is noted
3	SS5	Local green gaps	Preservation of Local Gaps and Local Green Space is vitally important to the balance struck between housing and environmental protection - the eastern and western gaps are essential breaks in the otherwise continuous built-up area.	SDWLP-27	Ferring Conservation Group	No	Support is noted
3	SS5	Local green gaps	The boundary to (c) Brooklands Recreation Area and abutting allotments should be amended to exclude land within Southern Water's ownership.	SDWLP-43	Southern Water	Yes	Boundary will be amended (see separate Mapping Extract)
3	SS5	Local green gaps	Objects to designation for the southern part of Goring Gap: - The map includes land within Arun DC who concluded the Gap does not fulfill the requirements for LGS - Council states no buildings but there is a large water pumping station and large raised manholes. - The land has no right of way. Apart from the playing field there is no recreational use or access - The fields make up a large extract of land - The fields have previously achieved a low quality score - Disagree with description of undeveloped coastline	SDWLP-44	Sylvatica Homes	No	Objection noted. The policy approach is considered justified. See Topic Paper 2 - Land Outside the Built Up Area for justification and rationale for the Local Green Gap designation.
3	SS5	Local green gaps	Not sound . Green gaps should only be a consideration where development needs are met	SDWLP-45	House Builders Federation	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS5	Local green gaps	Supports these policies but both should be strengthened and made clearer that development will be resisted in these areas.	SDWLP-57	Sussex Wildlife Trust	No	Although the key aim is to protect these areas as open spaces it is considered that a degree of flexibility is required as there could be exceptional circumstances where some limited development could be supported, for example, to support recreational use of the land or enhanced leisure provision. However, even in these examples the robust criteria embedded in the policy(ies) would provide strong and appropriate safeguards and ensure that the policy objectives are met.
3	SS5	Local green gaps	Supports the protection of Green Gaps particularly on the eastern side of the town providing a narrow but important gap between settlements to avoid coalescence and ensure the separate identity of Worthing and Sompting/Lancing within Adur District.	SDWLP-98	Adur District Council	No	Support is noted
3	SS5	Local green gaps	Support	SDWLP-103	Natural England	No	Support is noted
3	SS5	Local Green Gaps	Support - Delighted to see strong intention to protect the Green Gaps and you have correctly identified at-risk areas which need protection.	SDWLP-01	N/A	No	Support is noted
3	SS5	Local green gaps	Attached as Appendix 1 is a paper outlining the ecological features which make Goring Gap so important for birds.	SDWLP-64	Sussex Ornithological Society	No	Information is noted and will be used to inform future SPDs and work on Biodiversity Net Gain
3	SS5	Local green gaps	Green Gaps - The requirements of this Policy currently conflict with SS4 (which should be deleted) - Policy should be modified to remove reference to exceptional circumstances, the second criterion should be deleted, reference should be made to supporting development proposals that reinforce the separation of settlements and development proposals that increase the opportunities for recreational uses. - Policy should be amended to allow Chatsmore Farm designation.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	The policy approach is considered justified. Whilst the primary aim of the policy is to safeguard the separate characters and identities of different settlements by providing and physical breaks, the policy provides a degree of flexibility as there could be exceptional circumstances where some limited development could be supported, for example, to support recreational use of the land or enhanced leisure provision. It is considered that this provides a positive approach. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS5	Local green gaps	Objection to Policy SS5 and Policy SS6. Object to the designation of Manor Farm (the Goring-Ferring Gap) in this Draft Plan as a Local Gap/ Local Green Space. The overhanging deficit of 10,488 homes makes it profoundly unsound to introduce local greenspace/ local gap designations at this stage.	SDWLP-70	On behalf of Persimmon Homes	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS5	Local green gaps	SS5 & SS6 - reiterates comments made at the Regulation 18 - Landscape Character Assessment	SDWLP-73	On behalf of South Downs National Park Authority	No	Reference to the South Downs Landscape Character Assessment will be referred to in Topic Paper 2 (Land Outside of the Built Up Area Boundary) and any other relevant guidance.
3	SS6	Local green spaces	Worthing Leisure Centre must receive Local Green Space Designation to offer greater protection against housing development. - Marine already has an 83% deficiency in open/green space - Site was gifted via covenant for public and recreational use - high groundwater vulnerability - no local support for housing - traffic congestion is already severe	SDWLP-02	N/A	No	Comments noted. Although there is a long term aspiration to redevelop and enhance the Leisure Centre it is not being allocated for residential development within the emerging Local Plan. Any future development which may affect the loss existing sports and recreation buildings / facilities will have to be considered against criterion c) of Policy DM7 Open Space, Recreation & Leisure. The request for consideration of this site as a Local Green Space (LGS) is acknowledged. However, this parcel of land is of very different character than the three edge of town sites that are being designated as LGS within the WLP. A formal request to designate the 2 areas to the west of the Borough was made by local residents group at the start of the Local Plan Preparation process and Brooklands was promoted by an active 'Friends of' Group. Therefore, due to the timing of this request and the nature of the area in question it is not considered appropriate to designate this area as a LGS within this WLP. However, this area will be assessed through both the Leisure Strategy and the Green Infrastructure Strategy - both of which will help to inform the consideration of this site during the formal review of the WLP (Within 5 years of adoption).
3	SS6	Local green spaces	It is imperative that protection is given to Worthing's green spaces as identified in the plan.	SDWLP-15	Goring Residents Association	No	Support is noted
3	SS6	Local green spaces	Fully support designation of these areas as local green space	SDWLP-18	Transition Town Worthing	No	Support is noted

3	SS6	Local green spaces	Two of the Local Green Gaps are shared with Ferring - strongly support the analysis and protection of these areas. They have intrinsic value as green spaces and are much valued for their peaceful tranquility and wildlife. Goring-Ferring Gap has recently been designated a Local Wildlife Site. Chatsmore Farm has particular 'green' value because of the Ferring Rife.	SDWLP-27	Ferring Conservation Group	No	Support is noted
3	SS6	Local green spaces	Policy unsound as inconsistent with national policy and should be deleted.	SDWLP-45	House Builders Federation	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS6	Local green spaces	Support	SDWLP-103	Natural England	No	Support is noted
3	SS6	Local green spaces	Welcome the designations.	SDWLP-64	Sussex Ornithological Society	No	Support is noted
3	SS6	Local green spaces	SS6 Local Green Space - Contrary to national policy to further limit options given housing shortfall - Chatsmore Farm does not meet criteria	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS6	Local green spaces	Objection to Policy SS5 and Policy SS6. Object to the designation of Manor Farm (the Goring-Ferring Gap) in this Draft Plan as a Local Gap/ Local Green Space. The overhanging deficit of 10,488 homes makes it profoundly unsound to introduce local greenspace/ local gap designations at this stage.	SDWLP-70	On behalf of Persimmon Homes	No	The policy approach is considered justified. In the context of significant development pressure (particularly to meet housing needs) the Council has positively tested the development potential of all edge of town development sites. Six of the nine sites tested in these areas have been allocated for development. Of the remaining sites, strong landscape, biodiversity and ecological evidence demonstrates clearly the need for protection and this position is supported by the vast majority of respondents during Local Plan consultation stages (see Topic Paper 2 - Land Outside the Built Up Area). This approach is compliant with the NPPF and related Planning Practice Guidance.
3	SS6	Local green spaces	SS5 & SS6 - reiterates comments made at the Regulation 18 - Landscape Character Assessment	SDWLP-73	South Downs National Park Authority	No	Reference to the South Downs Landscape Character Assessment will be referred to in Topic Paper 2 (Land Outside of the Built Up Area Boundary) and any other relevant guidance.
3		Whole Chapter	Desperately need housing	SDWLP-03	N/A	No	Noted
4		Whole Chapter	Allocation policies should clarify the requirement for biodiversity net gain on each site and the need to integrate biodiversity within development, especially for brownfield sites.	SDWLP-57	Sussex Wildlife Trust	No	Policy DM18 (Biodiversity) clearly sets out the Council's position. The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording relating to biodiversity within individual site allocations as this would duplicate other parts of the Plan.
4		Whole Chapter	Whilst we acknowledge the supporting Flood Risk Sequential and Exceptions test paper, it is not clear in the emerging local plan as submitted how these sites have been through the process of sequential testing with regard to flood risk, and then ultimately taken forward within this plan.	SDWLP-59	Environment Agency	Yes	See SOCG. To clearly signpost the process sequential testing with regard to flood risk and to demonstrate that the sequential test has been passed within the Local Plan the following modification is proposed to paragraph 4.1 of the Local Plan: 4.1 All sites included in this section have been assessed in detail through the Council's Strategic Housing Land Availability Assessment (SHLAA) and, the Local Plan Sustainability Appraisal, and the SDWLP Flood Risk Sequential and Exception Test. Supported by these documents and other evidence, a conclusion has been reached that they should be allocated for development. The sequential test concluded that the majority of sites are located in Flood Zone 1 and these are the most sequentially preferable. However due to the limited number of sites available, to ensure that every effort has been made to meet Worthing's full local housing need as far as is practicable and reasonable, all suitably available sites are required including those at risk of flooding. Even with these there is still insufficient capacity to meet Worthing's full local housing need. Therefore it is considered that all the above sites pass the sequential test, as required by the NPPF.
4	A1	Beeches Avenue	Development ought to go ahead if the only real argument against it is the residents do not want it.	SDWLP-03	N/A	No	Noted
4	A1	Beeches Avenue	New developments should deliver the highest renewable standards	SDWLP-03	N/A	No	The Council has sought to prepare a Plan that responds to the Climate Change emergency (whilst also ensuring policies are deliverable and realistic. Any future development proposals would need to comply with the requirements of the Plan - particularly Policy DM17: Energy.
4	A1	Beeches Avenue	Access via Lyons Farm is impractical as often gridlocked. This and Upper Brighton Road should only be considered if a bypass for Worthing is achieved.	SDWLP-06	N/A	No	Objection noted. Evidence demonstrates that the previously identified constraints relating to access can be overcome / mitigated. There are currently no realistic or deliverable for any by-pass for Worthing. However, in this regard, it should be noted that Highways England have been working closely with key stakeholders to identify a package of potential improvements to the A27. This will help to meet the revised objectives in the government's Road Investment Strategy 2 (RIS2): 2020 to 2025, to improve the capacity and flow of traffic on the A27 from Worthing to Lancing. In the coming months Highways England aim to identify options for an improvement scheme, before holding a public consultation in spring/summer
4	A1	Beeches Avenue	Development would lead to more pollution in this area and infringe on the SDNP	SDWLP-07	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A1	Beeches Avenue	- Unacceptable level of traffic in and out of the site - Car repairers and storage of portable toilets unsuitable near to residential area.	SDWLP-09	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development. It is understood that the car repairers and storage facility will be relocated prior to the development of this site.
4	A1	Beeches Avenue	Welcomes exclusion of the football ground unless/until a suitable replacement site is identified. If included Sport England would object to the loss of playing field unless one of the exceptions was met.	SDWLP-17	Sports England	No	Noted
4	A1	Beeches Avenue	Object to loss of greenfield site and concerns over protection of SPZ	SDWLP-18	Transition Town Worthing	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A1	Beeches Avenue	Development would have a negative impact on already congested Lyons Farm junction and A27 in general. Concerns re Impact on local community if football club relocated, drinking water supplies, loss of green areas.	SDWLP-19	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.

4	A1	Beeches Avenue	- A27 in this location currently has delays, development would bring this to a standstill - would exacerbate current flooding that occurs after rain. - would have a negative impact on our countryside and habitat - Consideration should instead be given to brownfield sites - conserve and protect green spaces such as this"	SDWLP-21	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A1	Beeches Avenue	- Using Beeches Avenue and the Football Club as an access road would be a disaster. The extra traffic will cause chaos along the A27 and A24 - Pedestrians will find it impossible to access local amenities south of the A27 safely - Building on this elevated site will have adverse impacts on views in and out of the AONB	SDWLP-40	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A1	Beeches Avenue	Concerned to see this site proceed to the Regulation 19 consultation as an allocation. We seek clarity on what evidence has been brought forward that has seen this biodiversity reasoning dismissed.	SDWLP-57	Sussex Wildlife Trust	No	In 2018 the Beeches Avenue opportunity was included in the Draft Local Plan as an Omission site - these were sites where, in principle, a level of development might be acceptable. However, for the reasons set out for each site, the Council reached a conclusion that, at that stage, sufficient and robust evidence had not been submitted that would provide confidence that the identified constraints could be overcome. For this site, the Draft Plan was clear in that the key constraint was that it not not been demonstrated that suitable vehicular access arrangements could be achieved. Evidence prepared since 2018 now show that the previously identified constraints can be overcome / mitigated - and as such the site is now proposed as an allocation.
4	A1	Beeches Avenue	Policy does not go far enough to protect the integrity of ground water. The policy should ensure the risks are considered upfront and can demonstrate that development will not impact groundwater quality in line with Groundwater Protection: Principles and Practice (GP3)	SDWLP-59	Environment Agency	Yes	See SOCG. To ensure the protection of groundwater and ensure any necessary risk assessments are undertaken the following modification is proposed to development requirement f): f) Provide a Sustainable Urban Drainage System (SuDS) that includes measures to protect has been informed by a hydrogeological risk assessment to ensure and demonstrate the system does not pose an unacceptable risk to groundwater quality for drinking water in line with Position Statement G10 of Groundwater Protection: Principles and Practice (GP3).
4	A1	Beeches Avenue	Sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan.	SDWLP-103	Natural England	No	Comments noted. It is considered that the Development Requirements as drafted (alongside other policies in the Plan) provide adequate protection against potential harm to the National Park and other environmental assets in close proximity to this site.
4	A1	Beeches Avenue	Beeches Avenue - supports the Development Requirements, in particular points a), b), d) and e). The comments about the design being led by landscape character are reiterated	SDWLP-73	South Downs National Park Authority	No	Reference to the South Downs Landscape Character Assessment will be referred to in Topic Paper 2 (Land Outside of the Built Up Area Boundary) and any other relevant guidance. Furthermore, an amendment is proposed to WLP policy SS4 to state that development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape. This change will provide additional clarity and bring the Plan in line with the proposed wording changes in the NPPF. This, along with the Development Requirements set out in policy A1, are considered to provide adequate and robust guidance / protection.
4	A1	Beeches Avenue	A1 Beeches Avenue - Would exacerbate existing drainage issues and lead to more flooding - Degrade dark skies status of SDNP and impact bats and owls - Access onto A27 is unsustainable and Lyons Farm is often at gridlock.	SDWLP-08	N/A	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape Study and a Transport Study) were used to assess all potential sources including Beeches Avenue. While it is acknowledged there are some site constraints (as documented on page 73) it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development.
4	A2	Caravan Club, Titnore Way	Concerns about this allocation particularly the cumulative impact on the Titnore and Goring Woods Local Wildlife Site (LWS) complex leading to unacceptable impacts contrary to policy DM18 Biodiversity and the NPPF.	SDWLP-57	Sussex Wildlife Trust	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies were used to assess all potential sources including the Caravan Club site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 75), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. It is not considered that the allocation is in conflict with DM18 or the NPPF.
4	A2	Caravan Club, Titnore Way	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	See SOCG. To clearly signpost the exception test work that has been undertaken the following modification is proposed which inserts an additional bullet point under the site constraints list: • was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). The SFRA identifies the eastern section of the site as being at a high risk of groundwater flooding. This site To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modification is proposed to amend criteria b), and replace criteria c) as follows: b) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding and maintain a suitable buffer to the lake. c) A site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.
4	A2	Caravan Club, Titnore Way	Sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan.	SDWLP-103	Natural England	No	Comments noted. It is considered that the Development Requirements as drafted (alongside other policies in the Plan) provide adequate protection against potential harm to the National Park and other environmental assets in close proximity to this site.
4	A2	Caravan Club, Titnore Way	Caravan Club, Titnore Way believe the extent of degradation and eventual loss of ancient woodland in the LWS would be significant, unacceptable and in direct conflict with Policy DM18, d) and e).	SDWLP-64	Sussex Ornithological Society	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies were used to assess all potential sources including the Caravan Club site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 75), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. It is not considered that the allocation is in conflict with DM18.
4	A2	Caravan Club, Titnore Way	Comments at Reg 18 are reiterated regarding the supply of visitor accommodation and the need to ensure that support is given to the visitor economy in and around the National Park	SDWLP-73	South Downs National Park Authority	No	The current proposals (see criterion g) would help to ensure that the redevelopment of part of this site will help to protect, support and enhance the continued use of the land to the north as a caravan site.
4	A3	Centenary House	We do not feel that the development requirement section uses its potential to recognise the role this site could have in enhancing Green Infrastructure.	SDWLP-57	Sussex Wildlife Trust	No	Paragraph 4.8 explains that proposals to develop the allocated sites will need to comply with all relevant policies in the Plan. Policies DM18 (Biodiversity) and DM19 (Green Infrastructure) are particularly relevant to this request. The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording relating to green infrastructure.
4	A5	Decoy Farm	Allocation A5 Decoy Farm should be amended to recognise the constraint that the GSK pipelines present to future development.	SDWLP-42	Lichfields (on behalf of GSK)	Yes	Comments are noted and it is agreed that the development requirements should be amended to refer to the GSK effluent pipelines. Amend criterion j) to say: j) ensure layout is planned to ensure future access to existing water and/or wastewater infrastructure for maintenance and upsizing purposes (this includes the two effluent pipelines which run along the northern boundary) Phase occupation to....."

4	A5	Decoy Farm	Capacity should be amended to a minimum of 14,000 sqm. Supporting text should be amended to update latest position.	SDWLP-55	WSP (on behalf of Worthing Borough Council)	Yes	Further more detailed work has been undertaken to understand the site constraints and related development potential of this site as a consequence amend 'Indicative Capacity' to: Minimum of 18,000 14,000 sqm employment land (Note - this will result in the corresponding change needing to be made to the site allocations table (SS2) To update latest position update the following: Para 4.20 - third sentence - Remediation of the site is due to commence at the end of 2020 including was completed at the end of March 2021 and this included removal of..... Para 4.21 - third sentence - Current access for the site is from Decon Way Dominion Way which is accessed via Dominion Way .
4	A5	Decoy Farm	Indicative capacity states a minimum for the commercial space, this term has not been used in the other allocations and we seek clarity on its use here. Policy wording should be amended to make clear the need to deliver net gains for biodiversity and follow mitigation hierarchy.	SDWLP-57	Sussex Wildlife Trust	No	Paragraph 4.8 explains development requirements as usually a 'minimum'. Therefore, for consistency, the indicative capacity will be amended to remove the words 'Minimum of'. In this context, it should be noted that the indicative capacity for this site has been reduced from 18,000 sqm to 14,000 sqm employment land. (See response above). The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording to refer to biodiversity net gains
4	A5	Decoy Farm	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	See SOCG. To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modifications are proposed to the fourth site constraint and development requirement d): <ul style="list-style-type: none"> The Teville Stream (partially culverted) and a number of watercourses run along the site boundaries. There The SFRA identifies areas of Flood Zone 3 associated with these and that small parts of the site are at a high risk of surface and groundwater flood risk. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). <p>d) demonstrate how flood risk will be safely managed across the lifetime of the development, taking climate change into account, and not increased elsewhere; A site specific Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
4	A5	Decoy Farm	We would welcome discussion as to how the HWRS can be ensured that no safeguarding issues arise through the allocation and future development of Decoy Farm, and that future site reorganisation or expansion, if required, would not be prohibited.	SDWLP-61	On behalf of WSCC	Yes	The current Waste Plan relevant to Worthing is the West Sussex Waste Plan 2014 - this was reviewed in 2019 when it was concluded that the plan remains relevant and effective. To meet identified needs the Waste Local Plan allocates new sites and plans for extensions at existing facilities. The Decoy Farm site is not identified in this Plan for any extension. As such, it is not considered appropriate or necessary to safeguard any additional area of land within the A5 allocated area for this purpose, particularly as plans to develop the site are well advanced (remediation works have been completed, a business case is being developed and it is expected that an outline planning application will be submitted by the end of 2021). It is proposed that the following amendments are made to provide additional clarity that that development doesn't Decoy Farm should not prevent or prejudice the operation of the household waste recycling site: Amend 5th bullet point of 'Site Constraints' as follows: * Directly adjoins the boundary of the Household Waste Recycling Site which is safeguarded through the West Sussex Local Plan. The West Sussex Waste Local Plan requires the safeguarding of existing waste sites from other non-waste development which may prevent or prejudice their continued operation for such purposes. Amend criterion f) of the Development Requirements as follows: f) minimise impacts on nearby residential properties; protect the continued operation (and possible future reconfiguration / intensification) of the adjacent household waste recycling site;
4	A5	Decoy Farm	Decoy Farm - bullet point k) replaced by the following: k) Deliver biodiversity net gain on site and if this is not possible deliver an off site solution instead.	SDWLP-64	Sussex Ornithological Society	No	Policy DM18 (Biodiversity) clearly sets out the Council's position. The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording relating to biodiversity as this would duplicate other parts of the Plan.
4	A6	Fulbeck Avenue	Object due to loss of greenfield site, effects on flood protection and proximity to Local Wildlife Site	SDWLP-18	Transition Town Worthing	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Flood Risk Assessment and Landscape & Biodiversity Study) were used to robustly assess all potential sources including Fulbeck Avenue. While it is acknowledged there are some site constraints as documented on page 83, it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A6	Fulbeck Avenue	Concerns about this allocation particularly the cumulative impact on the Titnore and Gorring Woods Local Wildlife Site (LWS) complex leading to unacceptable impacts contrary to policy DM18 Biodiversity and the NPPF.	SDWLP-57	Sussex Wildlife Trust	No	Concerns noted. It is acknowledged there are some site constraints as documented on page 83, it is considered that the development requirements provide the necessary safeguards to address any negative impacts of development. Any future development proposal would also need to comply with the requirements of Policy DM18: Biodiversity and DM19: Green Infrastructure.

4	A6	Fulbeck Avenue	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	<p>See SOCG. To provide clarity around the exception test the following modification is proposed which amends the third bullet point under the site constraints list and inserts an additional bullet point:</p> <ul style="list-style-type: none"> • The site would be at risk from a breach scenario at Somerset Lake and failure of the flood storage facility to the north. These parts within an area with a high chance of flooding from surface water and at medium risk of groundwater flooding have previously caused flooding in the local area. The SFRA shows a small section of the site in the north and centre is located within Flood Zone 3b. A further northern section of the site is also located within Flood Zone 3a and parts of the site are at a high risk of surface water flooding and groundwater flooding. The SFRA also found that Somerset Lake posed a risk to the site in event of breach resulting in 38% of the site being affected on a dry day with depths up to 1.4m and on a wet day over half the site affected with depths up to 1.6m. Therefore development in this location would place additional people at risk of flooding. • This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment. <p>To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modification is proposed to amend criteria c) of the development requirements as follows:</p> <p>c) adopt the sequential approach so the most vulnerable uses are located in the areas at lowest risk of flooding. A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
4	A6	Fulbeck Avenue	Sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan.	SDWLP-103	Natural England	No	Comments noted. it is considered that the Development Requirements as drafted (alongside other policies in the Plan) provide adequate protection against potential harm to the National Park and other environmental assets in close proximity to this site.
4	A6	Fulbeck Avenue	Fulbeck Avenue - believe the extent of degradation and eventual loss of ancient woodland in the LWS would be significant, unacceptable and in direct conflict with Policy DM18, d) and e).	SDWLP-64	Sussex Ornithological Society	No	Concerns noted. It is acknowledged there are some site constraints as documented on page 83, it is considered that the development requirements provide the necessary safeguards to address any negative impacts of development. Any future development proposal would also need to comply with the requirements of Policy DM18: Biodiversity and DM19: Green Infrastructure.
4	A7	Grafton	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	<p>See SOCG. To provide clarity around the exception test the following modification is proposed which amends the first bullet point of the site constraints list:</p> <ul style="list-style-type: none"> • The majority of the site is in Flood Zone 3. The site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment. <p>To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modification is proposed to replace criteria c) of the development requirements with the following:</p> <p>c) A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
4	A8	HMRC Offices	Support Criterion F to ensure that future proposals coming forward in this allocation do not prevent (or negatively impact), potential development on land adjacent to west. For clarity and consistency (see commentary on Policy A10), the following re-wording is suggested: f) not prevent (or negatively impact) the potential for development on land lying adjacent to the west of the site (Policy A10: Land off Martlets Way including SGN and the Nib Land)	SDWLP-60	Rapleys on behalf of EM Goring LTD	No	It is not considered appropriate to amend the name of allocation 10 therefore there is no need to make a revision here (see more detailed response to Allocation A10)
4	A9	Lyndhurst Road	- Allocation will not meet policy requirements for family homes - Site can't deliver the number of units and necessary levels of parking - The indicative number of units should be greatly reduced - Development requirements should include character of surrounding area and nearby conservation areas"	SDWLP-05	N/A	No	See separate response
4	A9	Lyndhurst Road	Welcomes development - it has been a post industrial site for too long	SDWLP-10	N/A	No	Support is noted

4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Overdevelopment of site - Lack of family housing - Contamination - Impact on conservation areas - Lack of packing provision 	SDWLP-11	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Overdevelopment of site - number of dwellings should be reduced - Lack of family housing - doesn't deliver housing mix - Photo in WLP is out of date - Impact on conservation areas / heritage - Lack of packing provision / impact on local road network" 	SDWLP-12	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development for family housing but do not think that the density can be achieved whilst still meeting other policy requirements. - Indicative capacity should be reduced from 150 - Site should provide better mix of housing - Site constraints should be recognised - taking CA and heritage into account - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-13	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development for family housing but do not think that the density can be achieved whilst still meeting other policy requirements. - Indicative capacity should be reduced from 150 - Site should provide better mix of housing - Site constraints should be recognised - taking CA and heritage into account - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-14	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Overdevelopment of site - number of dwellings should be reduced - Lack of family housing - doesn't deliver housing mix - Photo in WLP is out of date - Impact on conservation areas / heritage - Lack of packing provision / impact on local road network 	SDWLP-22	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Decontaminating the site must not compromise the health and safety of local residents - Impact on local road network - Lack of parking will place pressure on the CPZ - Proposed densities will be unable to meet housing mix policy - High rise development is inappropriate for character of area. 	SDWLP-23	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated 	SDWLP-25	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated 	SDWLP-26	N/A	Yes	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced. 	SDWLP-28	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced." 	SDWLP-29	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced. 	SDWLP-31	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced. 	SDWLP-32	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Number of units should be reduced or full impact on local roads and parking needs to be considered - A9 must take into consideration local character and heritage constraints - Insufficient parking - Impact on the amenity of neighbouring residents. - A mix of housing to meet local need must be considered as the right way forward. 	SDWLP-35	N/A	No	See separate response

4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced. 	SDWLP-36	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Proposed density can only be met by a flatted scheme which is contrary to Policy DM1. Indicative number of units should be reduced. - Site description needs to be clearer about heritage and local character constraints. - There is insufficient parking proposed. - Out of date photo should be replaced. 	SDWLP-37	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - One bed flats are not designed for families - A 9 storey development is not in keeping with the area - Park Road and Lyndhurst Road are narrow - Parking is already at a premium, the levels of parking proposed are inadequate. 	SDWLP-38	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Capacity should be increased and opportunities for tall buildings considered to maximise use of this brownfield site. - Reduce level of affordable housing subject to viability assessment - Amend the mix of dwelling with a greater proportion of smaller 1 and 2 bed properties. 	SDWLP-49	ECE (on behalf of St Williams)	No	<p>It is considered that the current indicative capacity figure is appropriate as it would make very efficient use of the available land in this sustainable location. However, as with all sites, it may be that the capacity figure may change (upwards or downwards) as the scheme progresses and the Council is better able to understand any constraints and related design and massing issues and the potential impact that this will have on the surrounding area.</p> <p>There is a significant housing need for all types and sizes in the borough. As such, the Plan (as a whole) seeks to deliver a range of housing types to best meet the identified needs. However, whilst the Council will encourage a mix of housing types on most sites it is not necessarily the case that each development site will deliver housing types to meet all needs. The housing mix expected will be largely dependent on the location and character of the individual site and the indicative capacity figures provided for each allocation respond to this. For example, town centre sites (such as Lyndhurst Rod) and other sites well served by facilities and infrastructure are more suited to higher density (predominantly 1 and 2 bed) flatted developments (which could include tall buildings) than the edge of town sites which are more likely to deliver family housing. As allocated sites come forward for development the Council will use all relevant policies within the WLP to ensure that the site delivers the most appropriate development to meet identified needs whilst respecting the character of the surrounding area. This approach is also outlined in para 5.8 and a modification is suggested to the policy DM1 criteria a) to make this clearer.</p> <p>The Council's approach to viability and affordable housing is clearly set out in the policy and is one that is supported by an associated Developer Contributions SPD (which will be updated after WLP adoption). It is accepted that there may be additional and significant costs associated with the remediation of this former gas holder site. However, as with all allocations, the firm expectation is that the developments will fully comply with the provisions of policy DM3 unless the Council is satisfied that robust financial evidence (through an open book approach) exists that demonstrates that this would make the scheme unviable. As such, it would be premature to make the suggested modification now and there is no need to amend this text.</p>
4	A9	Lyndhurst Road	Allocation requirements does not stipulate the need to integrate biodiversity.	SDWLP-57	Sussex Wildlife Trust	No	Paragraph 4.8 explains that proposals to develop the allocated sites will need to comply with all relevant policies in the Plan. Policies DM18 (Biodiversity) and DM19 (Green Infrastructure) are particularly relevant to this request. The Plan should be read as a whole so, as such, it is not felt necessary to amend the wording.
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-74	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-75	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-76	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-77	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Development will block light - Increase in congestion (With impacts on Worthing Hospital) - Insufficient parking provision - Area is suitable for housing but must be sympathetic to local area 	SDWLP-78	N/A	No	See separate response

4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-79	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> Site promoter will seek a higher density than proposed Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-80	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-81	Kingshall Residents	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Impact on light and overlooking - Not in keeping with character - Insufficient parking provision - Traffic congestion and impact on health - Contaminated land - Won't be able to move as will not be able to sell - In a lockdown / timing is wrong - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - High rise development is inappropriate for character of area - Picture in Plan needs to be updated 	SDWLP-82	L Leggatt & T Barlow	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-83	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-84	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-85	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-86	N/A	No	See separate response

4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-87	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-88	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-89	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-90	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport - Development needs to be sensitive to the current buildings and overall character 	SDWLP-91	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-92	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-93	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-94	N/A	No	See separate response
4	A9	Lyndhurst Road	<ul style="list-style-type: none"> - Support development of site but at lower capacity - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-95	N/A	No	See separate response

4	A9	Lyndhurst Road	<p>Support development of site but at lower capacity</p> <ul style="list-style-type: none"> - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-96	N/A	No	See separate response
4	A9	Lyndhurst Road	<p>Support development of site but at lower capacity</p> <ul style="list-style-type: none"> - Should provide greater housing mix (inc family housing) - Site constraints (e.g. heritage) should be referred to consistently and should influence capacity - Impact on local road network - Lack of parking will place more pressure on the CPZ - High rise development is inappropriate for character of area. - Contamination works should not impact on local residents - Picture in Plan needs to be updated - Proposals should provide sufficient parking and other measures to encourage sustainable transport. 	SDWLP-97	N/A	No	See separate response
4	A9	Lyndhurst Road	Concerned about the impact on health and safety due to former development use (chemicals). Potentially significant levels of contamination. Inspector should examine the suitability of the site. Question whether an alternative use for this site should be considered.	SDWLP-102	Worthing Society	No	See separate response. Alternative uses have previously been proposed for this site - for example, the Core Strategy identified this site for a mixed use residential / commercial / retail development. However, given the changing dynamics of retail and the town centre economy it is no longer appropriate to plan for a more extensive town centre or enlarge retail offer. As such, and given the very significant levels of housing need, the Council is now of the view that residential development represents the most appropriate use for this site (particularly with viability considerations in mind).
4	A10	Martlets Way	<p>General principles are supported</p> <ul style="list-style-type: none"> - the name of the site in Policy A10 should include reference to both SGN's land – i.e., the former gasholder site and the 'Nib land - the policy should confirm that SGN's land should not be accessed over the HMRC and "Nib" sites - there should be a caveat that each proposal's site-specific circumstances (for example any physical constraints, feasibility, and viability) shall be considered where necessary. 	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	<p>A key aim of this allocation is that development of any parcel of land within this area does not prevent or prejudice the development potential of neighbouring areas. With the main focus of this allocation being the delivery of employment land as an extension to the Goring Business Park (with main access from the west) it is considered that the name of the allocation is still appropriate and there is no need to amend it. The role that that 'nib' land could play in helping to bring forward the comprehensive development of this site is explained in para 4.32.</p> <p>As explained in the response below, the Council is of the view that the SGN site should deliver employment uses. Criterion a) clearly explains that employment development should be accessed from the west. As such, with regards to access, it is not considered necessary to provide any reference to the 'nib' or the HMRC site.</p> <p>When the Council considers proposals for any site allocation the physical constraints, feasibility, and viability of the opportunity in question will be taken into account. There is no justification for including specific reference to this for this allocation.</p>
4	A10	Martlets Way	Martlets Way Council should opt to define a fixed housing target for draft Allocation A10, in combination with employment use as part of a mixed-use development. Believe the Council could do more to recalibrate the balance between housing and employment provision on the site, emphasising and delivering mixed-use development on the site. It is not an appropriate or justified approach to deliver solely a defined employment land target for site. Council has not chosen to optimise the potential density of the site. Not taken the appropriate opportunity to promote sustainable transport modes.	SDWLP-68	Carter Jonas (On behalf of Southern Gas Networks)	No	<p>To help meet identified employment needs it has been a long held objective to deliver new employment uses that will extend the existing employment designation. The most logical areas to extend into, using existing transport links (from the west), are located directly to the south and east of the existing site. This includes the former gas holder site. With the future use of this land in mind it is noted that the costs involved in remediating contamination of this former gas holder are likely to be significantly lower for employment uses compared to the cost of the works required to allow for residential use. A key aim remains that development of any parcel of land within this area does not prevent or prejudice the development potential of neighbouring areas.</p> <p>Given the lack of opportunities to deliver new or extended employment provision it is vital that the sites that are most suited to these uses deliver new and enhanced employment provision. This in turn will help to ensure that the Plan provides the appropriate balance between housing and employment growth.</p> <p>The representation argues that there is an overprovision of employment land and that, given the level of housing need, there should be a recalibration that would deliver a mixed use development that better balanced employment and housing need. Using the Employment Land Review's preferred job growth scenario the SDWLP does indicate an overprovision of 5,230 sqm. However, in this regard, it should be noted that this included an allowance for 18,000sqm to be delivered at Decoy Farm. As reported under A5 above, further more detailed work has been undertaken to understand the site constraints and related development potential of Decoy Farm and as a consequence the indicative capacity has been reduced to 14,000 sqm employment land. This therefore means that there is now only a slight overprovision of employment land when using the job growth scenario. The Council considers it important to retain some flexibility given a number of uncertainties including the introduction of Use Class E and the extension of permitted Development Rights. As such, it is not considered appropriate to revise the current proposed land uses for this allocation.</p>
4	A11	Stagecoach, Marine Parade	Capacity should be increased to a minimum of 95 units and commercial floorspace	SDWLP-50	Montagu Evans LLP (On behalf of Stagecoach South Ltd)	No	The site description, site constraints and development requirements all highlight the sensitive nature of this site in terms of the potential impact on heritage assets (Conservations Areas and List Buildings). As such, an indicative capacity of 60 dwellings (and 2,000 sqm) of commercial space is considered to be appropriate for this site. However, as with all sites, the indicative capacity figures should usually be considered as a minimum (see para 4.8). As such, the Council is likely to look favourably at a scheme that delivers a high level of development if it can be shown that it would protect and enhance heritage assets and comply with other relevant policies.

4	A11	Stagecoach, Marine Parade	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	<p>See SOCG. To provide clarity around the exception test the following modification is proposed which amends the first bullet point of the site constraints list:</p> <ul style="list-style-type: none"> one 3. Parts of the site lie within Flood Zone 3 the site is therefore at a high risk of coastal flooding and the SFRA states that climate change will have a significant impact on this site with Flood Zone 3 covering the whole site in the future. Therefore development in this location would place additional people at risk of flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). This concluded that both parts of the Exception Test had been satisfied for the site to be allocated. At the planning application stage Part b) of the Exception Test will need to be reapplied to take into account more detailed information about the proposed development and the specific mitigation proposed through a site specific Flood Risk Assessment. <p>To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modification is proposed to replace criteria c) of the development requirements with the following:</p> <p>c) A site specific Flood Risk Assessment should consider all sources of flooding and demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk.</p>
4	A12	Teville Gate	<p>- Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.</p> <p>- Any development around the station area should take into account the culverted watercourse that runs through the site and has historically resulted in flooding. The course and capacity of this should be taken into account. Opportunities where appropriate to de-culvert and create a biodiversity net gain should be sought.</p>	SDWLP-59	Environment Agency	Yes	<p>See SOCG. To clearly signpost the exception test work that has been undertaken the following modification is proposed which replaces the second bullet point under the site constraints list:</p> <ul style="list-style-type: none"> The SFRA shows 1/3 of the site is at a high risk of surface water flooding. This site was included in the SDWLP Flood Risk Sequential and Exception Test which was informed by the Level 2 SFRA (2020). <p>To more clearly highlight the outputs of the Level 2 SFRA for this site, the following modification is proposed to replace criteria c) as follows:</p> <p>c) A site specific Flood Risk Assessment should demonstrate that the development will be safe for it's lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall. This should include the measures identified in the Level 2 SFRA (2020) and a SuDS scheme to provide mitigation and opportunities to achieve a reduction in overall flood risk and protect water quality.</p> <p>To ensure the opportunity is identified and considered to de-culvert any onsite watercourses the following modification is proposed as an additional development requirement:</p> <p>g) Any development around the station area should take into account the culverted watercourse that runs through the site and has historically resulted in flooding. The course and capacity of this should be taken into account. Opportunities where appropriate to de-culvert and create a biodiversity net gain should be sought.</p>
4	A13	Titnore Lane	Do not support due to proximity to ancient woodland, impact on landscape character and impact on Local Wildlife Site	SDWLP-18	Transition Town Worthing	No	<p>Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Ecology Study) were used to assess all potential sources including this site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 97), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. In particular, it should be noted the proposed density of development in this location is significantly lower than for other sites - this reflects the sensitive nature of the surrounding areas and the need to provide appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site.</p>
4	A13	Titnore Lane	<p>- Support inclusion of allocation and consider that the site allocation requirements can be complied with</p> <p>- Local Plan has an indicative capacity of 60 (this falls below the minimum density of 35dph). This should be stated as a minimum and if it is demonstrated that a greater number of units could be developed in an acceptable manner this should be considered appropriate.</p> <p>- We expect development on this site to commence within a quicker time frame.</p> <p>- Suggest Expected Delivery is changed to 0-5 years.</p> <p>- Criteria should be renumbered to correct typo</p>	SDWLP-33	Tetra Tech Planning (on behalf of Clem Somerset)	Yes (in part)	<p>It is acknowledged that the proposed density of development in this location is significantly lower than for other sites and is lower than the proposed development densities set out in policy DM2. However, it is considered appropriate to take a more cautious approach for this site and the suggested capacity reflects the sensitive nature of the surrounding areas and the need to provide significant and appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site. However, whilst it is considered appropriate to retain the existing capacity figure it is also acknowledged that as plans for this site are advanced a higher level of housing delivery may be deemed to be acceptable but this will be dependent on fully and robustly meeting the development requirements for this sensitive site. Given the high levels of housing need in the borough the Council will welcome proposals that could increase supply but that should not be at the expense of environment assets.</p> <p>The Council note the request to bring the expected delivery timescale forward (from 6-10 years to 0-5 years). Given the environmental work required to bring this site forward the Council still considers the 6-10 year timescale to be appropriate. However, providing all development requirements can be met there is no reason that would prevent the site coming forward for development in advance of this. This will be kept under review within the Annual Monitoring Report and related Housing Land Supply Assumptions.</p> <p>The typo is acknowledged and the criteria set out in the development requirements will be corrected so that they run from a) to j) rather than from a) to i) as currently shown.</p>
4	A13	Titnore Lane	SWT object to the allocation of this greenfield site. The allocation and development of this site would inevitably result in deterioration of the ancient woodland contrary to national policy.	SDWLP-57	Sussex Wildlife Trust	No	<p>Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Ecology Study) were used to assess all potential sources including this site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 97), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. In particular, it should be noted the proposed density of development in this location is significantly lower than for other sites - this reflects the sensitive nature of the surrounding areas and the need to provide appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site. As a minimum, the development will need to provide a buffer of 15m to the Ancient Woodland (which is in line with the Government's Standing Advice).</p>
4	A13	Titnore Lane	Concerns re proximity to Ancient Woodland and recommend a 50m buffer	SDWLP-58	Woodland Trust	No	<p>Development proposals will have to demonstrate that they will not have a negative impact on Ancient Woodland. The development requirements established in allocation A13 requires a 20m buffer to Ancient Woodland which exceeds the Government's advised 15m buffer set out in their standing advice.</p>

4	A13	Titnore Lane	Further clarity is needed around the sequential test process, if relevant the exception test and the addition of the measures identified in the SFRA level 2 to be included as part of a site specific flood risk assessment.	SDWLP-59	Environment Agency	Yes	See SOCG. To ensure any flood risk is properly assessed the following modification is proposed to development requirement h): h) Adopt the sequential approach to site layout so the most vulnerable development types are located in the areas of lowest flood risk first, taking account of all sources. Should any development classified as a more vulnerable use be located in Flood Zone 3 the Exception Test must be applied. A Flood Risk Assessment should demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall;
4	A13	Titnore Lane	Suggested that there is reference to the importance of Titnore Lane itself as a strategic connection to the wider network.	SDWLP-61	On behalf of WSCC	Yes	Paragraph 4.37 - add sentence (after 1st sentence) as follows: the west and north. Titnore Lane itself is a strategic connection to the wider network of the A280 (via Clapham) and the A27. The site is
4	A13	Titnore Lane	Not sound. Object. Significant pressure on Local Wildlife Site. Concerned that buffer is not adequate. Not satisfied that the proposed landscape buffer will adequately protect the 'setting' of the national park. High probability of flooding. More work has to be done on a total catchment basis to validate the drainage sustainability of the Titnore site. Remove allocation.	SDWLP-63	CPRE	No	The Development Requirements b), c) and d) for site A13 Titnore Lane seek to ensure there is no loss or deterioration of Ancient Woodland, that a 20m buffer is provided in line with the Planning Practice Guidance and ensure the integrity of habitats associated with the Local Wildlife Site. Development requirement f) seeks to conserve the setting of the National Park by enhancing visual screening. Very small areas of the site (less than 5%) are affected by flooding. Development requirement h) aims to ensure development is not located in these areas through the sequential approach. In addition a modification has been proposed (See response to SDWLP-59) to strengthen this requirement, ensure any flood risk is properly assessed and clarify requirements for the Exception Test.
4	A13	Titnore Lane	Titnore Lane - object. Such degradation would be contrary to policy DM18, para d) and e). Delete allocation. Note that no compensatory mitigation strategy is proposed.	SDWLP-64	Sussex Ornithological Society	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Ecology Study) were used to assess all potential sources including this site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 97), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. In particular, it should be noted the proposed density of development in this location is significantly lower than for other sites - this reflects the sensitive nature of the surrounding areas and the need to provide appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site.
4	A13	Titnore Lane	Titnore Lane Comments at Reg 18 are reiterated Support the Development Requirements, in particular points b) and e). Suggest that Point a) reference is also made to the document 'Roads in the South Downs'; in point e) additional wording is used to emphasise that any new green corridors "are of sufficient nature and scale to be effective routes for wildlife". Future proposals for the site should use a landscape led approach with reference to the updated South Downs Landscape Character Assessment (LCA) 2020 (Appendix B)	SDWLP-73	South Downs National Park Authority	Yes (in part)	Reference to the South Downs Landscape Character Assessment will be referred to in Topic Paper 2 (Land Outside of the Built Up Area Boundary) and any other relevant guidance. Furthermore, an amendment is proposed to WLP policy SS4 to state that development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape. This change will provide additional clarity and bring the Plan in line with the proposed wording changes in the NPPF. Whilst the site promoter will be encouraged to refer and respond to all relevant guidance it would be somewhat misleading to refer specifically to a document titled 'Roads within the South Downs' when this site is not located within the National Park. However, the policy and supporting text clearly acknowledge and highlight the close proximity of the SDNP and the need to take this environmentally sensitive area into account. Amend criterion e) as follows: '.....gain in biodiversity. Any new green corridors should be of sufficient nature and scale to be effective routes for wildlife. Any new-trees removed
4	A13	Titnore Lane	This site should be left as countryside. Landscape consultant has indicated that a less intensive land use may be appropriate. In our view this leaves the door open for what in our view would constitute inappropriate development.	SDWLP-102	Worthing Society	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Ecology Study) were used to assess all potential sources including this site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 97), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. In particular, it should be noted the proposed density of development in this location is significantly lower than for other sites - this reflects the sensitive nature of the surrounding areas and the need to provide appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site.
4	A13	Titnore Lane	Sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan. Development at this site will need to consider any impacts on the nearby ancient woodland and ancient/veteran trees.	SDWLP-103	Natural England	No	Objection noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Ecology Study) were used to assess all potential sources including this site. While it is acknowledged there are some site constraints and sensitivities (as documented on page 97), it is considered that the development requirements provide the necessary safeguards to address any potential negative impacts of development on the environment. In particular, it should be noted the proposed density of development in this location is significantly lower than for other sites - this reflects the sensitive nature of the surrounding areas and the need to provide appropriate buffers to Ancient Woodland / SDNP and Local Wildlife Site. An amendment is proposed to WLP policy SS4 to state that development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape. This change will provide additional clarity and bring the Plan in line with the proposed wording changes in the NPPF. This, along with the Development Requirements set out in policy A13, are considered to provide adequate and robust guidance / protection.
4	A15	Upper Brighton Road	Access via Lyons Farm is impractical as often gridlocked. This and Beeches Avenue should only be considered if a bypass for Worthing is achieved.	SDWLP-06	N/A	No	Objection noted. Evidence demonstrates that the previously identified constraints relating to access can be overcome / mitigated. There are currently no realistic or deliverable for any by-pass for Worthing. However, in this regard, it should be noted that Highways England have been working closely with key stakeholders to identify a package of potential improvements to the A27. This will help to meet the revised objectives in the government's Road Investment Strategy 2 (RIS2): 2020 to 2025, to improve the capacity and flow of traffic on the A27 from Worthing to Lancing. In the coming months Highways England aim to identify options for an improvement scheme, before holding a public consultation in spring/summer 2022.
4	A15	Upper Brighton Road	Do not support due to proximity to National Park, loss of greenfield/agricultural land, reduction in gap between Worthing and Sompting and impact on Conservation Area.	SDWLP-18	Transition Town Worthing	No	Objection is noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Biodiversity Study which assessed potential impacts on the setting of the SDNP) were used to robustly assess all potential sources including land at Upper Brighton Road. However, it is accepted that this is a greenfield site with some constraints as documented on page 101. Supported by robust evidence it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A15	Upper Brighton Road	We do not support the allocation of this strategically placed Local Green Gap. The allocation will narrow the existing undeveloped gap and we suggest that it would be more beneficial for the site to progressing as part of the Local Green Gap and to resist its development.	SDWLP-57	Sussex Wildlife Trust	No	Objection is noted. The land in question does not currently fall with a designated Local Green Gap. However, it is accepted that this is a greenfield site with some constraints as documented on page 101. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Biodiversity Study) were used to assess all potential sources including land at Upper Brighton Road. Supported by robust evidence it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.

4	A15	Upper Brighton Road	Sites must be designed to conserve and enhance the character of National Park and its setting and ensure consistency with the special character and importance of the protected landscape as set out in the SDNP Management Plan.	SDWLP-103	Natural England	No	Objection is noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Biodiversity Study which assessed potential impacts on the setting of the SDNP) were used to robustly assess all potential sources including land at Upper Brighton Road. However, it is accepted that this is a greenfield site with some constraints as documented on page 101. Supported by robust evidence it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A15	Upper Brighton Road	Not sound. Development would mean that the important gap between the existing Worthing BUAB and the village of Sompting will virtually cease to exist. This we believe is a failure in terms of Policy SS1. Do not feel that the cumulative traffic impacts of this allocation have been fully addressed. Remove allocation.	SDWLP-63	CPRE	No	Objection is noted. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Biodiversity Study and Transport Study) were used to robustly assess all potential sources including land at Upper Brighton Road. However, it is accepted that this is a greenfield site with some constraints as documented on page 101. Supported by robust evidence it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development - this includes a sufficient buffer between the development and Sompting to the East.
4	A15	Upper Brighton Road	Upper Brighton Road - we believe that all developments in Local Green Gaps should be resisted, and we do not see anything about this particular allocation suggesting that any exceptional circumstances exist to alter our view that it should be deleted.	SDWLP-64	Sussex Ornithological Society	No	Objection is noted. The land in question does not currently fall with a designated Local Green Gap. However, it is accepted that this is a greenfield site with some constraints as documented on page 101. Given the level of housing need, brownfield sites alone are not sufficient. The SA together with associated evidence studies (including a Landscape & Biodiversity Study) were used to assess all potential sources including land at Upper Brighton Road. Supported by robust evidence it is considered that the development requirements provide the necessary safeguards to address and mitigate any potential negative impacts of development.
4	A15	Upper Brighton Road	Upper Brighton Road - support. There are no impediments to the site's delivery: it is immediately available for development and capable of implementation within the next 12 months.	SDWLP-65	Persimmon Homes	No	Support is noted
4	A15	Upper Brighton Road	Upper Brighton Road See comments made at Reg 18. Supports, in particular, the Development Requirements point b) and d). Future proposals for the site should use a landscape led approach with reference to the updated South Downs Landscape Character Assessment (LCA) 2020 (Appendix A)	SDWLP-73	South Downs National Park Authority	No	Reference to the South Downs Landscape Character Assessment will be referred to in Topic Paper 2 (Land Outside of the Built Up Area Boundary) and any other relevant guidance. Furthermore, an amendment is proposed to WLP policy SS4 to state that development within the setting of the National Park should be sensitively located and designed to avoid adverse impacts on the designated landscape. This change will provide additional clarity and bring the Plan in line with the proposed wording changes in the NPPF. This, along with the Development Requirements set out in policy A1, are considered to provide adequate and robust guidance / protection.
5		All DM Policies	Fully agree with your policies	SDWLP-01	N/A	No	Support is noted
5	DM1	Housing mix	Amend policies (mods proposed) to allow flexibility for schemes on sustainably located sites to be built at higher densities. These include alternative housing mix and consideration of tall and very tall buildings.	SDWLP-49	ECE (on behalf of St Williams)	Yes (in part)	There is a significant housing need for all types and sizes in the borough. As such, the Plan (as a whole) seeks to deliver a range of housing types to best meet the identified needs. However, whilst the Council will encourage a mix of housing types on most sites it is not necessarily the case that each development site will deliver housing types to meet all needs. The housing mix expected will be largely dependent on the location and character of the individual site and the indicative capacity figures provided for each allocation respond to this. For example, town centre sites and other sites well served by facilities and infrastructure are more suited to higher density flatted developments (which could include tall buildings) than the edge of town sites which are more likely to deliver family housing. As allocated sites come forward for development the Council will use all relevant policies within the WLP to ensure that the site delivers the most appropriate development to meet identified needs whilst respecting the character of the surrounding area. This approach is also outlined in para 5.8. However a modification is suggested below to the policy criteria a) to make this clearer. a) In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up to date evidence of housing needs and demands to determine the most appropriate housing mix based on the character and location of the individual site.
5	DM1	Housing mix	- Needs to acknowledge the preferred housing mix may not always be appropriate especially town centre or brownfield sites - M4(2) requirement is not justified	SDWLP-54	WSP (on behalf of NewRiver)	Yes (in part)	There is a significant housing need for all types and sizes in the borough. As such, the Plan (as a whole) seeks to deliver a range of housing types to best meet the identified needs. However, whilst the Council will encourage a mix of housing types on most sites it is not necessarily the case that each development site will deliver housing types to meet all needs. The housing mix expected will be largely dependent on the location and character of the individual site and the indicative capacity figures provided for each allocation respond to this. For example, town centre sites and other sites well served by facilities and infrastructure are more suited to higher density flatted developments than the edge of town sites which are more likely to deliver family housing. As allocated sites come forward for development the Council will use all relevant policies within the WLP to ensure that the site delivers the most appropriate development to meet identified needs whilst respecting the character of the surrounding area. This approach is also outlined in para 5.8. However a modification is suggested below to the policy criteria a) to make this clearer. a) In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up to date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site. The Council consider that the M4(2) requirement is justified based on the growing older population in Worthing and reflective of the current national direction of travel. Government consulted on raising accessibility standards of new homes in September 2020 which included options to make M4(2) mandatory or a minimum standard apart from by exception. The response of this consultation has not yet been published.
5	DM1	Housing mix	Live/work units should not be required to comply with the residential space standard requirements and affordable housing requirements.	SDWLP-56	WSP (on behalf of St Clair Developments)	No	The Council can see no justification in not treating the living areas of live / work units in the same way as other forms of housing for the operation of development policies. Furthermore, no robust evidence has been put forward to demonstrate why a different approach should be taken. The Whole Plan Viability Assessment (WPVA) has assessed the policy requirements and related financial contributions set out in the WLP - this has concluded that, viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. As live / work units are not a particularly prevalent form of development in Worthing these were not specifically tested within the WPVA as it is not realistic to test every potential development scenario. However, the WPVA did assess a wide range of housing developments (in scale and type) and this concluded that, in general, the policy requirements would not impact on development to a degree that would make developments unviable (that otherwise would have been viable). Furthermore, the WPVA builds in an appropriate buffer / margin so that the requirements set out in the WLP are not set at the margins of viability and are able to support development when economic circumstances adjust.

5	DM1	Housing mix	- It should be confirmed that individual site-specific circumstances and viability shall also be considerations - There is currently ambiguity between Criterion C) and supporting policy paragraphs 5.12 and 5.13 in terms of accessible housing, and more specifically what minimum building regulation standards	SDWLP-60	Rapleys On behalf of EM Goring Ltd	Yes (in part)	A modification is suggested to clarify policy criteria a): a) In order to deliver sustainable, mixed and balanced communities, the Council will expect all applications for new housing to consider the most up to date evidence of housing needs and demands to help determine the most appropriate housing mix based on the character and location of the individual site. It is considered that criteria c) is clear in that it sets out a requirement for all new build housing to meet the higher optional standard M4(2) for accessibility. The Council consider that the M4(2) requirement is justified based on the growing older population in Worthing and reflective of the current national direction of travel. Government consulted on raising accessibility standards of new homes in September 2020 which included options to make M4(2) mandatory or a minimum standard apart from by exception. The response of this consultation has not yet been published
5	DM1	Housing mix	Housing Mix - evidence is inaccurate as doesn't consider any impact on mix as a result of housing shortfall - Local Plan focuses on urban sites. It is unclear how it can be effective at meeting the need and demand for family housing.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	Given the levels of housing need and the limited opportunities to meet them there will inevitably be high demand for all housing types. As explained within the WLP the key will be to ensure that each opportunity delivers housing best suited to the particular site whilst taking the prevailing housing needs into account. See also the proposed modification to criterion a) of Policy DM1. As with all housing types, the full needs for family housing will not be met. However, the Plan is clear that family housing should form a key component of edge of town sites and this will help to provide a proportional contribution of the overall supply. Given that Worthing is a predominantly area it is somewhat inevitable that a key focus will be opportunities within the urban area. However, all development sites including greenfield sites around the edge of the borough have also been positively test and this process is clearly set out in the Council's evidence.
5	DM1	Housing mix	Understand the difficulties in reconciling nationally set housing targets with what can actually be provided and appreciate the stance taken in the plan, but have some concerns about the housing mix.	SDWLP-13	N/A	No	Given the levels of housing need and the limited opportunities to meet them there will inevitably be high demand for all housing types. As explained within the WLP the key will be to ensure that each opportunity delivers housing best suited to the particular site whilst taking the prevailing housing needs into account. See also the proposed modification to criterion a) of Policy DM1.
5	DM2	Density	Understand the difficulties in reconciling nationally set housing targets with what can actually be provided and appreciate the stance taken in the plan, but have some concerns about the housing density proposed.	SDWLP-13	N/A	No	Whilst there is a clear aim to make the most efficient use of available land, when read as a whole, the Plan also establishes appropriate checks and balances to ensure that the level of development is appropriate to each site / opportunity. This will help to protect the character of surrounding areas and the amenities of neighbouring occupiers. See also the proposed modification to criterion a) of Policy DM1.
5	DM2	Density	Minimum densities will encourage loss of urban green space and is contrary to policies to increase biodiversity and encourage local food production.	SDWLP-18	Transition Town Worthing	No	The NPPF requires plans to contain policies to optimise the use of land in the area, including minimum densities for areas where there is good public transport. It is expected that these will seek an uplift on existing densities in those areas, unless there are strong reasons otherwise. Whilst the Council will support this objective this won't be at the expense of important and valued urban green spaces.
5	DM2	Density	Support the fact that Policy makes clear that the capacity of any site must be based on a design led approach which consider the site context and character.	SDWLP-25	N/A	No	Support is noted
5	DM2	Density	Support the fact that Policy makes clear that the capacity of any site must be based on a design led approach which consider the site context and character.	SDWLP-26	N/A	No	Support is noted
5	DM2	Density	NPPF requires the Council to have evidence that the optional standard such as the Nationally Described Space Standards are needed. There does not appear to be any evidence to support adoption of these standards.	SDWLP-45	House Builders Federation	No	National planning policy and guidance does not offer detailed criteria on what would constitute evidence of need to support the adoption and use of the Nationally Described Space Standards (NDSS). However, the starting point for justifying the need for space standards is to demonstrate that there is a need. A section within the Council's Housing Implementation Strategy provides this evidence and explains that the Council already had justified local standards in place (within an SPD) to address this local issue / concern before the NDSS were published. The requirement to meet the NDSS was factored into the Whole Plan Viability Assessment which concluded that and this concluded that, in general, the policy requirements would not impact on development to a degree that would make developments unviable (that otherwise would have been viable). Furthermore, the WPVA builds in an appropriate buffer / margin so that the requirements set out in the WLP are not set at the margins of viability and are able to support development when economic circumstances adjust.
5	DM2	Density	There is a significant gap in the evidence, especially relating to for densities appropriate to an urban area with good sustainable travel opportunities.	SDWLP-47	Horsham DC	No	There is clear evidence relating to densities set out in the Housing Implementation Strategy and further work has been undertaken to strengthen this. The outcomes support the approach outlined in the WLP.
5	DM2	Density	Amend policies (mods proposed) to allow flexibility for schemes on sustainably located sites to be built at higher densities. These include alternative housing mix and consideration of tall and very tall buildings.	SDWLP-49	ECE (on behalf of St Williams)	No	There is a significant housing need for all types and sizes in the borough. As such, the Plan (as a whole) seeks to deliver a range of housing types to best meet the identified needs. However, whilst the Council will encourage a mix of housing types on most sites it is not necessarily the case that each development site will deliver housing types to meet all needs. The housing mix expected will be largely dependent on the location and character of the individual site and the indicative capacity figures provided for each allocation respond to this. For example, town centre sites and other sites well served by facilities and infrastructure are more suited to higher density flatted developments (that could include tall buildings) than the edge of town sites which are more likely to deliver family housing. As allocated sites come forward for development the Council will use all relevant policies within the WLP to ensure that the site delivers the most appropriate development to meet identified needs whilst respecting the character of the surrounding area.
5	DM2	Density	It is noted that there is further work being carried out to explore mechanisms to further increase density and this is welcomed.	SDWLP-53	Mid Sussex District Council	No	Comments noted. Additional work has been undertaken and this is set out in the Housing Implementation Strategy. This clearly supports the position taken in the WLP.
5	DM2	Density	The policy as drafted is not strong enough in promoting higher density developments on suitable sites.	SDWLP-54	WSP (on behalf of NewRiver)	No	The WLP is clear in that it seeks to deliver development that makes the most efficient use of available land and the expectation is that there will be an uplift on existing densities in all areas unless there are strong reasons otherwise. The WLP and the Housing Implementation Strategy clearly show how densities within the town centre have increased significantly in recent years and that this is set to continue. This evidence and the proposed policy approach demonstrate clear and positive support for (appropriate) high density development in the town centre.
5	DM2	Density	Live/work units should not be required to comply with the residential space standard requirements and affordable housing requirements.	SDWLP-56	WSP (on behalf of St Clair Developments)	No	The Council can see no justification in not treating the living areas of live / work units in the same way as other forms of housing for the operation of development policies (including DM3). Furthermore, no robust evidence has been put forward to demonstrate why a different approach should be taken. The Whole Plan Viability Assessment (WPVA) has assessed the policy requirements and related financial contributions set out in the WLP - this has concluded that, viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. As live / work units are not a particularly prevalent form of development in Worthing these were not specifically tested within the WPVA as it is not realistic to test every potential development scenario. However, the WPVA did assess a wide range of housing developments (in scale and type) and this concluded that, in general, the policy requirements would not impact on development to a degree that would make developments unviable (that otherwise would have been viable). Furthermore, the WPVA builds in some contingency within each test to provide some flexibility for unforeseen eventualities.
5	DM2	Density	- It should be confirmed that viability and the application of the planning balance shall be considerations - The threshold of 3 or more bedrooms appears set out in Policy DM1 should be referenced for the threshold that would trigger minimum density of 35 dph in Criterion B)	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Local Plans must be read as a whole and there is no need to refer to viability or the planning balance here as it is adequately covered elsewhere. It is considered that the wording set out in the supporting text and policy (criterion b) is clear and that there is no need to amend this.

5	DM2	Density	Increasing density will impact on other elements necessary to support strong, vibrant and healthy communities. Impact on para 1.24. DM policies 18, 19 and 20 will be especially vulnerable to dilution. Increased density should however reflect the DM1 and SHMA policies and ensure a significant number of 2/3 bedroomed homes are provided in all large new developments.	SDWLP-67	Cllr Helen Silman & Cllr Jim Deen (Labour Group)	No	To help meet significant housing needs the Council will seek to make most efficient use of land and increase residential densities in appropriate locations. However, this will not be at the expense of the amenities of neighbouring occupiers, infrastructure capacity or the character of the surrounding area. The Plan should be read as a whole and it is considered that the appropriate checks and balances are in place that will deliver high quality development.
5	DM3	Affordable housing	Differentiate between "Affordable" homes and "Social Housing". Need to have homes built for rent at less than market rents.	SDWLP-03	N/A	No	The WLP Glossary provides the definition used by the Council (and the NPPF) for affordable housing and different types of housing tenure.
5	DM3	Affordable housing	Caveats should be included for where onsite provision would make the scheme unviable.	SDWLP-49	ECE (on behalf of St Williams)	No	Policy DM3 (criteria b and f), the supporting text and associated guidance (Developer Contributions SPD) clearly sets out the Council's approach to affordable housing provision and viability. The SPD will be updated following the adoption of the WLP.
5	DM3	Affordable housing	Live/work units should not be required to comply with the residential space standard requirements and affordable housing requirements.	SDWLP-56	WSP (on behalf of St Clair Developments)	No	The Council can see no justification in not treating the living areas of live / work units in the same way as other forms of housing for the operation of development policies (including DM3). Furthermore, no robust evidence has been put forward to demonstrate why a different approach should be taken. The Whole Plan Viability Assessment (WPVA) has assessed the policy requirements and related financial contributions set out in the WLP - this has concluded that, viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. As live / work units are not a particularly prevalent form of development in Worthing these were not specifically tested within the WPVA as it is not realistic to test every potential development scenario. However, the WPVA did assess a wide range of housing developments (in scale and type) and this concluded that, in general, the policy requirements would not impact on development to a degree that would make developments unviable (that otherwise would have been viable). Furthermore, the WPVA builds in an appropriate buffer / margin so that the requirements set out in the WLP are not set at the margins of viability and are able to support development when economic circumstances adjust. .
5	DM3	Affordable housing	Policy should make clear that site-specific circumstances (for example its inherent physical /environmental constraints) shall also be taken into account	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Policy DM3 (criteria b and f), the supporting text and associated guidance (Developer Contributions SPD) clearly sets out the Council's approach to affordable housing provision and viability. The SPD will be updated following the adoption of the WLP.
5	DM3	Affordable housing	critierion f) - PPG making quite clear that development viability should be assessed as far as is possible on the basis of generic inputs – so as to ensure that assessment does not become a tax based on the success or efficiencies of an individual developer concerned. See suggested amendments to para 5.4, 5.14 & 5.15. Comments raised on the DSP Viability Testing. Specialised housing for older people be retested for viability and any reduced resulting affordable housing target be set out in policy.	SDWLP-62	The Planning Bureau (On behalf of McCarthy & Stone)	Yes (in part)	Agree with amendment to 5.4: it is not specialist housing for one group of people but housing for all Agree with amendments to clarify different types of housing in 5.14 and 5.15. Modification proposed as follows: 5.14... Options include retirement living or sheltered housing (housing with support), and extra care housing or housing with care (both classed as C3 dwellings) and residential care homes and nursing homes (care bed spaces classed as C2 provision). 5.15 Provision of housing with care (C3 use class) Sheltered and extra care housing are alternatives is an alternative to care/nursing home bed spaces and can help... Disagree with amendment to 5.15 to remove reference to use class C3 as consider it is important to distinguish between C2 and C3 uses especially as advice and analysis from WSCC suggests we need to alter the balance from C2 provision, residential and nursing homes, towards C3, housing provision, which can deliver better outcomes for longer and keeps people in their own home for as long as possible. Disagree with proposed deletion of the reference to 'an open book approach' set out in criterion f. A key objective of the Government in recent years has been to improve transparency in the planning system. Therefore, full disclosure is essential not only to allow public scrutiny of key planning decisions, but also to remove the often secret status of planning gain negotiations and agreements between developers and local authorities. The Council considers that the term 'open-book' captures this objective and does not need to be revised. Overall, the viability assumptions used are considered to be appropriate for the strategic level review and it is considered that the Whole Plan Viability Assessment provides a robust assessment of realistic development scenarios within the Borough. This concludes that when viewed as a whole the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. The viability assessment has been undertaken bearing in mind that such developments form a wider part of the overall spectrum of market housing offer, but also generally have some distinct characteristics. The assumptions are considered to reflect this within the typologies approach, which recognises that developments can vary considerably from one to another in
5	DM3	Affordable housing	Object. A more equitable approach should be for the Plan to return to first principles: to meet the obligation to provide for its own assessed housing need of 14,160 new homes, and then to apply to that figure a 30% affordable housing rate. The affordable housing burden on green field sites should be shifted to 30%.	SDWLP-65	Persimmon Homes	No	The viability assessment been undertaken bearing in mind that such developments form a wider part of the overall spectrum of market housing offer, but also generally have some distinct characteristics. The assumptions are considered to reflect this within the typologies approach, which recognises that developments can vary considerably from one to another in any event – whether for the general market or a more targeted occupier group. It is understood and acknowledged therefore that particular assumptions may be appropriate at a site and scheme specific level, over time.
5	DM3	Affordable housing	Affordable Housing - SHMA projections are unjustified as are based on assumption that full housing needs are met.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	The SHMA is considered to provide robust evidence that conforms with NPPF requirements and related guidance. Using accepted demographic projections the assessment considers a range of scenarios (including a dwelling led scenario) that make realistic assumptions on land supply. Evidence is clear in that, much like for all housing types and tenures in the Borough, the Council will not be able to meet the affordable need in full with this in mind, the focus should be provision of
5	DM5	Quality of the built environment	Amend text (mods proposed) to allow flexibility for schemes on sustainably located sites to be built at higher densities. These include alternative housing mix and consideration of tall and very tall buildings.	SDWLP-49	ECE (on behalf of St Williams)	Yes	Amend paragraph 5.64 to be more positive regarding applications for tall buildings on sites that can appropriately accommodate buildings of height. Amendment - ".....likely to continue. To ensure that efficient use is made of available land the Council will positively consider applications for tall buildings on sites that can appropriately accommodate buildings of height. Whilst this form...."

5	DM5	Quality of the built environment	Recommend strengthening the wording of the policy in order to meet the Council's obligations on climate mitigation and biodiversity net gain, as well as the emerging requirements of the National Model Design Code.	SDWLP-58	Woodland Trust	Yes	With regards to the suggestion of inserting an additional criterion regarding tree canopy cover it is considered that SP2 e) and g) adequately address this - particularly when then supported by Policy DM19 (Green Infrastructure). To strengthen policy amendments to Policy DM5 will be made as follows: ii) enhance the local environment by way of its appearance and character, with particular attention being paid to the architectural form, height, materials, density, scale, orientation, landscaping, tree canopy , impact on street scene and layout of the development; ix) respect the existing natural features of the site, including landform, trees and biodiversity and contribute positively to biodiversity net gain. Where appropriate, this will include the protection and integration of existing trees and green infrastructure into new developments
5	DM5	Quality of the built environment	- Criterion a vi) as currently worded is vague in terms of access expectations, and should be amended - To ensure consistency with the NPPF, Criterion a viii) should be re-worded - Criterion c) results in disproportionate, onerous expectations and requirements and should be deleted - Policy DM5 should make clear that site-specific circumstances (for example its inherent physical /environmental constraints and viability) shall also be taken into account.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	Yes (in part)	No change is required to Criterion a) vi) needs to be read in conjunction with the requirements set out in Policy DM15: Sustainable Transport & Active Travel. To ensure consistency with the NPPF, Criterion a) viii) should be re-worded as follows: viii) not have an unacceptable impact on the occupiers of adjacent properties, particularly of residential dwellings, including unacceptable loss of privacy, daylight/sunlight, outlook, an unacceptable increase in noise giving rise in significant adverse impacts , or vehicular movements resulting in severe cumulative impacts on the road network or loss of important open space of public value (unless it satisfies any of the exceptions set out under Policy DM7 – Open Space, Recreation and Leisure) ; Regarding criterion c) it is important that approved developments are not changed over time in a way that would detract from the quality of development originally approved. As such, these is no reason to change the existing wording. The Whole Plan Viability Assessment has assessed the policy requirements and related financial contributions set out in the WLP - this has concluded that, viewed as a whole, the emerging Local Plan proposals are considered to have reasonable prospects of viability and should therefore be able to meet the criteria of the NPPF and be consistent with the national guidance within the PPG in viability terms. Whilst there will always need to be some degree of flexibility in these matters the Council will continue to promote and support development that helps to mitigate the potential negative impacts on the environment.
5	DM6	Public realm	- 1st sentence of (e) is effective but last sentence should be deleted as unnecessary - the Regs don't permit consideration of the need for an advertisement in illuminated form.	SDWLP-20	British Sign & Graphics Association	Yes	It is agreed that the second part of Policy DM6 criterion e) as the first part ensures that advertisements will respect the character and appearance of the surrounding area. As such, the 2nd sentence of e) will be deleted.
5	DM6	Public realm	The policy should confirm that proportionate planning obligations shall only be sought where all the necessary statutory tests set out within the Regulations and NPPF are met.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM6	Public realm	Sets out fine aspirations but WLP needs to be linked inextricably to the 'Platforms for our Places' strategy to be deliverable	SDWLP-67	Cllr Helen Silman & Cllr Jim Deen (Labour Group)	No	The Local Plan does signpost to Platforms for our Places (see paragraph 1.15). It is not considered necessary to duplicate content in Platforms for our Places.
5	DM7	Open space, recreation and leisure	Allotments - To meet standards Worthing should provide 550 allotments or 137,500 sqm of land. - The eight allotment sites in Worthing total 1,080 plots, but occupy only 124,284 square metres (as plot sizes have been reduced) significantly less than the 22 hectares required. It is difficult to see where this shortfall will come from. - Access Standards - the existing sites are currently positioned such that many residents would be further that 720m away and would have a walk time in excess of 15 mins.	SDWLP-04	N/A	No	Comments noted. Given the land constraints in and around Worthing it is a challenge to meet the full needs of many different land uses - allotment provision is no exception. However, the Council will continue to balance competing needs and, where appropriate, will seek to protect and enhance the provision of allotments. Where a development is unable to provide sufficient on-site provision of open space, the Council can collect contributions that could be put towards off-site provision or enhancement of existing open space. A guidance note (Open Space, Recreation & Leisure - Jan 2021) has been prepared which provides justification for the access standard for allotments.
5	DM7	Open space, recreation and leisure	Support	SDWLP-17	Sports England	No	Support is noted
5	DM7	Open space, recreation and leisure	Recommends cross reference with revised 'Active Design' guidance and have also included a model policy.	SDWLP-17	Sports England	No	No change is needed as Policy SP3 Healthy Communities (para 2.32) already refers to the Active Design guidance
5	DM7	Open space, recreation and leisure	Unspecified standards could impact viability	SDWLP-49	ECE (on behalf of St Williams)	Yes	Comments noted. All requirements set out in the WLP were tested within the Whole Plan Viability Assessment. However, it is agreed that to provide clarity regarding the adopted standards (as informed by the Open Space Study) Criterion a) will be amended as follows: a) Schemes of 10+ dwellings will be required to provide open space on site in accordance with the Council's adopted standards (as set out within The Open Space Study (2019) applying occupancy levels based on the size of dwellings proposed) . 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 unless surplus provision exists locally .
5	DM7	Open space, recreation and leisure	Recommend adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation. Suggest amendments to table at 5.100	SDWLP-58	Woodland Trust	Yes	The standard for Accessible Natural Green Space (ANGS) has accidentally been omitted from Table 1 (Para 5.100). An amendment will be made to include a new row to the table which will incorporate the recommended standard for ANGS as defined by the Open Space Study. The Open Space Study includes woodlands within the definition of ANGS.
5	DM7	Open space, recreation and leisure	The policy should confirm that proportionate planning obligations shall only be sought where all the necessary statutory tests set out within the Regulations and NPPF are met. Criteria b) should be reworded to refer to future / updated studies.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	Yes (in part)	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed. Revise Criterion b) as follows: Proposals incorporating leisure/recreation facilities should use the findings of the Sport, Leisure and Open Space Study (or any future updated study) to inform the types required.
5	DM7	Open space, recreation and leisure	(Para 5.101-5.103) - policy and associated paragraphs be amended to make clear that the standards do not apply to specialised housing for older people, which will be considered on a case by case basis based on the nature of the development proposed and its proximity to local facilities and whether it is likely to place a demand upon those facilities.	SDWLP-62	The Planning Bureau (On behalf of McCarthy & Stone)	No	Comments noted. A guidance note (Open Space, Recreation & Leisure - Jan 2021) has been prepared which provides further clarity on the open space standards. The guidance note provides information on which types of development are eligible for on-site provision. This includes older people's accommodation.

5	DM8	Planning for sustainable communities / community facilities	Policy should confirm that proportionate planning obligations shall only be sought where all the necessary statutory tests set out within the Regulations and NPPF are met.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM9	Delivering infrastructure	The Council needs a discretionary CIL relief policy	SDWLP-56	WSP (on behalf of St Clair Developments)	No	CIL Regulations are clear in that the powers that the Council has to offer relief can be activated and deactivated at any point after a charging schedule is approved. This would be outside of the Local Plan process and, for this reason, it would not be prudent or necessary to make any commitment to this (either way) within the WLP.
5	DM9	Delivering infrastructure	Policy should confirm that proportionate planning obligations shall only be sought where all the necessary statutory tests set out within the Regulations and NPPF are met.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM10	Economic growth and skills	Criteria J) and K) should reference the planning obligations and conditions tests within the Regulations and NPPF	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM10	Economic growth and skills	Economic Growth - Policy hasn't considered the effects of housing shortfall on economic growth. More employment land is proposed to be allocated in the WLP than would be required	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	The Employment Land Review's preferred job growth scenario which helps to inform the WLP reflects a realistic level of employment growth that takes the inability to fully meet housing needs into account. The approach taken in the WLP is one that seeks to balance competing demands for land in the most sustainable way - this will see the mean that viable employment land is retained with two main allocations (Decoy Farm and Martlets Way) helping to provide the bulk of the additional space required. The representation argues that there is an overprovision of employment land. In this regard the SDWLP does indicate an overprovision of 5,230 sqm when assessed against the Employment Land Review's preferred job growth scenario. However, the figure of 28,000sqm planned for in the SDWLP included an allowance for 18,000sqm to be delivered at Decoy Farm. As reported under A5 above, further more detailed work has been undertaken to understand the site constraints and related development potential of Decoy Farm and as a consequence the indicative capacity has been reduced to 14,000 sqm employment land. This therefore means that there is now only a slight overprovision (1,230sqm) of employment land when using the job growth scenario. The Council considers it important to retain some flexibility given a number of uncertainties including the introduction of Use Class E and the extension of permitted Development Rights. As such, it is considered that the WLP provides the appropriate and sensible balance between housing and employment growth.
5	DM11	Protecting and enhancing employment sites	Broadwater Business Park Employment Area Boundary should be modified to include the entire GlaxoSmithKline site.	SDWLP-42	Lichfields (on behalf of GSK)	Yes	It is agreed that there is no logical reason why the built area to the east of the site (but still within the GSK Curtilage) are not located within the Broadwater Business Park Employment Area. It is agreed that the modification of the employment designation will have the effect of including all of GSK's operational area as part of the Key Industrial Estate and Business Park, and better reflect the use of the site to support the pharmaceutical production function. This is in line with WLP policy DM11 and Strategic Objective 8. As such, it is proposed that the designation be modified to include this part of the GSK operational site (see separate mapping extract). The Council does not however, agree with the suggested inclusion of the sports pitch within the employment designation. Whilst it is noted that the pitch is only used by employees of GSK for well-being purposes this does not in itself mean it should be treated (in planning terms) any differently from other publicly accessible pitches. The Town and Country Planning (Development Management Procedure) (England) Order 2015 and NPPF define a playing field as 'the whole of a site which encompasses at least one playing pitch'. It also does not differentiate between different types of ownership e.g. public, private or educational ownership (the pitch was considered and included within the 2019 Playing Pitch Strategy). The inclusion of the playing pitch within the wider Employment' designation may prejudice the future use of the land and this would be contrary to the Government's objective that playing fields should be protected unless certain criteria can be met. There has been no evidence provided to indicate that these tests have been met or that Sport England would support a change in designation. As such, it is proposed that the playing field will remain outside the Broadwater Business Park Employment Area.
5	DM11	Protecting and enhancing employment sites	Wording should define 'employment uses' such as by Use Classes. Policy should confirm the evidence required will be proportionate	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Para 5.153 defines employment uses for the purpose of the policy? In line with guidance and legislation, the Council will only ever require evidence to be proportionate. The type and nature of evidence required is further clarified within the Council's Sustainable Economy SPD which will be updated following the adoption of the WLP.
5	DM11	Protecting and enhancing employment sites	Policy and supporting text be amended to allow for the loss of existing employment land where a more beneficial and sustainable use of land is proposed and citing that a flexible approach will be taken in order to aid economic recovery.	SDWLP-62	The Planning Bureau (On behalf of McCarthy & Stone)	No	In response to the Council's evidence base and the limited opportunities available for new employment land the WLP seeks to ensure that strong policies are in place to protect existing employment sites. However, great care has been taken to ensure that the policy wording is not overly restrictive and a suitable degree of flexibility is provided. Whilst there is an acknowledgement that other uses might be acceptable if certain conditions / tests are met this would be determined in a controlled way using the policy and the supporting SPD. The WLP, when read as a whole, explain and clarifies the Council's approach to balancing the needs of all land uses.
5	DM12	The visitor economy	General support, but some concerns that enhancement of the night time economy should not be at the expense of local residents. Additionally noise levels and anti-social behaviour has been increasing to the detriment of town centre residents.	SDWLP-13	N/A	No	The concerns are noted no amendments necessary as it is considered that these issues are adequately covered in the supporting text to the policy and in criterion a)

5	DM13	Retail and town centre uses	- Criteria h is overly restrictive and contrary to the NPPF - Doesn't acknowledge 2020 changes to the Use Classes Order and introduction of Class E - Ideally we'd like to see the policy support replacement of retail with other uses as supported by the evidence study - The Montague Shopping Centre should be taken out of the Primary Shopping Frontage and reclassified as Secondary.	SDWLP-54	WSP (on behalf of NewRiver)	No	The WLP (particularly policy SS3) provides clear strategy and direction for the town centre. Although retail remains a key focus the policies within the Plan very clearly support the diversification of uses (including residential) within the town centre with strong encouragement for alternative uses - particularly those that support both the daytime and evening economies. Whilst the Council still considers it appropriate to provide a clear policy framework for the town centre and other retail areas (see DM13) it is not considered that this is overly restrictive. Care has been taken to ensure that the wording is sufficiently flexible to allow changes in circumstance (covid-recovery, changing retail habits, changes of Permitted Development Rights, leisure demands, mixed-use community hubs etc). Whilst it is acknowledged that new use Class E is likely to have implications for land uses within retail areas this has been taken into consideration and it is not felt that any change is required to the policy framework at this time - however, this will be kept under review. The Council's evidence would not support the suggested change of the Montague Centre from Primary to Secondary shopping frontage. Criterion h) is clear that conditions will only be applied where it is relevant and appropriate to do so. This approach is not contrary to the NPPF as it will allow the Council to ensure that approved changes are in line with the Council's aspirations for the area (which, in turn, reflect the Government's objective to support economic growth and vibrancy within town centres).
5	DM13	Retail and town centre uses	The new Local Plan should encourage a range of uses in town centres, including residential, to improve their vitality and viability, and avoid overly restrictive policies which would impede this.	SDWLP-56	WSP (on behalf of St Clair Developments)	No	The WLP (particularly policy SS3) provides clear strategy and direction for the town centre. Although retail remains a key focus the policies within the Plan very clearly support the diversification of uses (including residential) within the town centre with strong encouragement for alternative uses - particularly those that support both the daytime and evening economies. Whilst the Council still considers it appropriate to provide a clear policy framework for the town centre and other retail areas (see DM13) it is not considered that this is overly restrictive. Care has been taken to ensure that the wording is sufficiently flexible to allow changes in circumstance (covid-recovery, changing retail habits, changes of Permitted Development Rights, leisure demands, mixed-use community hubs etc). Whilst it is acknowledged that new use Class E is likely to have implications for land uses within retail areas this has been taken into consideration and it is not felt that any change is required to the policy framework at this time - however, this will be kept under review.
5	DM13	Retail and town centre uses	Retail - Policy hasn't considered the effects of housing shortfall.	SDWLP-66	Pegasus Group (On behalf of Persimmon Homes)	No	Housing provision and resulting shortfall are adequately covered elsewhere in the Plan and there is no need to make specific reference within this specific policy. The need to maximise all development opportunities is made throughout the plan including within the supporting text to this policy - Para 5.181 makes reference to new dwellings where opportunities exist and Para 5.195 also refers to upper floor uses for residential uses.
5	DM14	Digital infrastructure	Object to this policy as it is onerous and unsound. The requirements will result in delaying determination of applications and impact the viability and delivery of developments. Purpose of Policy DM14 should be to assess whether a proposed development for telecommunications infrastructure is an acceptable use of land. As such, the requirements relating to non- telecommunications infrastructure proposals under Policy DM14 should be removed.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Worthing BC works in partnership with West Sussex CC (WSCC) as part of the Gigabit Coast Project. WSCC is keen that the requirement to ensure gigabit-capable broadband is available in all new build development at the point of occupation should remain within the policy. WSCC advise that the Government has started talking about its New Build Act again, and are of the view that it is likely to become law. In support of Worthing's proposed policy position it should be noted that last year DCMS consulted on new build regulations and issued its conclusions in March 2020. Following the publication of the response, the Government has stated it will: * Amend Building Regs to require all new build developments to have physical infrastructure to support gigabit-capable connections * Amend Building Regs to create a requirement on housing developers to work with network operators so that gigabit broadband is installed in new build development (up to a cost cap) * Publish supporting statutory guidance as soon as possible * Continue to work with network providers to ensure that are connecting as many new build developments as possible and at the lowest possible price * Work with housing developers and their representative bodies to raise awareness of these new requirements. It is also interesting to note that two major national stakeholders Openreach and Barratt support the introduction of full- fibre infrastructure in new build developments. The Council consider that the policy contains the right approach and it follows the direction of travel being set by the Government. In addition, the policy does allow for some level of flexibility where it can be demonstrated that due to special circumstances the policy requirements cannot be met.
5	DM15	Sustainable transport & active travel	There is a lot of comment on climate aims and low carbon and low pollution yet there are developments being included as possibilities that would add traffic to severely congested, and polluted roads such as the A27. A bypass is needed to allow these to even be considered and to improve the health of residents in this part of Worthing, yet no mention of this is made and there seems to be no joined up strategy to be working with Highways and the Government in this area.	SDWLP-06	N/A	No	There are currently no realistic or deliverable for any by-pass for Worthing. However, in this regard, it should be noted that Highways England have been working closely with key stakeholders (including WBC and WSCC) to identify a package of potential improvements to the A27. This will help to meet the revised objectives in the government's Road Investment Strategy 2 (RIS2): 2020 to 2025, to improve the capacity and flow of traffic on the A27 from Worthing to Lancing. In the coming months, Highways England aim to identify options for an improvement scheme, before holding a public consultation in spring/summer 2022. A key aim of the Local Plan is to help promote and deliver an enhanced provision for sustainable modes of transport which, combined with other measures and policies will help to mitigate the impacts of development.
5	DM15	Sustainable transport & active travel	Support	SDWLP-17	Sports England	No	Support is noted
5	DM15	Sustainable transport & active travel	Fully support this policy and emphasis on climate change and the environment.	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM15	Sustainable transport & active travel	The inclusion of equestrians within the Council's Local Plan provision for non motorised users would: • Add to the health and wellbeing of a sector of the county's population who would otherwise be excluded; • Benefit the local economy with the income that the sport attracts to local areas; • Ensure that equality of opportunity is provided for a sport dominated by women; • Need cost no more than the plans which would otherwise exclude them (in many cases, simply a different sign to indicate use by all user groups) Concerned about equestrians being pushed out of A&W due to the high level of development and having to travel further afield adding to numbers of car journeys and the negative impact on the climate. Notes that the A27 forms a significant barrier for equestrians.	SDWLP-24	British Horse Society	No	Comments noted. Reference to bridleways and multi-user access have been referred to in paragraphs 5.89, 5.275 & 3.45. Criterion a) of Policy DM15 states that the Council will promote and support development that prioritises active travel by walking, cycling, Non-Motorised User routes. Policy SS4 f) clarifies that opportunities to improve access to the National Park with be sought through joint working with key partners.
5	DM15	Sustainable transport & active travel	Part iv) is not legally compliant as the standard is set outside of the Local Plan and should be considered in the viability assessment.	SDWLP-45	House Builders Federation	No	All policy requirements (and an additional allowance) were factored in to the Whole Plan Viability Assessment. The reference to the County Council Standards is appropriate within this policy as it signposts the requirements that have been adopted by the Borough Council.
5	DM15	Sustainable transport & active travel	- Part b) vii) SWT do not consider this is an evidence based position and therefore is not justified.	SDWLP-57	Sussex Wildlife Trust	No	This improvements highlighted are identified in the Worthing Local Plan Transport Study - this is clearly an evidenced based position.

5	DM15	Sustainable transport & active travel	Reference should be made to the planning obligations and conditions tests within the Regulations and NPPF, site specific circumstances, The trigger threshold for 'major development' to be confirmed, that information required will be proportionate.	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM15	Sustainable transport & active travel	There is still further work to be undertake before Highways England can agree that the plan is sound in relation to its potential impacts on the safe and efficient operation of the A27 Truck Road. - Undertake some additional work on the indicative cost of the Offington Roundabout Mitigation Scheme and to cost the other sustainable transport measures set out in the Transport Study. There will need to be a fall back position which would necessitate highway improvements in the event that the modal shift is not secured. May be more effective to look at a blended approach whereby the council seek contributions to pay for the Offington Roundabout Improvement scheme, together with a package of other sustainable transport measures rather than relying solely on sustainable transport improvements. Necessary for the council to consider how it will deal with windfall development outside of the Local Plan as this adds to the cumulative impacts on the highway network both local and strategic. - Develop a Statement of Common Ground.	SDWLP-72	On behalf of Highways England	No	Further work has been undertaken by the Council's consultants to address these requests. Progress made and areas of agreement are set out with a Statement of Common Ground which is expected to be signed before Submission. Where appropriate this will also explain how further work will be progressed (and guidance produced) to address any outstanding matters.
5	DM15	Sustainable transport & active travel	Support, especially b) iii)	SDWLP-73	South Downs National Park Authority	No	Support is noted
5	DM16	Sustainable design	With opportunities to consider a new town centre vision it doesn't seem the time to prioritise greenfield sites	SDWLP-09	N/A	No	Greenfield sites are not prioritised. Given the levels of housing and employment needs in the Borough all opportunities to deliver development needed to be positively reviewed. This included all edge of town greenfield sites. However, town centre regeneration remains a key objective within the Plan and the associated Spatial Strategy.
5	DM16	Sustainable design	Fully supportive of this but think it should also have a section on designed in mitigation measures such as raised electrics and flood resistant floors and walls.	SDWLP-13	N/A	Yes	First sentence of Para 5.282 to be amended as follows: Opportunities should be sought to reduce the causes and impacts of flooding where appropriate through the use of appropriate flood resilience and resistance measures, and natural flood management techniques....
5	DM16	Sustainable design	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM16	Sustainable design	Unsound as duplicating national policy in relation to energy efficiency improvements. Reference to the 31% improvement above Part L of Building Regulations should be deleted.	SDWLP-45	House Builders Federation	No	The Government have consulted on and published their response to The Future Homes Standard which they state will be implemented from 2025. In their response to the consultation the Government explain that to provide some certainty in the immediate term, they will not amend the Planning and Energy Act 2008, which means that local authorities will retain powers to set local energy efficiency standards for new homes. Criteria a) of Policy DM16 makes clear that the requirements including that set out in criteria b) relating to CO2 reduction will apply unless / until superseded by national planning policy or Building Regulations and are not duplicating national policy. The requirements set out were intended to be consistent with the Government's proposed 2021 interim uplifts which was delayed from an original 2020 date and therefore provide security should this interim uplift be further delayed or not implemented. To ensure they remain consistent with the emerging standard the following modifications are required (see below response).
5	DM16	Sustainable design	Remove parts b) and c) of DM16 to ensure consistency with national policy by removing reference to reduction of CO2 levels and Part L of Building Regulations.	SDWLP-49	ECE (on behalf of St Williams)	Yes	The Government have consulted on The Future Homes Standard and Future Buildings Standard and has published their response to The Future Homes Standard which they state will be implemented from 2025. In their response to the consultation the Government explain that to provide some certainty in the immediate term, they will not amend the Planning and Energy Act 2008, which means that local authorities will retain powers to set local energy efficiency standards for new homes. Criteria a) of Policy DM16 makes clear that the requirements including that set out in criteria b) and c) relating to CO2 reduction will apply unless / until superseded by national planning policy or Building Regulations and are not duplicating national policy. The requirements set out were intended to be consistent with the Government's proposed 2021 interim uplifts which was delayed from an original 2020 date and therefore provide security should this interim uplift be further delayed or not implemented. To ensure they remain consistent with the emerging standard the following modifications are required: - Replace Criteria b) with the following b) All new build housing will achieve a minimum 31% CO2 reduction, compared to the Building Regulations Part L 2013 standard, through carbon saving technology and fabric improvements in line with the energy hierarchy. New non-domestic buildings will achieve a 27% improvement in CO2 on average per building compared to the current Part L 2013 standard. This should be delivered through very high fabric standards, improved services and low carbon technologies in line with the energy hierarchy. Delete criteria c) as this is now covered by the amendments to criteria b) above and other requirements within Policy DM16. <i>(Note - this will result in the need to update existing references d) to j))</i>
5	DM17	Energy	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM17	Energy	Requiring connection to combined heat and power would reduce consumer choice.	SDWLP-45	House Builders Federation	No	The policy seeks to ensure that major developments connect to heat networks where they already exist or (if they don't) maximise opportunities to connect to future networks (subject to viability). It is acknowledged that being on a heat network does restrict consumer choice because it is not possible to change suppliers. However, the government is strongly promoting heat networks in the Clean Growth Strategy as a means of meeting its obligations in the Climate Change Act as they can deliver significant reductions in greenhouse gas emissions when compared with equivalent individual heating systems. The Council will expect heat networks to be registered with the Heat Trust, which sets standards and provides consumer protection for heat network customers.
5	DM17	Energy	Remove part a) of DM17 to ensure consistency with national policy by removing reference to reduction of CO2 levels and Part L of Building Regulations. - Suggest changes to part c) of DM17	SDWLP-49	ECE (on behalf of St Williams)	Yes	Agree part a) can be removed as the mod proposed to DM16 now assumes that carbon reduction will be met through fabric improvements and carbon saving technology. Therefore the following amendments should be made: Delete criteria a) of Policy DM17 We agree with the suggested modification to criteria c) of Policy DM17 as follows: c) Major development within areas identified as heat network opportunity clusters, will be required to connect to district heating networks where: i) they exist at the time of permission being granted ii) where the heat network route lies adjacent to the site iii) where otherwise it is feasible and viable to do so or will be expected to maximise opportunities for the development of a future district heating network. Alternatively, where a heat network route is planned but has not been delivered, sites adjacent to the planned heat network routes should be required to be heat network ready to enable a future connection.

5	DM18	Biodiversity	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM18	Biodiversity	There is a clear understanding of the South Marine Plan, the subsequent policies (in a whole plan approach), the mitigation hierarchy and how the terrestrial and marine environments overlap within the intertidal area.	SDWLP-48	MMO	No	Comments noted
5	DM18	Biodiversity	Supportive of development achieving biodiversity net gain	SDWLP-49	ECE (on behalf of St Williams)	No	Support is noted
5	DM18	Biodiversity	Support - amendments suggested to Biodiversity Net Gain reference.	SDWLP-57	Sussex Wildlife Trust	Yes	Comments noted. Amend first sentence of para 5.259 as follows: "Biodiversity net gain delivers measurable improvements for biodiversity by creating or enhancing habitats after avoiding or mitigating harm as far as possible and is in addition to any compensation identified . The Environment Bill....."
5	DM18	Biodiversity	Welcomes the explicit protection given to ancient woodland and veteran trees in section d). However, the policy requires strengthening to deliver such protection in practice. Amendments suggested	SDWLP-58	Woodland Trust	No	Comments noted. It is considered that the wording set out within policy DM18 provides strong protection of Ancient Woodland in Worthing. It is acknowledged that these woodlands provide a highly valued irreplaceable habitat and, as such, further protection (and a buffer requirement) is established within appropriate allocation policies (for example, see A13 - Titnore Lane)
5	DM18	Biodiversity	- It would place an onerous requirement on development on previously developed sites that ultimately could affect their viability and delivery. 20% net gain should be encouraged not required - Criteria i) should reference the planning obligations and conditions tests within the Regulations and NPPF	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	Policy DM18 criterion h) makes it clear that 20% onsite net gain is encouraged. The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM18	Biodiversity	No comments to make concerning SA. Need to consider importance of biosecurity. Need to refer to relevant Marine Plan in WLP.	SDWLP-103	Natural England	No	Comments noted. The relevant Marine Plan has been referred to (South Marine Plan) at para 3.47. The issue of biosecurity will be considered within the emerging Green Infrastructure Strategy.
5	DM18	Biodiversity	Support policy but encourage strengthening wording to promote the maximum uptake of +20% net gain delivery. See suggested wording.	SDWLP-103	Natural England	Yes	Agree with modification. Amend criterion h) as follows: h) New developments (excluding change of use and householder) should must 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 strongly 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.
5	DM18	Biodiversity	Support. Clarify bullet point (h) where if it is not possible to achieve net gains on site it should be made clearer that there will be a requirement for the gains to be delivered off site. We would also like to see WBC identify where such off site locations are, and for them to be sited so as to improve biodiversity connectivity and Nature Recovery.	SDWLP-64	Sussex Ornithological Society	No	The Council is not able to seek offsite net gain as there is no credit scheme in place yet which will feed out from the nature recover network. A call for sites for Nature Recovery Networks will be undertaken in the future and WBC will be actively involved in this process (along with WSCC and the Local Nature Partnership). The approach taken where offsite net gain is necessary will be clarified through a SPD.
5	DM19	Green infrastructure	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM19	Green infrastructure	Support, recommend Council consider the use of an Urban Green Factor	SDWLP-57	Sussex Wildlife Trust	No	A key component of the Council's emerging Green Infrastructure Strategy will be the development of a green space factor - this is an urban greening factor by another name. This applies a factor between 0 - 1 depending on the GI / biodiversity potential. The main purpose is to ensure that even where an offsite biodiversity solution is accepted, some onsite GI is still provided.
5	DM19	Green infrastructure	Section c) needs strengthening. Amendments suggested	SDWLP-58	Woodland Trust	Yes	Comments noted. An amendment will be made to criterion c) to strengthen policy requirement. c) In all new developments there should be no net loss of trees and any trees removed should usually be replaced on a greater than 1:1 basis to support maintain current levels of canopy cover and contribute to biodiversity net gain Additional tree planting is encouraged where appropriate to improve the quality of the local environment, and increase appropriate species the canopy cover with native species. Where possible, tree stock should be UK sourced and grown.
5	DM19	Green infrastructure	Reference should be made to the planning obligations and conditions tests within the Regulations and NPPF, site specific circumstances, The trigger threshold for 'major development' to be confirmed, that information required will be proportionate	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM19	Green infrastructure	Support	SDWLP-103	Natural England	No	Support is noted
5	DM19	Green infrastructure	Disappointed that no Green Infrastructure map has been developed.	SDWLP-64	Sussex Ornithological Society	No	Comments noted. Further work is to be carried out in due course which includes the preparation of a Joint Green Infrastructure Strategy for Adur & Worthing Councils.
5	DM20	Flood risk and sustainable drainage	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted.
5	DM20	Flood risk and sustainable drainage	Part D should be amended in line with NPPG to allow sufficient flexibility	SDWLP-49	ECE (on behalf of St Williams)	Yes	Agree. Suggest the following modification to the first part of criterion d): The surface water drainage scheme should use Sustainable Drainage Systems and where practicable and viable be designed to:
5	DM20	Flood risk and sustainable drainage	Reference should be made to the planning obligations and conditions tests within the Regulations and NPPF, site specific circumstances, that information required will be proportionate	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM20	Flood risk and sustainable drainage	Support	SDWLP-103	Natural England	No	Support is noted
5	DM21	Water quality and sustainable water use	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM21	Water quality and sustainable water use	Reference should be made to the planning obligations and conditions tests within the Regulations and NPPF, site specific circumstances, that information required will be proportionate	SDWLP-60	Rapleys On behalf of EM Goring Ltd	No	The Council is obliged to apply the appropriate and proportionate legal obligations / conditions and it is not considered appropriate to duplicate national legislation or the NPPF here. Local Plans must be read as a whole and Policy DM9 and supporting text clearly sets out the Council's approach to delivering infrastructure (including the use of CIL and S106 agreements). Further detail is also set out with the Council's Developer Contributions SPD which will be updated following the adoption of the WLP. It is standard good practice in Planning that evidence required for any particular application is proportionate to the scheme being proposed.
5	DM21	Water quality and sustainable water use	Support however encourage strengthening of requirement e) by setting the water efficiency requirement in line with Southern Water's Target 100's tighter value 100 litres per person per day or tighter where possible.	SDWLP-103	Natural England	No	The wording is already considered to be taking a positive approach as it sets a requirement and also an encouragement to go beyond it. To strengthen the requirement further would be exceed optional higher standard for Building Regs.

5	DM22	Pollution	Fully support these policies and emphasis on climate change and the environment	SDWLP-18	Transition Town Worthing	No	Support is noted
5	DM22	Pollution	Criteria b), d) , e) should be reworded. Suggestions provided	SDWLP-60	Rapleys On behalf of EM Goring Ltd	Yes	Suggested amendments are considered acceptable and therefore will be addressed as follows: b) New development in Worthing will be located in areas most suitable to the use of that development to avoid unacceptable risks from all sources of pollution. d) Where appropriate, air quality, and/or noise and lighting assessments will be required to support planning applications. These should be undertaken in accordance with the most up to date guidance and have regard to any relevant action plans. e) Where there is potential risk of contaminated land, proportionate investigations and assessments will be required in relation to relevant development proposals. These should assess the nature and extent of contamination and the potential risks to human health, adjacent land uses and the local environment
5	DM22	Pollution	Support	SDWLP-103	Natural England	No	Support is noted
5	DM23	Strategic approach to the historic environment	Welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF.	SDWLP-46	Historic England	No	Support is noted
5	DM24	The historic environment	Welcome the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF.	SDWLP-46	Historic England	No	Support is noted
5			Very pleased to see the emphasis on environment and sustainability and think you have some excellent policies here.	SDWLP-13	N/A	No	Support is noted
DTC			We consider that the legal test of Duty to Co-operate compliance has been met. Request further clarification and preparation of a Statement of Common Ground to evidence the Duty to Cooperate work between our authorities and establish (and ideally agree) respective positions.	SDWLP-47	Horsham DC	No	Comments noted. Further Duty to Cooperate work will be carried out and a Statement of Common Ground is being prepared.
DTC			MSDC would be happy to work with WBC on a revised Memorandum of Understanding (MoU)	SDWLP-53	Mid Sussex District Council	No	Comments noted. Further Duty to Cooperate work will be carried out and a Statement of Common Ground is being prepared.
DTC			Statement of Common Ground to be signed before Submission of the Plan, clarifying the mechanism, resources, process and timescales on how it is intended to resolve unmet need and how it is being addressed by WBC in cooperation with the relevant authorities in the Strategic Planning Board (including Arun). - Also enter into a Statement of Common Ground between Arun and Worthing.	SDWLP-69	On behalf of Arun District Council	No	Comments noted. Further Duty to Cooperate work will be carried out and a Statement of Common Ground is being prepared.
DTC			Does not identify sufficient sites to meet housing need and the extent to which this is the maximum which can be sustainably delivered will be tested through the forthcoming Examination into the WLP, though in general terms the constraints, and in particular the scarcity of land, are recognised and understood. - CDC will continue to engage constructively, actively and on an ongoing basis with other local authorities and organisations to address sub-regional issues.	SDWLP-71	On behalf of Chichester District Council	No	Comments noted. Further Duty to Cooperate work will be carried out and a Statement of Common Ground is being prepared.
DTC			Acknowledges the challenges faced by WBC in meeting housing need and the process to produce the Submission Draft Worthing Local Plan having robustly, exhaustively and positively sought to find sites suitable for development - Appreciates and understands the constraints the Council faces in finding suitable sites	SDWLP-73	On behalf of South Downs National Park Authority	No	Comments noted. Further Duty to Cooperate work will be carried out and a Statement of Common Ground is being prepared.
Map			Broadwater Business Park Employment Area Boundary should be modified to include the entire GlaxoSmithKline site.	SDWLP-42	Lichfields (on behalf of GSK)	Yes	It is agreed that there is no logical reason why the built area to the east of the site (but still within the GSK Curtilage) are not located within the Broadwater Business Park Employment Area. It is agreed that the modification of the employment designation will have the effect of including all of GSK's operational area as part of the Key Industrial Estate and Business Park, and better reflect the use of the site to support the pharmaceutical production function. This is in line with WLP policy DM11 and Strategic Objective 8. As such, it is proposed that the designation be modified to include this part of the GSK operational site (see separate mapping extract). The Council does not however, agree with the suggested inclusion of the sports pitch within the employment designation. Whilst it is noted that the pitch is only used by employees of GSK for well-being purposes this does not in itself mean it should be treated (in planning terms) any differently from other publicly accessible pitches. The Town and Country Planning (Development Management Procedure) (England) Order 2015 and NPPF define a playing field as 'the whole of a site which encompasses at least one playing pitch'. It also does not differentiate between different types of ownership e.g. public, private or educational ownership (the pitch was considered and included within the 2019 Playing Pitch Strategy). The inclusion of the playing pitch within the wider Employment' designation may prejudice the future use of the land and this would be contrary to the Government's objective that playing fields should be protected unless certain criteria can be met. There has been no evidence provided to indicate that these tests have been met or that Sport England would support a change in designation. As such, it is proposed that the playing field will remain outside the Broadwater Business Park Employment Area.