



WORTHING LOCAL PLAN 2020- 2036

WBC-E-15

Sustainability Appraisal Note

Appraisal of Unmet Need

November 2021

Sustainability Appraisal Note - 04/11/21

Appraisal Of Unmet Need

- 1) All potential development sites identified were assessed through the SA site criteria (DIIA 4.4 and appendix D1). This was done early on in the process prior to reviewing evidence recommendations. To be transparent as to which sites had been identified and considered as part of the Local Plan process it included all identified 'potential' sites such as Chatsmore Farm, Goring-Ferring Gap and Land at Dale Road (part of Brooklands Park). This process sought to provide an objective and replicable method to assessing potential sites based on quantitative criteria. No sites were excluded from the Local Plan as a result of this appraisal, indeed it should be noted that only one site (Union Place) did not score red on any criteria.
- 2) Evidence collated and related recommendations started to be reviewed including the 2015 Landscape and Ecology Study (para 3.2 DIIA). From this it became apparent that the evidence was recommending that a number of sites were not suitable for development.

Further landscape work was commissioned in 2017 to positively test whether developing part of a site or incorporating mitigation could reduce the potential level of harm. Where the evidence supported this, despite their constraints these sites were taken forward for allocation.

- 3) Those sites the evidence recommended were unsuitable for development (even after further consideration), were also tested as options in terms of allocating or protecting the site to determine whether the adverse impacts would significantly and demonstrably outweigh the benefits. This included Chatsmore Farm, Goring-Ferring Gap and Brooklands Park (Dale Road). This appraisal can be found in Table 10 of the DIIA and Appendix D2. The conclusions of this appraisal were as follows:

Chatsmore Farm

Option 1 Protecting the site:

Option 1 has very positive effects against the landscape & character objective reflecting the sensitive nature of this site. There are also a range of other positive effects in terms of communities, water management and soils objectives. There are a number of neutral effects including on healthy lifestyles and the economy recognising that by protecting the site it will essentially remain unchanged from the baseline situation. The positive effects are balanced against a very negative effect in terms of restricting

housing delivery in an area unable to meet its local housing need. It is not considered that this can be mitigated

Option 2: Allocating the site for development:

Option 2 has very negative effects against the landscape & character objective which cannot be mitigated due to the permanent loss of gap between settlements and on the impact of the setting of the South Downs National Park. There are also a number of other negative effects against environmental objectives and on healthy lifestyles and communities. However this option does score as having very positive effects positively due to its ability to contribute to meeting local housing need and recognising the benefits of delivering housing in a highly sustainable location.

It is worth noting that the landscape study did identify the option of developing in the south west corner which it identified as being less sensitive. However, this option has been screened out of the SA as there is currently no realistic means of access to this part of the site. Further landscape evidence was commissioned to assess further proposals put forward for Chatsmore Farm in respect to the planning application. If this had recommended that the portion of the site proposed for development was suitable, this would have then been allocated for development in the Local Plan and appraised through the SA.

Goring- Ferring Gap

Option 1 Protecting the site:

Option 1 scores as having very positive effects against the landscape & character objective which has to be balanced against very negative effects associated with the housing objective. In addition to this the option generally scores positively against a number of environmental objectives and for communities as protecting the site would safeguard an asset that is well valued by the local community. This option scores as having neutral scores on healthy lifestyles and economy objectives reflecting how with this option some aspects of the site will remain unchanged.

Option 2: Allocating the site for development:

Option 2 scores as having very positive effects for housing which has to be balanced against very negative effects on the landscape & character objective. This option also scores negatively against a number of other environmental and social objectives including healthy lifestyles and communities. There are also several uncertain scores relating to possible additional or indirect benefits of development.

Brooklands Park (Dale Road)

Option 1 Protecting the site:

Option 1 scores very positively for communities and landscape & character objectives. There are also positive benefits when scored against healthy lifestyles and water management objectives. A negative effect has been identified associated with the potential loss of opportunities to remediate the former landfill in the north west corner of the site. In addition there are a number of neutral effects reflecting the recognition that the site is already protected through the planning system and therefore continuing to protect it will often result in no significant changes

Option 2 Allocating Dale Road:

Option 2 to allocate the part of the site known as Dale Road scored positively for economy, housing and land & soils objectives reflecting the potential benefits of development and the opportunity this may bring in terms of remediating contaminated land caused by the former landfill. However a very negative effect was scored against landscape & character reflecting the sensitive location of the site. This option also scored as having negative effects against biodiversity and water management objectives reflecting the potential impact of development. In relation to the HIA/EqIA neutral effects were scored for healthy lifestyles and communities as the option would remove the opportunity to expand the park into this space.

Where the evidence had indicated that the sites were unsuitable for development options were then tested (where appropriate for each site) to understand the impact of Local Green Gap and Local Green Space designations on each site that would be affected. This can also be found in Table 10 of the DIIA and Appendix D2. The overall impact of these policies were also assessed as part of the individual effects of policies, total and cumulative effects in the Submission SA Report Appendix D.

- 4) Given the significance of the housing shortfall the SA did appraise options to determine whether the adverse impacts of meeting housing needs would significantly and demonstrably outweigh the benefits in line with NPPF 11b (DIIA 4.5 and Appendix D2). This included 3 options:
 - **Option 1:** Need Led Figure (akin to meeting full need). This option aims to meet local housing need by assuming all potential sites will be allocated for residential development at high densities allowing no land for other uses in an effort to meet the Local Housing Need. This option assumed the allocation of 11,295 homes giving an overall housing supply figure of 14,674 homes over the Plan period. This concluded that the high densities required in Option 1 would result in very negative effects in terms of

biodiversity and landscape and character. This also scores negatively in terms of environmental quality, water management, historic environment, healthy lifestyles, communities and economy as it is assumed that other uses on sites would be restricted. The appraisal highlights that although this option delivers the highest number of housing the densities required may impact on the type and mix of housing provided.

- **Option 2:** Supply Led Figure (akin to developing all identified sites (including those not being allocated). This option considers all potential sites will be allocated for development at an appropriate density to deliver housing and where suitable a mix of uses. This option assumed the allocation of 2,023 homes giving an overall housing supply figure of 5,402 homes over the Plan period. This concluded that Option 2 scores positively for housing, built environment, economy and town centres due to the levels of development this option would enable. However these benefits are largely outweighed by the very negative effects from the loss of biodiversity and the potential impact on the setting of the South Downs National Park and existing settlement patterns as a result of coalescence.

- **Option 3:** Evidence Led Figure (akin to following evidence recommendations i.e. the strategy in the Local Plan). This option has taken into account findings of evidence studies. As such the developable area of some sites has been reduced to allow sufficient mitigation and buffers. In addition a number of sites included in Option 2 have been excluded where evidence has recommended they are unsuitable for development. This option assumed the allocation of 853 homes giving an overall housing supply figure of 4,232 homes over the Plan period. This concluded that Option 3 scores negatively for housing due to the significant shortfall that would result from this option. However Option 3 would not result in any very negative effects and has improved scores for biodiversity, land and soils and landscape and character compared with the other options.

This appraisal was not repeated with updated housing figures as the findings would not be significantly different to enable meaningful comparisons to be made. The overall impact of the Local Plan strategy i.e the unmet need, is also assessed as part of the individual effects of policies, total and cumulative effects (Appendix D Submission SA Report).

- 5) Para 2.6.8 and 5.2.2 of the Submission SA Report explains and signposts that the appraisal of Local Plan Strategic Objectives, all potential sites against the sites criteria and reasonable options identified in preparing the Draft Local Plan can be found within the DIIA. An updated appraisal of the Strategic Objectives was included in the Submission SA Report, the intention was to also duplicate

the appraisal of potential sites and reasonable alternatives within the Technical Appendices of the Submission SA Report. However in the interests of keeping the SA proportionate it was felt that signposting the earlier report was sufficient to meet the requirements and that duplication was therefore not necessary.

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